PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Item 53, I. D. #5256

ENERGY DIVISION **RESOLUTION E-3969**

February 16, 2006

R E S O L U T I O N

Resolution E-3969. This resolution grants Southern California Edison Company's request to establish a Memorandum Account to record certain SCE costs associated with interconnecting Renewables Portfolio Standard (RPS) generators.

By Advice Letter 1950-E filed December 23, 2005

SUMMARY

This Resolution approves Memorandum Accounts to record the cost of studies necessary for transmission facilities to accommodate contracts Edison signed pursuant its 2003 and 2005 RPS solicitations, but does not approve recovery of those study costs until they are reviewed for prudency.
This Resolution also requires Edison to conduct in the spring of 2006 studies of specified transmission facilities to accommodate 4000 MW by the end of 2010 of unknown future Tehachapi wind generation projects, and it approves both Memorandum Account treatment and recovery of study costs.

NOTICE

Notice of AL 1950-E was made by publication in the Commission's Daily Calendar. SCE states that copies of the AL were mailed and distributed in accordance with Section III-G of General Order 96-A.

PROTESTS

No protests to AL 1950-E were filed.

Two supporting Comments were filed.

PG&E on January 3, 2006 filed Comments supporting the concept of establishing a memorandum account to book the cost of network interconnection studies that may be incurred by the utility to facilitate achievement of RPS goals, for renewable resource projects with which SCE has signed power procurement agreements. Further, PG&E states, SCE's proposal should have the effect of encouraging more renewable development by eliminating some of the up-front costs of securing interconnection with the utility grid, and ultimately to contribute to the 20% RPS goal by 2010.

The California Wind Energy Association (CalWEA) on January 20, 2006 also filed comments supporting SCE's position in the AL that the various studies must be conducted in the next few months if the state's RPS targets are going to be met on time.

BACKGROUND

Decision 04-06-010 in the Commission's original Transmission OII directed parties to form a Collaborative to recommend facilities needed to bring power from the Tehachapi wind resource area (WRA) to the grid in support of the EAP goal adopted in 2003 of California reaching a 20% renewable energy consumption by the year 2010.

Edison was also directed to file CPCNs in 2004 for transmission expansion to begin to accommodate the growth in wind generation in the Tehachapi and Antelope WRAs. Associated with these, SCE filed in October 2004 Advice Letter (AL) 1833-E to establish an Antelope Transmission Projects Memorandum Account to avoid retroactive ratemaking concerns when seeking recovery of costs not approved for recovery by FERC.

In December 2005 SCE filed a similar but broader Advice Letter 1950-E seeking urgent approval of tracking accounts for, among other things, its cost to perform biological studies during the 2006 spring bloom season on transmission line routes needed to expand transmission for RPS generators for which SCE already has contracts.

The schedule appearing in the March 2005 Tehachapi Collaborative report[1] indicates that IOUs must conduct in the spring of 2006 the environmental studies needed to file applications for a Certificate of Public Convenience and Necessity (CPCN) in 2006 for each Tehachapi-related transmission line route possibly required to meet the Energy Action Plan (EAP) 20% renewable energy goal by the end of 2010. If the spring 2006 opportunity were missed, spring 2007 would be the next one. Since the transmission construction process often takes 5 years or more the EAP goal would be jeopardized.

Since issuing its first report in March 2005 the Tehachapi Collaborative Study Group (TCSG) has considered and reduced, from more than 18, to 2 the number of candidate conceptual transmission plans. The TCSG may recommend in its second report that IOUs study both the Expanded Path 26 (Tehachapi-Midway) and gen-tie (Tehachapi-Antelope) routings, even though only one may be built. The rationale is that beginning the environmental study now risks $2-3 million of permitting costs on a line which may not be built; while delaying the in-service date of Tehachapi wind power by one year risks raising costs to ratepayers many times more than the study costs.

In its response to an Energy Division data request SCE provided the basis for the discussion and Commission interpretations below.

Transmission Facilities to be Covered by this Resolution

Advice Letter 1950-E requests authority to recover costs associated with:

- Interconnection studies (Feasibility, System Impact, and Facilities);
- Costs for engineering and environmental studies and surveys not approved for recovery by FERC in transmission rates; and
- Other capital costs not approved for recovery by FERC in transmission rates.

The authority granted by the Resolution applies to recording in a Memorandum Account the cost of studies of interconnection facilities and network transmission upgrades necessary to interconnect:

[1] http://www.cpuc.ca.gov/Published/Graphics/48819.PDF;

- RPS generation resources contracted in the 2003 and 2005 RPS solicitations; and
- Tehachapi WRA transmission projects.

Included are studies of generation tie lines from the generators to the first point of interconnection with SCE's networked grid, similar to the Antelope Transmission Project Segment 3, a high voltage, bulk transfer generation tie line expected to serve multiple RPS generation resources, but studies of other generation tie lines are not included.[2]

In addition to recording of study costs this Resolution also grants authority for recovery of the study costs for the Tehachapi WRA projects specified below, because completing the biological studies for them during the 2006 spring bloom period is critical to meeting the goal of 20% renewable energy in 2010.

However, authority is not granted in this Resolution for recovery of other study costs, for transmission to accommodate RPS contracts from the 2003 and 2005 solicitations or future unknown contracts, or of capital costs. First such costs when recorded in the approved Memorandum Account are subject to prudency review in a formal proceeding such as an Energy Resources Recovery Account (ERRA) proceeding.

Estimated Amount and Type of Expenditures to be Requested
SCE's Advice Letter 1950-E requests authority for memorandum accounts that will enable SCE to obtain cost recovery under P.U. Code § 399.25(b)(4) of RPS interconnection costs not approved by FERC for recovery in transmission rates.

The capital costs of the interconnection facilities and network transmission upgrades necessary for interconnection have not been fully developed. Such estimates are developed for and submitted with Certificate of Public Convenience and Necessity (CPCN) applications after Facilities Studies and additional engineering and cost studies have been completed. Conceptual cost estimates for transmission facilities to interconnect RPS resource areas are available in the Transmission Ranking Cost

[2] SCE is not presently aware of other generation tie lines similar to Antelope Transmission Project Segment 3 for interconnecting RPS generation resources from the 2003 RPS solicitation or from those RPS resources on the 2005 RPS solicitation short list. The Antelope Transmission Project Segment 3 is a generation tie line type project; however, recovery of its costs are subject to the memorandum accounts established under Advice Letter 1833-E.

Reports (TRCR). The TRCR cost estimates are only useful for comparing RPS generation bids. As a general rule, expenditures for procurement of materials, construction of transmission facilities, and mitigation of environmental effects are not made until after the CPCN is granted.

Capital Cost Recovery
Ordinarily, the capital costs of network transmission upgrades necessary to interconnect RPS generation projects would be eligible for recovery in FERC-jurisdictional transmission rates. Under FERC's interconnection rules, SCE may require the interconnecting generator to pay initially for all of the capital costs. If the generator achieves commercial operations, it receives the capital costs back in the form of "transmission credits" paid over five years. At that time, SCE reflects the capital costs in FERC-jurisdictional transmission rates. However, if some of the network transmission upgrade capital costs are not authorized by FERC for recovery in transmission rates, SCE would not provide transmission credits to the generator for such costs.

If the CPUC provides § 399.25(b)(4) cost recovery assurances, SCE may pay some of the costs to construct RPS generator network transmission facilities and high voltage, bulk transfer generation tie lines serving multiple generators without first obtaining the funds from the RPS generators. Cost recovery under § 399.25(b)(4) would apply to the high voltage, bulk transfer generation tie lines serving multiple generators without further FERC review based on FERC's decision 112 FERC ¶ 61,014. When SCE seeks to recover network transmission costs in its transmission rates, some of the costs may not be authorized for recovery by FERC. In that event, cost recovery under §399.25(b)(4) would apply to the network transmission facilities. SCE will not seek recovery under Section 399.25(b)(4) of capital and O&M costs recovered in FERC-approved transmission rates.

Double Recovery
SCE states that it does not have cost recovery already arranged for any of the projects to be covered by this Resolution.

In both SCE's 2003 and 2005 solicitations, SCE relied on the existing FERC/ISO procedures which require that the generator pay for the costs for the interconnection studies (Feasibility , System Impact, and Facilities Studies). Generators do not receive the costs of these interconnection studies back in the form of "transmission credits." In other words, the costs of such studies ordinarily are borne by generators, do not become part of the capital costs of the utility's interconnection facilities, and are not recovered in FERC-jurisdictional transmission rates. SCE did not explicitly

state in its RPS solicitations that participants in the solicitation should include these costs in their bid prices; SCE does not know what costs participants included in their bids. However, participants in the RPS solicitations may have relied on existing FERC/ISO procedures when they developed their bids. SCE filed the advice filing because some projects with which SCE has contracted have not expeditiously complied with their obligation to proceed through the interconnection studies. Eliminating the payment issues could facilitate the interconnection process. Even if the projects included the costs in their bid prices, the developers still must pay cash to get the project studies completed. Apparently, some developers are reluctant to make these payments. The procedure proposed in the Advice Letter 1950-E may move the interconnection process forward more rapidly.

To address concerns about the potential for double recovery or providing the renewable developers with a windfall, SCE will develop mechanisms to recover the costs associated with the Feasibility, System Impact, and Facilities Studies from the developers of the RPS generation resources. For RPS generator resources holding RPS procurement contracts, SCE will enforce the developers' obligations to pay for such costs. If SCE pays for such studies without initial contribution from an RPS project developer in order to maintain progress towards the 2010 RPS goal, SCE would record such costs in the memorandum accounts authorized by Advice Letter 1950-E. If the RPS project developer were to subsequently pay such costs, SCE will timely reverse the transaction in the memorandum accounts. For future RPS generation resources, SCE will include in the procurement contract stronger obligations for the developers to commit to the FERC interconnection process in a timely fashion.

DISCUSSION

Under present procedures, a would-be generator wanting to connect its project to the grid would apply to the CAISO and pay for a feasibility study, followed by system impact and facilities studies, which would include the selection of the transmission line route. At the conclusion of this process, an interconnection agreement with the CAISO would be signed. If the connection facilities included a new transmission line of 100kV or above, the utility to whose grid the connection would be made, would apply for a PTC or CPCN. In the case of a CPCN, the utility would prepare proponents environmental assessment (PEA), identifying tower locations, tower access routes and conduct biological and other studies to determine the impact on the environment the line would cause. In its advice letter, SCE proposes to perform all these studies, from the initial feasibility study to the PEA preparation for the

renewables generators with which it has signed contracts, and requests cost recovery for the studies and also for the capital costs of the facilities identified in the studies.

Not all lines justify the urgency for meeting the 2006 spring bloom, for example the Antelope-Vincent-Mesa upgrade project, is one of the lines essential to accommodate the 1,700 MW of wind projects already in the CAISO study queue for interconnection approval. Since a line to Mesa already exists, spring bloom studies would not be needed where the same right of way is used.

The TCSG Second Report is not expected until March 1, 2006. Even if it recommends a definitive route, the Commission may not have time at that point to direct the SCE to start and complete biological studies of the 2006 spring bloom season.

This Resolution directs SCE to commence without delay all studies leading up to and including the spring 2006 biological studies needed to accommodate the RPS generation projects for which it has Power Purchase Agreements (PPA) contracts as well as those that may be needed to accommodate 4000 MW of Tehachapi wind resource area (WRA) wind generation projects.

The transmission facilities which may be needed to accommodate Tehachapi generation consist of the following.

- Tehachapi to Midway 500kV single circuit transmission line. The line will run from Tehachapi Substation 1 to PG&E's Midway Substation. The route will be selected by SCE.
- Tehachapi Substation 1 to Antelope Substation 500kV lines. Three lines are being planned, two in one right-of-way and one in the other. The rights-of-way will have a separation such that no one event will cause the outage of all three circuits.
- Tehachapi Substation 1 to Tehachapi Substation 2 230kV transmission line.
- Antelope Substation to Vincent Substation. The route is that of Alternative 6 presently being studied for the Antelope to Pardee transmission line. If Alternative 6, or a portion thereof, is chosen for that line, the width of the right-of-way will be sufficient to accommodate two single-circuit 500kV transmission lines for the portion of the route common to both lines.
- Antelope Substation to Tehachapi Substation 5. The present single-circuit 230kV transmission line will be replaced with a double-circuit 230kV transmission line.
- Antelope Substation to Vincent Substation: upgrades of two existing 230kV transmission lines to a single 500kV circuit.

The Commission in this DRAFT Resolution seeks comments on the advantages and disadvantages of ordering SCE to complete all of the studies in the year 2006, especially studies needed for the third of the three (3) 500kV lines that would be needed to transmit the full 4000 MW of Tehachapi potential. That third line, in terms of the facilities described in the bullets above, would consist of either the first bullet alone, a line from Tehachapi to PG&E's Midway substation, or, an equivalent alternative instead of the line to Midway, which would be bullets 2 and 4 combined, a line from Tehachapi to SCE's Vincent substation, via the Antelope substation between them.

COMMENTS

Public necessity permits a waiver of the full 30-day comment period of Public Utilities Code Section 311(g) in order to secure the benefits of the tariff changes that SCE proposed in AL 1950-E. No party protested the AL and two parties supported it. We have balanced the public interest in avoiding the possible harm to public welfare flowing from delay in considering this resolution against the public interest in having the full 30-day period for review and comment as required by Rule 77.7(f)(9). We conclude that the former outweighs the latter. Because of the need to conduct the required biological studies before the 2006 spring bloom period we conclude that failure to adopt a decision before the expiration of the 30-day review and comment period would cause significant harm to the public welfare. Accordingly we reduce the comment period for this Resolution to 6 days.

Timely comments were filed by …… on …..

FINDINGS

1. SCE filed AL 1950-E on December 23, 2005.
2. To avoid retroactive ratemaking SCE could track in a memorandum account its study costs related to expanding transmission capacity to purchase RPS energy.
3. Biological studies must be conducted in the 2006 spring bloom season in order to meet by 2010 the 20% renewable energy goal.

THEREFORE IT IS ORDERED THAT:

1. Southern California Edison Company is authorized to track in a memorandum account costs associated with Feasibility Studies, System Impact Studies and Facility Studies for those RPS projects with which it has procurement contracts, and costs associated with engineering and environmental studies and surveys for other RPS projects as well as the transmission, subtransmission and substation facility costs for those projects.

2. Southern California Edison Company shall perform the studies necessary for the preparation of PEAs and the filing of CPCNs by the end of 2006 for the following projects. The cost of studies for the following projects shall be recorded in a memorandum account and those costs that are not approved by FERC for recovery in transmission rates are approved for recovery in retail rates under the provisions of Public Utilities Code Section 399.25.
   - Tehachapi to Midway 500kV single circuit transmission line. The line will run from Tehachapi Substation 1 to PG&E's Midway Substation. The route will be selected by SCE.
   - Tehachapi Substation 1 to Antelope Substation 500kV lines. Three lines are being planned, two in one right-of-way and one in the other. The rights-of-way will have a separation such that no one event will cause the outage of all three circuits.
   - Tehachapi Substation 1 to Tehachapi Substation 2 230kV transmission line.
   - Antelope Substation to Vincent Substation. The route is that of Alternative 6 presently being studied for the Antelope to Pardee transmission line. If Alternative 6, or a portion thereof, is chosen for that line, the width of the right-of-way will be sufficient to accommodate two single-circuit 500kV transmission lines for the portion of the route common to both lines.
   - Antelope Substation to Tehachapi Substation 5. The present single circuit 230kV transmission line will be replaced with a double-circuit 230kV transmission line.
   - Antelope Substation to Vincent Substation: upgrades of two existing 230kV transmission lines to a single 500kV circuit.

3. SCE should file and serve within 10 days of the effective date of this order Tariff Sheets revised to incorporate the accounts authorized by this Resolution.

4. Edison may seek recovery of recorded expenses subject to prudency review in a formal proceeding such as an Energy Resources Recovery Account (ERRA) proceeding.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on February 16, 2006; the following Commissioners voting favorably thereon:

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STEVE LARSON
Executive Director

February 1, 2006 RESOLUTION E-3969

Commission Meeting February 16, 2006

TO: PARTIES TO SOUTHERN CALIFORNIA EDISON ADVICE LETTER 1950-E

Enclosed is draft Resolution Number E-3969 of the Energy Division. It will be on the agenda at the next Commission meeting, which is held at least 15 days after the date of this letter. The Commission may then vote on this Resolution or it may postpone a vote until later.

When the Commission votes on a draft Resolution, it may adopt all or part of it as written, amend, modify or set it aside and prepare a different Resolution. Only when the Commission acts does the Resolution become binding on the parties.

Parties may submit comments on the draft Resolution.

An original and two copies of the comments, with a certificate of service, should be submitted to:

Jerry Royer
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

A copy of the comments should be submitted to:

Brian Schumacher
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Fax: 415-703-2200

Comments on the draft Resolution must be received by the Energy Division by Tuesday February 7, 2006. Those submitting comments must serve a copy of their comments on 1) the entire service list attached to the draft Resolution, 2) all Commissioners, and 3) the Director of the Energy Division, on the same date that the comments are submitted to the Energy Division.

Comments shall be limited to five pages in length plus a subject index listing the recommended changes to the draft Resolution, a table of authorities and an appendix setting forth the proposed findings and ordering paragraphs.

Comments shall focus on factual, legal or technical errors in the proposed draft Resolution. Comments that merely reargue positions taken in the advice letter or protests will be accorded no weight and are not to be submitted.

Replies to comments on the draft resolution may be filed (i.e., received by the Energy Division) on Friday February 10, 2006, three days after comments are filed, and shall be limited to identifying misrepresentations of law or fact contained in the comments of other parties. Replies shall not exceed five pages in length, and shall be filed and served as set forth above for comments.

Late submitted comments or replies will not be considered.

Donald Lafrenz
Energy Division

Enclosure: Service List
Certificate of Service

CERTIFICATE OF SERVICE

I certify that I have by mail this day served a true copy of Draft Resolution E-3969 on all parties in these filings or their attorneys as shown on the attached list.

Dated February 1, 2006 at San Francisco, California.

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Jerry Royer

NOTICE

Parties should notify the Energy Division, Public Utilities Commission, 505 Van Ness Avenue, Room 4002 San Francisco, CA 94102, of any change of address to insure that they continue to receive documents. You must indicate the Resolution number on the service list on which your name appears.

Service List for Resolution E-3969

Service was made by email to the Service Lists of the following two proceedings:

Transmission OII 00-11-001;
Procurement OIR 04-04-026.

Transmission OII 00-11-001:

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Procurement OIR 04-04-026:

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