



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) Application No. 08-05-039
Certificate of Public Convenience and Necessity)
for the San Joaquin Cross-Valley Loop) (Filed May 30, 2008)
Transmission Project)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
COMMENTS ON ALTERNATE DECISION OF COMMISSIONER BOHN

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Dated: July 19, 2010

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
COMMENTS ON ALTERNATE DECISION OF COMMISSIONER BOHN**

TABLE OF CONTENTS

<u>Section</u>	<u>Title</u>	<u>Page</u>
I.	THE ALTERNATE DECISION ERRONEOUSLY IMPOSES A FUNDING REQUIREMENT ON RATEPAYERS FOR VISALIA’S BIKE TRAILS.....	2
II.	THE ALTERNATE DECISION STILL INCLUDES ERRONEOUS ASSUMPTIONS CONCERNING CONTINGENCY PRIOR TO FINAL ENGINEERING	5
III.	CONCLUSION.....	7

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
COMMENTS ON ALTERNATE DECISION OF COMMISSIONER BOHN**

TABLE OF AUTHORITIES

Page(s)

State Statutes

<i>California Public Utilities Code</i>	
§1002(a).....	3

California Public Utilities Commission Decisions

<i>D.00-05-048</i>	3
<i>D.09-12-044</i>	6

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**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
COMMENTS ON ALTERNATE DECISION OF COMMISSIONER BOHN**

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 comments to the Alternate Decision of Commissioner Bohn Granting SCE a Certificate of Public Convenience and Necessity (CPCN) to Construct the San Joaquin Cross Valley Loop Transmission Project (SJXVL Project), issued June 28, 2010 (Alternate Decision).

Consistent with Rule 14.3(c), SCE’s comments are limited to factual, legal, and technical errors in the Alternate Decision. To the extent that the Alternate Decision contains the same errors as the Proposed Decision of ALJ Yacknin and to which SCE already commented, SCE does not repeat those earlier comments. However, SCE affirms its earlier comments on the Proposed Decision – particularly concerning the erroneous finding that disregards the negative reliability impacts caused by schedule delays due to environmental studies¹ – and respectfully requests that the factual, legal and technical errors be corrected in the final decision. In these

¹ See SCE Comments to Proposed Decision of ALJ Yacknin, pp. 2-4 (citing to the uncontroverted evidence on the record that “**any** delay in the construction of this project is an increased amount of risk for reliable service to the area;” SCE/Tucker, Tr. 169:2-27 (emphasis added)). Only Alternative 1 can feasibly solve the region’s reliability issues by 2012, due to delays of two years or longer for required environmental studies to address findings in the Final Environmental Impact Report that presume the presence of critical habitat on all other routes, including Alternative 2. See also, SCE Opening Brief, pp. 8-11.

comments, SCE focuses on the new findings of the Alternate Decision. As discussed below, SCE recommends the adoption of key revisions to the Alternate Decision to correct several important legal and factual errors, as set forth in Appendix A.

I.

THE ALTERNATE DECISION ERRONEOUSLY IMPOSES A FUNDING REQUIREMENT ON RATEPAYERS FOR VISALIA’S GREEN PATHWAY

The Alternate Decision proposes to require SCE ratepayers to fund up to \$2 million for the creation of a landscaped, open-space green pathway under the transmission line in Visalia, and in addition, fund the acquisition of any property rights necessary for the pathway. SCE objects to these funding requirements and urges the Commission to eliminate them from the Alternate Decision for the following reasons. First, the Alternate Decision provides no valid grounds upon which to order SCE to fund Visalia's green pathway. Second, the Alternate Decision establishes damaging precedent for all public utilities and ratepayers in California. Third, the Alternate Decision does not provide for a corresponding \$2M increase in the CPUC’s recommended cost cap, nor does it provide any mechanism for recovery of undefined property rights acquisition costs associated with the development of the green pathway. Finally, the Alternate Decision fails to consider potential issues associated with the green pathway requirement that could negatively impact the construction of the Project.

The Alternate Decision justifies a \$2 million ratepayer contribution to subsidize Visalia’s ongoing green pathway project, exclusive of any SCE costs incurred in the acquisition of undefined property rights, on the basis that the contemplated transmission line project “worsens the impact to the community, particularly as the right of way is adjacent to existing and planned residential and commercial structures.”² However, there are no findings or facts within the Alternate Decision that support the need for this additional mitigation measure. In fact, this

² Alternate Decision, p. 36.

statement is contradictory to and inconsistent with other conclusions in the Alternate Decision. The Alternate Decision finds that while the Commission has a duty to consider community values under Pub. Util. Code § 1002(a), “consistent with Commission precedent,”³ the Commission makes these considerations “in the course of [its] environmental review pursuant to CEQA.”⁴ Upon full consideration of impacts to planned development, the Commission had already found that “the proposed project would not encroach on the planned development, and the EIR reasonably determined that the proposed project’s proximity to the planned development does not cause a significant adverse impact; accordingly, no mitigation is required.”⁵ Thus, the Alternate Decision’s order to require \$2 million of ratepayer funds to subsidize Visalia’s green pathway in spite of the Commission’s conclusion that the Project does not create any impacts to the planned Visalia development is erroneous and should be stricken.

If SCE ratepayers are nevertheless required to fund \$2 million towards Visalia’s green pathway based on an unsupported assertion that transmission lines are “potential eyesores,”⁶ there would be no stopping local jurisdictions from asserting the same claim for ratepayer funding of their own projects each time a public utility transmission line project is before the Commission. Because of the broad unsupported statements made in this Alternate Decision, there is no telling how many planned or future local projects could similarly request funding, and what the future fiscal impact could be to public utilities and ratepayers if the Alternate Decision is adopted by a vote of the Commission. Additionally, assuming *arguendo* that SCE’s contribution to Visalia’s green pathway project is appropriate mitigation, which it is not, the Alternate Decision contains no justification to support the \$2 million amount.

Further, the alternate decision also does not provide for a corresponding \$2M increase the CPUC’s recommended cost cap, nor does it provide any mechanism for recovery of undefined

³ Alternate Decision, p. 24 (citing to *Lodi Gas Storage*, D.00-05-048, p. 28).

⁴ Alternate Decision, p. 24.

⁵ Alternate Decision, p. 25.

⁶ Alternate Decision, p. 36.

property rights acquisition costs associated with development of the green pathway. These additional cost elements reflect additional project scope that was not specifically included in cost testimony previously provided by SCE to the Commission, and accordingly, should be added to the CPUC's recommended cost cap.

Finally, the Alternate Decision requires SCE to jointly fund and enact improvements within the right of way corridor without any regard or investigation as to whether the improvements proposed by Visalia are even feasible without jeopardizing the constructability, timing, or primary purpose of the Project, or further posing safety hazards or operational hinderances. Before the Commission should require SCE ratepayer funds to be used towards this green pathway, there should be at least some review of whether the green pathway is a consistent use for these rights of way, which cannot happen until there is an engineering review of detailed plans.

For the reasons set forth above, SCE believes that the Alternate Decision should be modified to eliminate the requirement that SCE ratepayers be required to fund any portion of Visalia's proposed green pathway within the transmission corridor.

If, despite these errors, the Commission nevertheless chooses to adopt the Alternate Decision ordering SCE to develop Visalia's green pathway, SCE would, at a minimum, request the following modifications be made to the Alternate Decision:

1. The Commission should provide clear, reasonable justification within the Alternate Decision for adopting the proposed additional mitigation so that the bounds of this new requirement are better understood, as it represents a significant change in how the CPUC conducts environmental analysis under CEQA, which could have important ramifications on future transmission projects.

2. The Alternate Decision should provide a clear understanding of how the \$2 million amount was derived in order for all public utilities to plan for the precedential effects of the

Alternate Decision, including how SCE should plan to estimate the cost for similar community funding requirements on all future transmission projects.

3. The Alternate Decision should make clear that SCE would work cooperatively with Visalia to develop a green pathway that would be subject to SCE's primary need to use the transmission right of way for its primary purpose: the transmission of electricity. Any secondary development within the right of way should be subordinate to the primary use of the right of way and only allowed to the extent, and under terms and conditions that make a green pathway compatible with the safe and reliable construction, operation and maintenance of the transmission line.

4. The Alternate Decision should clarify that SCE's requirement to cooperate with Visalia should not jeopardize the timing or construction of the Proposed Project. For example, the Alternate Decision is not clear whether SCE would be responsible for obtaining necessary property rights solely for Visalia's green pathway project. SCE should not be in a position of having to acquire property rights on behalf of the City due to the risk such acquisitions may have to the Project construction schedule, or to acquire any property rights, at SCE's expense, solely for Visalia's green pathway.

5. The Alternate Decision should increase the estimate of maximum reasonable cost for the project by \$2 million.

II.

THE ALTERNATE DECISION STILL INCLUDES ERRONEOUS ASSUMPTIONS CONCERNING CONTINGENCY PRIOR TO FINAL ENGINEERING

Although the Alternate Decision improves upon the Proposed Decision's erroneous rejection of SCE's requested 30.6% contingency cost for Alternate 2,⁷ the final decision still requires further clarification. Importantly, the Alternate Decision does correct a major error of the Proposed Decision by adopting a mechanism that enables SCE to file a revised cost estimate

⁷ See Proposed Decision, p. 41.

with the Commission and thereafter seek an adjustment to the maximum cost cap once SCE has developed a final detailed engineering design-based construction estimate.⁸ However, the Alternate Decision still erroneously reduces project contingency to 15 % prior to final engineering by improperly retaining and agreeing with certain erroneous language of the Proposed Decision that “Generally, by the time an electric utility files an application for authority to construct a power line or substation, the utility should know the final cost of the project to within 15%.”⁹ As explained in SCE’s testimony and earlier comments, contingency should be based on the degree of uncertainty in the project’s scope and uncertainty in the estimated costs for the project at this stage of the project’s development.¹⁰ The amount of contingency will decrease as the project scope is better defined, such that “as the SJXVL project progresses from the conceptual stage to the preliminary stage or planning stage to the final engineering stage, the contingency amount, as a percentage of the estimate, will decrease.”¹¹

SCE proposed a 30.6% contingency for Route Alternative 2 because at the time the application was filed – and indeed still today – that alternative route is only at the conceptual engineering stage, which means that there are significant uncertainties that could affect costs.¹² The Alternate Decision’s discussion implies that the utility should have cost estimates within a contingency margin appropriate for final engineering at the time the utility files its CPCN application – especially for what was developed as an alternative route to the route recommended by the utility that was more developed. This is contrary to reason and if true, would add significant cost and delay to the process by essentially requiring development of transmission route engineering to final quality before the application is even submitted, the final route is

⁸ Alternate Decision, p. 42.

⁹ Alternate Decision, p. 41 (citing to *Tehachapi Renewable*, D.09-12-044, at pp. 70-71).

¹⁰ Gokbudak, Ghosh, Ex. 2 at pp. 20-23.

¹¹ Gokbudak, Ghosh, Ex. 2 at p. 22.

¹² Gokbudak, Ghosh, Ex. 2 at pp. 18, 22 (“the SJXVL cost estimates are based only on . . . conceptual engineering available for Alternatives 2, 3 and 6.”). These uncertainties include the defined scope uncertainties, errors or omissions within the defined scope, unanticipated problems associated with the scope of work involved, rework provisions, material quantity uncertainties, material pricing uncertainties, labor cost uncertainties, change in market conditions (particularly in Engineering, Procurement and Construction), outage scheduling risk, land acquisition cost uncertainties, and environmental and cultural mitigation. Gokbudak, Ghosh, Ex. 2 at pp. 18, 22.

known, or the mitigation measures are determined. Thus, the final decision should be modified to remove this language and make clear that the Commission does not require such precise engineering for a proposed route or route alternatives before the project is even submitted for licensing.

Although the Alternate Decision provides for a mechanism to adjust the maximum and prudent cost estimate via advice letter after final engineering, the Commission should recognize that in future applications, utilities will necessarily need to submit cost estimates based on conceptual or preliminary engineering, which necessitate a higher contingency margin that the Alternate Decision implies is reasonable.

III.

CONCLUSION

For all of the reasons discussed above, the Alternate Decision should be modified to correct the factual, legal and technical errors to ensure that the record and the final decision are legally and factually accurate. Further, for all of the reasons set forth in SCE's earlier comments to the Proposed Decision, the final decision should be modified to correct the errors that remain in this Alternate Decision.

Respectfully submitted,

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APPENDIX A

PROPOSED MODIFICATIONS

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SCE recommends the following changes be made to the text, Findings of Fact, Conclusions of Law, and Order Paragraphs of the Alternate Proposed Decision Granting Southern California Edison Company a Certificate of Public Convenience and Necessity for the San Joaquin Cross Valley Loop Transmission Project issued in A.08-05-039 on June 28, 2010.¹³ A page citation to that Proposed Decision is provided in brackets for the changes that SCE proposes.

Added language is indicated by underline
Deleted language is indicated by ~~strike-through~~

Proposed Modifications to Findings of Fact

- [p. 42] 6. Alternative ~~2~~ 1 is the environmentally superior route.
- [p. 43] 10. Alternative ~~2~~ 1 is feasible.
- [p. 43] 11.supports our approval of Alternative ~~2~~ 1, despite its significant unavoidable impacts. As such, the benefits of Alternative ~~2~~ 1 outweigh and override its significant and unavoidable impacts.
- [p. 43] 12. Alternative ~~2~~ 1 includes no-cost and low-cost measures....
- [p. 44] ~~13. Visalia's proposal to require SCE to work with Visalia to undertake all steps necessary to develop a multi-use, green pathway within the transmission corridor that runs through Visalia, wit the modifications discussed herein, is reasonable and consistent with the Commission's consideration of community values.~~
- [p. 44] 14. The reasonable and prudent cost of Alternative ~~2~~ 1 is \$103,396,000.

Proposed Modifications to Conclusions of Law

¹³ Note: These proposed edits do not include all necessary changes to discussion to conform to SCE's recommendation that the Commission authorize Alternative 1 instead of Alternative 2, but focuses mainly on those errors in the Proposed Decision needs to be corrected, plus changes to all Findings of Fact, Conclusions of Law, and Ordering Paragraphs.

- [p. 43] 1. SCE should be granted a CPCN for Alternative ~~2~~ 1 of the proposed....
- [p. 43] 3. Energy Division shall ~~SCE should be directed to~~ serve the MMRCPC on all landowners within 300 feet of Alternative ~~2~~ 1, as identified....
- [p. 44] ~~5. SCE should implement Visalia's proposal for the development of a multi-use green pathway, with the modifications proposed herein.~~
- [p.44] 6. The maximum cost of Alternative 1 should be set at \$103.396 million, excluding AFUDC.

Proposed Modifications to Ordering Paragraphs

- [p. 44] 1. Southern California Edison Company is granted a Certificate of Public Convenience and Necessity to construct the San Joaquin Cross Valley Loop Project Alternative ~~2~~ 1 in conformance
- [p. 45] ~~6. The City of Visalia's proposal for the creation of a multi-use green pathway, as modified herein, is approved and Southern California Edison Company is directed to implement this proposal.~~
- [p. 45] 6. The maximum cost of Alternative 1 should be set at \$103.396 million, excluding Allowance for Funds Used During Construction. Once SCE has developed a final detailed engineering design-based construction estimate for the final route, SCE shall, within 30 days, file with the Commission an advice letter with the revised cost estimate and seek an adjustment of the amount of maximum reasonable and prudent costs pursuant to Public Utilities Code section 1005.5(b).

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) COMMENTS ON ALTERNATE DECISION OF COMMISSIONER BOHN** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address.

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Executed this 19th day of July, 2010, at Rosemead, California.

/s/ Henry Romero

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[TOP OF PAGE](#)
[BACK TO INDEX OF SERVICE LISTS](#)