



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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In the Matter of the Application of Southern)
California Edison Company (U338-E) for a)
Certificate of Public Convenience and Necessity)
for the San Joaquin Cross-Valley Loop)
Transmission Project)

Application No. 08-05-039

(Filed May 30, 2008)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
REPLY COMMENTS ON PROPOSED DECISION OF ALJ YACKNIN

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Dated: June 1, 2010

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
REPLY COMMENTS ON PROPOSED DECISION OF ALJ YACKNIN**

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**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
REPLY COMMENTS ON PROPOSED DECISION OF ALJ YACKNIN**

Pursuant to Rule 14.3 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby submits these reply comments to the Proposed Decision of Administrative Law Judge Yacknin Granting SCE a Certificate of Public Convenience and Necessity to Construct the San Joaquin Cross Valley Loop Transmission Project (SJXVL Project), issued May 4, 2010 (Proposed Decision). Consistent with Rule 14.3(d), SCE offers these reply comments in response to a handful of the misrepresentations presented in intervening parties’ comments.¹

I.

FARM BUREAU MAKES AN ERRONEOUS STATEMENT ABOUT CONTINGENCY

In discussing the Proposed Decision’s recommended reduction in contingency from 30.6% to 15%, Farm Bureau erroneously concludes that “the reduced impact of the cost is important, however, the cost spread between it and Alternative 3A would be reduced as well diminishing arguments against pursuing Alternative 3A on the basis of cost.”² For the reasons

¹ SCE received comments from Protect Agriculture Communities Environment (PACE), The City of Visalia, the California Farm Bureau Federation and Tulare County Farm Bureau (Farm Bureau), and Paramount Citrus Association (Paramount). Given the five-page limit on reply comments, SCE is not able to comment on the many other legal and factual errors contained in these parties’ comments, and instead SCE focuses here on the most egregious errors and misstatements.

² Farm Bureau Comments to Proposed Decision, p. 12.

explained in SCE’s testimony³ and in SCE’s Comments to the Proposed Decision, it is erroneous to reduce SCE’s contingency prior to final engineering. Importantly, even if the Commission’s maximum cost cap were to be reduced by this amount, there is nothing on the record to suggest that the actual costs required to construct this challenging project could be reduced, as the cost estimates developed for Route 2 are only conceptual at this stage. Thus, an erroneous reduction in the contingency amount would not improve the comparative economics of Route 3 (or Route 3A), which remain approximately \$65 million higher than Route 1.⁴

II.

PACE MAKES ERRONEOUS STATEMENTS NOT INCLUDED ON THE EVIDENTIARY RECORD ABOUT ROUTE 3A

In its Comments on the Proposed Decision, PACE notes that it disagrees with the Proposed Decision and then offers “support” that is not only outside the evidentiary record, but in some instances, is erroneous. For example, in its attempt to show the purported benefits of Route 3A, PACE alleges – without citation – that “Route 3A will have none of the required water mitigation measures that are likely to significantly delay the construction of the new transmission line. . . .”⁵ As PACE is aware, evidence concerning Route 3A beyond the EIR was stricken from the evidentiary record.⁶ More importantly, there has been no evidence on the record that would imply that Route 1 would suffer actual schedule delays as a result of the required hydrology mitigation measures to be dealt with in final engineering – or that Routes 3 or 3A would require “no” such hydrology mitigation measures. The Commission should disregard this unfounded and incorrect assertion.

III.

PARAMOUNT MAKES ERRONEOUS STATEMENTS ABOUT ROUTE 3A’S IMPACT

³ SCE/Gokbudak and Ghosh, Ex. 2, pp. 18-25; SCE’s Comments to Proposed Decision, pp. 7-11.

⁴ SCE/Gokbudak and Ghosh, Ex. 2, p. 19; SCE/Gokbudak and Ghosh, Ex. 3, pp. 2-7.

⁵ PACE Comments to Proposed Decision, pp. 2, 6.

⁶ Tr. 121:8-123:2 (“I do not wish to have evidence in this record that I need to consider outside of the EIR in terms of determining the feasibility of Alternative 3A, that is for the EIR determination to be made.”).

In advocating in favor of Route 3A, Paramount makes a number of overreaching statements and misrepresentations. For example, Paramount states that “Alternative 3A will have no adverse impacts on recreational, historical or aesthetical values of the impacted region.”⁷ This unsupported statement is not only overbroad, but inconsistent with the EIR and Paramount’s own comments. Paramount claims that “people seek aesthetically pleasing areas in which to relax and recreate” and that “a long line of power poles and utility lines decreases the aesthetic appeal, and thereby decreases the desirability of the recreational areas.”⁸ Yet, Paramount fails to acknowledge that to the extent there are aesthetic or recreational impacts from the project on Route 2, there reasonably should be similar impacts affecting customers along Route 3A. Paramount’s claim that there is only aesthetic impact on the route that affects Paramount and that there is “no impact” on routes that do not affect Paramount is clearly false on its face.

Moreover, as stated in the DEIR, eleven historic resources were identified within the project area of Route 3, amounting to six historic resources more than Route 1. Moreover, the DEIR also states that nine prehistoric resources were identified within the project area of Route 3, which is seven more than have been identified for Route 1. While historic and prehistoric resource values are present on all routes, records search and archeological survey data indicate that Route 3 (including 3A) has a higher probability of cultural resource impacts than Route 1.⁹

Paramount makes further – and more egregious – misrepresentations in its erroneous statement that “Alternative 3A was created as an attempt to avoid the impacts of Alternative 3 to wetlands and associated state- and federally-listed species in the Stone Corral Ecological Reserve” and that “by contrast, Alternative 2 does include vernal pools that must be surveyed prior to construction.”¹⁰ Paramount’s claim that Route 3A avoids the need for the environmental

⁷ Paramount Comments to Proposed Decision, pp. 4-5.

⁸ Paramount Comments to Proposed Decision, p. 4.

⁹ SCE/Wilder, Ex. 3, p. 21; DEIR pp. 4.5-28 – 4.5-29. For example, 14.6 miles of the Big Creek 1 – Rector and Big Creek 3 – Rector Transmission Lines (eligible for National Register of Historic Places) would be removed and replaced by construction of Route 3 in comparison of 10.8 miles of these historic lines replaced by construction on Route 2, and 1.1 miles of these historic lines replaced by construction Route 1.

¹⁰ Paramount Comments to Proposed Decision, p. 5.

studies required for Route 2 is false. Indeed, not only would construction of Routes 3 and 3A have to address the federal- and state-listed species confirmed to be present in the Stone Corral Ecological Reserve, but the approximate 1.24 mile migration radius of the federal- and state-listed California Tiger Salamander would include portions of the 3A corridor, requiring protocol level surveys to determine whether Route 3A avoids the protected species found in the Stone Corral Reserve.¹¹ Moreover, Route 3A would not avoid the approximate six miles of designated Critical Habitat for vernal pool plant species along Stokes Mountain.¹² This area would require protocol-level surveys for vernal pool plant and wildlife species, taking approximately 2 years to complete.¹³ If species are determined to be present, permitting would take an estimated 1 to 10 years.¹⁴ In addition, Routes 3 and 3A also share the same route segment as Route 2 that would require removal of Elderberry shrubs, which is a host plant to the threatened Valley Elderberry Longhorn Beetle, necessitating that take authorization be obtained from the U.S. Fish and Wildlife Service.¹⁵ Accordingly, Paramount's statements that Route 3A would not create environmental impacts or suffer from similar construction delays as Route 2 are entirely without merit and should be disregarded by the Commission.

IV.

FARM BUREAU AND PARAMOUNT MAKE ERRONEOUS STATEMENTS ABOUT THE GARAMENDI PRINCIPLES

Farm Bureau and Paramount allege that the FEIR – and hence the Proposed Decision – did not adequately consider Route 3A using the Garamendi Principles as a guideline.¹⁶ Specifically, these parties imply that an analysis of the project under the Garamendi Principles would demonstrate that Route 3A, which utilizes more existing right of way than Route 1, would

¹¹ SCE/Wilder, Ex. 3, pp. 19-20 (Route 2 has 5 miles of vernal pools designated as critical habitat by the United States Fish and Wildlife Service, compared to 8 miles for Routes 3 and 3A); SCE Reply Brief, pp. 6-7.

¹² SCE/Wilder, Ex. 3, p. 19.

¹³ SCE/Wilder, Ex. 3, p. 19.

¹⁴ SCE/Wilder, Ex. 3, p. 20.

¹⁵ SCE/Wilder, Ex. 3, p. 19.

¹⁶ Farm Bureau Comments to Proposed Decision, p. 7; Paramount Comments to Proposed Decision, pp. 6-7.

be the better alternative. However, in their simplistic argument looking only at the first principle, Farm Bureau and Paramount fail to acknowledge that the Garamendi Principles clearly provide for the creation of new rights-of-way when justified by environmental, technical or economic reasons as determined by the appropriate licensing agency. Route 1 not only avoids impacting habitat suitable to support threatened and endangered vernal pool species found on the existing right-of-way for all other alternatives, including Route 3A, but Route 1 also is the only route that is technically feasible to meet the project's purpose and need of addressing critical reliability issues within the necessary timeframe.¹⁷ Route 1 is also less complicated to construct from a safety and timing consideration as compared to all other routes, and Route 1 is economically superior in that it would cost tens of millions of dollars less than Routes 2 or 3.¹⁸ Thus, although a Garamendi Principles analysis is not required under CEQA, any full analysis of all of the principles – and not just one of those principles – would clearly demonstrate that creating new right-of-way for Route 1 is clearly justified due to its environmental, technical, and economical superiority.

V.

CONCLUSION

For all of the reasons discussed above and in SCE's Comments to the Proposed Decision, the Commission should modify the Proposed Decision as set forth in Appendix A.

Respectfully submitted,
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¹⁷ SCE/Wilder, Ex. 3, pp. 19-20; SCE/Tucker, Ex. 2, pp. 1-10.

¹⁸ SCE/Alford, Ex. 2, pp. 13-17; SCE/Gokbudak and Ghosh, Ex. 2, pp. 19.

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON PROPOSED DECISION OF ALJ YACKNIN** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

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Executed this 1st day of June, 2010, at Rosemead, California.

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