



BEFORE THE PUBLIC UTILITIES COMMISSION OF  
STATE OF CALIFORNIA

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In the Matter of the Application of SOUTHERN )  
CALIFORNIA EDISON COMPANY (U 338-E) )  
for a Certificate of Public Convenience and )  
Necessity Concerning the Devers-Palo Verde )  
No. 2 Transmission Line Project )  
\_\_\_\_\_ )

Application No. 05-04-015  
(Filed April 11, 2005)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)**  
**PETITION FOR MODIFICATION OF DECISION NO. 07-01-040**

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Dated: May 14, 2008

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requests the Commission authorize SCE to construct the Midpoint Substation,<sup>1</sup> near Blythe, California.<sup>2</sup>

Attachment A contains SCE's requested modifications.

## I.

### **OVERVIEW OF SCE REQUEST TO CONSTRUCT DPV2 IN PHASES**

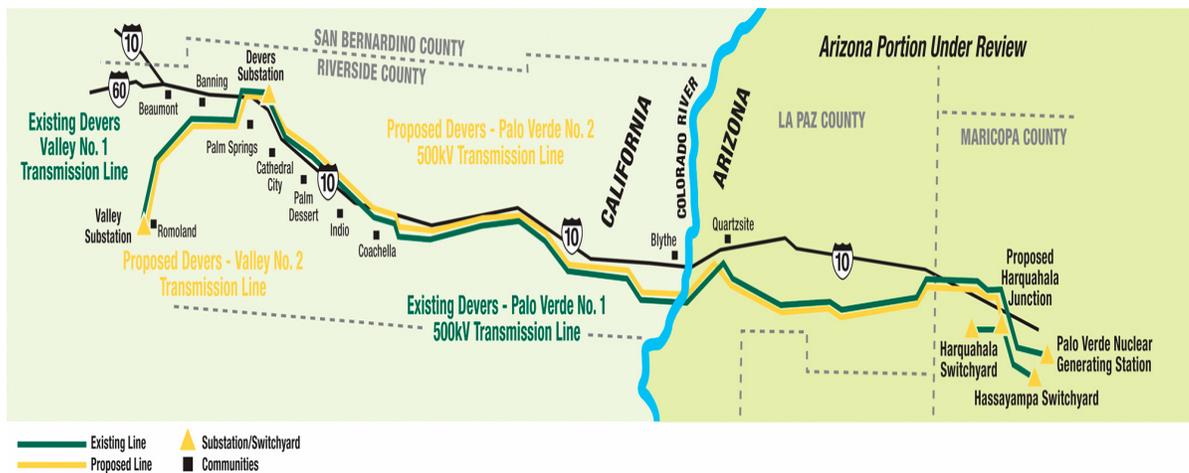
DPV2 involves two major transmission lines. The Devers-Harquahala is a new 500 kV transmission line between Arizona and California. The Devers-Harquahala line is about 230 miles long. About 102 miles is in Arizona. The rest is in California. The Devers-Harquahala line parallels the existing Devers-Palo Verde No. 1 500 kV transmission line for most of its route.

The Devers-Valley No. 2 transmission line ("Devers-Valley No. 2") is a new 500 kV transmission line connecting SCE's Devers and Valley substations in California. It is about 41.6 miles long. Devers-Valley No. 2 is entirely within California and parallels SCE's existing Devers-Valley No. 1 line in California.

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<sup>1</sup> The Midpoint Substation scope of work for the purposes of this filing is a transmission switchyard ("Midpoint Switchyard"), which includes the electrical facilities and associated equipment necessary to construct a 500 kV switchrack to terminate the Devers-Palo Verde No. 1 transmission line and DPV2. The Midpoint Switchyard does not include transformers that may later be added to interconnect future generators and transmission. If and when transformers are added to the Midpoint Substation, it would not be a part of the DPV2 costs referenced in Section I.D of this Petition. The transformers would be paid for by generators through the Large Generator Interconnection process. The "Midpoint Switchyard" is referred to as "Midpoint Substation" in the Final EIR/EIS, and will be referred to as "Midpoint Substation" hereinafter. See, Ex. 35, Final EIR/EIS, Vol. 1, Section C.4.4.1, p. C-20.

<sup>2</sup> As discussed later in this Petition, there are two possible locations for the Midpoint Substation. SCE originally proposed the Midpoint Substation as an option for the DPV2 project. The Final EIR/EIS evaluated two locations: (a) the Midpoint Substation that SCE proposed, and (b) the substation that Desert Southwest Transmission Project proposed, called the "Midpoint-DSW Substation" about five miles away. Both locations were evaluated and are discussed in the Commission's Decision and the Final EIR/EIS.



DPV2 was approved by the Commission,<sup>3</sup> the California Independent System Operator (“CAISO”),<sup>4</sup> the United States Department of Interior’s Bureau of Land Management (“BLM”),<sup>5</sup> and the United States Fish and Wildlife Service.<sup>6</sup>

On June 6, 2007,<sup>7</sup> the Arizona Corporation Commission (“ACC”) issued a decision that denied SCE’s request for a permit to site the DPV2 facilities in Arizona. SCE is strongly committed to a successful project in Arizona. SCE intends to pursue its ongoing work with Arizona stakeholders toward reconfiguring DPV2 transmission facilities in Arizona in order to reach consensus on an acceptable project.

In the interest of preserving all its options, SCE has appealed the ACC’s DPV2 decision.<sup>8</sup> SCE is also pursuing the authority Congress granted the Federal Regulatory Commission (“FERC”) to site transmission facilities under the siting provisions of the Energy Policy Act of 2005.

<sup>3</sup> On January 25, 2007, the Commission issued D.07-01-040, which approved SCE’s request to construct DPV2.

<sup>4</sup> On February 24, 2005, California Independent System Operator (“CAISO”) issued a report which found that DPV2 is a necessary and cost effective addition to the electrical grid.

<sup>5</sup> The Joint CPUC/BLM Final Environmental Impact Report/Environmental Impact Statement (“EIR/EIS”) was published on October 25, 2006. BLM has not yet issued a Right-of-Way permit.

<sup>6</sup> On May 18, 2007, the United States Fish and Wildlife Service granted SCE a Right-of-Way Grant through the KOFA Wildlife Refuge.

<sup>7</sup> The ACC voted on May 30, 2007. The ACC decision is dated June 6, 2007.

<sup>8</sup> The appeal has been stayed by joint motion to facilitate the working relations between SCE and the ACC on the DPV2 project.

On February 25, 2008, SCE met with FERC's Office of Energy Projects for an Initial Consultation. This meeting initiated what FERC requires under its "Pre-Filing" process. FERC's process envisions up to one year of "Pre-Filing" activities before a formal application may be filed at FERC. SCE believes that this affords all interested parties the opportunity to develop a solution acceptable to SCE, the ACC, and Arizona stakeholders for the transmission facilities to be sited in Arizona.

Meanwhile, in this petition, SCE requests that the Commission modify D. 07-01-040 to authorize SCE to construct DPV2 facilities in phases. Specifically, SCE requests that the Commission authorize SCE to begin constructing the DPV2 facilities in California. SCE also requests the Commission authorize SCE to construct the Midpoint Substation, near Blythe, California.

SCE's petition is due to the ACC decision denying a permit to construct DPV2 in Arizona. SCE is committed to constructing the DPV2 facilities that will allow DPV2 to terminate in Arizona. In the Commission evidentiary hearings on the need for DPV2, all parties agreed that DPV2 is cost-effective and needed. The Utility Reform Network ("TURN"),<sup>9</sup> the Division of Ratepayer Advocates ("DRA"),<sup>10</sup> and the CAISO<sup>11</sup> called DPV2 a clear winner for ratepayers.

SCE requested that the Commission to approve the acceleration of SCE's construction of the California phase of DPV2. This request does not change the cost-effectiveness of the DPV2 project. Although the full project benefits are not expected to commence until the 2012

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<sup>9</sup> TURN, Phase 1, Opening Brief, p. 1 ("TURN agrees with what is essentially the consensus view of the parties that the proposed DPV2 project is likely to be a cost-effective investment for ratepayers. The Commission can make such a finding here with considerable comfort, given that the economics of the project have undergone substantial review by several different parties using different methods and all have reached effectively the same conclusion.").

<sup>10</sup> DRA, Phase 1, Opening Brief, p. 1 ("DRA recommends that the Commission grant the CPCN, as the DPV2 project likely will be a cost-effective investment for ratepayers.").

<sup>11</sup> The CAISO estimated that the benefits from DPV2 will exceed its costs under a wide variety of future system conditions and that the expected benefit-cost ratio ("BCR") comfortably ranges from 1.2 to 3.2. In fact, Mr. Florio, witness for TURN, expressed greater confidence in the CAISO's analysis reflecting a BCR of 3.2, making the line "a pretty clear winner for ratepayers".

timeframe, DPV2 will still provide net benefits. Based on Exhibit 6, even if the first three years of benefits from DPV2 (2009, 2010, and 2011) were removed, the DPV2 would still have significant net benefits.<sup>12</sup>

SCE has received a large number of interconnection requests for new generation in the Blythe area. Development of these projects requires construction of the California portion of the DPV2 project if the power from these projects is to reach markets in Southern California. SCE requests that the Commission authorize SCE to begin constructing the DPV2 facilities in California, including the Midpoint Substation, to achieve timely access to the potential new renewable generation in this region.

## **II.**

### **SCE’S REQUEST WILL ALLOW SCE TO ACCESS POTENTIAL NEW RENEWABLE GENERATION NEAR BLYTHE, CALIFORNIA**

#### **A. SCE Has Received Interconnection Requests for Over 5000 MW of Renewable Power in the Blythe Area Since the Commission Approved DPV2**

On January 25, 2007, the Commission approved SCE’s request to construct DPV2. As shown in Table 1, over 5000 MW of new renewable generation and over 1200 MW of new conventional gas-fired generation have requested interconnection in the Blythe area. (See, Attachment B, the Declaration of Robert J. Lugo.)

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<sup>12</sup> See, SCE Ex. 6. This is illustrative only and not a cost-effectiveness analysis.

<b>Table 1</b>	
<b>New Generation Interconnection Requests In The Blythe Area (MW)</b>	
Renewable	
Midpoint	2750
Julian Hinds-Eagle Mountain Area	<u>2378</u>
Total Renewable	5128
Conventional Gas-Fired MW	
Midpoint	1210
Total Requests to Interconnect	
Midpoint (2750 + 1210)	3960
Julian Hinds-Eagle Mountain Area	<u>2378</u>
Total	6338

**B. The California Portion of DPV2 is Needed to Access New Renewable Generation in the Blythe Area**

SCE is committed to constructing the DPV2 facilities in Arizona and is working with Arizona stakeholders to reconfigure the project in a way that provides greater value to Arizona and the Southwest, and ultimately leads to receiving a permit to construct the Arizona facilities. However, SCE requests that the Commission allow SCE to accelerate construction of the DPV2 facilities in California.

The potential for renewable generation development in the Blythe area is significant. For example, the March 2008 California Energy Commission’s Renewable Energy Transmission Initiative Phase 1A Report shows 317,920 MW of Solar Thermal potential in the Mohave and Imperial areas. More specifically, since November, 2006, SCE has received requests for 5128 MW of renewable generation to interconnect in the Blythe area. This includes requests received in May 2008 from two solar projects representing 1050 MW.

Pursuant to the Energy Policy Act of 1993 and FERC’s Large Generator Interconnection Procedures, SCE is obligated to interconnect these generation resources. To the extent that the generation in the Blythe area develops, the DPV2 California facilities would be needed to deliver

the power to Southern California load centers. And, Midpoint Substation will be needed to allow the potential new generation in the Blythe area to interconnect with the Southern California transmission system. (See, Attachment C, the Declaration of Dana Cabbell). SCE requests that the Commission authorize SCE to construct the DPV2 facilities in California, in order to access renewable power potential in the region.

Under Public Utilities Code § 399.25(b)(4), the Commission shall allow prudently-incurred costs not approved for recovery in general transmission rates by FERC to be recovered in CPUC-jurisdictional rates, if the new transmission facilities facilitate RPS goals. SCE is not requesting in this petition that the Commission authorize cost-recovery under Pub. Util. Code § 399.25. However, it reserves the right to do so in the future.

**C. The Commission Fully Analyzed the Environmental Impacts of the Midpoint Substation**

SCE originally proposed constructing of the Midpoint Substation near Blythe, California and adjacent to the proposed Devers-Harquahala 500 kV transmission line. SCE proposed the Midpoint Substation as an optional component of DPV2.<sup>13</sup>

In the Final EIR/EIS, the Commission fully evaluated the environmental impacts of the Midpoint Substation at two locations.<sup>14</sup> The Commission fully evaluated two locations for a substation to interconnect generation in the Blythe area: (a) Midpoint-Desert Southwest Substation (called “Midpoint-DSW Substation” in the Final EIR/EIS) , and (b) the substation

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<sup>13</sup> Ex. 35, Final EIR/EIS, Vol. 1, ES-8.

<sup>14</sup> Ex. 35, Final EIR/EIS, Vol. 1, Section C.4.4.1, p. C-20, footnote 6 (“A proposed new substation in the Blythe area is referred to as ‘Midpoint’ by both DSWTP (see Section 4.4.1 above) and SCE in their respective applications; however, the actual locations of their respective Midpoint Substations differ, as is shown in Figure Ap.1-10 (DSWTP’s Midpoint Substation would be approximately 5 miles northwest of SCE’s proposed Midpoint Substation location). In a comment on the Draft EIR/EIS, the DSW proponents asked that the CPUC and BLM consider designation of this substation location as an acceptable location for SCE to interconnect with the DSW transmission line from the Blythe power plants. As stated in Ex. 36, Final EIR/EIS, Vol. 2, Section E.2.1.3, p. E-12 (Proposed Project vs. Desert Southwest Transmission Project Alternative), the two substation sites are considered to be comparable and equally environmentally superior/preferable.”)

SCE originally proposed (called “Midpoint Substation” in the Final EIR/EIS).<sup>15</sup> These two substations are located about five miles apart. The Final EIR/EIS states that the “Midpoint Substation” and “Midpoint-DSW Substation” are comparable, and equally environmentally superior/preferable:

“The Midpoint-DSW Substation was fully analyzed in this EIR/EIS as a component of the DSWTP, and was found to be comparable to the Midpoint Substation location identified by SCE. Both sites are on BLM land, and no significant environmental impacts would result from construction of a substation at either site. As a result, this EIR/EIS concludes that the two sites are comparable, and equally environmentally superior/preferable.”<sup>16</sup>

During evidentiary hearings, SCE was in discussions with the parties interested in the substation. Because these discussions were then preliminary in nature, SCE did not then request that the Commission authorize SCE to construct the substation at either location.

SCE now requests that the Commission authorize SCE to construct the Midpoint Substation.<sup>17</sup> The exact location of the DSW-Midpoint Substation and the analysis is in the Final EIR/EIS in Volume 2 at page E-12.<sup>18</sup>

**D. The Commission Ordered SCE to File An Advice Letter to Update DPV2 Costs and the Final Route Was Known and Final Engineering is Complete**

As a procedural matter, SCE requests that the Commission maintain the adopted maximum cost adopted by the Commission in D.07-01-040 at this point in time. SCE will provide the updated maximum costs at a later date, once the final route is known and it has completed final engineering as provided in D.07-01-040:

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<sup>15</sup> See, e.g., Ex. 35, Final EIR/EIS, Vol. 1, p. C-20, footnote 6, and Ex. 36, Final EIR/EIS, Vol. 2, Section E.2.1.3, p. E-12.

<sup>16</sup> (Emphasis added). Final EIR/EIS, Vol. 2, Section E.2.1.3, p. E-12.

<sup>17</sup> The preferred location is the Midpoint-DSW location described in the Final EIR/EIS, provided that SCE can reach an acceptable agreement with the Desert Southwest Power Project.

<sup>18</sup> See, e.g., discussion in Ex. 35, Final EIR/EIS, Vol. 1, pp. C-20 to C-22, Section C.4.4.1 at pp. C-20 to C-22, and Ex. 35, Final EIR/EIS, Vol. 2, Section E.2.1.3, pp. E-12, Midpoint-DSW Substation.

“If SCE’s final detailed engineering design-based construction estimates for the authorized project exceeds the authorized maximum cost, SCE should seek an increase in the approved maximum cost pursuant to § 1005.5(b), to allow the Commission to assess whether the cost increases affect the cost effectiveness and need for the DPV2 project.”<sup>19</sup>

Some background may be helpful.

In D.07-01-040, the Commission approved approximately \$545,285,000 (2005 dollars direct, contingency, P&B, and A&G), as the maximum cost for DPV2, subject to certain adjustments:

“10. Pursuant to Pub. Util. Code § 1005.5(a), the maximum cost determined to be reasonable and prudent for the DPV2 project, including pension and benefits, and administrative and general expenses, but excluding, Allowance for Funds Used During Construction, is \$545,285,000 in 2005 dollars, to be decreased by \$24,080,000 if the Devers-Harquahala line is terminated by Harquahala Junction and increased by \$8,282,000 if the Alligator Rock-North of Desert Center route segment is used. The Handy-Whitman Index of Public Utility Construction Costs shall be used in assessing compliance with the authorized maximum cost.”<sup>20</sup>

The Commission recognized that SCE’s cost-estimates were based on preliminary engineering. The Commission ordered SCE to update its costs via an Advice Letter, based on the final route. SCE was to update its cost if the final detailed engineering for the final route resulted in design-based construction estimates that are higher, or lower than the Commission authorized in D.07-01-040:

“12. If SCE’s final detailed engineering design-based construction estimate for the authorized project exceeds the authorized maximum cost, SCE shall, within 30 days, file an advice letter to seek an increase in the approved maximum cost pursuant to § 1005.5(b), and shall address whether the cost increases affect the cost effectiveness and need for the DPV2 project.”<sup>21</sup>

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<sup>19</sup> D.07-01-040, mimeo., p. 107, Conclusion of Law No. 108.

<sup>20</sup> D.07-01-040, mimeo., p. 115, Ordering Paragraph No. 10.

<sup>21</sup> D.07-01-040, mimeo., pp. 115-116, Ordering Paragraph No. 11.

And:

“Once SCE has developed a final detailed engineering design-based construction estimate for the final route, if this estimate is one percent or more lower than the authorized maximum reasonable and prudent cost identified in Conclusion of Law 10, SCE shall, within 30 days, file and advice letter to show cause why the Commission should not adopt a lower amount as the maximum reasonable and prudent cost to reflect the final estimate.”<sup>22</sup>

SCE believes that the Commission did not intend for SCE to be filing multiple advice letters ‘updating’ the cost, based on regulatory events or before the final route was determined.

**E. SCE Will File An Advice Letter With The Costs Of The DPV2 Project, Using The Process Ordered By The Commission In D.07-01-040**

SCE is seeking approval to construct DPV2 in phases. The first phase of construction would occur in California to provide access to renewable generation being developed in the Blythe area. The California phase would involve the following transmission facilities:

- The Devers-Valley No. 2 transmission line, which is the same transmission line component of DPV2;
- A transmission line segment from SCE’s existing Devers substation to the proposed Midpoint Substation (i.e., essentially to the California border); and
- The Midpoint Switchyard near Blythe, California.

SCE envisions a separate construction phase in Arizona to begin when the permit to construct the DPV2 facilities in Arizona is obtained through the ACC or FERC regulatory process. This phase of construction would complete DPV2 in Arizona. It would involve the transmission line segment from the Midpoint Substation (essentially the California border) to the eastern terminus of DPV2 at Harquahala Junction in Arizona.

The Commission’s order adopted SCE’s uncontested costs estimates in Exhibit 31. However, SCE did not provide separate costs for these three components. A rough delineation

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<sup>22</sup> D.07-01-040, mimeo., p. 115, Ordering Paragraph No. 115.

of the costs that were provided in evidentiary hearings, is shown in Table 2 below, as supported by Attachment D, the Declaration of Marco Ahumada, SCE’s project manager, attached.

<b>Table 2</b>	
<b>Costs For DPV2</b>	
<b>(\$2005, based on preliminary estimates provided in Exhibit 31)</b>	
Devers-Valley No. 2	\$ 90 million
Devers to the California Border (without Midpoint)	\$267 million
California Border to the Harquahala Junction	<u>\$188 million</u>
Total	\$545 million

The total cost will increase by the cost of constructing the Midpoint Switchyard. As shown in Attachment E, SCE’s current estimate for the switchyard is that it will add approximately \$101.9 million (in 2008 dollars including pensions and benefits, administrative and general overheads, not including Allowance for Funds Used During Construction). These costs are for the switchyard only.<sup>23</sup>

SCE proposes to file a separate advice letter with updated costs for the entire DPV2 project. SCE will file the advice letter when SCE knows the final route and has completed final engineering. SCE believes this comports with the Commission’s order to file an Advice Letter with the final detailed construction cost-estimate, once SCE knows the final route, and has completed final engineering.

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<sup>23</sup> See, footnote 1. Ex. 35, Final EIR/EIS, Vol. 1, Section C.4.4.1, p. C-19 (“A proposed new substation in the Blythe area is referred to as ‘Midpoint’ by both DSWTP (see Section 4.4.1 above) and SCE in their respective applications; however, the actual locations of their respective Midpoint Substations differ, as is shown in Figure Ap.1-10 (DSWTP’s Midpoint Substation would be approximately five miles northwest of SCE’s proposed Midpoint Substation location). In a comment on the Draft EIR/EIS, the DSW proponents asked that the CPUC and BLM consider designation of this substation location as an acceptable location for SCE to interconnect with the DSW transmission line from the Blythe power plants. As stated in Ex. 36, Final EIR/EIS, Vol. 2, Section E.2.1.3 (Proposed Project vs. Desert Southwest Transmission Project Alternative), the two substation sites are considered to be comparable and equally environmentally superior/preferable.”)

**III.**

**CONCLUSION**

SCE requests that the Commission authorize SCE to construct the DPV2 facilities in California, including the Midpoint Substation. Granting SCE's request will allow California to access potential new renewable and conventional gas-fired generation in the Blythe area, which will help California achieve its renewable goals and the RPS goals for the state of California.

For all the above reasons, SCE requests that the Commission modify D.07-01-040, as set forth in Attachment A.

Respectfully submitted,

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## ATTACHMENT A

### SCE'S REQUESTED CHANGES TO THE FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDERING PARAGRAPHS IN D.07-01-040

SCE shows its requested changes below. Additions are shown underlined and deletions are shown with strikeout.

#### **Modify Conclusion of Law No. 8, pages 108-109 as follows:**

8. Project approval should be conditioned upon construction according to the following route.

SCE shall pursue permitting the DPV2 facilities in Arizona. If SCE receives approval to construct DPV2 in Arizona either from the Arizona Corporation Commission or the Federal Energy Regulatory Commission, SCE will construct the DPV2 facilities in Arizona in accordance with the permit issued for the Arizona facilities. It is expected that in ~~In~~ Arizona, the DPV2 project should depart from either the Harquahala Generating Station switchyard or a new Harquahala Junction. If the DPV2 project departs from the Harquahala Generating Station switchyard, it should proceed east, paralleling the existing Harquahala- Hassayampa 500 kV line for approximately five miles to its intersection with SCE's existing DPV1 route at the site of the proposed Harquahala Junction. At this point, whether the route departs from the Harquahala Generating Station switchyard or Harquahala Junction, the route should be the same.

At its intersection with DPV1 at Harquahala Junction, the DPV2 route should turn north (paralleling the DPV1 line) for approximately 2.4 miles to where it should cross I-10, and then proceed 3.7 miles to a point northeast of Burnt Mountain. From there the route should turn west and roughly parallel the north side of I-10 and the Central Arizona Project Canal for approximately 20 miles into La Paz County, then turn southwest, crossing to the south of I-10 and proceeding approximately 5 miles to a point where it meets the El Paso Natural

Gas Company (EPNG) pipeline. The route should parallel the EPNG pipeline and DPV1 for approximately 56 miles, across the Ranegras Plain where a series capacitor bank should be constructed and through La Posa Plain. The route may follow or deviate from SCE's proposed route in the Kofa area. The route should cross over Arizona Highway 95 and proceed into the Dome Rock Mountains to the summit of Copper Bottom Pass. The route should turn southwest and descend the western slope of the Dome Rock Mountains to reach the Colorado River.

SCE is authorized to construct the DPV2 facilities in California along the following route. The route should cross the Colorado River into California and generally follow the DPV1 right of way to SCE's Devers substation. The route should pass into the Palo Verde Valley, five miles south of Blythe, California and should proceed westerly approximately ten miles to the top of the Palo Verde Mesa. From that point on the Mesa, the route should turn northwest and continue to a point approximately two miles south of the I-10 and five miles southwest of the Blythe Airport, which is the site of the proposed Midpoint-DSW Substation. From the Midpoint Substation, the route should turn northwest to a point two miles south of I-10 and five miles southwest of Blythe Airport. ~~At this point, the route should turn~~ west following the DPV1 line to a point five miles east of Desert Center. DPV2 should either follow the DPV1 route for 10.6 miles or the North of Desert Center route for 11.8 miles north of I-10 and Desert Center to avoid the Alligator Rock Area ACEC. On the west side of Alligator Rock ACEC and south of I-10, the route should continue west for another 24 miles, passing a site where a series capacitor should be constructed, to a point in Shavers Valley where it should turn north and cross I-10 about two miles east of the Cactus City Rest Stop. After crossing I-10, the route should continue west-northwest, parallel to the DPV1 line for 46 miles to the Devers substation.

The route west of the Devers substation should leave Devers in a westerly direction paralleling SCE's existing Devers-Valley No. 1 line for 41.6 miles. The route should cross into the San Bernardino National Forest and the Santa Rosa and San Jacinto Mountains National Monument and parallel the Devers-Valley

No. 1 line westerly and southwesterly until it terminates at SCE's Valley substation.

**Add Additional Finding of Fact to state:**

\_\_\_ SCE should be authorized to construct the Midpoint Substation.

**Add Additional Finding of Fact to state**

\_\_\_ In total, renewable projects in the current CAISO queue for the Blythe area exceed 5000 MWs in capacity. The DPV2 facilities in California would accommodate output from anticipated renewable facilities near the proposed Midpoint and Julian Hinds-Eagle Mountain substations near Blythe, California.

**Modify Ordering Paragraph No. 2, pages 112-113 as follows:**

2. SCE shall, as a condition of the CPCN, build the DPV2 project in accordance with the following route:

SCE shall pursue permitting the DPV2 facilities in Arizona. If SCE receives approval to construct DPV2 in Arizona either from the Arizona Corporation Commission or the Federal Energy Regulatory Commission, SCE will construct the DPV2 facilities in Arizona in accordance with the permit issued for the Arizona facilities. It is expected that in ~~In~~ Arizona, the DPV2 project should depart from either the Harquahala Generating Station switchyard or a new Harquahala Junction. If the DPV2 project departs from the Harquahala Generating Station switchyard, it should proceed east, paralleling the existing Harquahala- Hassayampa 500 kV line for approximately five miles to its intersection with SCE's existing DPV1 route at the site of the proposed Harquahala Junction. At this point, whether the route departs from the Harquahala Generating Station switchyard or Harquahala Junction, the route should be the same.

At its intersection with DPV1 at Harquahala Junction, the DPV2 route should turn north (paralleling the DPV1 line) for approximately 2.4 miles to where it should cross I-10, and then proceed 3.7 miles to a point northeast of Burnt

Mountain. From there the route should turn west and roughly parallel the north side of I-10 and the Central Arizona Project Canal for approximately 20 miles into La Paz County, then turn southwest, crossing to the south of I-10 and proceeding approximately 5 miles to a point where it meets the El Paso Natural Gas Company (EPNG) pipeline. The route should parallel the EPNG pipeline and DPV1 for approximately 56 miles, across the Ranegras Plain where a series capacitor bank should be constructed and through La Posa Plain. The route may follow or deviate from SCE's proposed route in the Kofa area. The route should cross over Arizona Highway 95 and proceed into the Dome Rock Mountains to the summit of Copper Bottom Pass. The route should turn southwest and descend the western slope of the Dome Rock Mountains to reach the Colorado River.

SCE is authorized to construct the DPV2 facilities in California along the following route. The route should cross the Colorado River into California and generally follow the DPV1 right of way to SCE's Devers substation. The route should pass into the Palo Verde Valley, five miles south of Blythe, California and should proceed westerly approximately ten miles to the top of the Palo Verde Mesa. From that point on the Mesa, the route should turn northwest and continue to a point approximately two miles south of the I-10 and five miles southwest of the Blythe Airport, which is the site of the proposed Midpoint-DSW Substation. From the Midpoint Substation, the route should ~~turn northwest to a point two miles south of I-10 and five miles southwest of Blythe Airport~~ At this point, the route should turn west following the DPV1 line to a point five miles east of Desert Center. DPV2 should either follow the DPV1 route for 10.6 miles or the North of Desert Center route for 11.8 miles north of I-10 and Desert Center to avoid the Alligator Rock Area ACEC. On the west side of Alligator Rock ACEC and south of I-10, the route should continue west for another 24 miles, passing a site where a series capacitor should be constructed, to a point in Shavers Valley where it should turn north and cross I-10 about two miles east of the Cactus City Rest Stop. After crossing I-10, the route should continue west-northwest, parallel to the DPV1 line for 46 miles to the Devers substation.

The route west of the Devers substation should leave Devers in a westerly direction paralleling SCE's existing Devers-Valley No. 1 line for 41.6 miles. The route should cross into the San Bernardino National Forest and the Santa Rosa and San Jacinto Mountains National Monument and parallel the Devers-Valley No. 1 line westerly and southwesterly until it terminates at SCE's Valley substation.

**Modify Ordering Paragraph No. 7, page 114-115 as follows:**

7. ~~If SCE is authorized requests Commission authorization to construct the Midpoint Substation or any other facilities related to integration of DPV2 and new renewable generation and conventional gas-fired generation near Blythe, California. the Desert Southwest transmission project, SCE shall address environmental and other impacts of upgrades to DPV2 that would be undertaken to integrate DPV2 and the Desert Southwest transmission project.~~

**ATTACHMENT B**

**DECLARATION OF ROBERT J. LUGO**

I, Robert J. Lugo, declare as follows:

1. I am Manager of the Grid Interconnect and Contract Development Group of Southern California Edison Company’s (SCE), Transmission and Distribution Business Unit and have held this position since October 2002. I have personal knowledge of the facts stated herein and, if called as a witness, could and would competently testify thereto.

2. SCE has received interconnection requests representing 5128 MW of new renewable generation, in addition to 1210 MW of new conventional gas-fired generation that is proposed in the Blythe area, as shown in the table below.

<b>New Generation Interconnection Requests In The Blythe Region (MW)</b>	
Renewable	
Midpoint	2750
Julian Hinds-Eagle Mountain Area	<u>2378</u>
Total Renewable	5128
Conventional MW	
Midpoint	1210
Total Requests to Interconnect	
Midpoint (2750 + 1210)	3960
Julian Hinds-Eagle Mountain Area	<u>2378</u>
Total	6338

3. In late 2007 and early 2008, renewable projects representing 2750 MW of generation requested interconnection at the Midpoint Substation, in addition to 1210 MW of conventional gas-fired generation also proposing interconnection at the Midpoint Substation. In total, requests received by SCE to interconnect with the proposed Midpoint Substation equal 3960 MW.

4. Additionally, almost 2400 MW of new renewable power projects have requested interconnection in the Julian Hinds and Eagle Mountain area. This is an area in the desert approximately 50 miles from Blythe, California. The Julian Hinds Substation is located approximately twelve miles from the Eagle Mountain Substation.

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

Executed this **14<sup>th</sup> day of May, 2008** at Rosemead, California.

/s/ Robert J. Lugo

---

Robert J. Lugo

**ATTACHMENT C**

**DECLARATION OF DANA CABELL**

I, Dana Cabbell declare as follows:

1. I am the Southern California Edison Company's Manager of Transmission Intertie Planning. I have personal knowledge of the facts stated herein and, if called as a witness, could and would competently testify thereto.

2. My understanding is SCE has received interconnection requests representing 5128 MW of new renewable generation, in addition to 1210 MW of new conventional gas-fired generation that is proposed in the Blythe area, as stated in the Declaration of Robert J. Lugo. Pursuant to the Energy Policy Act of 1993 and FERC's Large Generator Interconnection Procedures, SCE is obligated to interconnect these generation resources.

3. To the extent that the generation in the Blythe area develops, the California portion of DPV2 would be needed to deliver the power to Southern California load centers. Midpoint Substation will be needed to allow the potential new generation in the Blythe area to interconnect with the Southern California transmission system.

4. It is my judgment that that the added transmission capacity from DPV2 will likely be used by a renewable power project within a reasonable period of time.

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

Executed this **14<sup>th</sup> day of May, 2008** at Rosemead, California.

/s/ Dana Cabbell

---

Dana Cabbell

**ATTACHMENT D**

**DECLARATION OF MARCO AHUMADA**

I, Marco Ahumada, declare as follows:

1. I am the Southern California Edison Company’s Project Manager for the Devers-Palo Verde No. 2 Project. I have personal knowledge of the facts stated herein and, if called as a witness, could and would competently testify thereto.

2. At this time, the final engineering for the Midpoint Substation is not complete. As shown in Attachment E, SCE’s current estimate for the substation will add approximately \$101.9 million (in 2008 dollars including pensions and benefits, administrative and general overheads, not including Allowance for Funds Used During Construction). These costs are for the Midpoint Switchyard only.

3. In D.07-01-040, the Commission approved approximately \$545,285,000 (2005 dollars direct, contingency, P&B, and A&G), as the maximum cost for DPV2, subject to certain adjustments. My understanding is that a very rough delineation of the costs that SCE provided in hearings is shown in the table below.

<b>Costs For DPV2 (\$2005, based on preliminary estimates provided in Exhibit 31)</b>	
Devers-Valley No. 2	\$ 90 million
Devers to the California Border (without Midpoint)	\$267 million
California Border to the Harquahala Junction	<u>\$188 million</u>
Total	\$545 million

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

Executed this **14<sup>th</sup> day of May, 2008** at Rosemead, California.

/s/ Marco Ahumada  
\_\_\_\_\_  
Marco Ahumada

## Appendix E

<b>DPV2 Midpoint Substation</b> <b>Cost X \$1,000 in 2008 Constant Dollars</b> <b>Midpoint 500kV Switchyard Elements</b>			
	Description	Type	Total Direct With Contingency
1	Switchyard Construction. Install 500kV facilities and associated equipment to connect DPV1 and Devers-Harquahala transmission lines. Grade and prepare site for an area covering 1900 feet by 1000 feet.	Substation	60,800
2	Loop DPV1 and Devers - Harquahala 500kV Transmission lines into Midpoint Switchyard positions.	Substation	8,100
3	Construct access road to Midpoint Switchyard.	Substation	18,900
4	Provide Station Light and Power for Midpoint Switchyard.	Substation	700
5	Install telecommunication equipment for Midpoint Switchyard.	Telecom	1,400
6	Acquire land and land rights for Midpoint Switchyard.	Realestate	700
<b>Direct Costs with Contingency</b>			<b>90,600</b>
7	<b>Direct Costs without Contingency</b>		<b>\$ 67,000</b>
8	<b>Contingency</b>		<b>\$ 23,600</b>
9	<b>Direct Costs with Contingency (Sub-Total)</b>		<b>\$ 90,600</b>
10	<b>P&amp;B and A&amp;G</b>		<b>\$ 11,340</b>
11	<b>TOTAL SWITCHYARD COST (Cost X \$1,000 in 2008 Constant Dollars)</b>		<b>\$ 101,940</b>
12	<b>AFUDC (Cost X \$1,000 in Nominal Dollars)</b>		<b>\$ 12,718</b>
<p>Notes:</p> <p>AFUDC estimated using 10% incremental cost of capital, "mid-year" convention, and subject to changes in interest rates, amount and timing of capital expenditures. Assumed project work order will close December 2011 with the rest of the DPV2 project.</p> <p>To the extent SCE recovers Construction Work in Progress (CWIP) on any of those expenditures in FERC - jurisdictional transmission rates, SCE would not also record AFUDC on those expenditures.</p>			

**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) PETITION FOR MODIFICATION OF DECISION NO. 07-01-040** 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. First class mail will be used if electronic service cannot be effectuated.

Executed this **14<sup>th</sup> day of May, 2008**, at Rosemead, California.

/s/ Sara Carrillo

\_\_\_\_\_  
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