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9  
10 **BEFORE THE PUBLIC UTILITIES COMMISSION**  
11 **OF THE STATE OF CALIFORNIA**  
12

13  
14 In the Matter of the Application of SOUTHERN  
15 CALIFORNIA EDISON COMPANY (U 338-E)  
16 for a Certificate of Public Convenience and  
17 Necessity for the San Joaquin Cross Valley Loop  
18 Transmission Project.

19 Application 08-05-039  
20 (Filed May 30, 2008)

21  
22 **REPLY BRIEF OF THE CITY OF FARMERSVILLE**  
23

24 The City of Farmersville hereby submits its reply brief in opposition to the application of  
25 Southern California Edison Company (SCE) for a Certificate of Public Necessity and  
26 Convenience.  
27

28 **I. SUMMARY OF REPLY RECOMMENDATIONS**

The City of Farmersville requests and recommends that the Commission find that SCE's  
alleged urgency is not supported by: (1) the new energy forecast data, (2) the lack of prior  
outages under base-case conditions, and (3) the lack evidence to suggest that the single- and  
double-contingency problems are likely to occur within the next few years.

City of Farmersville also requests and recommends that the Commission reject SCE's  
argument that Alternative 1 is superior to Alternative 2 and the others based on delays, especially  
since Alternative 1 has many delays associated with it and SCE's Proposed Project Objectives in  
the DEIR do not include any timeframe whatsoever.

Based on the DEIR's side-by-side comparison of Alternative 1 and Alternative 2 (and  
others) which clearly indicates that Alternative 2 will have the same impacts as Alternative 1

1 except that Alternative 2 will have a lesser impact on agricultural resources than Alternative 1,  
2 the City of Farmersville requests and recommends that the Commission reject SCE's argument  
3 that Alternative 2 has more environmental impacts than Alternative 1 and decline to approve  
4 Alternative 1.

## 5 II. DISCUSSION

### 6 SCE's Claimed Urgency For Issuance of A Certificate of Public Convenience Is Not 7 Supported By The California Energy Commission's Revised Forecast of Peak 8 Demand.

9 In its prepared testimony SCE states that a rising trend in population growth created the  
10 need for the Proposed Project:

11 "Tulare County is one of the fastest growing regions in California.  
12 This increased growth has resulted in an increased demand for  
13 electricity. SCE has determined that the existing transmission lines,  
14 which deliver electricity to Rector Substation located southeast of  
15 Visalia, are operating at or near their limits and will be unable to  
16 deliver sufficient electricity to safely and reliably serve this increased  
17 demand. As a result, SCE is proposing to construct the San Joaquin  
18 Cross Valley Loop Project..."<sup>1</sup>

19 However, in its opening brief, SCE now concedes that "...a significant impact on  
20 forecasted demand in the San Joaquin Valley area is not expected due to the recession..."<sup>2</sup>  
21 Additionally, the California Energy Commission's 2010-2020 forecast which was adopted in  
22 December 2009 confirms that a dip in energy demand is expected due to both economic  
23 downturn and expected savings from energy efficiency programs:

24 "The dip in the early years of CED 2009 Adopted is caused by both  
25 the revised economic projections and by elevated assumptions about  
26 increased energy efficiency program savings."<sup>3</sup>

27 SCE's opening brief also erroneously assumes a 2.5% load growth<sup>4</sup> even though the  
28 CEC's updated growth forecast for peak demand from 2010 through 2018 is only 1.40%.<sup>5</sup> The

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25 <sup>1</sup> *Southern California Edison Company's Testimony Supporting Its Application For A Certificate Of Public  
26 Convenience And Necessity To Construct The San Joaquin Cross-Valley Loop Transmission Project*, pg. B-1 (July 20, 2009).

27 <sup>2</sup> SCE Opening Brief at pg. 11 [emphasis added].

28 <sup>3</sup> CALIFORNIA ENERGY DEMAND 2010-2020 ADOPTED FORECAST, pg. 89 (December 2, 2009); available at:  
<http://www.energy.ca.gov/2009publications/CEC-200-2009-012/index.html>

<sup>4</sup> See SCE Opening Brief at pg. 6.

1 CEC's forecast also shows that the peak consumption level originally predicted (in October  
2 2007) for the present year (2010) has been delayed and is now the predicted level for 2015,  
3 reducing the projected peak consumption for this year to a level very close to the 2008 level.<sup>6</sup>  
4 These updated data show that SCE's claimed need and urgency for Alternative 1 are not  
5 supported.

6 The single-contingency problem identified by SCE as the worst-case threat to reliability  
7 of service<sup>7</sup>, namely *if* the Big Creek 1-Rector transmission line went down, is a hypothetical  
8 scenario that SCE has not identified as occurring in the past. In fact the double-contingency  
9 problem identified by SCE,<sup>8</sup> namely if the Big Creek 1-Rector and Big Creek 3-Rector  
10 transmission lines both went down *at the same time*, also has not been identified by SCE as  
11 occurring at any time in the past. Moreover, SCE has not identified any reason to believe that  
12 either of the two transmission lines will be down at any time in the near future. Accordingly, the  
13 two SCE contingency hypothetical problems are not by themselves sufficient to hastily proceed  
14 with the Proposed Project's Alternative 1 as suggested by SCE.

15 SCE also claims that reliability of service is threatened under a base-case scenario  
16 because the Big Creek 3-Rector transmission line will be overloaded beyond its maximum  
17 capability when the Visalia rector substation's load exceeds 700 MW.<sup>9</sup> According to SCE's  
18 Prepared Testimony both the Big Creek 3-Rector and the Big Creek 1-Rector transmission lines  
19 terminate at the Visalia rector substation.<sup>10</sup> Thus the Big Creek 3-Rector line will not be  
20 operating by itself. SCE failed to consider and discuss the fact that the Big Creek 1-Rector  
21 transmission line is also be available for use by the Visalia rector substation during the base-case  
22

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23 <sup>5</sup> See lower portion of Table 14, CALIFORNIA ENERGY DEMAND 2010-2020 ADOPTED FORECAST, pg. 89  
24 (December 2, 2009).

25 <sup>6</sup> See lower portion of Table 14, CALIFORNIA ENERGY DEMAND 2010-2020 ADOPTED FORECAST, pg. 89  
26 (December 2, 2009).

27 <sup>7</sup> SCE Opening Brief at pg. 4.

28 <sup>8</sup> SCE Opening Brief at pg. 5.

<sup>9</sup> SCE Opening Brief at pg. 4.

<sup>10</sup> *Southern California Edison Company's Testimony Supporting Its Application For A Certificate Of Public  
Convenience And Necessity To Construct The San Joaquin Cross-Valley Loop Transmission Project*, pg. 2 (July 20, 2009).

1 conditions, and SCE clearly conceded this: “The base-case scenario is defined by having all Big  
2 Creek Corridor electrical facilities in operation.”<sup>11</sup> SCE’s claim, that the Big Creek 3-Rector line  
3 will be overloaded beyond its maximum capacity if the Visalia rector substation’s load exceeds  
4 700 MW, is also undermined by SCE’s own statement that the peak load on one occasion  
5 allegedly reached 701 MW.<sup>12</sup> Significantly, SCE has never contended that on this occasion the  
6 Big Creek 3-Rector line, which has an emergency rating of 106%,<sup>13</sup> went down or otherwise  
7 became inoperable. Furthermore, no other equal or higher peak load at the Visalia rector  
8 substation has ever been identified by SCE.

9 The CEC’s latest energy forecasts and SCE’s own statements do not support an urgent  
10 need to hastily approve Alternative 1 on the grounds that base-case peak loads or speculative  
11 contingencies will render existing transmission facilities inoperable within the next few years.  
12 Accordingly, the City of Farmersville requests and recommends that the Commission find that  
13 SCE’s alleged urgency is not supported by: (1) the new energy forecast data, (2) the lack of prior  
14 outages under base-case conditions, and (3) the lack evidence to suggest that the single- and  
15 double-contingency problems are likely to occur within the next few years.

16 **The Same Logic Behind SCE’s Claim That Alternative Route 2 (and Other Routes)**  
17 **Are Infeasible Applies Equally To Alternative Route 1.**

18 SCE does not dispute that Alternative Routes 2, 3A or any other alternative routes would  
19 be feasible, electrically and from a construction standpoint, and would adequately address the  
20 reliability concerns that prompted the Proposed Project in the first place. For example, with  
21 regard to Alternative 2, SCE clearly concedes that it would satisfy the project’s purpose and can  
22 be constructed:

23 “To be clear and as explained below, although Route Alternative 2 –  
24 if constructed within a timeframe that would meet the Project’s  
25 purpose, need, and objectives as defined by SCE – may be  
26 technically feasible from a construction and electrical standpoint, the  
delays that would be caused by necessary environmental studies now  
render that route “infeasible” because it cannot be constructed to

27 <sup>11</sup> SCE Opening Brief at pg. 4.

28 <sup>12</sup> SCE Opening Brief at pg 4.

<sup>13</sup> SCE Opening Brief at pg. 5.

1 address the area's system reliability needs *within a sufficient*  
2 *timeframe.*"<sup>14</sup>

3 As noted from this quote, SCE simply argues that Alternative 2 will not address the reliability  
4 problems that prompted the Proposed Project *within the timeframe that SCE believes is*  
5 *appropriate.* However, it should be noted that SCE's Proposed Project Objectives in the DEIR  
6 do not include any timeframe whatsoever.<sup>15</sup>

7 Although SCE claims that Alternative 2 and the other alternatives will have delays due to  
8 the mitigation measures and that such delays will render the project infeasible for timing reasons  
9 only, SCE failed to account for the fact that the Proposed Project (i.e. Alternative 1) will also  
10 have delays that can last years. Some of these delays include, but are not limited to, the  
11 following:

- 12 1. Mitigation Measure 4.4-2a: Alternative Route 1 has within it the valley  
13 elderberry longhorn beetle habitat. SCE has proposed avoidance of elderberry  
14 shrubs through the implementation of APM-BIO-01 and consultation with  
15 USFWS to develop additional mitigation measures if avoidance is not feasible.  
16 [DEIR at pg. 4.4-32.]
- 17 2. Mitigation Measure 4.4-2b: If detailed surveys indicate that the project would  
18 directly or indirectly impact any occupied valley elderberry longhorn beetle  
19 habitat, SCE must consult with the USFWS to determine if formal consultation  
20 is required under the Endangered Species Act. [See Table 8.1, DEIR at pg. 8-  
21 20.]
- 22 3. Mitigation Measure 4.4-6: Grassland and agricultural portions of the Proposed  
23 Project are generally known to support the San Joaquin kit fox.<sup>16</sup> SCE must  
24 conduct reconstruction surveys within 200 feet of work areas to identify  
25 potential San Joaquin kit fox dens or other refugia in and surrounding work  
26 areas. If kit fox occupancy is determined at a given site, closure activities must  
27 immediately be halted and the USFWS must be contacted.
- 28 4. Mitigation Measure 4.4-3: Regarding Swainson's hawk and golden eagle  
nesting areas, for activities conducted with agency approval within the required  
buffer zone, a qualified biologist must monitor construction activities and  
active eagle nest(s) to monitor eagle reactions to activities. If activities are  
deemed to have a negative effect on nesting eagles, the biologist shall  
immediately inform the construction manager that work should be halted, and  
CDFG must be consulted. [See Table 8-1, DEIR at pg. 8-21; DEIR at pg. 4.4-  
33.]

<sup>14</sup> SCE Opening Brief at pg. 2, FN-3 [emphasis added].

<sup>15</sup> DEIR at pg. 3-2.

<sup>16</sup> DEIR at pg. 4.4-36.

1 In addition to the list of delays above, and as a practical matter, SCE failed to also consider the  
2 lengthy delays that would likely occur as a result of the many legal challenges and appeals if  
3 Alternative 1 were approved. The record and FEIR are filled with many public comments  
4 opposing Alternative 1 and therefore this potential delay, as a practical matter, also suggests that  
5 SCE's contention that Alternative 1 would result in the swiftest completion of construction is  
6 unrealistic.

7 As a practical matter, all of the alternative routes might have significant delays, including  
8 Alternative 1. Therefore, in the same way that SCE argues that the Alternative 2 (and the others)  
9 would be infeasible based on their potential delays, Alternative 1 is similarly infeasible due to  
10 the delays associated with it. As a consequence, Alternative 1 is not superior to Alternative 2 or  
11 any other alternative route in terms of delays. Accordingly, the City of Farmersville requests and  
12 recommends that the Commission reject SCE's argument that Alternative 1 is superior to  
13 Alternative 2 and the others based on delays, especially since SCE's Proposed Project Objectives  
14 in the DEIR do not include any timeframe whatsoever.

15 **SCE's Argument That Alternative Route 1 Has Less Impacts Than Alternative**  
16 **Route 2 Is Not Supported By The FEIR And Should Be Rejected.**

17 Although SCE attempts to argue that Alternative 2 will have more environmental impacts  
18 than the Proposed Project,<sup>17</sup> Table 5-2 in the DEIR has a side-by-side comparison of Alternative  
19 1 and Alternative 2 (and others) and clearly indicates that Alternative 2 will have the same  
20 impacts as Alternative 1 except that *Alternative 2 will have a lesser impact on Agricultural*  
21 *Resources* than Alternative 1.<sup>18</sup> Even though the FEIR makes it clear that Alternative 2 is  
22 environmentally superior to Alternative 1, the Commission can do even better with Alternative  
23 3A which would have an even lesser impact on Agricultural Resources and would eliminate the  
24 impacts to Biological Resources from Alternative 3. SCE has not deny this. Therefore, the City  
25 of Farmersville requests and recommends that the Commission reject SCE's argument that  
26  
27

28 <sup>17</sup> SCE Opening Brief at pg. 15.

<sup>18</sup> Table 5-2, DEIR at pg. 5-4.

1 Alternative 2 has more environmental impacts than Alternative 1 and decline to approve  
2 Alternative 1.

### 3 III. CONCLUSIONS

4 The CEC's December 2009 energy forecasts and SCE's own statements do not support an  
5 urgent need to hastily approve Alternative 1 on the grounds that base-case peak loads or  
6 speculative contingencies will render existing transmission facilities inoperable within the next  
7 few years. Accordingly, the City of Farmersville requests and recommends that the Commission  
8 find that SCE's alleged urgency is not supported by: (1) the new energy forecast data, (2) the  
9 lack of prior outages under base-case conditions, and (3) the lack evidence to suggest that the  
10 single- and double-contingency problems are likely to occur within the next few years.

11 In the same way that SCE argues that the Alternative 2 (and the others) would be  
12 infeasible based on their potential delays, Alternative 1 is similarly infeasible due to the delays  
13 associated with it. As a consequence, Alternative 1 is not superior to Alternative 2 or any other  
14 alternative route in terms of delays. Accordingly, the City of Farmersville requests and  
15 recommends that the Commission reject SCE's argument that Alternative 1 is superior to  
16 Alternative 2 and the others based on delays, especially since SCE's Proposed Project Objectives  
17 in the DEIR do not include any timeframe whatsoever.

18 Although SCE attempts to argue that Alternative 2 will have more environmental impacts  
19 than Alternative 1, the DEIR's side-by-side comparison of Alternative 1 and Alternative 2 (and  
20 others) clearly indicates that Alternative 2 will have the same impacts as Alternative 1 except  
21 that Alternative 2 will have a lesser impact on agricultural resources than Alternative 1.  
22 Therefore, the City of Farmersville requests and recommends that the Commission reject SCE's  
23 argument that Alternative 2 has more environmental impacts than Alternative 1 and decline to  
24 approve Alternative 1.

25 Regarding Alternative 1 in general, and as discussed in the City of Farmersville's opening  
26 brief, the FEIR failed to adequately consider the aesthetic, social and economic impacts from the  
27 physical location of the Proposed Project though it did properly find that the loss of farmland  
28 would be significant enough to render Alternative 2 to be environmentally superior.



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16 Transmission Project.

Application 08-05-039  
(Filed May 30, 2008)

17 **CERTIFICATE OF SERVICE**

18 [Rule 1.9(d), CPUC Rules of Practice and Procedure/]

19 I, the undersigned, declare and state as follows:

20 I am employed in Tulare County and over eighteen (18) years of age. I am not a party to  
21 the within entitled action. My business address is 108 West Center Avenue, Visalia, California  
22 93291. On the date listed below, I caused the following document(s), all of which were produced  
23 on recycled paper, to be served in the manner hereafter indicated:

24 **REPLY BRIEF OF THE CITY OF FARMERSVILLE.**

25  **BY MAIL:** For each party with no e-mail address listed below, I placed  the original  
26 and/or  a true copy(ies) thereof enclosed in sealed envelope. I deposited such  
27 envelope in the U.S. mail at the City of Visalia, State of California, with first-class  
28 postage thereon fully prepaid.

**BY FACSIMILE TRANSMISSION:** I transmitted via facsimile a true copy thereof to  
the addressee at facsimile number:

**BY ELECTRONIC MAIL (EMAIL):** At 3/25/10 4:45 A.M./P.M. on the date listed  
below, I transmitted via the Internet, from kfike@farleylawfirm.com without any  
report of error, a true copy thereof to the following e-mail address(es):

**BY OVERNIGHT DELIVERY:** I deposited  the original and/or  a true copy(ies)  
thereof into envelope(s) or package(s) designated by the overnight delivery carrier with  
delivery fees fully prepaid or provided and:

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- deposited such envelope(s) or package(s) in a facility regularly maintained by the overnight delivery carrier; or
- delivered such envelope(s) or package(s) to an authorized courier or driver authorized by the overnight delivery carrier to receive documents

**PERSONAL SERVICE:** By causing delivery by hand on March \_\_\_\_, 2010 to the following person at the address shown:

**SERVICE WAS DIRECTED TO:**

**See attached SERVICE LIST.**

I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed on March 25, 2010, at Visalia, California.

  
 \_\_\_\_\_  
 Kari Fike

MD/Farmersville - Certificate of Service.doc

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