

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



FILED

8-17-16
04:59 PM

Application of PacifiCorp, an Oregon
Company, for a Permit to Construct the
Lassen Substation Project Pursuant to
General Order 131-D.

Application 15-11-005
(Filed November 2, 2015)

**MOTION FOR PARTY STATUS
OF THE OFFICE OF RATEPAYER ADVOCATES**

LAURA TUDISCO

Attorney for
The Office of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Telephone: (415) 703-2164
E-Mail: laura.tudisco@cpuc.ca.gov

August 17, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of PacifiCorp, an Oregon Company,
for a Permit to Construct the Lassen Substation
Project Pursuant to General Order 131-D.

Application 15-11-005
(Filed November 2, 2015)

**MOTION FOR PARTY STATUS
OF THE OFFICE OF RATEPAYER ADVOCATES**

In accordance with Rule 1. 4(a)(4) of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), the Office of Ratepayer Advocates (“ORA”) requests party status in the above proceeding.

I. COMMUNICATIONS

Communications and correspondence regarding these proceedings should be directed to the following individuals in the Office of Ratepayer Advocates at 505 Van Ness Avenue, San Francisco, CA 94102:

Charles Mee
cqm@cpuc.ca.gov

415-703-1147

Joseph Abhulimen
jaa@cpuc.ca.gov

415-703-1552

II. DESCRIPTION OF PARTY

ORA is the independent consumer advocate within the Commission established by the Legislature to “... represent and advocate on behalf of the interests of public utility customers and subscribers within the jurisdiction of the Commission.”¹ ORA’s goal, set forth by statute, is “... to obtain the lowest possible rate for service consistent with reliable and safe service levels.”²

¹ Public Utilities Code §309.5.

² Public Utilities Code §309.5.

III. STATEMENT OF INTEREST

PacifiCorp, doing business as Pacific Power (“PacifiCorp”), filed Application (“A.”)15-11-005 requesting that the Commission issue a Permit to Construct (“PTC”) the proposed Lassen Substation to replace the existing Mt. Shasta Substation and, upon completion of the Lassen Substation, to remove the Mt. Shasta Substation. In connection with the construction of the new substation, PacifiCorp says it will upgrade associated transmission and distribution lines and install approximately 1,200 feet of underground cable to increase capacity of an existing underground distribution line. PacifiCorp refers to all these activities as the “the Lassen Substation Project” or the “Proposed Project.”³

According to the Application, the Mt. Shasta Substation is “... a severely deteriorated wood structure,” and its condition has “... prompted concerns about the Mt. Shasta Substation being able to safely and reliably meet current and future local and contractual system demand.”⁴ According to PacifiCorp, the estimated cost of the Project is approximately \$7 million.

From PacifiCorp’s description of the project, it is likely to have a direct impact on reliability and safety of service PacifiCorp provides to its customers. Advocating for PacifiCorp customers to obtain safe and reliable service is part of ORA’s mandate pursuant to Public Utilities Code Section 309.5. So, too, is the goal of obtaining “... the lowest possible rate for service consistent with reliable and safe service levels.”⁵

IV. STATEMENT OF INTENDED CONTENTIONS

PacifiCorp says that the Proposed Project consists of the following four elements:

1. Lassen Substation will be an unmanned automated low -profile substation approximately 290 feet by 212 feet (1.4 acres), within a site comprising approximately 4.5 acres, owned by PacifiCorp.⁶
2. Replacement of 36 wood poles, spanning approximately 1.5 miles, which support the existing 69 kilovolts (kV) transmission line, with poles that would support 115 kV transmission line and a distribution under-build.⁷

³ A.15-11-005, p. 1.

⁴ A.15-11-005, p. 2.

⁵ Public Utilities Code §309.5.

⁶ A.15-1005, pp. 3-4.

3. Distribution upgrade, upgrading part of the distribution facilities from 4.16 kV to 12.5 kV, to meet current capacity requirements and future load growth, and installing three new 12.5/4.16 kV transformers.
4. In the original application, PacifiCorp proposed that approximately 500 feet of the undergrounded distribution line crossing Interstate 5 using the Department of Transportation conduit would be converted to overhead. In response to comments, in its Amendment to Application, PacifiCorp says that it "...has revised the proposed Lassen Substation Project such that this distribution line is no longer proposed to run overhead, but will be undergrounded at the same location."⁸
5. Removal of Mt. Shasta Substation: Once the proposed Lassen Substation has been constructed and is operational, the above-ground equipment within the existing Mr. Shasta Substation will be removed.²

ORA is reviewing the Application, the Amendment to the Application and the Proponent's Environmental Assessment Reports. If this Motion is granted, ORA's participation as a party should not expand the scope of the issues or delay the procedural schedule.

V. CONCLUSION

For all the foregoing reasons, ORA asks that its Motion for Party Status be granted.

Respectfully submitted

/s/ LAURA TUDISCO

Laura Tudisco

Attorney for
The Office of Ratepayer Advocates

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
Phone: (415) 703-2164
E-mail: ljt@cpuc.ca.gov

August 17, 2016

⁷ A.15-11-005, pp. 3-4.

⁸ Amendment to Application, p. 2.

² A.15-11-005, p. 4.