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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 (U338E) for a  
Certificate of Public Convenience and Necessity  
for the RTRP Transmission Project

A.15-04-013  
(Filed April 15, 2015)

**MOTION FOR PARTY STATUS AS TO NEWLY AFFECTED PROPERTY  
BY ANTHONY P. VERNOLA, SUCCESSOR TRUSTEE OF  
THE PAT & MARY ANN VERNOLA TRUST – MARITAL TRUST,  
AS TO AN UNDIVIDED 1/2 INTEREST; AND ANTHONY P. VERNOLA,  
TRUSTEE OF THE ANTHONY P. VERNOLA TRUST U/D/T  
DATED OCTOBER 18, 2000, AS AMENDED, AS TO AN  
UNDIVIDED 1/2 INTEREST**

David B. Cosgrove  
RUTAN & TUCKER, LLP  
611 Anton Blvd., Suite 1400  
Costa Mesa, CA 92626  
Telephone: (714) 641-5100  
Facsimile: (714) 546-9035  
Email: [dcosgrove@rutan.com](mailto:dcosgrove@rutan.com)  
Attorneys for Vernola Trust North

September 29, 2016

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

In the Matter of the Application of Southern  
California Edison Company (U338E) for a  
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DATED OCTOBER 18, 2000, AS AMENDED, AS TO AN  
UNDIVIDED 1/2 INTEREST**

ANTHONY P. VERNOLA, SUCCESSOR TRUSTEE OF THE PAT & MARY ANN VERNOLA TRUST – MARITAL TRUST, AS TO AN UNDIVIDED 1/2 INTEREST; AND ANTHONY P. VERNOLA, TRUSTEE OF THE ANTHONY P. VERNOLA TRUST U/D/T DATED OCTOBER 18, 2000, AS AMENDED, AS TO AN UNDIVIDED 1/2 INTEREST (collectively “Vernola Trust North”), pursuant to California Public Utilities Commission Rules of Practice and Procedure, Rule 1.4(a)(4) and Rule 11.1, hereby moves for leave to participate as a party to this proceeding with respect to property newly affected by recent developments in the processing of environmental review on the Application.

Specifically, Vernola Trust North owns property located north of Limonite Avenue and south of Bellegrave Avenue, along Pats Ranch Road, in the City of Jurupa Valley. Its holdings consist of Riverside County Assessor Parcel No. 160-050-050, and a portion of Assessor Parcel No. 160-050-048. The property is depicted in **Exhibit A** incorporated by this reference and

attached hereto (“Vernola North Property”). In addition, Vernola Trust North also has certain signage and other license rights over the properties presently owned by Sky Country Investment Co. / East, LLC, already a party to this proceeding.

Under the original proposed alignment for the Riverside Transmission Reliability Project (“RTRP”), the Vernola North Property appeared unaffected. However, on or about August 16, 2016, Applicant SOUTHERN CALIFORNIA EDISON (“SCE”) announced a “Hybrid Route” alternative that it intends to seek as its preferred RTRP alignment. As Vernola Trust North understands it, the “Hybrid Route” alternative proposes to route underground transmission lines along with appurtenant facilities across the southerly portion of its Vernola North Property. A diagram depicting Vernola Trust North’s understanding of the proposed “Hybrid Route” alternative crossing on Vernola North Property is attached as **Exhibit B**.

Vernola Trust North opposes this alignment, and intends to present legal and factual contentions regarding its need, location, and impacts. Vernola Trust North anticipates that if party status is granted, it will submit a written protest pursuant to Commission Rules of Practice and Procedure 2.6.

The newly proposed “Hybrid Route” alternative alignment will directly impact Vernola Trust North and its property north of Limonite Avenue. The east-west portion of the new alignment from Pats Ranch Road is proposed to traverse the southern portion of the Vernola Trust North property. The alignment will impact a series of easements located within the designated “Hybrid Route” alternative, including utility, sewer, and storm drain easements. It will also affect site setbacks and developable area on the portion of the property with the highest market appeal and development demand – its corner frontage between Limonite Avenue and Pats Ranch Road. As such, Vernola Trust North is opposed to this proposed “Hybrid Route” alternative alignment in its present configuration, and anticipates arguing in favor of California Public Utilities Commission requiring the Applicant to site it completely within public rights of way.

It should be noted that Vernola Trust representatives have already filed protests in this proceeding, but relating to different properties, located south of Limonite Avenue. On June 1,

2015, the “Vernola Trust” protested with respect to its ownership of Riverside County Assessor Parcel No. 152-640-003. The same trustees also joined in the protest of the “Vernola Apartments,” filed the same date. The announced “Hybrid Route” alternative removes RTRP facilities from these two properties, and pursuant to an “Agreement Addressing a ‘Hybrid’ Alternative in the Riverside Transmission Reliability Project Proceeding,” the Vernola Trust owners of those properties agreed that so long as the RTRP route being considered substantially conformed to the “Hybrid Route” alternative, they would no longer pursue those protests.

That agreement did not in any way include or bind the Vernola Trust parties in their capacity as owners of other properties, however. In exercising this reserved right, and given the starkly different impacts the “Hybrid Route” alternative will have on the Vernola North Property than on all those properties south of Limonite Avenue, Vernola Trust North seeks separate recognition of its right to pursue protests of the “Hybrid Route” alternative alignment, and offers to do so under the designation of “Vernola Trust North” to avoid potential confusion that might result from similar ownership of differently-situated properties.

Vernola Trust North acknowledges that as to the property in question, it seeks to join this proceeding well after it has been initiated. However, the recent announcement by Applicant SCE of its proposed “Hybrid Route” alternative alignment as its preferred alternative implicates new and impactful consequences for the Vernola North Property and its future development potential.

Vernola Trust requests that all correspondence, pleadings, notices, orders, ruling, and other communications concerning this proceeding be provided to it through the following:

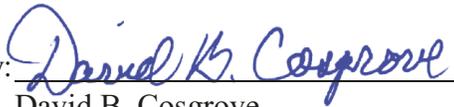
David B. Cosgrove  
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Telephone: (714) 641-5100  
Facsimile: (714) 546-9035  
Email: [dcosgrove@rutan.com](mailto:dcosgrove@rutan.com)

Prior to filing this motion, a draft was provided to attorneys for SCE and the City of Riverside, to determine if either party opposed the request for party status by Vernola Trust North. On or about September 28, 2016, both parties indicated by e-mail that they did not oppose the request, but reserved all rights including the right to respond to any protest that Vernola Trust North may file, in the event the motion were granted.

For all the reasons stated above, Vernola Trust North asks the Commission grant its motion to be permitted party status in this proceedings with respect to the Vernola North Property.

Respectfully submitted,

RUTAN & TUCKER, LLP

By:   
David B. Cosgrove  
Attorneys for Vernola Trust North

September 29, 2016

**VERIFICATION**

I am the authorized agent for ANTHONY P. VERNOLA, SUCCESSOR TRUSTEE OF THE PAT & MARY ANN VERNOLA TRUST – MARITAL TRUST, AS TO AN UNDIVIDED 1/2 INTEREST; and ANTHONY P. VERNOLA, TRUSTEE OF THE ANTHONY P. VERNOLA TRUST U/D/T DATED OCTOBER 18, 2000, AS AMENDED, AS TO AN UNDIVIDED 1/2 INTEREST and am authorized to make this verification on their behalf. I am informed and believe that the matters stated in the foregoing document are true.

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

Executed this 23 day of Sept, 2016, at Crocker-Miller California.

**ANTHONY P. VERNOLA, SUCCESSOR  
TRUSTEE OF THE PAT & MARY ANN  
VERNOLA TRUST – MARITAL TRUST, AS  
TO AN UNDIVIDED 1/2 INTEREST**

By: Anthony P. Vernola  
Anthony P. Vernola, Trustee

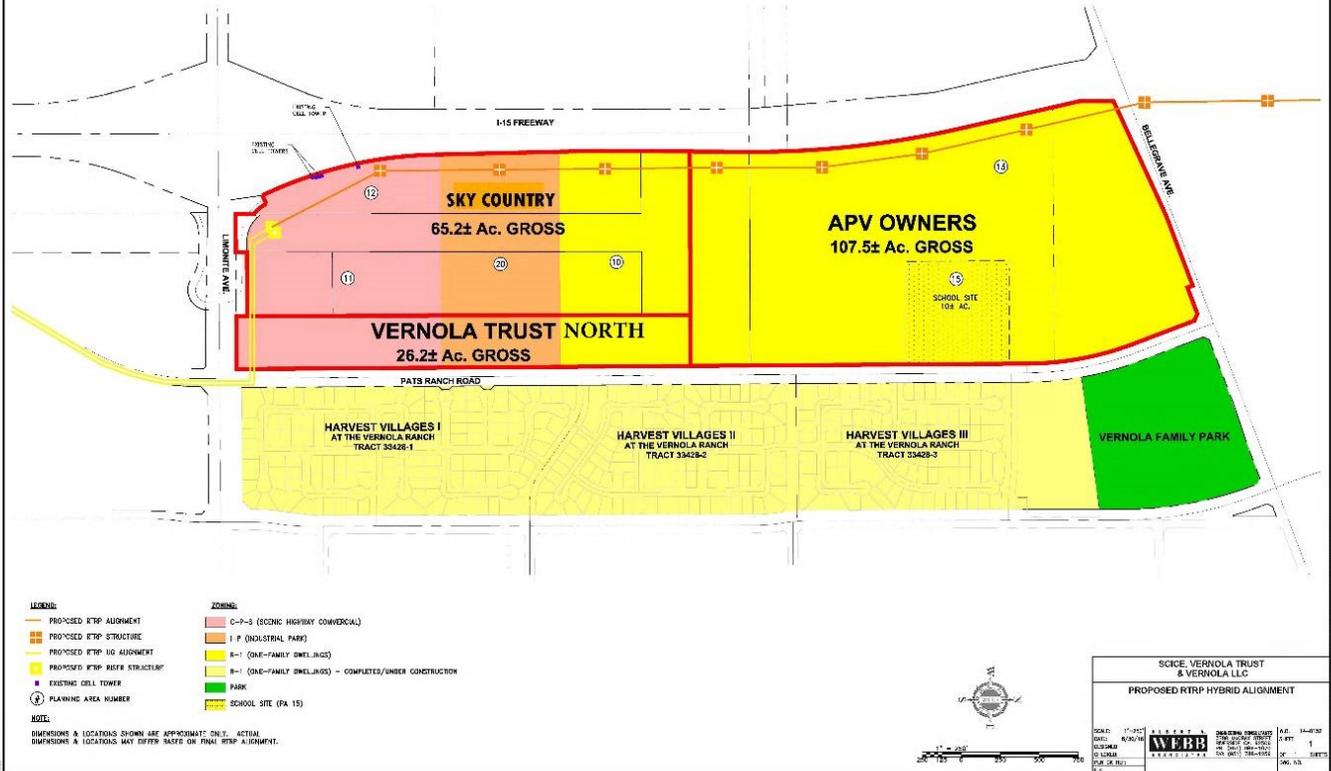
**ANTHONY P. VERNOLA, TRUSTEE OF THE  
ANTHONY P. VERNOLA TRUST U/D/T  
DATED OCTOBER 18, 2000, AS AMENDED,  
AS TO AN UNDIVIDED 1/2 INTEREST**

By: Anthony P. Vernola  
Anthony P. Vernola, Trustee

# EXHIBIT A

## VERNOLA NORTH PROPERTY

### PROPOSED RTRP HYBRID ALIGNMENT – SKY COUNTRY, VERNOLA TRUST NORTH & APV OWNERS



# EXHIBIT B

## SCE HYBRID ALTERNATIVE



**Ian Forrest**  
Senior Attorney  
Real Property, Local Government  
and Licensing  
[Ian.Forrest@sce.com](mailto:Ian.Forrest@sce.com)

August 18, 2016

VIA E-MAIL and OVERNIGHT DELIVERY

Anthony P. Vernola  
On behalf of the Vernola Marketplace  
Apartment Project Owners  
P.O. Box 217  
Upland, CA 91785-0217

Mark Torres  
Lennar Homes of California, Inc.  
980 Montecito Dr., Ste. 302,  
Corona, CA. 92879  
Email: [Mark.Torres@Lennar.com](mailto:Mark.Torres@Lennar.com)

Re: Notice of Hybrid Route Communication

Dear Messrs. Vernola and Torres,

Please be advised that on August 17, 2016, pursuant to Section 1.a. of the *Agreements Addressing a "Hybrid" Alternative in the Riverside Transmission Reliability Project Proceeding* (Agreements) executed between Southern California Edison Company (SCE), the City of Riverside (Riverside), Lennar Homes of California, Inc. (Lennar), and the Vernola Marketplace Apartments Project Parties (VAP Parties<sup>1</sup>) respectively, SCE communicated to the California Public Utilities Commission (CPUC) that the Hybrid Route (depicted in Attachment A to the respective Agreements) is the preferred route for completion of the proposed Riverside Transmission Reliability Project (RTRP). SCE's communication is included as Attachment 1 hereto for your reference. Riverside's communication is included as Attachment 2 hereto.

This letter provides notice of the communications to the CPUC per the terms of the Agreements. In turn, SCE respectfully requests that Lennar and the VAP Parties timely satisfy their commitments under Section 2.a., and submit the written, public statements contained in Attachment B to their respective Agreements to the CPUC's attention.

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<sup>1</sup> As specified in the *Agreement Addressing a "Hybrid" Alternative in the Riverside Transmission Reliability Project Proceeding*, the VAP Parties include all owners of the VAP, consisting of: Assessor Parcel Nos. ("APNs") 152-020-012 and 152-640-003, being *Anthony P. Vernola, Successor Trustee of the Pat and Mary Ann Vernola Trust - Marital Trust*, as to an undivided ½ interest, and *Anthony P. Vernola, Trustee of the Anthony P. Vernola Trust, U/D/T dated October 18, 2000*, as amended, as to an undivided ½ interest; and APNs 152-020-021 and 152-020-022, being *APV Investments PA 19, LLC*, a California limited liability company, as to an undivided ¾ interest; *Bellatera Investments PA 19, LLC*, a California limited liability company, as to an undivided 1/12th interest; *Shellina Investments PA 19, LLC*, a California limited liability company, as to an undivided 1/12th interest; and *Boomer Investments PA 19, LLC*, a California limited liability company, as to an undivided 1/12th interest.

# EXHIBIT B

Notice of Hybrid Route Communication  
Page 2  
August 18, 2016

Should you have any questions or comments, please contact me directly.

Sincerely,

*Ian Forrest*

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Ian Michael Forrest, Esq.

Attorney for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
P.O. Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1926  
Facsimile: (626) 302-6980  
E-mail: [Ian.Forrest@sce.com](mailto:Ian.Forrest@sce.com)

cc.

Richard S. Bondar, PO Box 1295, Corona, CA 92878, [rickbondar@aol.com](mailto:rickbondar@aol.com)

David B. Cosgrove, Esq., Rutan & Tucker, LLP, 611 Anton Blvd., Suite 1400, Costa Mesa, CA 92626, [dcosgrove@rutan.com](mailto:dcosgrove@rutan.com)

Melanie Houk, Esq., Deputy General Counsel, Lennar Homes of California, Inc., 25 Enterprise, Ste. 300, Aliso Viejo, CA. 92656, [Melanie.Houk@Lennar.com](mailto:Melanie.Houk@Lennar.com)

Geoffrey Smith, Lennar Homes of California, Inc., 980 Montecito Dr., Ste. 300, Corona, CA. 92879, [Geoffrey.Smith@Lennar.com](mailto:Geoffrey.Smith@Lennar.com)

George Hanson, Engineering Manager, Riverside Public Utilities, 3750 University Ave., 4<sup>th</sup> Floor, Riverside, CA 92501, [grhanson@riversideca.gov](mailto:grhanson@riversideca.gov)

Kristi J. Smith, Esq., Chief Assistant City Attorney, City of Riverside, 3750 University Ave., Suite 250, Riverside, CA 92501, [ksmith@riversideca.gov](mailto:ksmith@riversideca.gov)

Donald Johnson, Principal Manager, Southern California Edison Co., Major Projects Organization, 3rd Party Projects, 2 Innovation Way PIV2, Pomona, CA. 91768, [Donald.Johnson@sce.com](mailto:Donald.Johnson@sce.com)

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# EXHIBIT B

## Attachment 1

*SCE's August 17, 2016 CPUC Communication*



# EXHIBIT B

A.15-04-013 RTRP-CPUC Deficiency Report-SCE-001 Q.03 Supplemental

*Southern California Edison*  
RTRP A.15-04-013

## DATA REQUEST SET A.15-04-013 RTRP-CPUC Deficiency Report-SCE-001

To: CPUC  
Prepared by: Kenneth Spear  
Title: Sr. Project Manager  
Dated: 08/16/2016

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### Question 03 Supplemental:

CEQA requires consideration of alternatives that are capable of substantially reducing or eliminating significant environmental effects (CEQA Guidelines Section 15126.6(a)). Define alternatives that meet the project objectives and reduce or avoid potentially significant impacts of the proposed project on the approved Riverbend housing project and Vernola Marketplace Apartment Community. This may include local routing alternatives or electrical system alternatives.

### Response to Question 03 Supplemental:

On April 15, 2015, Southern California Edison Company (“SCE”) filed Application No. 15-04-013 for a Certificate of Public Convenience and Necessity (“CPCN”) to permit SCE to construct a portion of the Riverside Transmission Reliability Project (“RTRP” or “Project”). SCE’s CPCN Application was subsequently amended on April 30, 2015.

On or about May 22, 2015, SCE received correspondence from the California Public Utilities Commission (CPUC) identifying certain deficiencies in SCE’s CPCN Application. These deficiencies were summarized in the *Deficiency Report for the Riverside Transmission Reliability Project Application (A.15-04-013)* (“Deficiency Report”). On or about July 24, 2015, SCE submitted its *Response to the California Public Utilities Commissions’ Deficiency Report for the Riverside Transmission Reliability Project Application (A.15-04-013)* (“Response”).

SCE hereby submits this Supplemental Response in response to Question 3 of the Deficiency Report:

On or about June 1, 2015, the owners of the referenced Riverbend and Vernola Marketplace Apartment Community projects (Lennar Homes of California, Inc. (“Lennar”) and the “VAP Parties,” respectively), among others, filed protests to SCE’s Application. Ensuing discussions between SCE, the City of Riverside (“Riverside”), Lennar and the VAP Parties have identified an alternative alignment which substantially reduces or eliminates the environmental effects of RTRP on the Riverbend and Vernola Marketplace Apartment Community projects and resolves certain concerns raised by Lennar and the VAP Parties.

# EXHIBIT B

A.15-04-013 RTRP-CPUC Deficiency Report-SCE-001 Q.03 Supplemental

Pursuant to those discussions, and agreements concluded between SCE, Riverside, Lennar and the VAP Parties, SCE proposes to pursue, as its preferred Project route, a “hybrid” aboveground / underground alternative 220 kV transmission line route (the “Hybrid Route,” depicted in the Attachment hereto (*Riverside Transmission Reliability Project Hybrid Route* map)) in the pending RTRP Application proceeding. As shown in the attached map, the Hybrid Route proposes underground construction of the 220 kV transmission lines within public rights-of-way immediately adjacent to the Riverbend and Vernola Marketplace Apartment Community projects.

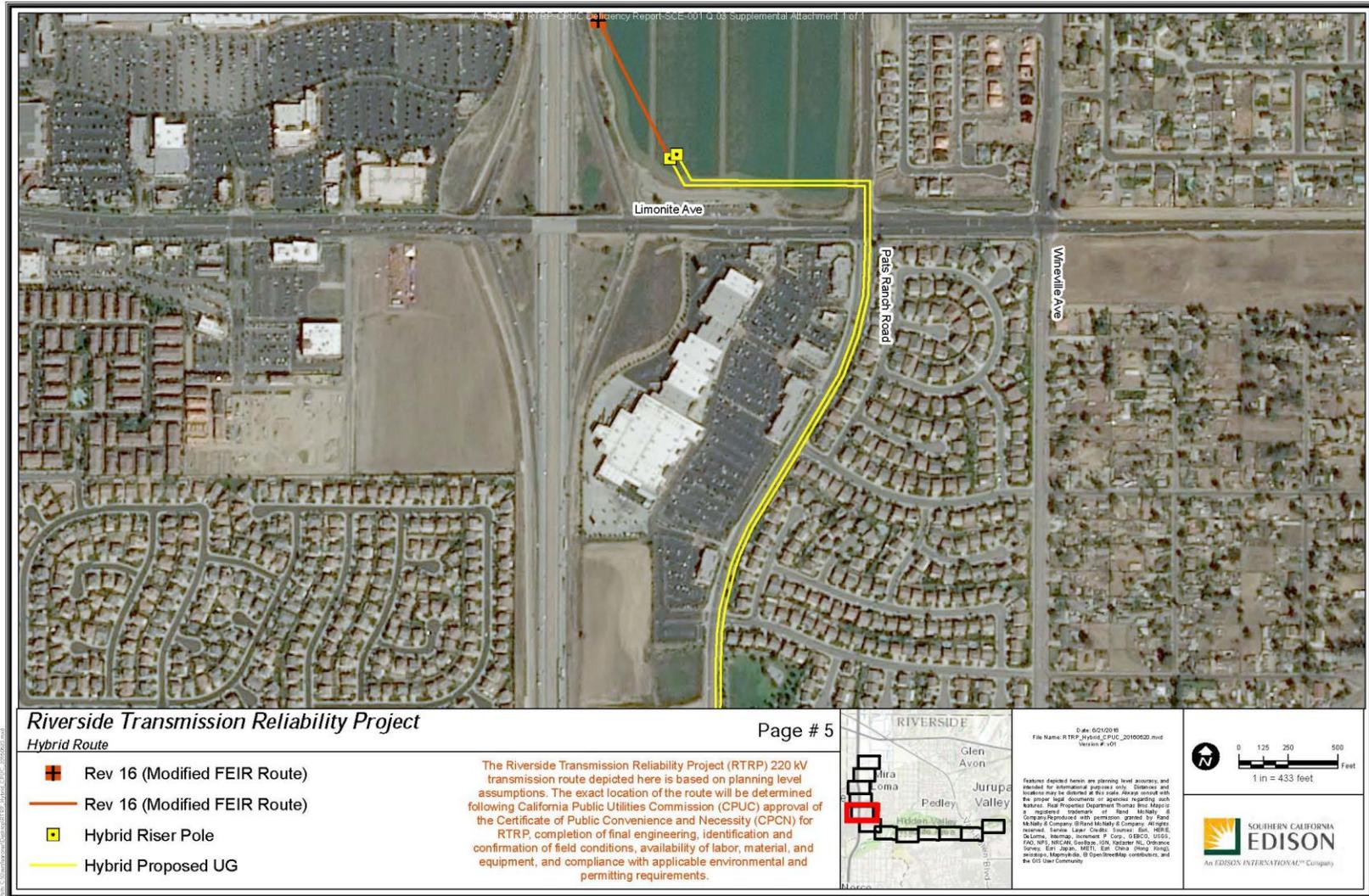




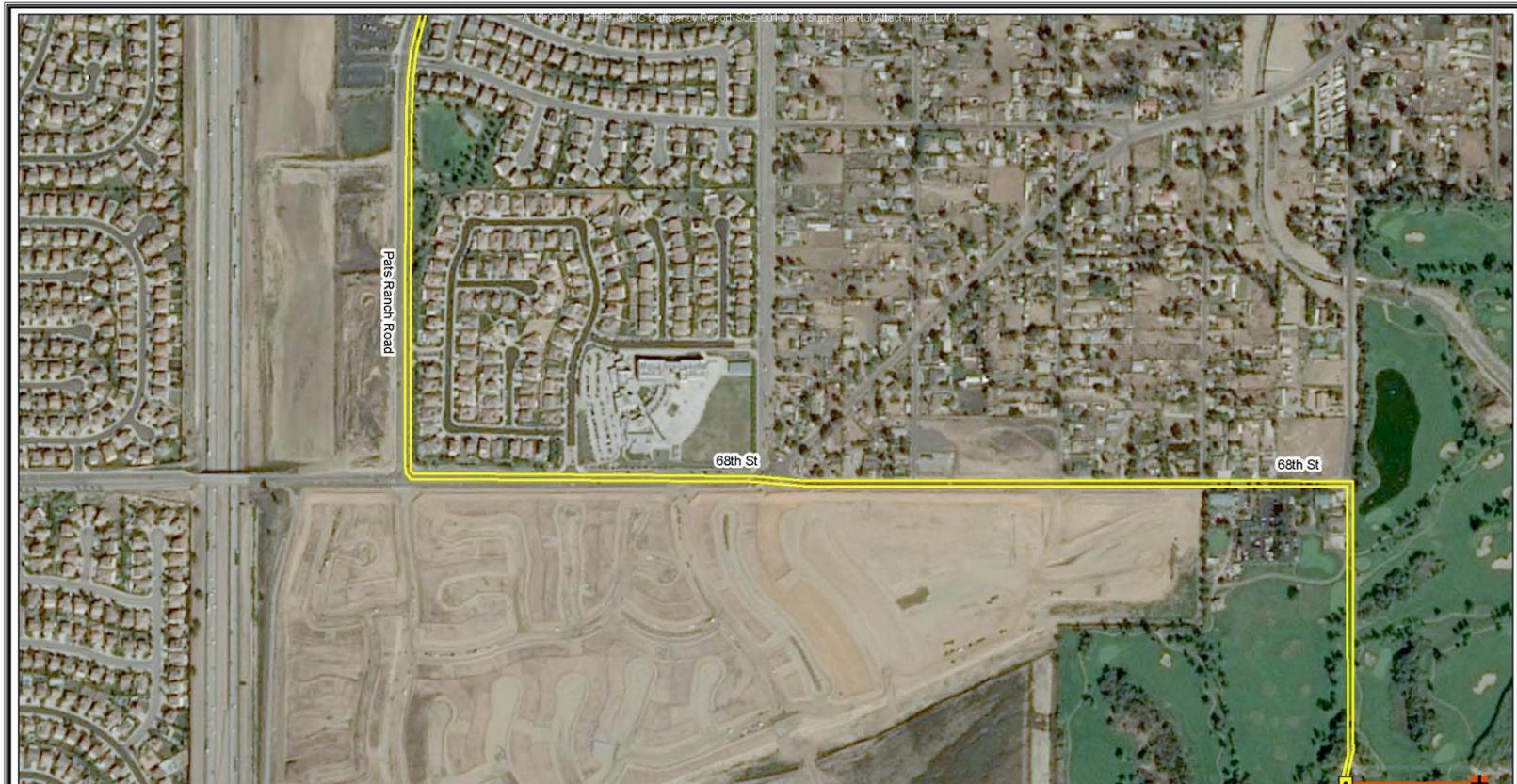




# EXHIBIT B



# EXHIBIT B



## Riverside Transmission Reliability Project

### Hybrid Route

-  Rev 16 (Modified FEIR Route)
-  Rev 16 (Modified FEIR Route)
-  Hybrid Riser Pole
-  Hybrid Proposed UG

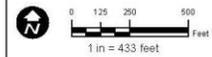
The Riverside Transmission Reliability Project (RTRP) 220 kV transmission route depicted here is based on planning level assumptions. The exact location of the route will be determined following California Public Utilities Commission (CPUC) approval of the Certificate of Public Convenience and Necessity (CPCN) for RTRP, completion of final engineering, identification and confirmation of field conditions, availability of labor, material, and equipment, and compliance with applicable environmental and permitting requirements.

Page # 6

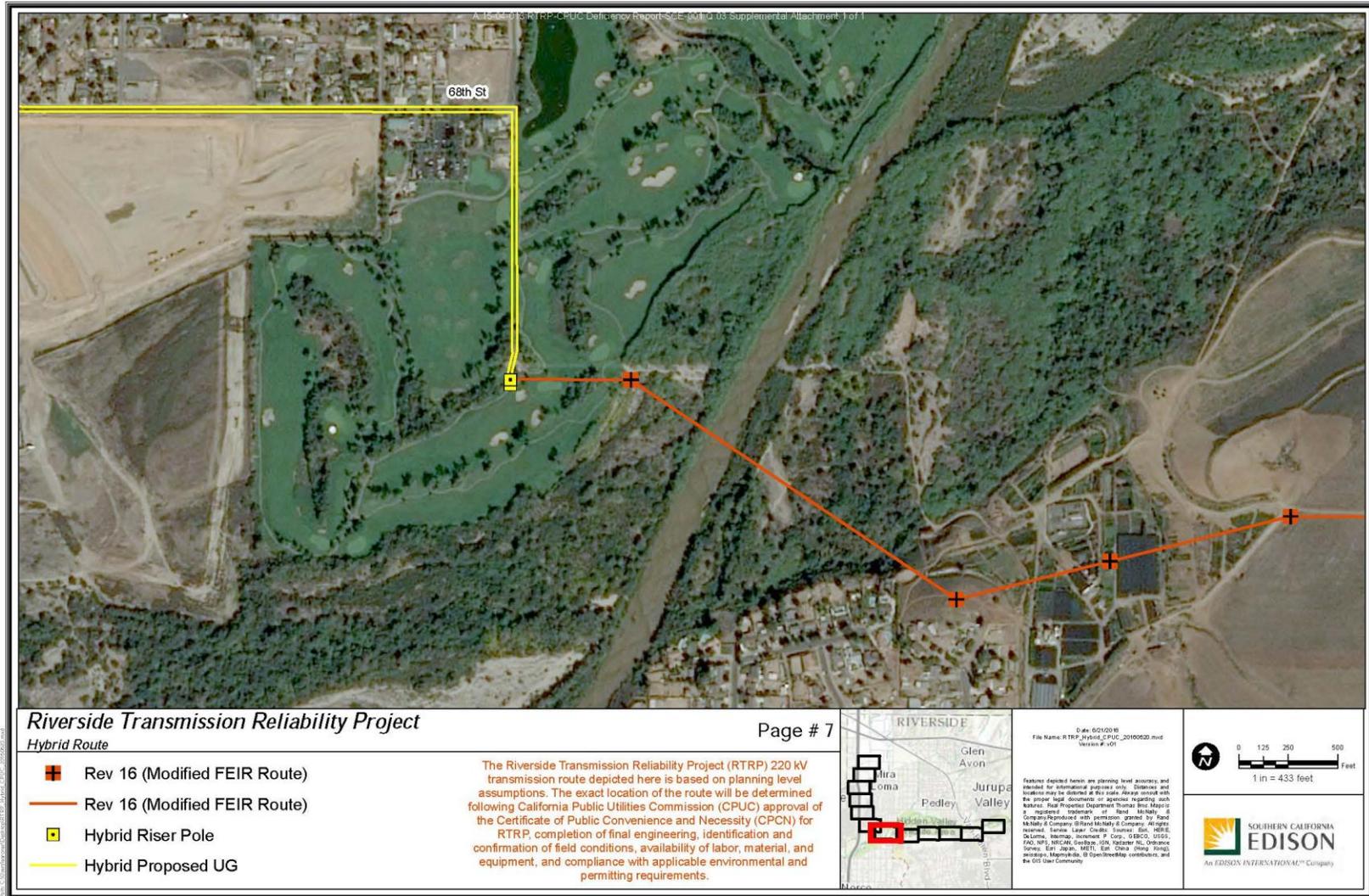


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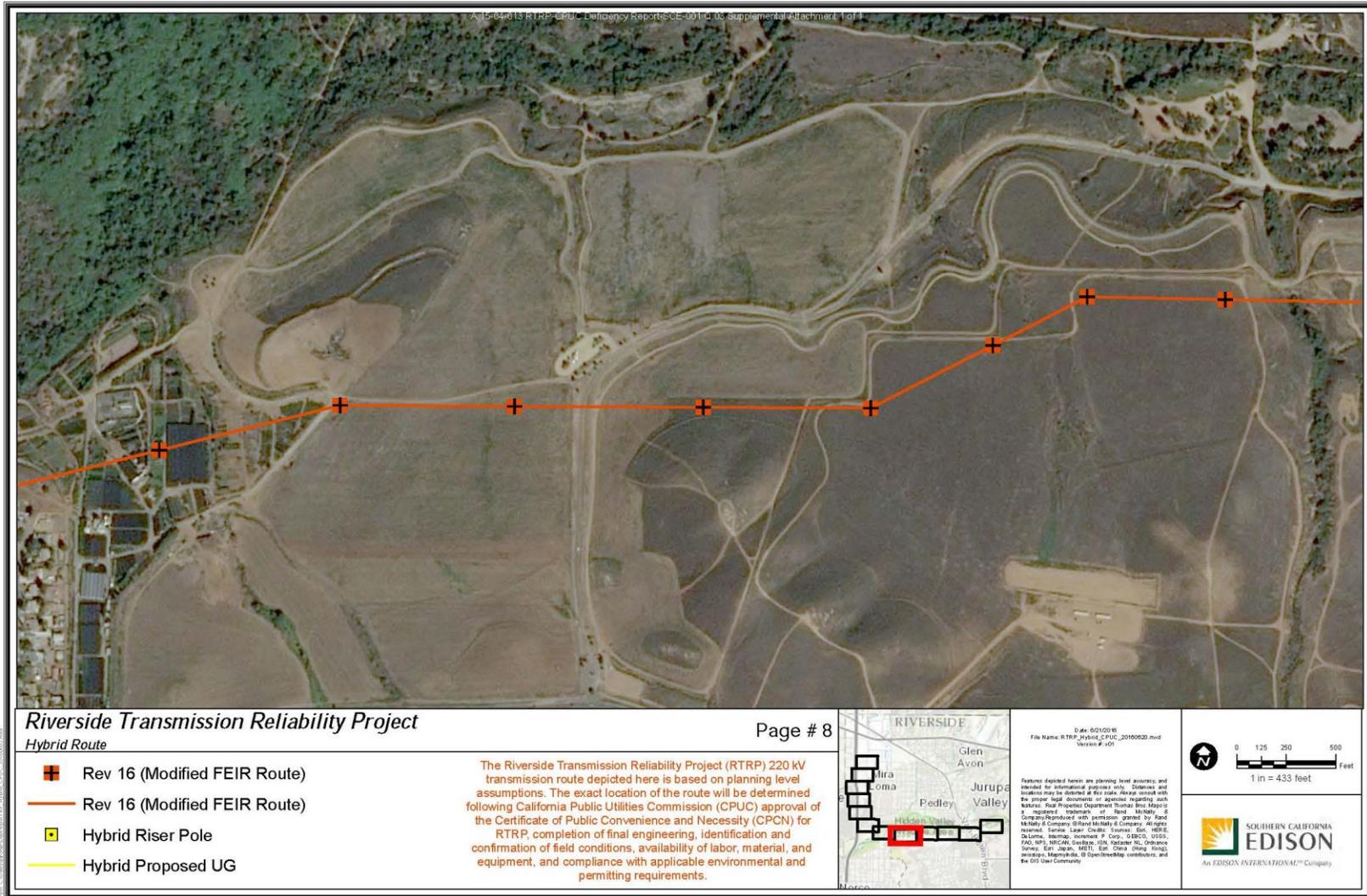
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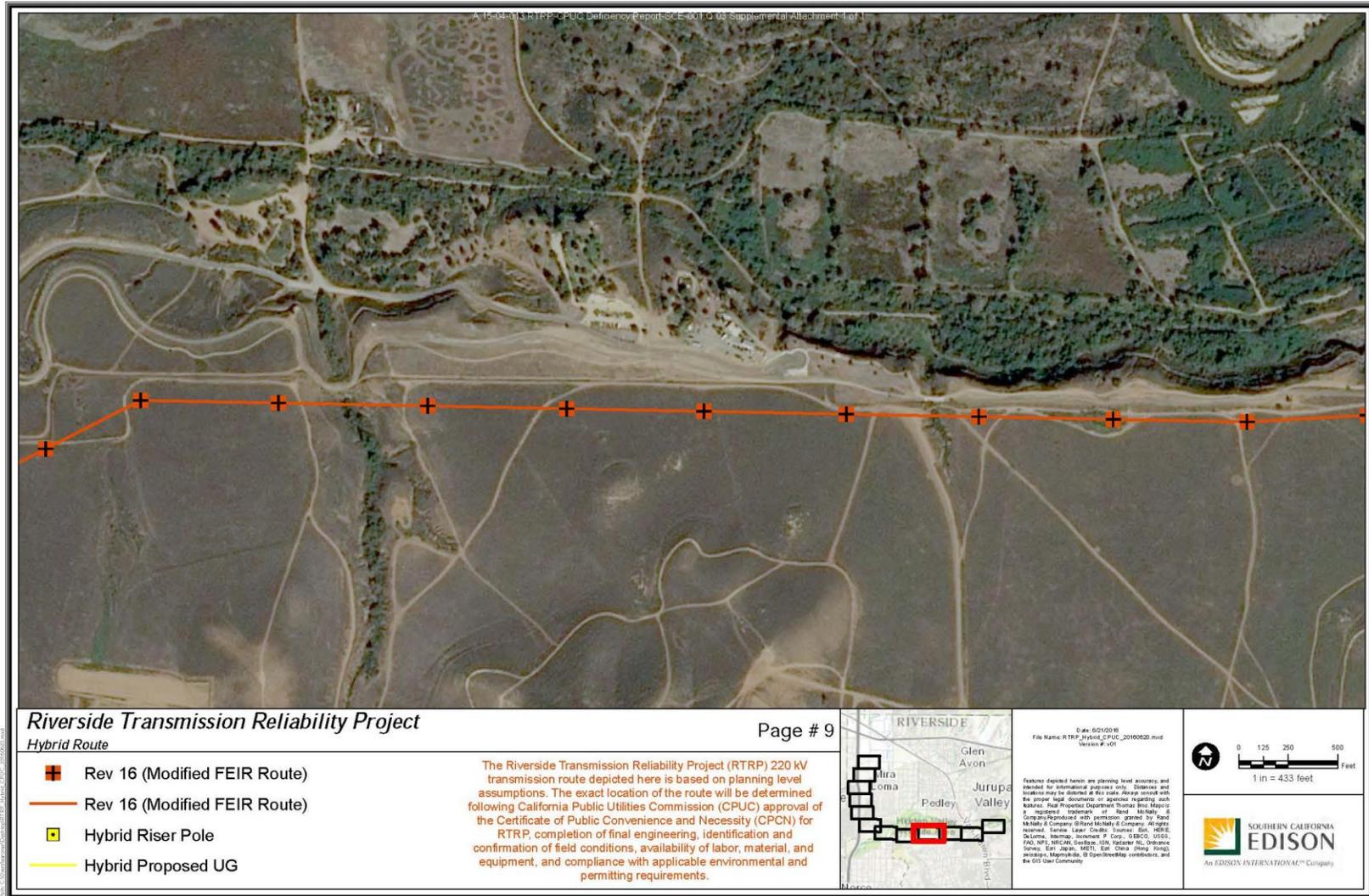
# EXHIBIT B



# EXHIBIT B



# EXHIBIT B









# EXHIBIT B

## Attachment 2

*Riverside's August 18, 2016 CPUC Communication*



# EXHIBIT B

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**From:** Uchida, Jensen [<mailto:jensen.uchida@cpuc.ca.gov>]  
**Sent:** Thursday, August 18, 2016 1:16 PM  
**To:** Hanson, George R.  
**Cc:** Mulligan, Jack M.; [jeff.thomas@panoramaenv.com](mailto:jeff.thomas@panoramaenv.com)  
**Subject:** [External] RE: A.15-04-013 RTRP (2016-08-18): Riverside Supports Southern California Edison Company's Supplemental Data Request Response and Attachment to RTRP-CPUC Deficiency Report-SCE-001 Q.03

Thank you Mr. Hanson.

---

**From:** Hanson, George R. [<mailto:GRHanson@riversideca.gov>]  
**Sent:** Thursday, August 18, 2016 1:13 PM  
**To:** Uchida, Jensen  
**Cc:** Mulligan, Jack M.; [jeff.thomas@panoramaenv.com](mailto:jeff.thomas@panoramaenv.com); Hanson, George R.  
**Subject:** A.15-04-013 RTRP (2016-08-18): Riverside Supports Southern California Edison Company's Supplemental Data Request Response and Attachment to RTRP-CPUC Deficiency Report-SCE-001 Q.03  
**Importance:** High

Mr. Uchida, the City of Riverside supports, as its preferred Riverside Transmission Reliability Project route, the "Hybrid Route" depicted in the map attached to Southern California Edison Company's August 17, 2016 Supplemental Response to Question 3 of CPUC Deficiency Report-SCE-001.

I have attached their filing to this e-mail for your reference.

Best regards,

George Hanson  
Engineering Manager  
Riverside Public Utilities  
3750 University Ave., 4<sup>th</sup> Floor  
Riverside, CA 92501  
951.826.2400

[grhanson@riversideca.gov](mailto:grhanson@riversideca.gov)  
WATER | ENERGY | LIFE

