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II.

On November 3, 2010 Southern California Edison Company (U 338-E) filed its Application for a Permit to Construct Electrical Facilities: Colorado River Substation Expansion Project, pursuant to California Public Utilities Commission's (Commission or CPUC) General Order 131-D (GO 131-D), this Application for a permit to construct (PTC) authorizing SCE to construct the proposed project known as the Colorado River Substation Expansion Project (Project) near Blythe in Riverside County, California. The Project will interconnect renewable generation projects in the Blythe area of the Mohave Desert to the California Independent System Operator (CAISO)-controlled grid at the previously approved Colorado River Substation (CRS). The CRS was analyzed in the Devers-Palo Verde No.2 500kV Transmission Line (DPV2) Final Environmental Impact Report/Environmental Impact Statement (Final EIR/EIS) and was included in the Certificate of Public Convenience and Necessity (CPCN) issued by the CPUC for the DPV2 project in Decision (D.) 07-01-040, dated January 25, 2007 as modified pursuant to D.09-11-007, dated November 3, 2009.¹

¹ In the Final EIR/EIS for SCE's Devers-Palo Verde No. 2 Transmission Line Project (October 2006) Volume 2 of 3 Environmental Analysis (Part 2) and Appendices, the Colorado River Substation, or CRS, location which was approved by the CPUC in D.09-11-007 was called the "Midpoint-DSW Substation:" Page E-12 states, "The Midpoint-DSW Substation was fully analyzed in this EIR/EIS as a component of the [Desert Southwest Transmission Project] DSWTP, and was found to be comparable to the Midpoint Substation location identified by SCE. Both sites are on BLM land, and no significant impacts would result from construction of a substation at either site. As a result, this EIR/EIS concludes that the two sites are comparable, and equally

For this PTC application, the Project consists of:

1. Substation Expansion: In order to accommodate renewable generator interconnections, the footprint of the previously approved 45 acre Colorado River 500/220 kV Substation, must be expanded to approximately 90 acres. The expanded substation site would be approximately 1,600 feet by 2,400 feet. Approximately 1,500 feet by 2,200 feet would be surrounded by a wall with two gates. The Project, along with the previously approved CRS, would be an ultimate 4480 MVA 500/220kV substation. The CRS will be equipped initially as a 2240 MVA 500/220kV substation.

2. Generation Tie-line Connections: The generators' 220 kV gen-tie lines would be interconnected into the CRS by constructing the final span of conductors from the interconnecting generators' final transmission line structures to the substation dead-end rack.

3. Telecommunications Facilities: Optical ground wire (OPGW) would be strung on the generators' gen-tie lines and would terminate inside the CRS. SCE would install the last span of OPGW between the switch rack and the interconnecting generators' first transmission line structures outside the CRS. SCE would make the final terminations to associated communications equipment installed inside the CRS.

III.

CALifornians for Renewable Energy, Inc. (CARE) interest in the above captioned proceeding is in representing SCE ratepayers who live and reside in Blythe California²

environmentally superior/preferable." Intervener CARE requests an opportunity to disprove this claim by SCE.

² See *Decision 09-09-023* which Grants Intervenor Compensation to CALifornians for Renewable Energy for substantial contributions to *Decision 08-05-028* which grants the application by Southern California Edison Company (SCE) for approval of a contract for an offer from Blythe Energy, LLC (Blythe)

who will be directly impacted by the proposed project that would not be able to participate meaningfully so as to inform the Commission's decision making processes, otherwise. As an intervener CARE requests an opportunity to disprove the claim by SCE that the project analyzed in "the Final EIR/EIS for SCE's Devers-Palo Verde No. 2 Transmission Line Project (October 2006) Volume 2 of 3 Environmental Analysis (Part 2) and Appendices, the Colorado River Substation, or CRS, location which was approved by the CPUC in D.09-11-007" is the same project that SCE now requests approval for in its [petition to construct] PTC application, in addition to its Supplemental EIR³, before the Commission.

CARE was unaware of this proceeding until it searched for any proceeding the Commission may have opened on this matter on the Commission's website. This research was in response to a written Notice of the Draft Supplemental EIR⁴ that was released on February 22, 2011 received by US Mail the following day. The SEIR lists Application A.05-15-015 instead of Application A.10-11-005 which should be changed so as not to intentionally confuse the public.

Additionally if allowed we ask that this Application be re-noticed to the Commission's Applications and Advice Letter service lists as we imagine we are not alone in missing the filing of this Application in November 2010.

for up to 490 megawatts (MW) of expected capacity and energy at page 15:
http://docs.cpuc.ca.gov/PUBLISHED/FINAL_DECISION/106877.htm

³ See <http://www.cpuc.ca.gov/Environment/info/aspen/dpv2/dpv2.htm>

⁴ See <http://www.cpuc.ca.gov/Environment/info/aspen/dpv2/toc-sdeir.htm>

Conclusion

WHEREFORE, for the reasons set forth above, CARE respectfully requests that it be permitted to intervene in the above-captioned proceedings and be made a party for all purposes.

Additionally CARE asks for leave to file a late notice of intent (“NOI”) to claim compensation in this case if so required to be eligible to receive compensation.

Respectfully submitted,



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Lynne Brown Vice-President
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March 4, 2011

Verification

I am an officer of the Intervening Corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of March 2011, at Soquel, California.



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Certificate of Service

I hereby certify that I served the foregoing document “*MOTION TO INTEREVENE AND LEAVE TO FILE LATE NOI OF CALIFORNIANS FOR RENEWABLE ENERGY, INC. (CARE)*” under CPUC Docket A.10-11-005. Each person designated on the official service list, has been provided a copy via e-mail, to all persons on the attached service lists on March 4, 2011 transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of March 2011, at Soquel, California.



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