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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of
SOUTHERN CALIFORNIA EDISON
COMPANY (U-338-E) For a Certificate of
Public Convenience and Necessity for the
RTRP Transmission Project

Application 15-04-013
(Filed April 15, 2015)

**MOTION FOR PARTY STATUS AND SUBSTITUTION OF LESSO MALL
DEVELOPMENT (JURUPA VALLEY) LIMITED**

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Dated: October 12, 2016

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I. Introduction

Pursuant to Rules 1.4(a)(4) and 11.1 of the California Public Utilities Commission (“CPUC”) Rules of Practice and Procedure, Lesso Mall Development (Jurupa Valley) Limited (“Lesso”) respectfully moves for party status and to substitute for 12071 Bellegrave Avenue, LLC (“Bellegrave”) in this proceeding.

Prior to filing this motion, on October 11, 2016, Lesso provided a draft to Southern California Edison Company (“SCE”) to determine if SCE opposed its request for party status and to substitute for Bellegrave. On or about October 11, 2016, SCE indicated by e-mail it did not oppose the request, but reserved all other rights in the event the motion is granted. Also on October 11, 2016, Lesso provided a draft of the motion to Bellegrave. Bellegrave stated it supports Lesso’s request for party status and substitution.

II. Lesso’s Interest in this Proceeding

Lesso has an interest in this proceeding because it is the current owner of a 109.64-acre parcel of property commonly known as the Thoroughbred Farms Property (the “Property”). Lesso purchased the Property from Bellegrave on August 31, 2016. The Property is located in

the City of Jurupa Valley. It is bordered to the north by Landon Drive, on the east by Wineville Avenue, to the south by Bellegrave Avenue, and on the west by Interstate 15. As proposed, the Riverside Transmission Reliability Project (“Project”) would involve the placement of transmission lines, towers, and a right of way on the Property’s western and northern borders.

Bellegrave is a party to this proceeding based on its prior ownership interests in the Property. On June 1, 2015, in its capacity as the Property’s owner at that time, Bellegrave filed a Protest to Application for Certificate of Public Convenience and Necessity for the RTRP Transmission Project (“Protest”). As the current owner of the Property, Lesso has an interest in protecting its interests in the Property and in advancing the Protest.

As articulated in the Protest, the Project will affect Lesso’s interests in the following ways: (i) placement of the transmission line towers on the Property and the imposition of development setbacks will impact the size, configuration, and feasibility of improvements at the Property, ultimately affecting Lesso’s utilization of the Property and the Property’s highest and best use; (ii) as a result of adverse aesthetic impacts and public perception of EMF exposure, the Project will significantly diminish the Property’s marketability and value, and of any future development thereon; (iii) as a result of the uncertainty regarding the Project’s impacts on development, the Project will continue to disrupt the marketability of the Property; and (iv) the Project will diminish property values and tax revenues in the City of Jurupa Valley, thereby undercutting the City’s efforts to grow, develop, and prosper.

In short, as the Property’s current owner, Lesso is a member of the community and has an interest in the growth, development, and prosperity of the Property and the City of Jurupa Valley. For these reasons, Lesso requests party status, and to substitute for Bellegrave, in this proceeding.

III. Notice

Service of notices, orders, and other correspondence in this proceeding should be directed to K&L Gates LLP at the address set forth below:

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IV. Conclusion

Lesso's participation in this proceeding will not prejudice any party—indeed, SCE does not oppose Lesso's participation—and will not delay the schedule or broaden the scope of the issues in the proceeding. For the reasons stated above, Lesso requests the CPUC grant this Motion for Party Status and Substitution.

Dated: October 12, 2016

Respectfully submitted,

/s/ William J. Bernfeld

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