



**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 (U 338-E)  
for a Certificate of Public Convenience and  
Necessity: Eldorado-Lugo-Mohave Series  
Capacitor Project.

A.18-05-007

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) JANUARY 2026**  
**PETITION FOR MODIFICATION OF DECISION 25-10-012**

**PUBLIC VERSION**

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Dated: **January 6, 2026**

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**I.**

**INTRODUCTION**

Pursuant to California Public Utilities Commission (Commission or CPUC) Rule of Practice and Procedure 16.4 and Ordering Paragraph (OP) 5 of Commission Decision (D.) 20-08-032, Southern California Edison Company (SCE) respectfully submits this January 2026 Petition for Modification (January 2026 PFM) of D.25-10-012, *Decision Granting Southern California Edison Company's Petition for Modification of Decision 20-08-032*. In particular, by this PFM, SCE requests the CPUC adjust the maximum reasonable and prudent cost (MRPC) for the Eldorado-Lugo-Mohave Series Capacitor Project (ELM Project or Project) to account for the cost to implement gas pipeline mitigation measures required by the Final Mitigated Negative Declaration (MND) approved by the Commission for the ELM Project pursuant to the California Environmental Quality Act (Pub. Resources Code § 21000 et seq. CEQA). Specifically, SCE requests an increase in the MRPC of approximately \$33 million in 2019 constant dollars to account for the cost to (1) conduct an alternating current (A/C) study to assess whether the ELM Project would have any impacts to Southern California Gas Company (SoCalGas) gas pipelines that parallel or cross portions of the ELM Project and (2) design and install all necessary

grounding or other measures needed to mitigate any identified impacts (together, the SoCalGas pipeline mitigation work).

On April 19, 2019, SCE submitted an amended application seeking a Certificate of Public Convenience and Necessity (CPCN) for the ELM Project (CPCN Application). In D.20-08-032, the Commission granted a CPCN for the ELM Project and established a MRPC of \$239 million. D.20-08-032 ordered SCE to file a PFM if SCE were ever to seek an increase to the ELM Project MRPC. Pursuant to that Decision and the requirements set forth in CPUC Rules of Practice and Procedure Rule 16.4 which governs PFMs, SCE in May 2023 filed a PFM requesting an increase in the MRPC for the ELM Project to \$295 million (the May 2023 PFM). SCE stated in the May 2023 PFM and subsequent status updates that the SoCalGas pipeline mitigation work could not be made a part of that request because SoCalGas would not determine the full scope of the pipeline mitigation work until September 2025 and SoCalGas would not finalize and provide the full cost estimate to SCE until December 2025.<sup>1</sup> Therefore, although the Commission approved an increase in the MRPC to \$295 million in D.25-10-012, as described in this January 2026 PFM, SCE could not include the cost of the SoCalGas pipeline mitigation work in the May 2023 PFM requesting an increased MRPC.<sup>2</sup> Now that SCE has a complete cost estimate for the SoCalGas pipeline mitigation work, SCE files this January 2026 PFM seeking to again adjust the MRPC to account for the cost of the SoCalGas pipeline mitigation work.

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<sup>1</sup> See SCE's May 2023 PFM at pp. 34-35 ("while SCE has prepared this PFM in order to comply with the Decision's direction that SCE seek an increase prior to exceeding the MRPC, SCE anticipates that a separate additional PFM may be necessary in the future due to additional work scope that has not yet been delineated and remains subject to ongoing analyses. Namely, to protect nearby SoCalGas pipelines from the effects of induced alternating current (AC), SCE likely will have to install physical mitigation facilities, although the scope and cost of this mitigation is not yet known because SCE and SoCalGas are still evaluating the level of mitigation that will be necessary. SCE anticipates that a separate PFM to address the costs associated with the AC mitigation effort may be necessary once those details are known."). Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M509/K793/509793857.PDF>. See also SCE's November 1, 2024 Status Update, p. 15; February 3, 2025 Status Update, p. 15; May 1, 2025 Status Update, p. 15; and August 1, 2025 Status Update, p. 13.

<sup>2</sup> See Section V, below.

To support that request, in this document SCE describes the scope and cost of the required SoCalGas pipeline mitigation work and explains why these costs could not be included as part of the original CPCN Application or May 2023 PFM. SCE demonstrates that this January 2026 PFM is timely filed and that the spend necessary to implement the SoCalGas pipeline mitigation work is reasonable and prudent, particularly because in D.20-08-032 the CPUC found the ELM Project was needed and based on this history recently approved a revised ELM Project MRPC<sup>3</sup>, and the ELM Project cannot be fully in-serviced until the SoCalGas pipeline mitigation work is complete.<sup>4</sup> SCE's proposed revisions to D.25-10-012 are included with this PFM as Appendix A. In addition, this PFM is supported by the Declaration of Selya Juliano Arce (attached as Appendix B), Declaration of Mukhtar Taslim (attached as Appendix C), and the Declaration of Jack Huang (attached as Appendix D).

## II.

### **SUMMARY OF REQUEST FOR RELIEF**

In D.20-08-032, the Commission granted a CPCN for the ELM Project, contingent upon SCE's compliance with the mitigation measures described in the Mitigation, Monitoring, Compliance and Reporting Plan (MMCRP) attached to the approved MND.<sup>5</sup> The MMCRP section titled "Utilities and Service Systems" lists three mitigation measures SCE is required to implement to mitigate potential impacts from the ELM Project on neighboring utilities. In relevant part, these mitigation measures require SCE to coordinate with SoCalGas to conduct an alternating current (A/C) inference study to determine whether the ELM Project would create an "increased risk of corrosion due to induced currents or voltages" on the SoCalGas pipelines that parallel or cross portions of the ELM Project,<sup>6</sup> and, if so, to "use data gathered in the [A/C] interference study to determine appropriate design measures to protect the utility from

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<sup>3</sup> D.25-10-012, OP #1 (approving SCE's May 2023 PFM).

<sup>4</sup> D.25-10-012, pp. 8-9.

<sup>5</sup> D.20-08-032, OP #1.

<sup>6</sup> D.20-08-032, Appendix A, MM UT-1 p. 48 of 105.

corrosion.”<sup>7</sup> Mitigation measure (MM) UT-1 also requires SCE to ensure all necessary grounding or other measures necessary to provide appropriate pipeline mitigation be installed before the in-service date of the ELM Project series capacitors.<sup>8</sup> SCE is prepared to in-service the ELM Project as soon as SoCalGas completes the pipeline mitigation scope of work. SoCalGas estimates that the pipeline mitigation work will be completed by June 2026. SCE anticipates in-servicing the ELM Project later that month.<sup>9</sup>

In D.20-08-032 the Commission acknowledged that costs associated with the ELM Project could increase and directed SCE to file a PFM seeking approval of a revised MRPC if the cost of the project did in fact increase. SCE filed a PFM seeking an increase in the ELM Project MRPC in May 2023 and in D.25-10-012 the CPUC increased the total ELM Project MRPC from \$239 to \$295 million.<sup>10</sup> SCE now files this January 2026 PFM seeking to modify D.25-10-012 to increase the total ELM Project MRPC to \$328 million to account for the costs associated with the SoCalGas pipeline mitigation scope of work.

The ELM Project costs have increased as a result of SCE’s compliance with the MMCRP, specifically MMs UT-1 to UT-3. Consistent with the requirements set forth in D.20-08-032, Rule 16.4 and Pub. Util. Code § 1005.5(b), which specifically allows a utility applicant

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<sup>7</sup> D.20-08-032, Appendix A, MM UT-1 p. 48 of 105.

<sup>8</sup> *Id.*

<sup>9</sup> SoCalGas has stated that its pipeline mitigation work will be completed no later than June 2026. SCE anticipates in-servicing the ELM Project as soon as the SoCalGas work is complete. There is a possibility that SoCalGas may complete the SoCalGas pipeline work sooner than June 2026, but SCE has not received any official communication from SoCalGas as to the expected project completion date. Considering that the CPUC has dismissed PFMs focused on project cost as moot once the project was completed and in use (*see e.g.* D.19-05-006 dismissing SCE’s PFM as moot because CPUC Section 1005.5 does not contemplate a retroactive review of cost cap increases), SCE is filing this PFM seeking an increase in the ELM Project MRPC after receiving the final cost estimates from SoCalGas in December 2025 to provide the CPUC time to consider this PFM before the anticipated June 2026 in-service date.

<sup>10</sup> To avoid confusion due to the different basis of costs, unless otherwise indicated, all costs utilized throughout this PFM have been rounded to the nearest million and are presented in 2019 constant dollars. All nominal costs from years prior to and after 2019 have been converted into 2019 constant dollars using a blend of historical and forecast escalation rates provided by S&P Global Market Intelligence, formerly IHS Global Markit. Specifically, SCE uses the Transmission Plant – Electric Utility Construction, Pacific, forecast. This forecast is as of January 2026.

to seek additional cost recovery beyond that originally set forth in a CPCN Application if the Project costs have increased and the CPUC finds those increased costs reasonable, this January 2026 PFM provides the justification for the increase to the MRPC by providing the total estimated cost to comply with these mitigation measures, namely, the cost to study the impact of the ELM Project on neighboring SoCalGas pipelines and to implement mitigation necessary to protect the SoCalGas pipelines from any impacts generated by the ELM Project.<sup>11</sup> SCE respectfully requests the CPUC approve this adjustment because these costs are reasonable given (1) the ELM Project is needed and (2) SCE is required to install the required gas pipeline mitigation measures before fully in-servicing the ELM Project.

SCE's request is consistent with its communications to the CPUC, in which SCE made clear that at some future date it would be submitting a request for the total cost of the SoCalGas pipeline mitigation work to the CPUC, as, for reasons described below, those costs were excluded from both the original CPCN Application estimate and the May 2023 PFM.<sup>12</sup> During the proceedings on the May 2023 PFM, SCE stated that it planned to share costs of the SoCalGas pipeline mitigation work with the Commission once SoCalGas provided a complete set of costs to SCE, whether by filing a second PFM, amending the May 2023 PFM, or via any other procedural vehicle desired by the CPUC.<sup>13</sup> SCE communicated this commitment to the assigned ALJ (ALJ Jungreis) and the CPUC Energy Division on numerous occasions through regulatory filings, status updates, and regular quarterly meetings where provided the CPUC with updates on the progress of the SoCalGas pipeline mitigation and associated expenditures.<sup>14</sup>

This January 2026 PFM also explains that the total cost of the SoCalGas pipeline mitigation was largely determined by SoCalGas, and therefore SCE could not have provided the

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<sup>11</sup> See Section VI for additional detail regarding costs by element.

<sup>12</sup> See Section V, below.

<sup>13</sup> May 2023 Petition for Modification of D.20-08-032, pp. 33-35, *see also* August 8, 2023 Status Conference Statement, p. 7, and December 1, 2023 Status Statement, p. 3.

<sup>14</sup> *See e.g.* May 1, 2024 Status Update, Appendix A, p. 10, August 29, 2024 Status Update, p. 17, November 1, 2024 Status Update, p. 15; February 3, 2025 Status Update, p. 16; May 1, 2025 Status Update, p. 16; August 1, 2025 Status Update, p. 14.

Commission with a reasonably accurate estimate for this scope of work until SCE received the cost information from SoCalGas.<sup>15</sup> SCE received the cost estimate for the final scope of work from SoCalGas in December 2025.

Construction on the SoCalGas pipeline mitigation work began in September 2025 following approvals from the CPUC, National Park Service (NPS), and Bureau of Land Management (BLM). SoCalGas plans to complete this work by June 2026. Once mitigation is complete, SCE will fully energize the ELM Project, making all additional transmission capacity available ahead of the summer period when demand is high.

SCE's spend to date on the SoCalGas pipeline mitigation work accounts for approximately \$15.9 million of the cost increase requested in this PFM. The remaining \$17.0 million is the estimated cost to complete the SoCalGas pipeline mitigation work.<sup>16</sup> The specific details of cost by major work category and the explanation of the factors contributing to the estimates are discussed in detail in Section VI, below.

For the reasons explained in this PFM, SCE respectfully requests that, as soon as reasonably practical, the Commission consider and approve an approximately \$33 million increase in the MRPC established for the ELM Project, from \$295 million to \$328 million.

### **III.**

#### **LEGAL STANDARDS APPLICABLE TO THIS PFM**

Public Utilities Code Section 1708 authorizes the Commission to “rescind, alter, or amend any order or decision made by it.” Relevant here, Pub. Util. Code Section 1005.5 states that a utility “may apply to the commission for an increase in the maximum cost” of a project

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<sup>15</sup> See Section V.B and V.C, below.

<sup>16</sup> While the ultimate amount that SCE will pay to SoCalGas is subject to a final true-up, SCE is including the maximum potential cost amount associated with these costs in this PFM now, in consideration of D.20-08-032's direction that SCE seek any MRPC adjustment via the filing of a PFM before the MRPC is exceeded. If SCE ultimately pays SoCalGas less than the full amount identified in this PFM, SCE will true-up the actual costs and only recover those costs actually incurred.

established in a CPCN, and that the Commission “may authorize an increase in the specified maximum cost if it finds that the cost has in fact increased and that the present or future public convenience and necessity require the construction of the project at the increased cost.”<sup>17</sup> The petitioning party bears the burden of justifying its requested modification.<sup>18</sup>

Rule 16.4 of the CPUC Rules governs the filing of a PFM, a procedural vehicle that “asks the Commission to make changes to an issued decision.”<sup>19</sup> Rule 16.4 includes both procedural and substantive requirements. Rule 16.4 requires that a PFM be filed and served within one year of the effective date of the decision proposed to be modified, or, if more than one year has elapsed, explain why the petition could not have been presented within one year of the effective date of the Decision.<sup>20</sup> Rule 16.4 also requires that a PFM concisely state the justification for the requested relief and propose specific wording to carry out all requested modifications to the decision, support any factual allegations with specific citations to the record in the proceeding or to matters that may be officially noticed, and support any allegations of new or changed facts with an appropriate declaration or affidavit.<sup>21</sup>

In D.20-08-032, the Commission further specified that the vehicle for seeking an increase in the MRPC is a Petition for Modification:

Pursuant to Pub. Util. Code Section 1005.5(b), at any point during the [ELM] Project, but prior to any expenditures in excess of the cost cap, SCE must file a formal Petition for Modification with the Commission for consideration of a revised determination of the reasonable and prudent maximum cost of the Project.<sup>22</sup>

D.20-08-032 also states that when evaluating whether to approve an increase to the MRPC for the ELM Project, the CPUC will consider whether the increase in costs “hinged upon factors outside of SCE’s control” and that any cost increase should not be approved “if the

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<sup>17</sup> Cal. Pub. Util. Code § 1005.5(b).

<sup>18</sup> See D.08-09-024, at 3.

<sup>19</sup> Rule 16.4(a).

<sup>20</sup> Rule 16.4(d).

<sup>21</sup> Rule 16.4(b).

<sup>22</sup> D.20-08-032, p.52, Ordering Paragraph (OP) # 5.

alleged increases are the result of a failure of SCE to provide the Commission with reasonably accurate estimates in this proceeding.”<sup>23</sup>

As discussed below, SCE has complied with Rule 16.4 and the requirements of D.20-08-032 and therefore requests an adjustment to MRPC pursuant to Section 1005.5.

#### IV.

#### **ELM PROJECT BACKGROUND AND PROCEDURAL INFORMATION**

##### **A. Relevant Procedural History, Culminating in a CPCN and a Revised MRPC**

SCE applied for a CPCN for the ELM Project on April 19, 2019. On August 27, 2020 the CPUC issued D.20-08-032, granting SCE a CPCN for the ELM Project, concluding that the ELM Project would serve the public convenience and necessity by improving grid reliability, providing the transmission capacity upgrades necessary to alleviate the deliverability constraints upon renewable energy development, and providing the capacity necessary to meet electric providers’ and the California’s Renewable Portfolio Standards (RPS) requirements.<sup>24</sup> The CPUC also found that environmental issues were appropriately addressed through the mitigation measures identified in the MMCRP and, with implementation of those measures, there was no substantial evidence that the ELM Project would have a significant effect on the environment.<sup>25</sup> The CPUC established a total MRPC of \$239 million for the ELM Project.<sup>26</sup>

The MRPC approved in D.20-08-032 was based on the cost estimate provided in SCE’s CPCN Application and supported by SCE’s testimony. Although SCE and SoCalGas had initiated coordination on the ELM Project in early 2019, before SCE submitted its CPCN Application, SoCalGas had not yet confirmed the need for an A/C study or identified a need for

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<sup>23</sup> See D.20-08-032, p. 37 (“Pub. Util. Code § 1005.5(b) would enable SCE to return to the Commission to apply for “an increase in the maximum cost specified in the certificate.” Therefore, SCE can seek approval for additional expenditures for construction of the ELM Project if the Commission “determines that the costs have in fact increased.”

<sup>24</sup> D.20-08-032, p. 20; Findings of Fact (FOF) 1-7.

<sup>25</sup> D.20-08-032, pp.47-48; FOF #11.

<sup>26</sup> D.20-08-032, p. 52, OP #4.



any mitigation measures. As a result, it was not feasible for SCE develop a cost estimate for any work, especially because SCE does not have expertise in assessing gas pipeline risks or estimating related mitigation costs.

As a result of this uncertainty, in D.20-08-032 the CPUC noted that the Project scope could include the “[i]nstallation of mitigation such as cathodic protection and grounding, if needed, as a result of any induced alternating current effects the increased power flow might have on nearby gas transmission pipelines.”<sup>27</sup>

The ELM Project CPCN was granted contingent, in part, upon SCE’s compliance with the mitigation measures adopted as part of the ELM Project MND. As evidenced by the language in D.20-08-032, at the time the CPCN for the ELM project was approved, it was still an open question as to whether any SoCalGas pipeline mitigation work would be necessary. To account for any possible impacts to the SoCalGas pipelines, the ELM Project MND mitigation measures required SCE to coordinate with SoCalGas to assess, and if necessary, mitigate, any potential impacts of the ELM Project on the gas transmission pipelines. D.20-08-032 also acknowledged that the cost to complete the ELM Project could increase beyond the established MRPC, and directed SCE to file a PFM requesting an increase before exceeding the approved MRPC should the cost to construct the ELM Project exceed the amount approved in D.20-08-032.<sup>28</sup>

On May 24, 2023 SCE filed a PFM of D.20-08-032, seeking Commission approval of an increase in the MRPC of the ELM Project to \$295 million. The May 2023 PFM explained that an increase to the MRPC was necessary to account for the increased cost of the ELM Project resulting from a number of unforeseen events that delayed the project online date and drove increased project costs. Relevant here, SCE’s May 2023 PFM stated clearly that the increased costs requested in the PFM did not include the cost of the SoCalGas pipeline mitigation work

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<sup>27</sup> D.20-08-032, p. 5.

<sup>28</sup> D.20-08-032, p. 52, OP #5.

because the scope of that work was not yet known and therefore a cost estimate for that work could not yet be developed.

On October 9, 2025, the CPUC issued D.25-10-012, granting SCE's May 2023 PFM and modifying Ordering Paragraph (OP) #4 of D.20-08-032 to increase the ELM Project MRPC to \$295 million. The CPUC found that the increased MRPC was reasonable given that the ELM Project was still needed at the increased cost and the majority of the cost increases were outside of SCE's control.<sup>29</sup> Although SCE had made clear that there would be additional costs associated with the SoCalGas pipeline mitigation work that were not included in the May 2023 PFM MRPC request, neither those costs nor the mechanism for reviewing and assessing those costs were addressed in D.25-10-012.

OP #5 of D.20-08-032 requires SCE to file a PFM before incurring costs that exceed the approved MRPC.<sup>30</sup> Because the scope and cost of the SoCalGas pipeline mitigation work were unknown at the time the CPCN Application and the May 2023 PFM were filed, the cost of the SoCalGas pipeline mitigation work was not included in either filing, and therefore neither approved ELM Project MRPC could have included the costs of the SoCalGas pipeline mitigation. However, to prevent project delays to this important project needed to support renewable energy deliverability (see Section IV.B., below), SCE proceeded with supporting the SoCalGas pipeline mitigation work, resulting in expenditures beyond the approved MRPC. Consequently, when the CPUC approved the revised MRPC in October 2025, SCE had already exceeded the new cost cap due to these necessary mitigation expenses.

Nevertheless, SCE had continuously informed the CPUC it was spending money on the mitigation work. In eight separate filings, as well as regular informational updates and quarterly meetings with Energy Division staff. SCE explained that it was relying on SoCalGas to provide the pipeline mitigation cost. SCE also repeatedly committed to amending the existing PFM or

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<sup>29</sup> D.25-10-012, pp. 13-14.

<sup>30</sup> This requirement was unchanged by D.25-10-012.

filing a new PFM once SoCalGas provided SCE with the final cost to complete the work, and did so upon receiving the necessary cost information from SoCalGas in December 2025. This January 2026 PFM is therefore submitted to seek approval for both the SoCalGas pipeline mitigation costs already incurred and the remaining SoCalGas pipeline mitigation costs through project close out.

**B. The CPUC Found that the ELM Project is Needed to Provide the Additional Capacity Necessary to Bring Renewable Generation Online**

The ELM Project is a policy-driven upgrade identified by the California Independent System Operator (CAISO) to increase the capacity of the existing transmission lines (the Eldorado-Lugo 500 kilovolt (kV) transmission line, the Lugo-Mohave 500 KV transmission line, and the Eldorado-Mohave 500 kV transmission line (together, the ELM Project)). The ELM Project would serve the public convenience and necessity by improving grid reliability and providing the transmission capacity upgrades to alleviate the deliverability constraints on renewable energy development in the state, thereby supporting California’s renewable energy goals and RPS. The ELM Project would accomplish this without requiring significant changes in the footprint of the existing transmission lines.<sup>31</sup> Absent the ELM Project, existing transmission capacity constraints would continue to limit future renewable energy development.

In October 2025, the CPUC approved SCE’s May 2023 request to increase the ELM Project cost. In approving the increased MRPC, the CPUC implicitly reaffirmed that the ELM Project was still needed, modifying the language of D.20-18-032 to increase the total cost while maintaining the CPUC’s original finding that the “cost of the ELM Project as identified in this decision is justified based upon the high degree of the certainty that the ELM Project is needed to ensure development of RPS-eligible resources in the Desert Area.”<sup>32</sup> Additionally, the ELM Project remains a part of the California Independent System Operator (CAISO) transmission plan

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<sup>31</sup> See D.20-08-032 at pp. 9, 21.

<sup>32</sup> D.20-08-032, p. 50, Col #11.

as a previously approved project and part of the base case upon which future projects are planned.<sup>33</sup>

Although the target date for completion of the ELM Project was delayed due to multiple issues, including delays associated with the series capacitor work, that work is now complete and the only remaining task is installation of the SoCalGas pipeline mitigation.

SoCalGas began construction on the pipeline mitigation in September 2025, after receiving approvals to proceed from the CPUC, NPS, and BLM. SoCalGas has shared that it expects to complete construction no later than June 2026. Once the mitigation is complete, SCE will operate the ELM Project<sup>34</sup> to its approved maximum compensation made possible by the series capacitors, making all of the additional transmission capacity associated with the ELM Project available ahead of the summer period when demand is high and in anticipation of generation interconnection projects that will require the Project to achieve full deliverability.

## V.

### **GOOD CAUSE SUPPORTS SCE'S REQUEST FOR AN INCREASE IN THE MRPC**

Pub. Util. Code § 1005.5(b) provides that a utility applicant may seek an increase to the project MRPC if the project costs have increased and the CPUC finds those increased costs reasonable. CPUC Rule 16.4 states that the method for making this request is a PFM. In D. 20-08-032, the CPUC established additional requirements for the ELM Project, explaining that

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<sup>33</sup> The CAISO identified the ELM Project as a policy-driven transmission project in its 2012-2013 transmission planning cycle. *Available at* <http://www.caiso.com/Documents/BoardApproved2012-2013TransmissionPlan.pdf>. The continued need for the ELM Project was confirmed in the 2024-2025 transmission plan, *Available at* <https://stakeholdercenter.caiso.com/InitiativeDocuments/BoardApproved-2024-2025-TransmissionPlan.pdf>.

<sup>34</sup> As described in detail in the attached Arce Declaration, the CPUC approved a minor project revision (MPR) permitting SCE to in-service some of the ELM Project series capacitors before the A/C mitigation was installed as long as SCE continue to bypass one or more series capacitors on the Lugo-Mohave transmission line section of the ELM Project until the A/C mitigation work is complete. August 28, 2025 MPR Approval. *Available at* [https://ia.cpuc.ca.gov/environment/info/aspen/elm/mprs/mpr008\\_08282025.pdf](https://ia.cpuc.ca.gov/environment/info/aspen/elm/mprs/mpr008_08282025.pdf).

should SCE apply for a PFM to modify the MRPC, the CPUC would evaluate both 1) whether the increased costs included in the PFM were due to factors outside of SCE's control; and 2) whether SCE failed to provide reasonably accurate cost estimates during the proceeding.<sup>35</sup>

As described herein, SCE seeks to modify the MRPC established in October 2025 because the total cost to complete the ELM Project has increased and the Project is still needed at this increased cost. SCE could not have provided this cost estimate earlier in the proceeding because SoCalGas developed all the costs for the SoCalGas pipeline mitigation work internally, and therefore SCE could not have ascertained the total costs until SoCalGas provided SCE with the final cost estimate, which occurred in December 2025. Once SCE had the complete cost estimate, SCE prepared and filed this January 2026 PFM requesting an increase to the ELM Project MRPC.

Table 1 below summarizes the total ELM Project costs, comparing the MRPC identified in D.25-10-012 with the amount requested in this PFM. The requested amount is based on the most current SoCalGas estimate for the pipeline mitigation work, known field conditions, and specified environmental requirements. All costs are presented in 2019 constant dollars.

***Table-1:ELM Project Cost Summary<sup>36</sup>***

	D.25-10-012 MRPC	January 2026 PFM	Variance (PFM-Decision)
ELM Project Cost	\$295	\$328	\$33

**A. SCE is Required to Complete the SoCalGas Pipeline Mitigation Work as Part of the ELM Project**

The ELM Project MMCRP requires SCE to comply with all identified mitigation measures. Specifically, MM UT-1 requires SCE to coordinate with SoCalGas to conduct an A/C

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<sup>35</sup> D.20-08-032, at 37.

<sup>36</sup> All costs in this PFM are in 2019\$ unless otherwise stated. Numbers may not precisely add due to rounding.

study assessing potential impacts of the ELM Project on adjacent pipelines and, if necessary, to design and implement appropriate mitigation.

SCE is seeking an increase to the MRPC to account for the costs of completing the A/C study and implementing the resulting recommendations. These expenditures are unavoidable, as the mitigation is a required component of the ELM Project. In fact, the ELM Project cannot be fully in-serviced unless these mitigations are in place, and failing to do so could result in potential safety risks.<sup>37</sup> Therefore, these costs are a necessary part of the ELM Project and should be included in the ELM Project MRPC.

**B. SCE Had Little, If Any, Control, Over The Costs Related to the SoCalGas Pipeline Mitigation Work**

Given SoCalGas's technical expertise and direct knowledge about, and responsibility for, the gas pipelines potentially impacted by the ELM Project, SCE and SoCalGas agreed that it was appropriate for SoCalGas to manage the A/C study and to design, engineer, and install any required mitigation measures identified as part of the gas pipeline mitigation work. SoCalGas would then provide SCE with a cost estimate for the work and SCE would provide the necessary funding to complete the work. This arrangement meant that while SCE retained the right to review and validate SoCalGas's proposed costs, it did not independently develop estimates or control the final amounts, as the scope and technical requirements were determined by SoCalGas and regulatory agencies.<sup>38</sup>

SCE relied on executed collectible work agreements (CWAs) and SoCalGas's expertise to compile a complete estimate for compliance with MM UT-1. The full chronology of this process is detailed in the attached Arce Declaration. The total cost of the SoCalGas pipeline mitigation work was therefore outside SCE's direct control. For example, as part of CWA Phase

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<sup>37</sup> D.20-08-0 32, Appendix A, MM UT-1 p. 48 of 105.

<sup>38</sup> The SCE team used its past experience with gas pipeline mitigation work on other projects to develop a high level estimate of per-mile pipeline mitigation costs and used this estimate as one method for assessing whether the costs SoCalGas provided to SCE were reasonable.

I (January 2020), SoCalGas provided SCE with the initial cost to complete the A/C study. However, as the study progressed, necessary revisions and refinements led to increased projected costs, resulting in SoCalGas submitting a change order to SCE requesting an increase in the funding for CWA Phase I (February 2023). While SCE had the opportunity to review and approve the additional spend requested in the change order, the underlying drivers of these additional costs, such as the cost to SoCalGas's consultant to collect additional field data and to make changes to the A/C model assumptions, were outside SCE's control.

The final A/C study, issued March 2024, concluded that the ELM Project would impact the SoCalGas pipelines and recommended specific physical mitigation measures. As a result, SCE and SoCalGas entered into CWA Phase II – Part 1 that, among other things, authorized payment by SCE to SoCalGas to begin to implement the study's recommendations. SoCalGas provided SCE with a cost estimate for procuring materials, conducting pre-construction planning, and permitting. While SCE did not develop any of these costs, SCE reviewed the estimate and finding the costs reasonable, executed CWA Phase II – Part 2 in August 2025.

After finalizing the mitigation scope, SoCalGas applied for federal permits for the mitigation work. SoCalGas received federal approvals in September 2025. Subsequently SoCalGas developed an estimate for completing the environmental restoration and mitigation work based on these permits and provided SCE with that estimate in December 2025. While SCE retained the right to review and provide input on the costs provided by SoCalGas, SCE did not have control over the cost for SoCalGas to complete the environmental remediation and pipeline mitigation work.

Throughout the ELM proceeding SCE regularly updated the CPUC on the progress of the A/C study and SoCalGas pipeline mitigation scope of work. In these communications SCE consistently explained its reliance on SoCalGas for cost estimates. SCE acted transparently and prudently in reviewing SoCalGas's expenditures on the gas pipeline mitigation work and provided the CPUC with this cost information as soon as the total estimate became available.

**C. SCE Could Not Provide the CPUC with a Reliable Cost Estimate for the SoCalGas Pipeline Mitigation Work until December 2025**

The costs associated with the SoCalGas pipeline mitigation exceed the approved MRPC (even as increased in D.25-10-012) due to additional project scope that was not known at the time SCE filed the ELM Project CPCN Application or the May 2023 PFM. At the time SCE filed the CPCN Application in April 2019, SCE and SoCalGas had not entered into an agreement regarding the A/C study and therefore SoCalGas had not started work on the A/C study and SCE did not know whether any A/C mitigation would be required. When SCE filed its May 2023 PFM, the A/C study was still a year from completion. Therefore, SCE could not have included the total SoCalGas pipeline mitigation costs in the total project estimate at either of these junctures (or at the time SCE submitted any of its quarterly Status Updates on the ELM Project, as discussed further below in Section V.D.) because SoCalGas had not provided SCE complete mitigation costs until December 2025. Only after receiving the final estimate in December 2025 was SCE able to compile a comprehensive cost summary and submit this PFM to the CPUC to request an increase in the MRPC for compliance with MM UT-1.

**D. SCE Submitted, Timely, Good Faith Information on the Scope and Potential Cost of the SoCalGas Pipeline Mitigation Work to the CPUC And Committed to Bring Those Costs to the CPUC Once Known**

Throughout the development and construction of the ELM Project, SCE consistently committed to transparency and regulatory compliance by providing timely, good faith information to the CPUC and its energy division staff regarding the scope and potential cost of the required SoCalGas pipeline mitigation work. SCE proactively communicated that the SoCalGas costs were not included in prior project estimates due to ongoing uncertainty about the scope and the absence of a comprehensive cost estimate from SoCalGas for the gas pipeline mitigation work.



As described in further detail below, SCE submitted quarterly informational updates to the CPUC Energy Division CEQA team, to ensure that the CPUC was kept up to date on the progress and anticipated cost increases related to the SoCalGas pipeline mitigation work. In addition to the quarterly informational submittals, SCE's regulatory team held meetings with Energy Division on a quarterly basis to provide updates on future and in-progress SCE projects. The quarterly update meetings included an overview of the ELM Project status and SCE regularly communicated expectations to file a second PFM to address cost increases resulting from the ELM Project, including the SoCal Gas pipeline mitigation work.<sup>39</sup> SCE also made quarterly status update filings (Status Updates) in the formal ELM Proceeding as directed by ALJ Jungreis in Rulings in the ELM Project proceeding.<sup>40</sup> SCE submitted eight Status Updates between August 2023 and August 2025 describing, in detail, the progress and spend on the ELM Project.<sup>41</sup> The Status Updates contain a complete narrative Declaration, along with all supporting documentation, regarding all aspects of the Project's status, including the Project timeline and costs, and were made available to the public via the CPUC's docket page.

SCE's Status Updates and quarterly informational submittals meetings consistently documented the SoCalGas pipeline mitigation work progress and flagged the likelihood that a future PFM would be needed to account for the costs associated with this mitigation. This approach ensured the CPUC was regularly informed as to SoCalGas's progress and SCE's spend

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<sup>39</sup> See e.g. SCE's June 2025 and October 2025 quarterly status updates. Available at [https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/ceqa-permitting/quarterly-general-order-131-e-reports/sce-cpuc-q2-quarterly-meeting\\_20250617.pdf](https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/ceqa-permitting/quarterly-general-order-131-e-reports/sce-cpuc-q2-quarterly-meeting_20250617.pdf) and <https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/infrastructure/ceqa-permitting/quarterly-general-order-131-e-reports/sce-cpuc-q3-quarterly-meeting-2025.pdf>.

<sup>40</sup> August 16, 2023 *Ruling Setting Forth Questions and Directing a December 1, 2023 Status Statement* available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K539/517539541.PDF>; April 5, 2024 *Ruling Setting Forth Questions and Directing a May 1, 2024 Status Statement*, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M528/K872/528872767.PDF>; and July 24, 2024 *Administrative Law Judge Ruling Setting Forth Questions and Directing Quarterly Status Statements*, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M536/K273/536273280.PDF>.

<sup>41</sup> SCE submitted Status Updates on August 8, 2023; December 1, 2023; May 1, 2024; August 29, 2024; November 1, 2024; February 3, 2025; May 1, 2025; and August 1, 2025.

on the SoCalGas pipeline mitigation work, therefore giving the CPUC the opportunity to make timely, informed decisions regarding project cost recovery.

SCE's ongoing coordination and transparent communication with the CPUC demonstrates SCE's commitment to regulatory compliance and prudent project management, supporting the reasonableness of its request for cost recovery related to the SoCalGas pipeline mitigation work. The following sections provide a summary of SCE's ongoing communications with the CPUC and demonstrate SCE's unwavering commitment to transparency regarding the cost and progress on the SoCalGas pipeline mitigation work.

## **1. Communications with the CPUC Energy Division**

OP #6 of D.20-08-032 requires SCE to make "quarterly information-only submittals to the Commission's Energy Division's CEQA [...] teams providing status updates on the Eldorado-Lugo-Mohave Series Capacitor Project." Beginning with the Q1 2022 quarterly informational update, SCE reported that the additional mitigation costs associated with the SoCalGas pipeline mitigation work would likely cause SCE to exceed the MRPC identified in D.20-08-032. SCE explained that SoCalGas was conducting an A/C study and that SCE would not know the scope or costs of the pipeline mitigation work until SoCalGas provided that information to SCE. However, SCE committed to update the CPUC with the cost once known.

SCE explained that the cost to complete the SoCalGas gas pipeline mitigation scope of work could not have been a part of the original ELM Project cost estimate because at the time that estimate was created, the scope of the gas pipeline mitigation work was unknown. SCE shared similar information with the CPUC Energy Division CEQA team in the 14 quarterly informational updates SCE submitted to Energy Division between Q1 2022 through Q2 2025.

In addition to the quarterly status updates, SCE's regulatory department holds quarterly meetings with the Energy Division staff to provide updates on projects in the licensing space, including the ELM Project. In at least ten of the quarterly updates (beginning in 2022) SCE explained that the mitigation costs associated with the SoCalGas pipeline mitigation work may

cause SCE to exceed the maximum cost cap and that SCE planned to file an additional PFM to account for those costs, once known. During regular twice-monthly meetings SCE also updated Energy Division staff and its consultant, Aspen, on the status of the ELM Project, including SoCalGas's progress on the pipeline mitigation work and the need for a future PFM.

## **2. Filings in the ELM Formal Proceeding**

On May 23, 2023, SCE filed a PFM seeking an increase in the ELM Project MRPC for additional costs resulting from various delays in the project schedule, among other things. In the May 2023 PFM, SCE explained that the requested revised MRPC did not include the costs associated with the required SoCalGas pipeline mitigation work because SoCalGas had not yet completed the A/C study, and therefore the scope (and cost) of any pipeline mitigation work was unknown. SCE explained:

[W]hile SCE has prepared this PFM in order to comply with the Decision's direction that SCE seek an increase prior to exceeding the MRPC, *SCE anticipates that a separate additional PFM may be necessary in the future due to additional work scope that has not yet been delineated and remains subject to ongoing analyses.* Namely, to protect nearby SoCalGas pipelines from the effects of induced alternating current (AC), SCE likely will have to install physical mitigation facilities, although the scope and cost of this mitigation is not yet known because SCE and SoCalGas are still evaluating the level of mitigation that will be necessary. *SCE anticipates that a separate PFM to address the costs associated with the AC mitigation effort may be necessary once those details are known.*<sup>42</sup>

After SCE submitted the May 2023 PFM, the ALJ Jungreis directed SCE to file a status conference statement ahead of an August 11, 2023 Status Conference.<sup>43</sup> SCE's status conference statement reiterated that SoCalGas was working on the A/C study and that a separate PFM to address the costs and any potential change to scope associated with SoCalGas's pipeline mitigation effort may be necessary once SCE knew the details of that scope of work.<sup>44</sup>

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<sup>42</sup> May 2023 Petition for Modification, pp. 34-35 (*italics added*).

<sup>43</sup> July 25, 2023 Ruling Setting A Status Conference and Directing Status Conference Statement, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M514/K688/514688327.PDF>.

<sup>44</sup> August 8, 2023 Status Statement, p. 7 n. 18.

During the August 11, 2023 Status Conference, ALJ Jungreis noted that the gas pipeline mitigation could become a part of the scope of the ELM Project, “if A/C induction on nearby gas transmission lines is found,” acknowledging that as of the August 11, 2023 Status Conference there remained uncertainty as to the scope of work associated with SoCalGas pipeline mitigation because SoCalGas had not yet completed the A/C study.<sup>45</sup>

Following the Status Conference, on August 16, 2023 ALJ Jungreis issued a *Ruling Setting Forth Questions and Directing a December 1, 2023 Status Statement* to provide an update on the status of the ELM Project and respond to a set of questions regarding overall Project progress and spend.<sup>46</sup> Pursuant to that direction, SCE submitted a December 1, 2023 Status Statement that, in part, reiterated that the pipeline work had the potential to result in additional costs beyond those SCE requested in the May 2023 PFM.<sup>47</sup> In a declaration attached to the December 1, 2023 Status update, ELM Project manager Selya Arce explained that the costs associated with the SoCalGas pipeline mitigation work could not have been included in the May 2023 PFM because at that time the pipeline mitigation study had not been completed and therefore SoCalGas could not determine the necessary scope of the work.<sup>48</sup>

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<sup>45</sup> August 11, 2023 Status Conference Statement Transcript, Page 6 lines 9-11.

<sup>46</sup> August 16, 2023 *Ruling Setting Forth Questions and Directing a December 1, 2023 Status Statement* available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M517/K539/517539541.PDF>.

<sup>47</sup> December 1, 2023 Status Statement, p. 4.

<sup>48</sup> Ms. Arce explained, “Another issue yet to be resolved that could result in additional project costs deals with potential mitigation that might be required to offset induction risks to a SoCalGas (“SCG”) underground pipeline near the ELM Project transmission lines. I expected for several months in 2022 and 2023 to receive information from SCG regarding the cost associated with their alternating current (“AC”) mitigation plan for the ELM Project sometime after they identified a change order request for the work in January 2022, but our agreement with SCG to complete the AC study was not executed as quickly as I anticipated (in fact the agreement was not executed until April 2023), hindering our progress in completing the AC Study. *I anticipated that the additional cost of that mitigation could cause SCE to exceed the MRPC for the ELM Project, thus requiring a PFM and therefore any nonpipeline cost increases (such as those discussed throughout this Declaration) could be included in that PFM.* However, the fact that all the other cost drivers caused the project to approach the PFM even before any of the pipeline work was estimated or included in a forecast necessitated the filing of the PFM on May 24, 2023. December 1, 2023 Status Statement, Appendix A, p. 53, fn 109 (italics added).

In April 2024, the ALJ Jungreis issued a *Ruling Setting Forth Questions and Directing a May 1, 2024 Status Statement*.<sup>49</sup> As part of the Status Statement, SCE shared that SoCalGas had completed the A/C study and that SCE and SoCalGas were in the process of developing the agreement for implementing the A/C mitigation identified in the study.<sup>50</sup> SCE reiterated that the cost of the SoCalGas work was not included in the total project spend provided in the Status Update because the costs were still unknown, but that SCE still anticipated filing a second PFM to address costs associated with the SoCalGas pipeline mitigation work, once known.<sup>51</sup>

On July 24, 2024, ALJ Jungreis issued a *Ruling Setting Forth Questions and Directing Quarterly Status Statements* directing SCE to answer a set list of questions on a quarterly basis.<sup>52</sup> SCE filed its first quarterly Status Statement on August 29, 2024.<sup>53</sup> In that update SCE stated that the total cost of the SoCalGas pipeline mitigation work was still being determined, and therefore SoCalGas's costs were not included in the August 29, 2024 Status Update.<sup>54</sup> SCE confirmed that it still planned to "fil[e] a second PFM to address the costs associated with the SoCalGas Pipeline mitigation."<sup>55</sup>

As ordered, SCE filed four quarterly Status Updates between November 1, 2024 and August 1, 2025. In each Status Statement SCE shared an update on SoCalGas's progress on the A/C mitigation work and confirmed that to account for SCE's spend on the SoCalGas pipeline mitigation work, SCE planned to either file a second PFM, amend the existing PFM, or share those costs via any other procedural vehicle desired by the CPUC, since those costs were not

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<sup>49</sup> April 5, 2024 *Ruling Setting Forth Questions and Directing a May 1, 2024 Status Statement*, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M528/K872/528872767.PDF>.

<sup>50</sup> May 1, 2024 Status Update, Appendix A, p.10.

<sup>51</sup> May 1, 2024 Status Update, Appendix A, p. 7.

<sup>52</sup> July 24, 2024 Administrative Law Judge *Ruling Setting Forth Questions and Directing Quarterly Status Statements*, available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M536/K273/536273280.PDF>.

<sup>53</sup> August 29, 2024 Status Statement.

<sup>54</sup> August 29, 2024 Status Update, p. 17.

<sup>55</sup> *Id.*

included in the May 2023 PFM and therefore all spend on the SoCalGas work scope would be beyond the requested MRPC.<sup>56</sup>

Beginning with the February 3, 2025 Status Update SCE began reporting SCE's inception to date (ITD) spend on the SoCalGas pipeline mitigation work.<sup>57</sup> SCE provided the CPUC with updates on SCE's ITD spend on the SoCalGas pipeline mitigation work in all subsequent Status Updates.<sup>58</sup> SCE shared its ITD spend on the SoCalGas pipeline mitigation work in these updates to provide transparency to the CPUC on the total ELM Project cost. While the cost of the SoCalGas work could not have been included in the May 2023 PFM because the scope of work was not known at that time, SCE's Status Updates gave the CPUC regular updates into those costs as they were developing. For example, in the August 1, 2025 Status Update SCE shared that in the April 2025 – June 2025 period SCE recorded [REDACTED] in costs related to the SoCalGas mitigation work. SCE's approach ensured that the CPUC was regularly informed on the progress on the ELM Project and SCE's spend to date on the SoCalGas mitigation work, providing the Commission with the necessary information to evaluate and approve the requested cost adjustments.

In summary, throughout the course of the ELM Project, SCE maintained transparency and consistent communication with the CPUC and its staff regarding the evolving scope and costs associated with the SoCalGas pipeline mitigation work. As documented in multiple status updates and regulatory filings, SCE proactively identified the need for a new or amended PFM once the full extent and cost of compliance with MM UT-1 was known and regularly confirmed its intention to file a new or amended PFM once SoCalGas provided the total cost estimate to SCE. SCE's ongoing coordination with the CPUC, timely updates on expenditures associated

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<sup>56</sup> November 1, 2024 Status Update, p. 15; February 3, 2025 Status Update, p. 15; May 1, 2025 Status Update, p. 15; August 1, 2025 Status Update, p. 13.

<sup>57</sup> February 3, 2025 Status Update p. 16, Appendix A, p. 9.

<sup>58</sup> May 1, 2025 Status Update, p. 14, Appendix A, p. 9; August 1, 2025 Status Update p. 16, Appendix A, pp. 8-9.

with the SoCalGas pipeline mitigation work show SCE's commitment to transparency, regulatory compliance and prudent project management.

**E. It was Reasonable for SCE to Incur Costs Related to the SoCalGas Pipeline Mitigation Work Before Filing this PFM**

Once the CPUC approved the ELM Project CPCN, SCE knew that it was required to comply with MM UT-1 before the ELM Project could be in-serviced. The first step in complying with MM UT-1 was to conduct an A/C study to determine whether the ELM Project would have any impact on the neighboring SoCalGas pipelines. Neither SCE nor SoCalGas knew if the study would conclude that mitigation work was required. Therefore, neither company could estimate the potential cost of SoCalGas pipeline mitigation work until the A/C study was complete. As a result, SCE could not and did not estimate any costs for the study or any subsequent work in the cost estimates submitted with the CPCN Application or SCE's subsequent May 2023 PFM.

Because the full extent of the mitigation could only be determined after the A/C study was complete, and therefore any necessary mitigation could not be scoped or priced until the A/C study was complete, SCE had no reasonable alternative but to proceed with the A/C study even though the costs for doing so had not yet been approved.

Similarly, once the A/C study was complete and confirmed that mitigation work would be necessary, SCE incurred costs necessary to support SoCalGas's efforts to install the A/C mitigation, even though the costs associated with that work had not yet been approved. This approach ensured that SCE continued to advance the ELM Project toward timely completion and protected public safety. This approach was consistent with prudent utility practice and regulatory expectations. As such, the expenditures incurred prior to filing this January 2026 PFM were both necessary and reasonable under the circumstances.

## VI.

### **SCE’S EXPENDITURES FOR THE SOCALGAS PIPELINE MITIGATION WORK ARE REASONABLE**

As explained above, SCE must comply with the requirements of MM UT-1 prior to fully in-servicing the ELM Project. The costs to comply with MM UT-1 are largely comprised of costs developed by SoCalGas, with additional costs for SCE support to SoCalGas’s work. Below, SCE provides a breakdown of the SoCalGas pipeline mitigation costs by project element, demonstrating that each expenditure is justified and necessary for regulatory compliance. All costs are presented in constant 2019 dollars, and where applicable, include remaining expenses through project completion.

#### **A. SoCalGas Pipeline Mitigation Costs by Project Element**

In the following subsections, SCE describes cost increases by category, explains what activities are included in each category, and identifies the major sources of the cost increase. For ease of reference, Table 2, below, corresponds to each subsection below that includes a description of the events and work associated with the additional costs.

***Table 2 - Project Cost Summary in Constant 2019 \$ (millions)***

<b>Pipeline Mitigation Costs</b>	<b>Recorded Costs ITD October 2025</b>	<b>Remaining “To- Go” Costs</b>	<b>Total Costs in Constant 2019\$</b>
SoCalGas			
SCE Support			
SCE Environmental			
Known Risks			
Direct Allocations			
Contingency			
<b>Total</b>	<b>\$15.9</b>	<b>\$17.0</b>	<b>\$33.0</b>



The recorded costs of \$15.9 million (2019\$) and the “to-go” cost of \$17M (2019\$) sum to the \$33 million (2019\$) requested in this PFM. The \$33 million (2019\$) is equivalent to \$47.5 million (nominal \$).

For comparison purposes, Table 3 below provides the same information in Table 2 but in Nominal \$.

***Table 3 - Project Cost Summary in Nominal \$ (millions)***

<b>Pipeline Mitigation Costs</b>	<b>Recorded Costs ITD October 2025</b>	<b>Remaining “To- Go” Costs</b>	<b>Total Costs in Nominal\$</b>
SoCalGas			
SCE Support			
SCE Environmental			
Known Risks			
Direct Allocations			
Contingency			
<b>Total</b>	<b>\$23.0</b>	<b>\$24.5</b>	<b>\$47.5</b>

**1. SoCalGas Work ( [REDACTED] )**

The costs included in this subsection make up the total amount SCE will pay to SoCalGas to complete the SoCalGas pipeline scope of work. SoCalGas provided these costs directly to SCE and SCE made payments directly to SoCalGas for these costs. This section includes SoCalGas’s costs to complete the A/C study and to design, engineer, construct, and complete restoration associated with the SoCalGas pipeline mitigation as described in CWA Phase I, the change order to CWA Phase I, CWA Phase II – Part 1, CWA Phase II – Part 2 and the estimated cost for SoCalGas to complete environmental mitigation.

**a) CWA Phase I ( [REDACTED] )**

As required by MM UT-1, SCE and SoCalGas entered into an agreement to have SoCalGas conduct an A/C study to evaluate effect of the ELM Project on the adjacent SoCalGas pipelines. SCE and SoCalGas entered into a collectible work agreement (CWA Phase I) which

included payment for SoCalGas's costs to conduct an A/C study to evaluate whether the ELM Project would create any alternating current interference on the neighboring SoCalGas pipelines, and if so, what mitigation would be necessary to ensure safe operating conditions. SCE and SoCalGas executed CWA Phase I in January 2020. The first draft of the A/C study was complete in April 2020. Over the next two years, the companies continued to work together to refine and optimize the A/C study model and scope of work to obtain accurate findings. To account for the additional spend associated with making these changes, SoCalGas submitted a change order to CWA Phase I. Once SCE approved the change order, SoCalGas refined the study model and the final A/C study was completed in March 2024. The final A/C study identified the scope of the work and the type of mitigation necessary to protect the SoCalGas pipeline from any induced or stray alternating current or other impacts resulting from the ELM Project.

**b) CWA Phase II [REDACTED]**

CWA Phase II includes SoCalGas's costs to design and construct the SoCalGas pipeline mitigation scope of work. In May 2025 SoCalGas and SCE entered into CWA Phase II – Part 1 to pay for the cost for SoCalGas to design the necessary mitigation and begin procuring materials, pre-construction planning, and permitting for the SoCalGas pipeline mitigation system. In August 2025, SoCalGas and SCE entered into CWA Phase II – Part 2 to pay for the cost to construct the A/C mitigation system to protect the SoCal Gas pipelines from increased stray or induced voltages and currents resulting from SCE's ELM Project. CWA Phase II – Part 2 also includes reconciliation and project close out costs.

**c) SoCalGas Environmental Mitigation [REDACTED]**

SoCalGas plans to complete all the required environmental restoration for the pipeline mitigation scope of work. In December 2025 SoCalGas provided SCE with an estimated budget for SoCalGas to complete the environmental restoration work. These costs were not included in either CWA Phase II agreement because at the time the parties negotiated those agreements,

SoCalGas had not yet received permits from the relevant federal agencies and therefore could not estimate the potential cost of the complete scope of work that would be needed to comply with those permits.

## **2. SCE Project Support**

SCE's Project Support costs are primarily comprised of labor expense and include costs for SCE and SCE's contract resources to coordinate, manage and control the project, including project and contract management. SCE's project management, engineering, and support staff provide management and oversight of the SoCalGas pipeline mitigation scope of work and execution support through the implementation of the project. The project management team reviewed the A/C study and the preliminary engineering scope, provided support for regulatory filings, team meetings, management reporting and other licensing and execution related activities. The project management team also provides ongoing support through reporting, data management, contract implementation, and coordination with SoCalGas. SCE also incurred project management costs associated with site visits and time coordinating with staff out in the field to monitor compliance with the ELM Project mitigation measures and relevant safety requirements.

This category also includes, but is not limited to, the work performed by several other SCE departments including Quality Assurance, Transmission Planning, Resource Planning, Grid Contracts, Regulatory Affairs, Public Affairs, Corporate Communications, and Supply Chain Support. Future project management, support and engineering costs are calculated based on an estimated percentage of time each employee will spend on the ELM Project. This projection is based on a combination of historical data, projections from the employees, and future workload. Any contract costs are also added and the aggregated number is used to develop the final estimate.

### 3. SCE Environmental [REDACTED]

SCE's environmental costs are those costs for SCE's environmental team to support the SoCalGas pipeline mitigation work. This includes costs associated with SCE's internal labor, consultant purchase orders, and other direct expenses necessary for environmental project management and compliance, including execution, compliance and administrative support from SCE's in-house environmental mitigation and restoration experts. SCE's environmental team reviewed SoCalGas environmental documents and developed SCE's environmental documents and those costs are included herein. Additionally, as a requirement of the permits filed by SoCalGas, SCE must complete preconstruction and protocol surveys to support pipeline mitigation work. Therefore, this subsection also includes the cost for SCE's consultant, Rincon to conduct pre-construction and protocol surveys.

### 4. Known Risk [REDACTED]

The Known Risk reserve is budgeted for events with known probability that may have an impact to the Project costs or schedule; it is not a contingency amount as these costs are directly tied to *known* project risks. The known risk is developed based on industry best-practices for project risk management and is regularly managed and updated by the project team throughout the project lifecycle. SCE's team applies its professional judgement and experience to identify and calculate associated costs with known risks that may occur.

To develop the Known Risk for the January 2026 PFM the SCE ELM Project team assessed primary risks associated with the SoCalGas pipeline mitigation work that could affect scope, cost and schedule, including delays related to agency approvals, unanticipated discoveries, and extreme weather events. The SCE ELM Project then calculated the appropriate reserve for those risks by factoring the probability of the incident occurring against the expected cost and schedule impact of the event.

## 5. Direct Allocations [REDACTED]

Direct Allocations represent incurred costs that cannot be assigned to a specific activity, group, or project. These costs reflect the corporate functions supporting SCE's entire portfolio of projects. For example, these allocations include (1) corporate departmental expenses associated with day-to-day operations such as salaries, office supplies, and related expenses; and (2) expenses not directly incurred by any single department, such as insurance premiums. Direct allocations are charged to projects like ELM by applying a company-wide composite weighted average capitalization rate, developed based on average recorded rates, by the company-wide direct allocation costs and allocating these costs monthly to capital orders based on the capital costs of the project and the total capital spend of the company.

Utilities are required to account for expense and capital in uniform ways, so that "each job or unit shall bear its equitable proportion" of total costs, both direct and allocated.<sup>59</sup> Direct material and labor costs are easily identifiable. However, some costs cannot be assigned to a specific task or function. Other costs, such as insurance, tax, and field accounting, typically support a number of activities. For these reasons, SCE allocates these types of costs to each project and SCE's accounting team performs the division overhead allocations each month. These costs are accumulated and then divided by the total base costs to arrive at an allocation rate. That allocation rate is then applied to the total base costs recorded in the individual project to determine the amount of direct allocations assigned to the project.

## 6. Contingency [REDACTED]

Contingency is defined by the Association for the Advancement of Cost Engineering International (AACEI) as "specific provision for unforeseeable elements of cost within the defined scope." Contingency is intended to cover uncertainty and variability in the estimated cost

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<sup>59</sup> 18 C.F.R., Part 101, Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act, Section 4A. *Available at* <https://www.ecfr.gov/current/title-18/chapter-I/subchapter-C/part-101>.

of known scope as well as inadequacies in estimating methods and scope and estimating limitations. As opposed to known risk, contingency attempts to account for unforeseeable elements of cost within the defined project scope, such as the cost of materials and labor or minor schedule changes. Contingency cannot account for major changes to project scope, schedule, or material and labor costs.

Consistent with SCE's standard practice and the AACEI industry standard guideline,<sup>60</sup> SCE applied a 15% contingency to the SoCalGas construction work associated with CWA Phase II – Part 2 and SoCalGas's environmental work, as well as known risks. There is no need for any contingency related to the CWA Phase I or CWA Phase II – Part 1 because those costs have already been incurred and the work completed and therefore contingency is not necessary.

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<sup>60</sup> AACEI Recommended Practice No. 40R-09 "Contingency Estimating: General Principles."

## VII.

### CONCLUSION

Consistent with Section 1005.5(b), SCE has shown that the actual costs for the ELM Project have exceeded the MRPC. For the foregoing reasons, SCE respectfully requests that the Commission grant this Petition to Modify D.25-10-012 to increase the MRPC for the ELM Project to \$328 million (2019 constant dollars) to help ensure appropriate completion of the pipeline mitigation work.<sup>61</sup>

Respectfully submitted,

ROBERT D. PONTELLE  
LAUREN P. GOSCHKE

*/s/ Lauren Goschke*

By: Lauren Goschke

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January 6, 2026

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<sup>61</sup> Rule 16.4(b) requires that this Petition “propose specific wording to carry out all requested modifications to the decision.” See Appendix A for such proposed wording.

**Appendix A**

**Proposed Language to Support Petition to Modify D.25-10-012**



**REQUESTED CHANGES TO THE FINDINGS OF FACT, CONCLUSIONS OF LAW,  
AND ORDERING PARAGRAPHS IN DECISION 25-10-012 AND DECISION 20-08-032**

SCE requests the following changes to the language of the Decision, findings of fact, conclusions of law, and ordering paragraphs in Decision (D.) 25-10-012, consistent with Commission Rule of Practice and Procedure 16.4 (b). Requested deletions to existing text are in ~~strike through~~ and requested additions are in **underline and bold**.

**Revise Finding of Fact # 4 as follows:**

4. SCE expects that the total ELM Project expenditure will remain within the \$~~295~~ **328** million (\$2019 constant) maximum reasonable and prudent cost amount requested in its PFM.

**Revise Conclusion of Law #3 as follows:**

3. Ordering Paragraph 4 of D.20-08-032 should be modified and superseded by the new maximum reasonable and prudent cost amount of \$~~295~~ **328** million for the ELM Project.

**Revise Ordering Paragraph #2 as follows:**

2. Ordering Paragraph 4 of Decision 20-08-032 is modified and superseded by the new maximum reasonable and prudent cost for the Eldorado-Lugo Mohave Series Capacitor Project is \$~~295~~ **328** million.

SCE also requests the following changes to the language of the Decision, findings of fact, conclusions of law, and ordering paragraphs in Decision (D.) 20-08-032, consistent with Commission Rule of Practice and Procedure 16.4 (b).

**Revise Language on page 34 of D.20-08-032 as follows:**

For these reasons, we find that SCE's estimated MRPC, consisting of estimates of direct expenditures of \$~~220~~ **328** million, ~~and a contingency estimate of \$19 million,~~ is reasonable and prudent. We adopt these costs as the maximum reasonable and prudent costs for purposes of Pub. Util. Code § 1005.5(a).

**Appendix B**

**Declaration of Selya Juliano Arce**

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

In the Matter of the Application Of SOUTHERN  
CALIFORNIA EDISON COMPANY (U 338-E)  
for a Certificate of Public Convenience and  
Necessity: Eldorado-Lugo-Mohave Series  
Capacitor Project.

A.18-05-007

**DECLARATION OF SELYA JULIANO ARCE IN SUPPORT OF  
SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) JANUARY 2026  
PETITION FOR MODIFICATION OF DECISION 25-10-012**

**PUBLIC VERSION**

ROBERT D. PONTELLE  
LAUREN P. GOSCHKE

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Dated: **January 6, 2026**

## **DECLARATION OF SELYA JULIANO ARCE**

I, SELYA JULIANO ARCE, say and declare that:

1. I am currently employed by Southern California Edison Company (“SCE”) as a Senior Project Manager in SCE’s Major Construction Project Management department. My business address is 3 Innovation Way, Pomona, CA 91768.

2. I have been employed by SCE for 20 years. My responsibilities include managing several large projects with responsibility for results in terms of project scope, budget, schedule, and risk analysis. As part of my job, I am also the Senior Project Manager for the Eldorado Lugo Mohave (“Project” or “ELM Project”), and my responsibility in that role is to lead SCE’s cross-functional project team responsible for licensing, engineering, and constructing the ELM project. Under my direction, the team’s responsibilities include but are not limited to budgeting, scheduling environmental permitting/licensing, contractor retention and management, environmental compliance enforcement and preparation and implementation of post-construction requirements for the project. I submit this Declaration in support of *Southern California Edison Company’s (U 338-E) January 2026 Petition For Modification of Decision 25-10-012* (“January 2026 PFM”). I also assisted with the preparation of SCE’s PFM of Decision (“D.”) 20-08-032, which was filed on May 24, 2023 and SCE’s December 1, 2023, May 1, 2024, August 29, 2024, November 1, 2024, February 3, 2025, May 1, 2025 and August 1 2025 Status Updates for the ELM Project.

3. I have been involved in various aspects of the ELM Project as Senior Project Manager since February 2018, and in that capacity, I have personal knowledge of the events and decisions that resulted in cost expenditures over the course of ELM Project licensing and execution. This includes expenditures that contributed to SCE’s decision to file the November 2025 PFM requesting an increase in the maximum reasonable and prudent cost for the ELM Project approved in Commission D.25-10-012 from approximately \$295 million to approximately \$328 million, as calculated in 2019 constant dollars.

4. I have reviewed the January 2026 PFM to be submitted in the above-referenced proceeding. The January 2026 PFM provides supplemental information that further supports SCE's request for an increase in the maximum reasonable and prudent cost set for the ELM Project as described in the January 2026 PFM.

5. This Declaration supplements provides additional information about the timeline of events associated with the execution of the SoCalGas pipeline mitigation required as part of the ELM Project, as well as background information regarding payments made. To support preparation of the January 2026, I either provided, or can attest to, information regarding SCE's role progress in supporting SoCalGas's work on the alternating current (A/C) pipeline mitigation and the background for SCE's cost calculations and estimates associated with the SoCalGas A/C pipeline mitigation as described in the January 2026 PFM, and I incorporate the information therein as part of this declaration. .

6. Attached to this Declaration as Attachment A is a Project Narrative ("January 2026 PFM Narrative") that provides additional supporting information to support the January 2026 PFM, and I incorporate the information therein as part of this declaration. In particular, the information in the January 2026 PFM Narrative provides additional background information on the development of the SoCalGas pipeline mitigation scope of work and associated payments and other costs recorded.

8. The January 2026 PFM Narrative contains citations to actual documents that provide supporting and substantiating evidence for the discussion in the January 2026 PFM Narrative Copies of those documents (or relevant portions thereof) are set forth in Appendix B to this Declaration and are organized in separate Document Sets.

9. I have personal knowledge of the information in this Declaration, including the process for compiling the narrative attached as Attachment A as well as the Document Sets attached as Attachment B, and if called as a witness, I could and would competently testify thereto.

10. Insofar as the materials and information referenced in this Declaration and its appendices are factual in nature, I believe them to be correct.

11. Insofar as the material in this Declaration and its appendices is in the nature of opinion or judgment, it represents my best judgment.

12. I supervised the preparation of this Declaration, including Attachment A and Attachment B.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 5th day of January 2026, at Pomona, California.

By: /s/ Selya Juliano Arce  
Selya Juliano Arce  
Professional Engineer and Senior Project Manager  
Southern California Edison Company

**Attachment A**

**Selya Juliano Arce Narrative**

## **SOCALGAS MITIGATION PROJECT HISTORY NARRATIVE**

I became the Project Manager for the ELM Project in February 2018, and I am intimately familiar with the history and specifics of the project since that time. In addition, through my exposure to the ELM Project and my interactions with project team members, I also have knowledge about the events that occurred and decisions that were made prior to that time.

Before I joined the project team, the ELM Project was identified by the California Independent System Operator (CAISO) as a critical transmission project necessary to bring additional renewable energy generation into California.<sup>1</sup> The ELM Project consists of the installation of series capacitors along three existing 500kV transmission lines to increase the power transfer capability of the existing system. While the ELM Project would increase the line ratings of these 500 kV transmission lines, it would not increase the voltage of the lines.

When I became Project Manager for the ELM Project, I learned that Southern California Gas Company (SoCalGas) had two gas pipelines that ran parallel to the Lugo-Mohave 500kV transmission line (L/M T-L), one of the three transmission lines that would have an increased line rating as a result of the ELM Project. I also learned that the L/M T-L and the SoCalGas pipelines had been operating in close proximity since the mid-1960s, when both sets of facilities were constructed. I understood that SoCalGas likely already had some kind of cathodic protection and/or alternating current (A/C) mitigation installed along the pipeline since the utility infrastructure had been operating in parallel for years without issue. However, I did not know if the increase in the line rating resulting from the installation of the ELM Project series capacitors would have any impact on the pipelines or necessitate any additional pipeline mitigation.

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<sup>1</sup> The CAISO identified the ELM Project as a policy-driven transmission project in its 2012-2013 transmission planning cycle. *Available at* <http://www.caiso.com/Documents/BoardApproved2012-2013TransmissionPlan.pdf>. The continued need for the ELM Project was confirmed in the 2024-2025 transmission plan, *Available at* <https://stakeholdercenter.caiso.com/InitiativeDocuments/BoardApproved-2024-2025-TransmissionPlan.pdf>.



SCE's goal is to bring the ELM Project online as soon as practicable to facilitate the integration of additional renewable generation needed to meet the state's renewable energy goals. I knew that meeting Project milestones was critical to keeping the ELM Project on schedule, and as a result, my decisions as Project Manager have been driven largely by schedule, while not overlooking the need to be reasonable and prudent with any expenditures.<sup>2</sup> Given this focus, I was eager to coordinate with SoCalGas to get their input on the ELM Project, and I set up a kick-off meeting for the two companies to discuss the ELM Project in January 2019.

The purpose of the January 2019 kick-off meeting was to provide SoCalGas with the scope of the proposed ELM Project and ask for SoCalGas's input on the impact of the ELM Project on the existing gas pipelines. In the kick-off meeting I shared a map of the ELM Project which showed that the L/M T-L 500 kV transmission line parallels the SoCalGas pipelines for approximately 55 miles. I asked the SoCalGas representatives if they thought any additional mitigation would be required as a result of the ELM Project and if a pipeline evaluation and/or a study was necessary to determine whether the ELM Project would be expected to have any impact on the gas pipelines, and if so, what mitigation was required. I also asked if a study were necessary, whether SoCalGas would perform the study, and if so, what information SoCalGas would need to complete the study and when SCE could expect to receive the results. In the meeting, SCE secured SoCalGas's commitment to support a study, if needed, and coordinate any gas pipeline mitigation that might be necessary. SoCalGas representatives stated that they would need additional details on the ELM Project to determine whether a study would be required and if so, which company should conduct the study. SoCalGas's representatives agreed to make best efforts to align any required pipeline mitigation work with the schedule for the ELM Project

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<sup>2</sup> Throughout this document I refer to decisions I made or authorizations I gave our contractor, SoCalGas, or others. These decisions typically were not made by me alone. They were evaluated and approved by, at a minimum, my management and immediate members of the ELM team and/or internal management committees including the Project Licensing and Execution Strategy Committee ("PLSC") and the Transmission and Substation Project Oversight Committee ("TSPOC").

series capacitor work. The companies also agreed to continue to coordinate while the ELM Project proceeded through the licensing process.

On April 19, 2019, SCE submitted an amended application seeking a Certificate of Public Convenience and Necessity (CPCN) for the ELM Project (CPCN Application). At the time SCE filed the CPCN Application, SoCalGas had not yet assessed the potential impacts of the ELM Project on its gas pipelines; therefore, the CPCN Application explained that the scope of the ELM Project *could* include the installation of A/C mitigation, *if* mitigation were determined to be needed.<sup>3</sup>

In the months following the kick-off meeting, SCE and SoCalGas continued to meet to discuss the ELM Project. Through ongoing discussions, I understood that SoCalGas planned to take the lead in assessing the potential impact of the ELM Project to their gas pipelines. The companies agreed that if an A/C study were necessary to assess these impacts, that SoCalGas would take the lead on conducting the study, since SoCalGas has both the in-house expertise and knowledge of third-party consultants with expertise in evaluating impacts of high-voltage transmission lines on gas pipelines. SCE agreed to provide information about the ELM Project and existing transmission lines to support SoCalGas's analysis, as needed.

The companies also agreed that if an A/C study were necessary, SCE would pay for SoCalGas to conduct the study. While SCE could have engaged its own consultant to conduct the A/C study, SCE's technical and management teams unanimously decided that it would be more effective for SoCalGas to perform the study since the study would evaluate impacts to SoCalGas's infrastructure. I felt comfortable with this arrangement and I believed that it would result in the most efficient outcome because SoCalGas is the gas pipeline operator and therefore I felt the most appropriate party to assess the validity of the study's results regarding impacts to the gas pipelines. I expected this approach to reduce review cycles and streamline the process. I

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<sup>3</sup> April 19, 2019, Southern California Edison Company's Amended Application for a Certificate of Public Convenience and Necessity for the ElDorado-Lugo-Mohave Series Capacitor Project, p. 5. Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M283/K484/283484103.PDF>.

also felt comfortable with this approach because, as part of any agreement between SCE and SoCalGas to pay for the A/C study, SCE would retain the right to review the study model and any results, including recommended mitigation.

On August 12, 2019, the CPUC published a Draft Initial Study/Mitigated Negative Declaration (IS/MND) and Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) for the ELM Project. The MMCRP included three mitigation measures (MMs) requiring SCE to assess and address the potential impacts of the ELM Project on neighboring utility systems, including the SoCalGas pipelines (MM UT-1 through MM UT-3). Relevant here, MM UT-1 requires SCE to work with SoCalGas to conduct an A/C inference study to determine whether the ELM Project would create an “increased risk of corrosion due to induced currents or voltages” on the SoCalGas pipelines that parallel or cross portions of the ELM Project, and, if so, to “use data gathered in the alternating current interference study to determine appropriate design measures to protect the utility from corrosion.”<sup>4</sup> MM UT-1 also requires SCE to ensure all necessary grounding or other measures necessary for gas pipeline protection to be installed before the in-service date of the ELM Project series capacitors.<sup>5</sup>

In my early discussions with SoCalGas it appeared that the company was unsure whether the ELM Project would impact the existing gas pipelines, since certain gas pipeline protections were already in place and the transmission and gas pipeline infrastructure had been operating in close proximity for years, without any known concerns. But now that I was aware that completion of an A/C study was likely to be a condition of the ELM Project approval, and therefore any delay in the completion of an A/C study or the installation of appropriate mitigation could delay the in-servicing of the ELM Project, I became concerned about the potential for the gas pipeline mitigation work to impact the ELM Project schedule.

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<sup>4</sup> ELM Project Final IS/MND, November 2019, p. 46.

<sup>5</sup> *Id.*

I knew it would take time to develop and complete an A/C interference study. I also knew that SCE would want time to review and validate the A/C study model and its results and that this process could also take time. I did not know how long it would take for SoCalGas to complete the A/C study and for SCE to complete its review, but I did not want the ELM Project to be delayed. I was concerned that if the A/C study concluded that the ELM Project would have an impact on the SoCalGas pipelines and therefore recommended installing pipeline mitigation, it would take time to implement the necessary mitigation, obtain any permits necessary to do any proposed work, and complete construction, and that any delay in that process could result in a delay to the ELM Project online date.<sup>6</sup> Therefore, I took an active coordination role with my counterparts at SoCalGas regarding this scope of work and scheduled regular meetings with SoCalGas to discuss next steps, including a timeline for completion. As a result, SCE and SoCalGas began to discuss drafting an agreement to address the scope, schedule, and cost of completing the A/C study and importantly, a schedule for execution.

In November 2019 the CPUC published the Final IS/MND for the ELM Project which included MM UT-1 through MM UT-3, unchanged from the Draft IS/MND. Now that it was very likely that SCE would need to complete an A/C study as part of the ELM Project, SCE and SoCalGas began to draft a Collectible Work Agreement (CWA Phase I) for the cost of the study and an A/C Mitigation Study/Reimbursement Agreement (Agreement) to memorialize the scope of the A/C study and required deliverables. The Agreement stated that SoCalGas would onboard a contractor to conduct an A/C study to assess the impacts of the ELM Project on the SoCalGas pipelines. The Agreement also included clearly defined project milestones and a study completion schedule. It established opportunities for the SCE team to review and provide timely input and feedback on the study model and any study results before determining whether and

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<sup>6</sup> At this point, it was SCE's objective to have the entire project completed by summer 2021, not only to avoid construction delays associated with the several months when outages would be unavailable, but also to make the project's increased power transfer capability available to generators during the summer peak loading season. (See SCE's December 1, 2023 Status Statement in Support for its Petition for Modification of Decision 20-08-032, Document Set 68, Page 985.)

which mitigation would be required. CWA Phase I described SCE's payment to SoCalGas study of the potential impact of any A/C produced by the ELM Project on approximately 55 miles of SoCalGas pipelines running roughly parallel to SCE's ELM Project and to determine whether any mitigation would be required to ensure safe operating conditions. CWA Phase I also included funding for SoCalGas to onboard a contractor to conduct the A/C study.

SoCalGas and SCE executed the CWA Phase I and Agreement in January 2020.<sup>7</sup> I felt comfortable entering into an agreement with SoCalGas at this time, even though a decision on SCE's CPCN Application for the ELM Project had not yet been issued, because the MMs requiring SCE to coordinate with SoCalGas to conduct an A/C study were included in the CPUC's Final IS/MND. In my experience, the project's CEQA document is not likely to substantially change once made final. In my experience, it is also common for work on projects with long lead times to parallel the project approval process. Given the need to bring the ELM Project online as soon as possible, I felt that it was prudent to enter into the CWA Phase I and Agreement so that SoCalGas could promptly begin work on the A/C study. I believed that early coordination could help minimize any possible delays in completion of the A/C study, which was a necessary prerequisite for determining whether any gas pipeline mitigation would need to be installed before the full capacity made possible by the ELM Project was made available, since it was only after SoCalGas completed the A/C study that SoCalGas assess whether A/C mitigation was necessary, and if so, install the appropriate mitigation. Therefore, to maintain the ELM Project schedule, I believed it was prudent to proceed with the A/C evaluation process as soon as possible.

Because the A/C study was a necessary piece of the ELM Project and, but for the ELM Project SoCalGas would not have needed to conduct the study, SCE agreed to pay for SoCalGas

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<sup>7</sup> Citations and references to a "Document Set" throughout the balance of this Narrative will be to the Document Sets included in Appendix B, as paginated by the stamp on the bottom of each page. *See* Appendix B of the Declaration of Selya Juliano Arce, Document Set 1 (CWA Phase I) pages 1-3; Document Set 2 (SCE/SoCalGas Agreement) pages 4-7.

to complete it.<sup>8</sup> Therefore, in January 2020 I authorized a payment of [REDACTED] to SoCalGas for CWA Phase I.<sup>9</sup> I felt comfortable with this amount because the CWA Phase I and Agreement included clearly defined milestones, which provided SCE with opportunities to review SoCalGas's progress and offer timely input. This structured approach helped ensure alignment between the two companies throughout the study lifecycle. CWA Phase I also underwent a thorough review by both SCE's technical team and its procurement/contracts team. Additionally, CWA Phase I required SoCalGas to provide SCE with an invoice before starting any work, along with reasonable backup documentation for (1) SoCalGas's reasonable administrative costs in preparing the technical specifications and performing/preparing the A/C Study and (2) the SoCalGas's A/C consultant's actual costs for performing the A/C Study. The Agreement provided that if the invoice was less than the deposit SCE provided to SoCalGas, SoCalGas would reimburse SCE the difference. Additionally, any spend to complete the A/C study above the agreed upon deposit would need to be approved by both companies.

The Agreement between SoCalGas and SCE also described the parameters for performance of the A/C study, including the responsibilities of each company to review and validate the model and study, as well as a schedule for study completion. The Agreement stated that the A/C study would be complete by April 24, 2020, four months after the companies executed the CWA Phase I and Agreement.<sup>10</sup> At the time SCE and SoCalGas entered into the Agreement, SoCalGas estimated that it would likely take another four to six months after completing the A/C study to construct any necessary A/C mitigation measures. The projected schedule laid out in the Agreement aligned with the overall ELM Project schedule.

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<sup>8</sup> All spend in this Declaration is provided in nominal dollars and represents the actual dollars at the time the transactions occurred for authorized project activities (e.g., payment for CWA, A/C study). The total project spend in nominal dollars is represented in Table 3 in the January 2026 PFM. All other spend described in the January 2026 PFM is provided in \$2019 constant dollars to provide an accurate comparison to the MRPC approved in D.20-08-032.

<sup>9</sup> Document Set 1 (CWA Phase I) pages 1-3.

<sup>10</sup> Document Set 2 (SCE/SoCalGas Agreement) pages 4-7.

After the companies executed CWA Phase I, I was informed that SoCalGas onboarded a consultant to conduct an A/C study to assess the impact of the ELM Project to the SoCalGas pipelines. SCE was not involved in either the development of the SoCalGas request for proposals (RFP) for an A/C study consultant or in the contractor selection process for the A/C study work. However, SoCalGas consistently provided SCE with updates on the criteria for selection during the companies' regular meetings, and I believed that because SoCalGas is a regulated utility, similar to SCE, that SoCalGas is required to onboard only qualified contractors per its compliance requirements. Therefore, I felt comfortable that SoCalGas had done its due diligence when it selected its contractor, Ark Engineering to complete the A/C study.

Ark Engineering provided SCE with the first version of the A/C study in April 2020, as anticipated. Per the Agreement, SCE began reviewing the study. Once the SCE team began reviewing the study, SCE noticed that the study recommended additional A/C mitigation measures along approximately 47 of the 55 miles of the ELM Project where the gas pipelines parallel the ELM Project transmission lines. The SCE team did not anticipate this recommendation and expected the study to recommend fewer miles of mitigation, because SoCalGas already had protection measures in place along the entirety of the gas pipelines in this area, and the SoCalGas pipelines and SCE transmission line had been operating in parallel for many years without incident.

I was committed to cooperating with SoCalGas to provide the necessary gas pipeline protection, but I also wanted to validate that all identified mitigation was actually precipitated by the ELM Project. I did not want SCE to pay for mitigation associated with any pre-existing or unrelated conditions. Therefore, I asked my team to conduct a thorough peer review of Ark Engineering's A/C study to validate the assumptions used to develop the model. The SCE team soon recognized that SCE did not have anyone in-house with the level of gas pipeline expertise necessary to thoroughly validate all the assumptions in the A/C study model. Therefore, my team decided it was prudent to onboard a gas pipeline expert to review the study. SCE conducted a RFP in June 2020 and selected Corrpro as its gas pipeline expert.

While SCE was working through onboarding Corrpro, SCE received a copy of the CPUC's final Decision approving the CPCN for the ELM Project. Compliance with the A/C mitigation measures was made a requirement of approval of the ELM Project CPCN in Decision (D.) 20-08-032, *Decision Granting a Certificate of Public Convenience and Necessity for the Eldorado-Lugo-Mohave Series Capacitor Project*, issued August 27, 2020.<sup>11</sup>

SCE onboarded Corrpro in late 2020 and after securing a non-disclosure agreement with SoCalGas to access the data used in the A/C study, Corrpro began reviewing Ark Engineering's study. Corrpro provided a peer review of the Ark Engineering study assumptions and methodology along with a gap analysis in May 2021. Corrpro raised concerns regarding the study's inputs and recommended validating the study's assumptions regarding soil resistivity, pipeline coating resistance, and transmission line loading values. Corrpro recommended that the model assumptions be validated with field data, as Ark Engineering's initial study was based on general assumptions and not field data from the ELM Project area. After back-and-forth discussions on these parameters, the two contractors agreed that additional field data was needed to support accurate calculations and analyses. Corrpro then completed a sensitivity analysis and conducted an evaluation of the SoCalGas testing facilities and submitted its gap analysis and feedback to the SoCalGas contractor.

While I understood that it could cost SCE more to have Corrpro and Ark Engineering gather field data, I believed that it was sensible for SCE to incur these costs because a valid study would bring SCE additional savings if it were to result in a narrower scope of mitigation. SoCalGas anticipated that once the scope of the mitigation was identified, it would take an estimated four to six months to install the mitigation. Around this time, the ELM Project itself had been delayed and therefore the timeline for completing the A/C study and subsequent potential gas pipeline mitigation work was not a concern.

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<sup>11</sup> D.20-08-032, OP #1, at p. 51.



Corrpro reviewed a revised model based on the information gathered in the field and produced a revised version of the April 2020 study. Corrpro provided the revised study to SoCalGas for their feedback and review in September 2021. Ark Engineering subsequently revised the study to include various scenarios agreed to by both parties.

In early 2022 SoCalGas shared that it would be submitting a change order to CWA Phase I to account for the cost of the ongoing revisions to the study model and the additional field testing required as a result of Corrpro's feedback on Ark Engineering's initial model. In February 2023 SoCalGas submitted a change order to CWA Phase I to SCE for the cost to conduct additional analysis to confirm the results of the initial study based on additional information gathered in the field. I reviewed the change order and found that the increased costs accurately reflected the cost to SoCalGas's consultant to conduct the additional field studies and to complete the A/C study.<sup>12</sup> The change was documented as a revision to the CWA Phase I in April 2023. I oversaw the processing of a formal change order request (ELM 127)<sup>13</sup> and in August 2023 authorized a payment of an additional \$ [REDACTED] to SoCalGas to complete the A/C study.<sup>14</sup>

SCE and SoCalGas remained in regular communication throughout the 2022 - 2023 time period as Ark Engineering and Corrpro worked together to refine and validate the A/C study. My team held bi-weekly recurring meetings with SoCalGas to discuss the progress of the A/C study and to facilitate the flow of information between SCE and SoCalGas's contractors and to discuss critical ELM Project milestones and schedule. SCE, SoCalGas, and their consultants had ongoing discussions about the assumptions underlying each model and the resulting scope of required mitigation. As described below, these efforts ultimately resulted in a significant reduction in the need for mitigation, lowering total construction and restoration costs. During this same period SCE had regular bi-monthly meetings with the CPUC Energy Division where SCE

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<sup>12</sup> Document Set 3 (SoCalGas Change Order), pages 8-21.

<sup>13</sup> Document Set 4 (ELM 127), pages 22-34.

<sup>14</sup> *Id.*

shared SoCalGas's progress on the A/C study and SCE explained that SCE would not know the scope, and therefore cost, of any required gas pipeline mitigation work until sometime after the A/C study was complete.

Around this same time my team and I recognized that, separate from the pipeline mitigation costs, the projected cost forecast for the ELM Project was likely to exceed the MRPC established in D.20-08-032 sometime in 2023.<sup>15</sup> Therefore, I directed the team to prepare a PFM to account for the excess costs to complete the ELM Project. The PFM was filed on May 24, 2023 (May 2023 PFM), and I believe that recorded costs exceeded the MRPC for the first time within one month thereafter.<sup>16</sup>

The MRPC established in D.20-08-032 did not include the cost to complete the SoCalGas pipeline mitigation work, and the May 2023 PFM request also did not include the cost to complete the SoCalGas pipeline mitigation work because the scope and the cost of that work were unknown at either time. In the May 2023 PFM, SCE explained that the scope of the SoCalGas pipeline mitigation work was still unknown as the A/C study was not yet final. Therefore, SCE could not provide an estimate for the cost of the SoCalGas pipeline mitigation work in the PFM. SCE explained that once those costs were known, it would either amend the May 2023 PFM or file a new PFM to account for those costs.

During this time period, SCE continued to hold regular quarterly meetings with the CPUC Energy Division. In these meetings SCE briefly shared the progress it was informed that SoCalGas was making on the gas pipeline mitigation work. SCE explained that beyond certain

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<sup>15</sup> Even by November 2022 my team and I were still expecting total nominal project costs (excluding costs associated with the SoCalGas pipeline mitigation work) to be about \$246.6 million, which I believed would still be within the MRPC total of \$239 (constant 2019 dollars). (*See SCE's December 1, 2023 Status Statement in Support for its Petition for Modification of Decision 20-08-032*, Document Set 65, Pages 976-978.)

<sup>16</sup> I anticipated that the additional cost of the SoCalGas pipeline mitigation could cause SCE to exceed the MRPC for the ELM Project, thus requiring a PFM and therefore any non-pipeline cost increases (such as those discussed throughout this Declaration) could be included in that PFM. However, the fact that all the other cost drivers caused the cost for the ELM Project to approach approved MRPC even before any of the SoCal Gas pipeline mitigation work was estimated or included in a forecast necessitated the filing of the May 2023 PFM without the SoCalGas pipeline mitigation costs.

costs already incurred (*i.e.*, project management costs associated with coordination with SoCalGas and the cost to onboard and manage Corrpro), the cost of the A/C mitigation work (including the cost to design, engineer, install, or mitigate any impacts) was not included in the May 2023 PFM because the A/C study was not yet complete. Therefore, the scope of the required SoCalGas pipeline mitigation work was unknown, and costs could not yet be estimated. That information was also shared in SCE's May 2023 PFM and the subsequent status updates submitted in response to rulings issued by the Administrative Law Judge (ALJ) in the proceeding. I submitted declarations along with those Status Updates, and in my declarations I made clear that I anticipated that SCE would amend the May 2023 PFM or file a new PFM to account for the cost of the SoCalGas pipeline mitigation work, once those costs were known.

Meanwhile, Corrpro and Ark Engineering conducted field testing between June and September 2023. The results of the field tests were used to refine and update the A/C study model and in October 2023 the consultants jointly proposed a revised A/C model. Both companies agreed to the model and a final A/C study was completed in March 2024. The final A/C study recommended the installation of physical mitigation facilities along approximately 19 miles of SoCalGas pipelines – a significant decrease in scope from the approximately 47 miles of mitigation identified in the first A/C study.

The final A/C study described the physical work that would be required to mitigate the impacts of the ELM Project on the SoCalGas pipelines. SCE and SoCalGas reviewed these recommendations and agreed that SoCalGas would be responsible for installing the A/C mitigation. The A/C mitigation would include trenching on one or both sides of the pipeline to install 2/0 copper wire in the trench. SoCalGas would then attach the copper wire to the solid-state decouplers (SSDs) at specific locations and then attach the SSDs to the pipeline. I understood from SoCalGas that these measures, when combined with the mitigation already in place, were believed to be sufficient to mitigate any of the A/C impacts from the ELM Project. SoCalGas also explained that the study did not identify any additional cathodic protection measures because SoCalGas's pre-existing cathodic protection measures, when working in

conjunction with the proposed A/C mitigation measures, were determined to be sufficient to protect the SoCalGas pipelines from A/C induced corrosion.

Once the necessary mitigation measures were known, I began to meet more frequently (at least bi-weekly) with my counterparts at SoCalGas to discuss next steps. In September 2024, the two companies began negotiating a follow-up to CWA Phase I to account for the costs associated with material procurement, project planning and permitting for the SoCalGas pipeline mitigation work.

Because SoCalGas was preparing to begin work on the physical scope of the pipeline mitigation, SoCalGas also began to evaluate which environmental permits would be necessary to implement the proposed scope of work. After discussions with the relevant agencies, SoCalGas determined that it would need to obtain permits from the Bureau of Land Management (BLM) and Mohave National Preserve (MNP) before work could begin on federal lands managed by those agencies. Therefore, SoCalGas began working to obtain necessary approvals from BLM and MNP to proceed with the pipeline mitigation work. SoCalGas submitted separate SF-299 Applications containing information regarding the scope of the A/C mitigation work occurring on federal lands to the BLM and MNP, respectively, on September 13, 2024.

In October 2024 SCE opened a new work order to record, track and monitor SCE direct spend on the SoCalGas pipeline mitigation work (ELM 143).<sup>17</sup> SCE recorded the costs of CWA Phase I in this work order and began recording all spend on SoCalGas pipeline mitigation related issues in the work order. SCE established a SoCalGas pipeline mitigation work order in October 2024 in part because it expected the negotiations regarding CWA Phase II – Part 1 to begin in November 2024 and the pre-construction effort on the SoCalGas work to begin in earnest after CWA Phase II – Part 1 was signed. In preparation for pre-construction work to begin on the SoCalGas pipeline work, SCE shared a copy of the final A/C study with the CPUC and BLM on November 1, 2024 as required by the ELM Project MM UT-1.

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<sup>17</sup> Document Set 5 (ELM 143), pages 35-43.

SCE remained in regular communication with the CPUC Energy Division throughout the entirety of the ELM Project, providing biweekly and quarterly updates on the ELM Project's status. In those discussions, SCE shared that it expected the major work on the six series capacitors needed to energize the ELM Project to be completed by May 2025. However, I knew that it was unlikely that the ELM Project would come online after the series capacitor work was complete because MM UT-1 prohibited SCE from in-servicing the ELM Project series capacitors until the SoCalGas pipeline mitigation was installed. While SoCalGas and SCE had been working diligently to draft CWA Phase II – Part 1, as of December 2024 there was no final agreement and therefore I knew it was very unlikely that the SoCalGas pipeline mitigation measures would be installed before May 2025. I also knew that it was important for the ELM Project series capacitors to come online as soon as possible. Therefore, my team and I worked together to develop a creative solution that would allow SCE to in-service the ELM Project series capacitors before implementing the gas pipeline mitigation measures in MM UT-1, while maintaining pipeline safety and integrity.

Following discussions with the CPUC Energy Division and its consultant Aspen on project energization, SCE submitted a Minor Project Revision (MPR) request to the CPUC on January 27, 2025 in advance of the completion of the series capacitor work, seeking approval to energize at least some of the ELM Project series capacitors to provide at least some of the additional capacity made possible by the ELM Project as soon as the series capacitors were available to come online. Namely, SCE proposed in the MPR to: 1) energize the ELM Project series capacitors along the ELM Project transmission lines that do not parallel the SoCalGas pipelines; and 2) continue to operate the transmission line that parallels the SoCalGas pipeline (the L/M T-L) consistent with pre-project conditions until the SoCalGas pipeline mitigation work was completed, at which point SCE would then remove any limits on loading levels across the entire project. SCE believed this approach would mitigate any potential risk to the neighboring

SoCalGas pipeline and maintain worker safety while the SoCalGas pipeline mitigation was being installed, while also providing some series capacitor benefit.<sup>18</sup>

The CPUC approved SCE's MPR request in February 2025.<sup>19</sup> That same month, SCE filed another Status Update with the CPUC. Even though the CPUC had approved SCE's MPR request in February 2025, permitting SCE to in-service a portion of the ELM Project prior to completing the SoCalGas pipeline mitigation work, the MPR also appeared to limit the way SCE planned to operate the L/M T-L pending implementation of the SoCalGas pipeline mitigation measures. SCE and SoCalGas both reviewed the approved MPR and agreed that SCE would submit a clarification letter to the CPUC requesting authorization to continue operating the L-M T/L at pre-project ratings until the SoCalGas pipeline mitigation was complete. SCE and SoCalGas began meeting to discuss revisions to the MPR. During this same period SCE and SoCalGas continued negotiating the terms of a second CWA (CWA Phase II) which would address the remainder of the costs for the SoCalGas pipeline mitigation work (including material purchase, project planning, construction, project reconciliation, and close out costs).

Because SCE opened a SoCalGas work order in October 2024, in the following Status Update (February 2025) SCE reported SCE's spend to date on the SoCalGas pipeline mitigation work. Each of SCE's subsequent Status Updates (May 2025 and August 2025) filed with the CPUC also included a report on SCE's spend on the SoCalGas pipeline mitigation work.

As I understood it, SoCalGas preferred to receive CPUC approval of SCE's revisions to the MPR before beginning construction on the gas pipeline mitigation measures. While I understood that position, I was concerned that any delay in the construction of the SoCalGas pipeline mitigation work could delay the online date for the ELM Project. Therefore, I felt it was critical for SoCalGas to continue with any pre-construction work that could be done while the companies simultaneously discussed the revisions to the MPR. As a result, SCE and SoCalGas

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<sup>18</sup> SCE MPR, submitted January 7, 2025. Available at [mpr008\\_req2.pdf](#).

<sup>19</sup> CPUC MPR Approval Letter, issued February 22, 2025. Available at [https://ia.cpuc.ca.gov/environment/info/asp/elm/mprs/mpr008\\_022225.pdf](https://ia.cpuc.ca.gov/environment/info/asp/elm/mprs/mpr008_022225.pdf).

agreed that due to the urgent need to begin work as soon as possible, it made sense to break CWA Phase II into two parts. CWA Phase II – Part 1 would cover the cost to SoCalGas to procure materials, complete pre-construction planning, and any required permitting for the gas pipeline mitigation system while CWA Phase II – Part 2 would cover the actual construction costs of the gas pipeline mitigation. Because the work contemplated under CWA Phase II – Part 1 was not focused on construction, this work could commence while the two companies continued to meet to discuss the MPR revision and construction costs, and while awaiting permits from the federal agencies.

SCE and SoCalGas entered into CWA Phase II – Part 1 in March 2025 and I authorized a payment of \$ [REDACTED]<sup>20</sup> the following month (April 2025). SCE's payment in CWA Phase II – Part 1 included the costs to procure materials, project planning, and permitting services. I felt comfortable with paying the amount requested in CWA Phase II – Part 1 because SoCalGas's proposal and cost estimates were based on SoCalGas' past experience, demonstrating their expertise and familiarity with such work and their own infrastructure. CWA Phase II – Part 1 clearly outlines the tasks SoCalGas will perform, including acquiring materials, project planning, and permitting services for the SoCalGas pipeline mitigation system. In addition, SoCalGas assured SCE that any unused deposit will be refunded upon project completion.

After SCE and SoCalGas executed CWA Phase II – Part 1, SoCalGas began receiving materials and preparing equipment to begin work. SoCalGas also onboarded a qualified contractor in advance so that SoCalGas could begin construction work as soon as a Notice to Proceed (NTP) was issued by the BLM and MNP. It is my understanding that SoCalGas received a signed Special Use Permit (SUP) from the MNP in May 2025. On April 11, 2025, SoCalGas submitted the Jurisdictional Water Permit to the Regional State Water Resources Control Board and the Lake and Streambed Alteration Agreement (LSAA) to the California Department of Fish

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<sup>20</sup> Document Set 6 (CWA Phase II - Part 1), pages 44-48.

and Wildlife (CDFW). It is also my understanding that SoCalGas received a Section 401 Certification on July 16, 2025, and the LSAA on August 28, 2025.

Given the critical nature of the ELM Project, I met weekly with my counterparts at SoCalGas to get updates on the status of the pipeline mitigation work. In July 2025 the two companies began negotiating CWA Phase II – Part 2 to cover the costs of construction, reconciliation, and project close. During my discussions with representatives from SoCalGas I learned that the SoCalGas construction team expected that construction of the gas pipeline mitigation measures would likely take between ten and twelve months, not the four to six months SoCalGas had originally estimated. This longer construction period would delay the ELM Project online date. I asked the SoCalGas team if they could improve the schedule and SoCalGas agreed to speak to their contractor about whether the construction work could be expedited.

SoCalGas's contractor was able to expedite the construction of the A/C mitigation work so that it would be completed in approximately eight months, closer to the four to six month estimate SoCalGas originally provided SCE. The expedited construction method resulted in an increased construction cost because SoCalGas hired additional staff and equipment to complete the work, but I believe the additional cost to expedite the SoCalGas mitigation was appropriate given the need to bring the ELM Project online as soon as possible. I believe that the decision to accelerate work, even at the additional cost, was reasonable because if work had proceeded under a non-accelerated schedule, the earliest that the ELM Project would have been able to come online would have been 10 - 12 months from the start of mitigation construction, which would have delayed the ELM Project in-service date beyond summer 2026. Under the expedited schedule SoCalGas shared that the expected completion date for the pipeline mitigation work would be June 2026, meaning that SCE would have the capability to operate all series capacitors during the summer 2026, should the need arise.

During this same period SCE and SoCalGas continued to discuss the language of the revised MPR and on August 26, 2025 SCE submitted a clarification letter to the CPUC ED explaining that while SCE planned to in-service some of the ELM Project series capacitors



before the SoCalGas pipeline mitigation work was complete, SCE would ensure the continued operation of the L-M T/L at its current rating by 1) by-passing one or more of the series capacitors on the L-M T/L until the SoCalGas pipeline mitigation work was complete and 2) delay requesting that CAISO re-rate the line to the post-ELM rating until SCE has written confirmation from SoCalGas that the A/C mitigation work was complete.<sup>21</sup> Energy Division approved a revised MPR on August 28, 2025.<sup>22</sup> With the revised MPR approved, SoCalGas was ready to move forward with construction.

SCE and SoCalGas signed CWA Phase II - Part 2 on August 11, 2025 and I authorized a payment of [REDACTED] the following month.<sup>23</sup> I felt comfortable with the amount requested in CWA Phase II – Part 2 because SoCalGas’s proposal and cost estimates were based on their past experience with similar work, demonstrating their expertise and familiarity with such work and their own infrastructure. Similar to the previous CWAs, SoCalGas also committed to refund any unused deposit upon project completion. Additionally, SoCalGas provided SCE with a cost breakdown which clearly outlines the various tasks SoCalGas will perform during construction.

SoCalGas reported that they received a NTP for the A/C mitigation work from the CPUC in August 2025 and a signed NTP from the BLM in September 2025. With the two phases of CWA Phase II executed and the necessary permits in hand, SoCalGas broke ground on the A/C mitigation work in September 2025.

Following agreement on construction, reconciliation, and close out costs, in October 2025 SCE and SoCalGas began discussing environmental restoration costs. Initially SoCalGas had asked SCE to perform all the required environmental restoration work, but after ongoing discussions, SoCalGas concluded that it would prefer to complete all the restoration work along

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<sup>21</sup> SCE’s Revised MPR, submitted on August 26, 2025. Available at, [mpr008\\_req.pdf](#).

<sup>22</sup> CPUC Approval of SCE’s Revised MPR, granted on August 28, 2025. Available at, [https://ia.cpuc.ca.gov/environment/info/aspen/elm/mprs/mpr008\\_08282025.pdf](https://ia.cpuc.ca.gov/environment/info/aspen/elm/mprs/mpr008_08282025.pdf).

<sup>23</sup> Document Set 7 (CWA Phase II - Part 2), pages 49-55.

the SoCalGas pipelines. SoCalGas explained that because it had not initially planned to do any restoration work, those costs had not been included in any of the prior CWAs.

SCE asked SoCalGas to provide SCE with a cost estimate to complete the restoration work. Once SCE received that estimate SCE would have a complete picture of total costs for the gas pipeline mitigation work to submit to the CPUC. SoCalGas provided SCE an estimate for its environmental work in late November 2025. SCE reviewed the estimate and had some questions about estimated costs. After further discussion, SoCalGas provided SCE a final restoration estimate in December 2025.

I relied heavily on SoCalGas to provide the costs related to the SoCalGas pipeline mitigation work because I believe SoCalGas to have expertise on pipeline related matters, and as such, I deferred to that expertise in estimating the total cost to complete the work necessary to protect its gas pipelines. Therefore, the cost of the SoCalGas pipeline mitigation was largely driven and developed by SoCalGas, although, as discussed above, SCE reviewed and evaluated the reasonableness and clarity of those costs.

Once I received the final estimate from SoCalGas my team put together a total projected cost to complete the SoCalGas pipeline mitigation work, which included SCE's payments to SoCalGas and SCE's in-house costs to support the work. Once the total cost to SCE was developed, my team prepared this January 2026 PFM. In all, the total cost to complete the SoCalGas pipeline mitigation work is estimated at \$50.2 million (nominal dollars).<sup>24</sup>

SoCalGas informed me that it will perform a true-up of costs once the gas pipeline mitigation work is complete, at which time SCE will receive any potential credits. SoCalGas has shared that they expect to complete the pipeline mitigation work no later than June 2026. I expect to fully in-service the ELM Project as soon as the gas pipeline mitigation is in place.

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<sup>24</sup> \$50.2 million nominal is equivalent to \$33.0 million (\$2019 constant).

**Attachment B**

**Document Sets**

Document Set	Document	Page
1	SoCalGas CWA – Phase I	1
2	SoCalGas Agreement	4
3	SoCalGas Change Order	8
4	ELM 127	22
5	ELM 143	35
6	SoCalGas CWA – Phase II – Part 1	44
7	SoCalGas CWA – Phase II – Part 2	49

**Document Set 1**



SOUTHERN CALIFORNIA GAS COMPANY  
COLLECTIBLE WORK AUTHORIZATION

Date Prepared 1/15/2020  
Estimate Prepared By Mark Barajas  
**Purchaser Name and Job Address**  
Name Southern California Edison  
Address 2 Innovation Way  
City Pomona State CA Zip 91768  
Phone # 909-274-3709  
Purchaser's SS# \_\_\_\_\_

Work Request # 0 WO # 94098  
ML \_\_\_\_\_ IO # 300803531  
Phone # \_\_\_\_\_  
**Billing Name and Address, If Different**  
Name Southern California Edison  
Address 2 Innovation Way  
City Pomona State CA Zip 91768  
Phone # 909-274-3709  
Or Federal Tax ID # \_\_\_\_\_

Purchaser requests and authorizes Southern California Gas Company (SoCalGas®) to perform the following work:

Conduct an AC interference study on SoCalGas pipeline assets within the EldoradoLugoMohave  
This study will determine which mitigation solutions will be required to ensure safe operating conditions in the area.

AGREED AND ACCEPTED 2/19/20  
(DATE)  
SOUTHERN CALIFORNIA GAS  
COMPANY BY Thanathee Trinooson  
Thanathee Trinooson  
SIGNATURE  
NAME (PRINT)

PURCHASER Southern California Edison  
(NAME OF COMPANY)  
MIKE CALVITTI PROJECT MANAGER  
PURCHASER OR AUTHORIZED REPRESENTATIVE (PRINT) TITLE  
Mike Calvitti  
SIGNATURE OF PURCHASER OR AUTHORIZED REPRESENTATIVE

PAYMENT INFORMATION		
AMOUNT RECEIVED _____	<input type="checkbox"/> CASH <input type="checkbox"/> CHECK	CHECK # _____
DATE PAYMENT TURNED IN: _____	BY (NAME OF EMPLOYEE): _____	PAYMENT TURNED IN AT: _____

# MPO Invoice Processing Request Form Cover Sheet

Vendor Name

Southern California Gas Company

Invoice #

Deposit 20200113

Invoice Date

1/13/2020

Payment Type:

☒ Non-PO

Vendor #

10085535

GL #

☐ PO

Purchase Order #

Work Performed Period

Project Name	SAP Accounting (Order # or Cost Center)	PO Line Item	Service Line Item (if applicable)	Amount
ELM Series Capacitor	404570		100%	
TOTAL				

Cost Engineer:

Taeck Yim

Print Name

Signature

DocuSigned by:

Taeck Yim

A2250A5BC24A418...

Ä! "Ä! 0! 0

Date

**Cost Engineer: Please complete the top portion of this Cover Sheet and submit document and Invoice to MPO****Approvals** - According to the Approval Authorization Matrix (AAM)

Doc#

Click link to view AAM

[T&D Approval Authorization Matrix](#)

SES#

Title	Print Name	Signature	Date
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Project Manager

Selya Arce

DocuSigned by:

Selya ArceÄ! "Ä! 0! 0

Principal Manager

Charles Adamson

DocuSigned by:

Chuck AdamsonÄ! "Ä! 0! 0

Director

Neal Hunstein

DocuSigned by:

Neal HunsteinÄ! #Ä! 0! 0

(Insert Title)

☐ Invoice Attached☒ Back-Up Attached☐**Will Call** Tuesday or Friday afternoons at GO-1☐ Pick Up By Name

PAX

**MPO: Once approvals have been obtained, please email Invoice Binder to [MPOInvoicing@sce.com](mailto:MPOInvoicing@sce.com).****Please include the vendor name and invoice number in the subject line.****Place hard copy of all documents (if available) in the Invoice Inbox located at PIV-2, 3rd Floor Column K4**

**Document Set 2**



1/7/2020  
Mark Barajas  
Project Manager  
Southern California Gas Company  
17071 Gas Line Road  
Victorville, CA 92394

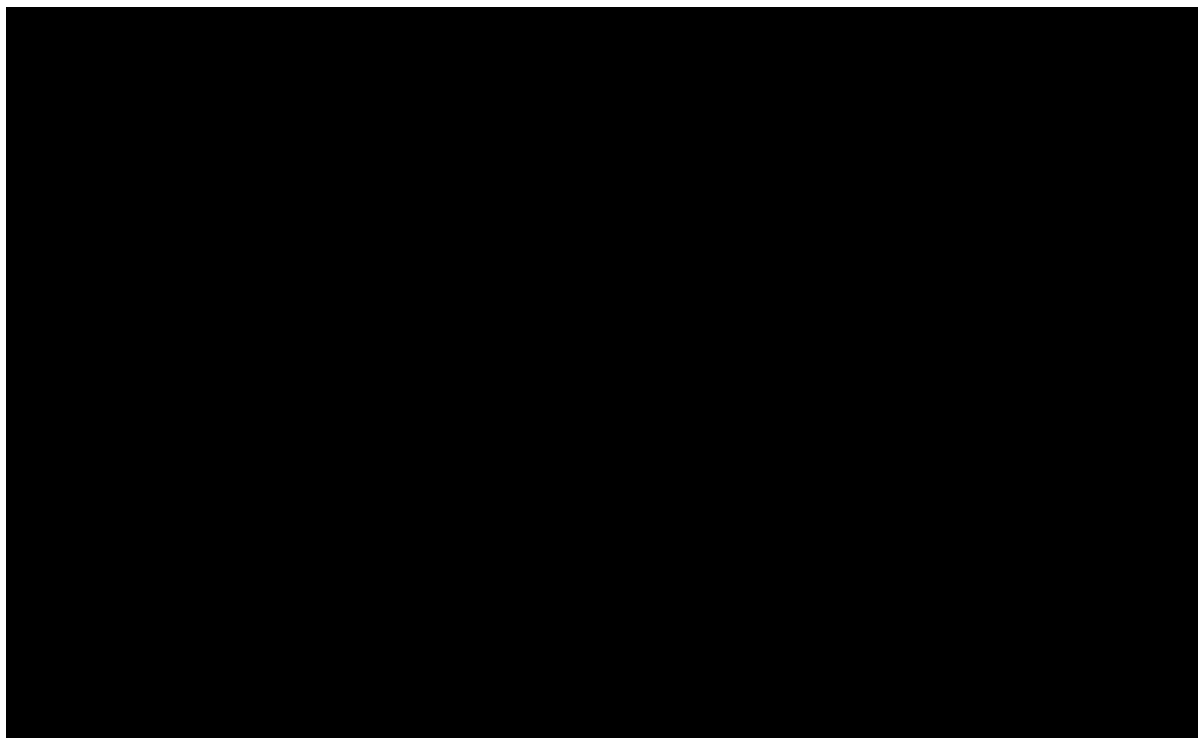
**Re: AC Mitigation Study/Reimbursement Agreement**

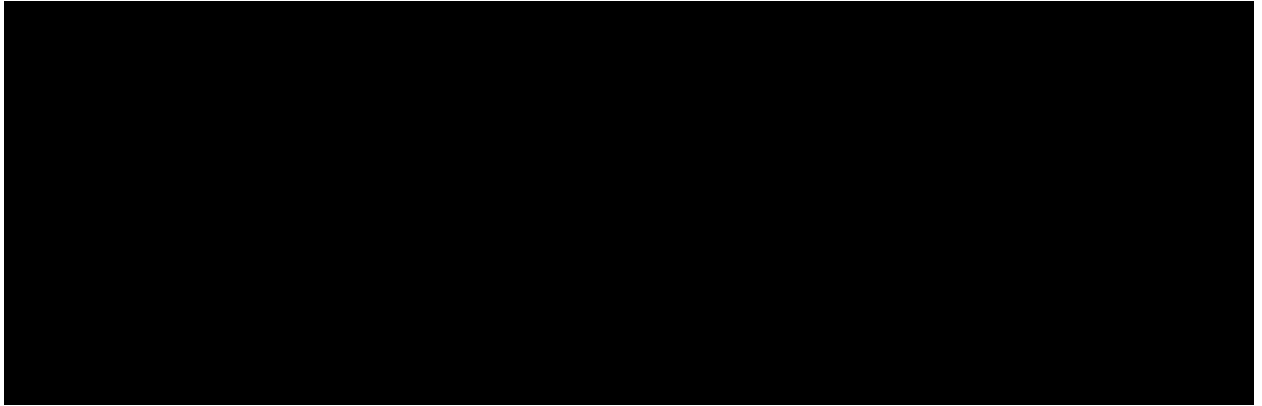
Dear Mr. Barajas:

As you know, Southern California Edison (“SCE”) is analyzing the impact of the increased transmission transfer capability associated with its Eldorado-Lugo-Mohave Series Capacitor project (described more fully in California Public Utilities Commission Application number A.1805007) (the “Project”). Specifically, SCE is evaluating the Project for the potential impact of alternating current (“AC”) on a +/- 55 mile segment of a gas line owned by the Southern California Gas Company (a California Corporation) (“SoCalGas”). The subject gas line is roughly parallel to SCE’s transmission line. Both the SCE transmission line and SoCalGas line are specifically described and illustrated on attachment “A” to this letter. To perform an evaluation of potential AC impacts on the gas line, SCE and SoCalGas have agreed to work cooperatively in the preparation of a study (the “AC Study”). Therefore, the purpose of this letter is to memorialize an agreement (“Agreement”) between the parties as to the development of parameters and subsequent performance of the AC Study. The parties agree as follows:

**I. Responsibilities of Parties.**

The parties have agreed to allocate their respective responsibilities as follows:

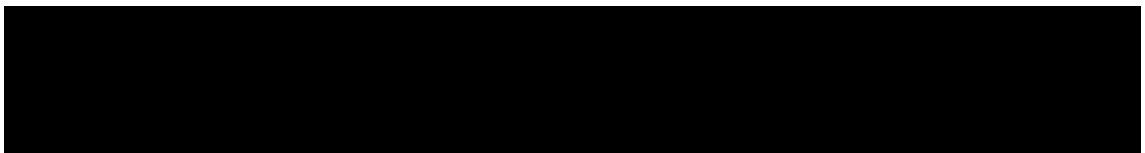


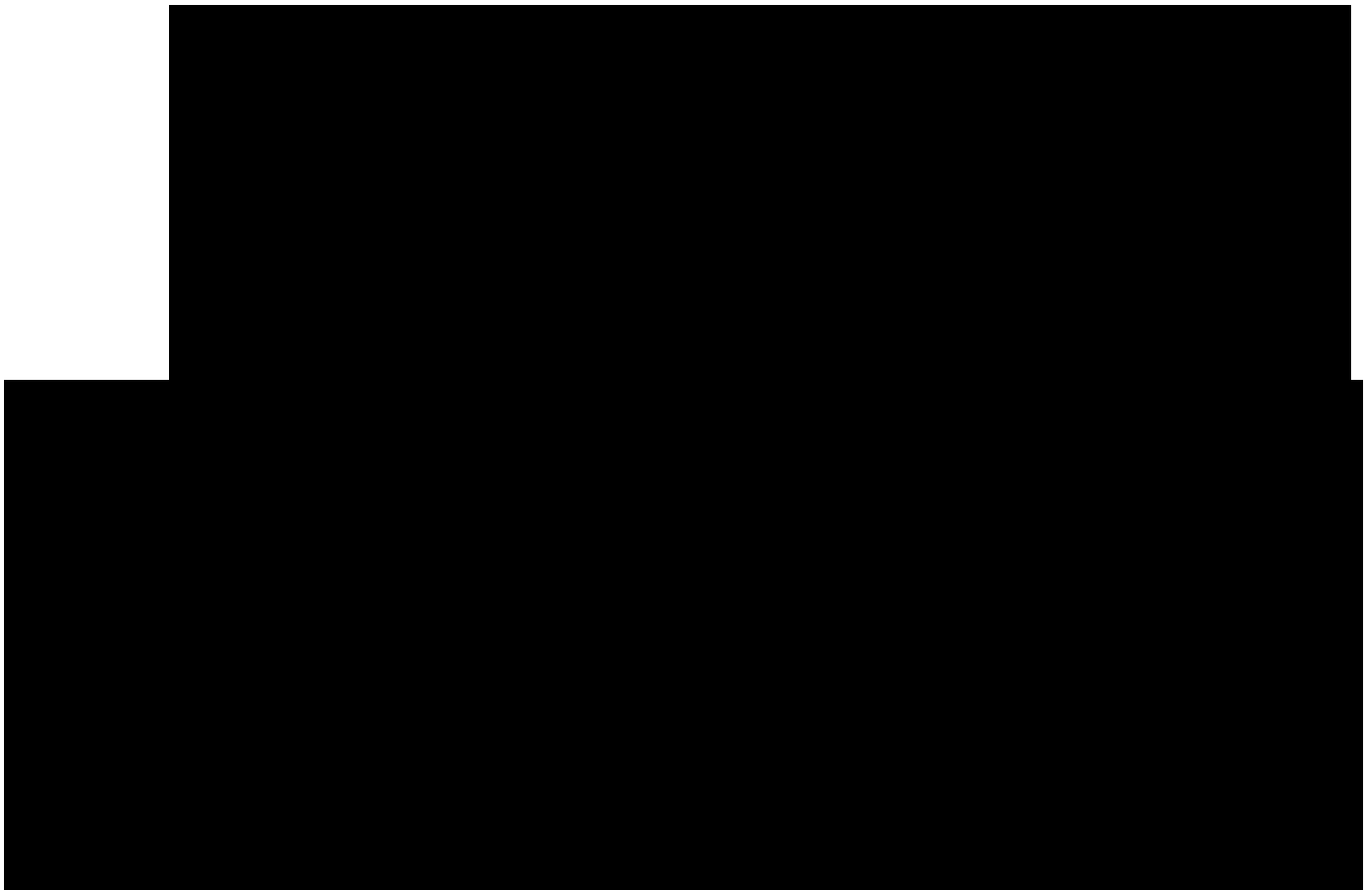


Following completion of the AC Study, the parties will meet and confer to discuss the results of the AC Study.

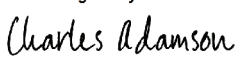
## **II. Work Process, Schedule, and Reimbursement.**

		<b>By</b>	<b>Duration (weeks)</b>	<b>Due Dates</b>
	Agreement Executed	SCE and SoCalGas		1/31/2020
<b>A</b>	SCE will provide its general requirements for the AC Study to So Cal Gas after the agreement is executed	SCE	1	2/7/2020
<b>B</b>	SoCalGas will provide SCE with a draft scope of the AC Study including the identity of its selected consultant and budget for SCE's approval after receiving SCE's specific requirements.	SoCalGas	1	2/14/2020
<b>C</b>	SCE will approve the draft scope, consultant and budget within upon receipt from SoCalGas	SCE	1	2/21/2020
<b>D</b>	The AC Consultant will provide both SCE and SoCalGas with "technical requirements and a complete scope of work for the AC Study" after receiving SCE's approval of the draft scope, consultant, and budget.	AC Consultant	1	2/28/2020
<b>E</b>	SCE and SoCalGas shall approve the "technical requirements and complete scope of work for the AC Study" upon receipt from AC Consultant	SCE and SoCalGas	1	3/6/2020
<b>F</b>	The AC Consultant shall provide the draft AC Study for SCE and So Cal Gas review and comment	AC Consultant	4	<b>4/3/2020</b>
<b>G</b>	SCE and SoCalGas shall review and provide comments on the AC Study after being received from the AC Consultant.	SCE and SoCalGas	1	4/10/2020
<b>H</b>	The AC Consultant shall address/resolve any questions from SCE and/or SoCalGas on the draft AC Study, and the consultant shall complete the final study	AC Consultant	2	<b>4/24/2020</b>





Sincerely,

DocuSigned by:  
  
F7DE74D2A79440D...  
Charles Adamson

Date: 1/13/2020

The foregoing Agreement is accepted by SoCalGas. By signing below, SoCalGas agrees to the terms of this Agreement.

DocuSigned by:  
  
DE29F484C158492...  
Mark Barajas

Date 1/13/2020

**Document Set 3**

# MPO Invoice Processing Request Form Cover Sheet

Vendor Name Southern California Gas Company Invoice # 23928  
 Invoice Date 7/5/2022

**Payment Type:**


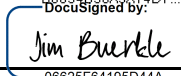
<input checked="" type="radio"/> Non-PO  <input type="radio"/> PO	Vendor # _____ GL # <u>6165150 - Construction Services Others</u>  Purchase Order # _____ Work Performed Period _____
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Project Name	SAP Accounting (Order # or Cost Center)	PO Line Item	Service Line Item (if applicable)	Amount
ELM				
TOTAL				

Cost Engineer: Taeck Yim  4/27/2023  
 Print Name Signature Date

**Cost Engineer: Please complete the top portion of this Cover Sheet and submit document and Invoice to MPO**

**Approvals** - According to the Approval Authorization Matrix (AAM) Doc# \_\_\_\_\_  
 Click link to view AAM [T&D Approval Authorization Matrix](#) SES# \_\_\_\_\_

Title	Print Name	Signature	Date
Project Manager	Selya Arce	Yvette Seymour signing for Selya Arce	
Principal Manager	Yvette Seymour		4/27/2023
	Jim Burkele		4/27/2023
(Insert Title)			

☒ Invoice Attached ☐ Back-Up Attached ☐ Will Call Tuesday or Friday afternoons at GO1  
☐ Pick Up By Name \_\_\_\_\_ PAX \_\_\_\_\_

**MPO: Once approvals have been obtained, please email Vendor Invoice and this Cover Sheet to [MPInvoicing@sce.com](mailto:MPInvoicing@sce.com).  
 Please include the vendor name and invoice number in the subject line.  
 Place hard copy of all documents (if available) in the Invoice Inbox located at PIV-2, 3rd Floor Column K4**



## SOUTHERN CALIFORNIA GAS COMPANY

## COLLECTIBLE WORK AUTHORIZATION

**Request Number:**

23928

**Date Prepared:** Date Received: Feb 22, 2023  
7/5/2022**WO#:** 94098.000**IO#:** 300803531**Estimate Prepared By:**

White, Kevin L. (Gas Dist)

**ML:****Phone#:****Purchaser Name and Job Address****Name:** Southern California Edison**Address:** 2244 Walnut Grove Ave**City:** Rosemead **State:** California **Zip:** 91770**Phone#:** 1 800 655 4555**Purchaser SS#:****Billing Name and Address, If Different****Name:** Southern California Edison**Address:** 2244 Walnut Grove**City:** Rosemead **State:** California **Zip:** 91770**Phone#:** 1 800655 4555**Or Federal Tax ID#:****Purchaser requests and authorizes Southern California Gas Company (SoCalGas ) to perform the following tasks:**

Additional analysis to confirm results; Multiple conference calls with SoCal Gas and SCE teams; Technical discussions associated with the SoCal Gas revised standards for AC interference, AC mitigation design, and AC corrosion effects; Preparation of a testing procedure for the coating resistance testing being performed and analysis of this data resulting in recommended coating resistance values to be used to determine the AC mitigation system design requirements; Coating Conductance Testing in accordance with the approved test procedure and data analysis.

AGREED AND  
ACCEPTED  
SoCalGas BY

(DATE)

NAME (PRINT)

SIGNATURE OF SOCALGAS REPRESENTATIVE

AGREED AND  
ACCEPTED  
PURCHASER

Yvette Seymour

PURCHASER OR AUTHORIZED  
REPRESENTATIVE (PRINT)

DocuSigned by:  
Yvette Seymour  
88034B650A6A1070

SIGNATURE OF PURCHASER OR AUTHORIZED REPRESENTATIVE

4/19/2023

(DATE)

Southern California Edison - Major

(NAME OF COMPANY)

Principal Manager MPO

TITLE

**Certificate Of Completion**

Envelope Id: 10A8CCCD54DE4CC880FF9DF39683C319

Status: Completed

Subject: Complete with DocuSign: SCG\_Collectible Work Authorization\_Agreement\_SCE\_ELM\_2023-01-23 YSeymour...

Custom Envelope Field:

Source Envelope:

Document Pages: 1

Signatures: 1

Envelope Originator:

Certificate Pages: 5

Initials: 0

DANIEL SARMIENTO

AutoNav: Enabled

P.O. Box 700

Enveloped Stamping: Enabled

Rosemead, CA 91770

Time Zone: (UTC-08:00) Pacific Time (US &amp; Canada)

DANIEL.SARMIENTO@SCE.COM

IP Address: 163.116.248.34

**Record Tracking**

Status: Original

Holder: DANIEL SARMIENTO

Location: DocuSign

4/18/2023 11:29:49 PM

DANIEL.SARMIENTO@SCE.COM

**Signer Events****Signature****Timestamp**

Yvette Seymour

yvette.seymour@sce.com

Principal Manager MPO

Southern California Edison - Major

Security Level: Email, Account Authentication  
(None)

DocuSigned by:



B8634B50A5A14D7...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.55

Sent: 4/18/2023 11:36:27 PM

Viewed: 4/19/2023 5:15:15 PM

Signed: 4/19/2023 5:16:28 PM

**Electronic Record and Signature Disclosure:**

Accepted: 4/19/2023 5:15:15 PM

ID: 81fb0bdb-1041-4d37-bc47-4da0eef7f562

**In Person Signer Events****Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp****Carbon Copy Events****Status****Timestamp**

Amy Hamilton

amy.k.hamilton@sce.com

Southern California Edison Company

Security Level: Email, Account Authentication  
(None)**COPIED**

Sent: 4/18/2023 11:36:27 PM

**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign

Selya Arce

selya.arce@sce.com

Security Level: Email, Account Authentication  
(None)**COPIED**

Sent: 4/18/2023 11:36:27 PM

**Electronic Record and Signature Disclosure:**

Accepted: 1/28/2021 5:05:58 PM

ID: fbfbcdfb-de7c-467b-b905-5a2c62cad2da

**Witness Events****Signature****Timestamp**

Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	4/18/2023 11:36:27 PM
Certified Delivered	Security Checked	4/19/2023 5:15:15 PM
Signing Complete	Security Checked	4/19/2023 5:16:28 PM
Completed	Security Checked	4/19/2023 5:16:28 PM
Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		



## **ELECTRONIC RECORD AND SIGNATURE DISCLOSURE**

From time to time, Southern California Edison Company (we, us or Company) may be required by law to provide to you certain written notices or disclosures. Described below are the terms and conditions for providing to you such notices and disclosures electronically through the DocuSign system. Please read the information below carefully and thoroughly, and if you can access this information electronically to your satisfaction and agree to this Electronic Record and Signature Disclosure (ERSD), please confirm your agreement by selecting the check-box next to 'I agree to use electronic records and signatures' before clicking 'CONTINUE' within the DocuSign system.

### **Getting paper copies**

At any time, you may request from us a paper copy of any record provided or made available electronically to you by us. You will have the ability to download and print documents we send to you through the DocuSign system during and immediately after the signing session and, if you elect to create a DocuSign account, you may access the documents for a limited period of time (usually 30 days) after such documents are first sent to you. After such time, if you wish for us to send you paper copies of any such documents from our office to you, you will be charged a \$0.00 per-page fee. You may request delivery of such paper copies from us by following the procedure described below.

### **Withdrawing your consent**

If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

### **Consequences of changing your mind**

If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

### **All notices and disclosures will be sent to you electronically**

Unless you tell us otherwise in accordance with the procedures described herein, we will provide electronically to you through the DocuSign system all required notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you during the course of our relationship with you. To reduce the chance of you inadvertently not receiving any notice or disclosure, we prefer to provide all of the required notices and disclosures to you by the same method and to the same address that you have given us. Thus, you can receive all the disclosures and notices electronically or in paper format through the paper mail delivery system. If you do not agree with this process, please let us know as described below. Please also see the paragraph immediately above that describes the consequences of your electing not to receive delivery of the notices and disclosures electronically from us.

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You may contact us to let us know of your changes as to how we may contact you electronically, to request paper copies of certain information from us, and to withdraw your prior consent to receive notices and disclosures electronically as follows:

To contact us by email send messages to: [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com)

### **To advise Southern California Edison Company of your new email address**

To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

If you created a DocuSign account, you may update it with your new email address through your account preferences.

### **To request paper copies from Southern California Edison Company**

To request delivery from us of paper copies of the notices and disclosures previously provided by us to you electronically, you must send us an email to [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state your email address, full name, mailing address, and telephone number. We will bill you for any fees at that time, if any.

### **To withdraw your consent with Southern California Edison Company**

To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:

- i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;
- ii. send us an email to [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

### **Required hardware and software**

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### **Acknowledging your access and consent to receive and sign documents electronically**

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to 'I agree to use electronic records and signatures' before clicking 'CONTINUE' within the DocuSign system.

By selecting the check-box next to 'I agree to use electronic records and signatures', you confirm that:

- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify Southern California Edison Company as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by Southern California Edison Company during the course of your relationship with Southern California Edison Company.



# SOUTHERN CALIFORNIA GAS COMPANY

## COLLECTIBLE REMITTANCE

**BILL TO:**

**NAME:** Southern California Edison

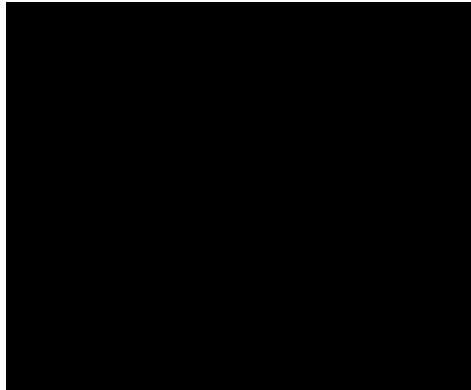
**ADDRESS:** 2244 Walnut Grove

**CITY:** Rosemead

**STATE:** California

**ZIP:** 91770

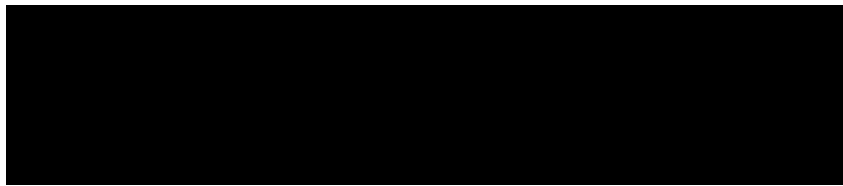
**PHONE#:** 1 800655 4555



**Return this form when mailing payment**

**MAIL TO:**

Southern California Gas Company  
Sundry Billing  
P.O. Box No 2007  
Monterey Park, CA 91754-0957



Make checks payable to SoCalGas and include internal order number on check

**PLEASE MAKE TIMELY PAYMENT TO AVOID DELAYS IN JOB SCHEDULE**

**Certificate Of Completion**

Envelope Id: 311155C17DE844FFAF3CE62EBF4065B5

Status: Completed

Subject: Complete with DocuSign: 20230420 ELM So Cal Gas Req No. 23928.pdf

Custom Envelope Field:

Source Envelope:

Document Pages: 2

Signatures: 3

Envelope Originator:

Certificate Pages: 5

Initials: 0

Amy Mundy

AutoNav: Enabled

P.O. Box 700

Enveloped Stamping: Enabled

Rosemead, CA 91770

Time Zone: (UTC-08:00) Pacific Time (US &amp; Canada)

Amy.Mundy@sce.com

IP Address: 163.116.248.33

**Record Tracking**

Status: Original

Holder: Amy Mundy

Location: DocuSign

4/26/2023 3:02:17 PM

Amy.Mundy@sce.com

**Signer Events**

Taeck Yim

Taeck.Yim@sce.com

Security Level: Email, Account Authentication  
(None)**Signature**DocuSigned by:  
  
A2250A5BC24A418...**Timestamp**

Sent: 4/26/2023 3:24:38 PM

Viewed: 4/27/2023 7:08:45 AM

Signed: 4/27/2023 7:08:50 AM

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.140.61

**Electronic Record and Signature Disclosure:**

Accepted: 1/27/2021 12:40:28 PM

ID: ec2991eb-1e94-4861-9400-dc9805c1b4e2

Yvette Seymour

Yvette.Seymour@sce.com

Principal Manager MPO

Southern California Edison - Major

Security Level: Email, Account Authentication  
(None)DocuSigned by:  
  
B8634B50A5A14D7...

Sent: 4/27/2023 7:08:51 AM

Viewed: 4/27/2023 7:25:18 AM

Signed: 4/27/2023 7:25:32 AM

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.48

**Electronic Record and Signature Disclosure:**

Accepted: 4/27/2023 7:25:18 AM

ID: c6a096a4-4e13-4851-b8c9-7375bf99684c

Jim Buerkle

jim.buerkle@sce.com

Director, Generation

SCE

Security Level: Email, Account Authentication  
(None)DocuSigned by:  
  
06625F64195D44A...

Sent: 4/27/2023 7:25:33 AM

Viewed: 4/27/2023 8:23:05 AM

Signed: 4/27/2023 8:23:27 AM

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.46

**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign

**In Person Signer Events****Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp**

Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	4/26/2023 3:24:38 PM
Certified Delivered	Security Checked	4/27/2023 8:23:05 AM
Signing Complete	Security Checked	4/27/2023 8:23:27 AM
Completed	Security Checked	4/27/2023 8:23:27 AM
Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		

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### **All notices and disclosures will be sent to you electronically**

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- i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;
- ii. send us an email to [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

### **Required hardware and software**

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### **Acknowledging your access and consent to receive and sign documents electronically**

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

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- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify Southern California Edison Company as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by Southern California Edison Company during the course of your relationship with Southern California Edison Company.

**Document Set 4**



## MAJOR PROJECTS ORGANIZATION Change Request Form

Change Request Number:

ELM\_127

Estimate: \$

(ROM - Populated from CIA)

Change Type (What's driving the change?)

Project Name (in SAP):

Eldorado Lugo Mohave Series Capacitor

Pin Number:

7546

Change Title:

Impact Level:

**Level I - High Impact**

Initiator Name:

Daniel Samiento

Initiator Phone/PAX:

63501

Initiator Dept./Org.:

MPO

Date Initiated:

Standard CR



The change process in standard estimated time; 4 weeks (20 calendar days).

Expedited CR



The change process is placed on a Fast Track in order to have CR and impact analysis completed in time for next CCB (14 calendar days).

Direct To Proceed (DTP) CR



Immediate action required, PM approves the change and directs the team to proceed. (non-discretionary &amp; cannot deviate from authorizations).

Last TSPOC Approved WISER Stage:Stage: Approved for Construction (Passed G5)**Proposed Change - (Brief Summary Description):**

Payment for Socal Gas AC Mitigation Study

**I. Business or Technical Reason for Change: (Specify affected projects, segments, etc.)****Is change unavoidable?**

Check if yes; explain below.

This impact has been identified under Known Risk #1481A.

**II. Baseline Scope/Cost/Schedule: (Reference pertinent documents: PEA, CPCN, GRC, Project Plan, etc.)**

Scope: N/A

Cost:

Schedule:

**III. Proposed Scope/Cost/Schedule: (Description of the change and how it deviates from the baseline):****Change in unit counts?**

es



If yes, please note the differences.

Scope: N/A

Cost:

Schedule:

**IV. Any additional risks created with this change? OR Does this change mitigate existing risk(s)? List below:**



## MAJOR PROJECTS ORGANIZATION Change Request Form

### Change Category (check all that apply)

- |   |   |
|---|---|
| <input type="checkbox"/> Scope / Methods: New / Refine / Delete<br><input type="checkbox"/> Contract Deviation (Change to Ts & Cs)<br><input type="checkbox"/> Change in Standards (Eng/Des)<br><input type="checkbox"/> External Agency/Commission Request<br><input type="checkbox"/> Capital Scope Transfer to O&M | <input type="checkbox"/> Field Change Order<br><input type="checkbox"/> Field Conditions<br><input type="checkbox"/> Licensing / Permitting<br><input type="checkbox"/> Variation From Estimate<br><input checked="" type="checkbox"/> Other (Specify): Estimate Revision based on Actual bid |
|---|---|

### Change Impact

- ☐ Single significant impact event; OR  
☐ Accumulation of small changes/ Periodic Evaluation/ Reconciliation

If impact to other Projects/Segments/Programs/PINs, please list below.

PIN(s): \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

### Stakeholders Potentially Impacted (check all that apply)

- |   |  |
|---|--|
| <input type="checkbox"/> Customer<br><input checked="" type="checkbox"/> Cost Engineering<br><input type="checkbox"/> Resource Planning & Perf Mgmt (RPPM)<br><input type="checkbox"/> Edison Carrier Solutions (ECS)<br><input type="checkbox"/> Environmental (CEH&S)<br><input checked="" type="checkbox"/> Estimating: Substation or Transmission Line<br><input checked="" type="checkbox"/> Engineering<br><input type="checkbox"/> Generation Interconnection Planning<br><input type="checkbox"/> Grid Operations Management<br><input type="checkbox"/> Information Technology (IT)<br><input type="checkbox"/> Legal Organization<br><input type="checkbox"/> Local Public Affairs (LPA)<br><input checked="" type="checkbox"/> Major Projects Organization (MPO) | <input type="checkbox"/> Project Engineering<br><input type="checkbox"/> Real Properties (RP)<br><input type="checkbox"/> Regulatory Affairs<br><input type="checkbox"/> Scheduling<br><input type="checkbox"/> Substation Construction & Maint (SC&M)<br><input type="checkbox"/> Supply (Chain) Management<br><input type="checkbox"/> Sub & Transmission Business PIng (S&TBP)<br><input type="checkbox"/> Technical Planning<br><input type="checkbox"/> Telecommunications<br><input type="checkbox"/> Transmission Commercial Mgmt.<br><input checked="" type="checkbox"/> Transmission (TPD/Construct & Maint)<br><input type="checkbox"/> Other (Specify): |
|---|--|

**Has the Customer been notified?** ☒ **Yes** ☐ **No** If no, why not? If yes, are supporting docs attached?

**Supporting documentation attached?** ☐ Check if yes; list documents below.



TIME IMPACT ANALYSIS

Change Request Number: ELM\_127  
Date Received:

Show Impacts to: Shifting need date  
Shifting O.D.  
Moving major milestone  
Handoff to other group  
Regulatory

Schedule Impact Narrative (What is the Impact on critical activities? on the potential mitigation?):

No changes in schedule.

Supporting documentation attached? If Yes, check box and list documents below:

Time Impact

<b>Major Milestone on Critical Path</b> <b>Changed by (highlight one):</b> > +/- 1 Month > +/- 1 Year > +/- 3 Month > +/- 2 Year > +/- 9 Month > +/- 3 Year  <b>List New Milestone Dates:</b> <div></div>	<b>Regulatory Filing Date</b> <b>Changed by (highlight one):</b> > +/- 1 Month > +/- 1 Year > +/- 3 Month > +/- 2 Year > +/- 9 Month > +/- 3 Year  <b>List New Regulatory Filing Dates:</b> <div></div>	<b>Operating Dates</b> <b>Changed by (highlight one):</b> > +/- 1 Month > +/- 1 Year > +/- 3 Month > +/- 2 Year > +/- 9 Month > +/- 3 Year  <b>List New Operating Dates:</b> <div></div>
--	--	---

Complete schedule items below or attach schedule Fragnet Layout in similar format.

OTHER ACTIVITIES IMPACTED:			DATE TYPE:			COMMENTS:	
CURRENT BASELINE SCHEDULE			IMPACT TO BASELINE SCHEDULE			CALENDAR DAYS	
Current Start	Current Finish	Current Float	Impact Start	Impact Finish	Impact Float	Start Variance	Finish Variance
						0	0
						0	0
						0	0
						0	0
						0	0
						0	0
						0	0

Completed by: 

DocuSigned by:  
Ray Chikalingappa  
3004880A33304EB  
Signature & Date

 8/11/2023



## COST IMPACT ANALYSIS

\*Pick from drop down list

Change Request Number: ELM\_127

Date Received: \_\_\_\_\_

### Change Description (populates from 1-CR Form 2):

Payment for Socal Gas AC Mitigation Study

### Change Request Cost Summary:

PIN or WEP Number(s): PIN 7546

Project Element:

Multiple Work Orders: ☐ YES ☒ NO

Type of Change Cost Class:

**901904772**

*When multiple work orders are affected, summarize overall cost in the table and attach the detailed cost breakdown per work order.*

### Change Request Estimate

Home Office

Material/ Equipment

Construction

Overhead

IMM Chargeback

Contingency

Program Impact

**TOTAL CHANGE COST:**

*Provide additional supporting documentation as required to support the analysis.*

*Attach monthly/quarterly analysis if expenditure shift is to occur in current year.*

*Cost reductions should show as (negative) numbers.*

### Cost Impact to Budget/Cont

### Source or Destination of Funds:

<sup>A</sup> Total Change Cost: Inc/(Dec)

<sup>B</sup> Contingency Inc/(Dec)

<sup>C</sup> Other (Known Risks)

<sup>D</sup> O&M Budget Request Incr/ (Dec)

**TOTAL:**

Accounting:

Comments:

Note: The following cost is related to the above change, not the total budget.

### BASELINE Expenditure Plan (if Change Cost > \$1 M)

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -				\$ -

### PROPOSED Expenditure Plan (if Change Cost > \$1 M)

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
				\$ -

### VARIANCE (Baseline vs. Proposed)

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -	\$ -	\$ -	\$ -	\$ -

### <sup>D</sup>O&M Budget Request: Expenditure Plan

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -	\$ -	\$ -	\$ -	\$ -

Comments:

<sup>D</sup> Required when O&M Budget is Requested. Consult an assigned O&M Manager for available budget and approval.

Completed by: \_\_\_\_\_

8/11/2023

AZ2J0A9B624A416..

**CHANGE REQUEST DISPOSITION**

**Change Request Number:** ELM\_127  
**CCB Meeting Date:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**Total Cost Impact:** \$ -  
**Total O&M Cost Impact:** \$ -

**Change Control Board (CCB) Disposition:**

**Status:** Open  
**Disposition:** Approved  
**Date:** 8/11/2023

Note: Verify documentation will be updated; use the Documentation Verification Checklist.

**Revisit Date (Deferred CR Only):** \_\_\_\_\_

**Expected Implementation Date:** \_\_\_\_\_  
*(s/b one month after approved change date)*

**Change impacts Earned Value** ☐ YES ☐ NO

☐ INITIAL BASELINE

☐ REPLANNING

**Additional Comments:**

The CCB has reviewed this Change Request via email notification along with Selya Arce's signature.

**CCB: Change Request Decision Makers/ Approvers (Licensed Projects) :****Title:****Print Name:****Signature:****Date:****MPO Development PM****MPO Execution PM****MPO Development Manager 3****MPO Execution Manager 3****MPO Director****MPO Vice President**Selya Arce

DocuSigned by:

*Selya Arce*

C5E622F01349444...

8/15/2023





# SOUTHERN CALIFORNIA GAS COMPANY

## COLLECTIBLE REMITTANCE

**BILL TO:**

**NAME:** Southern California Edison

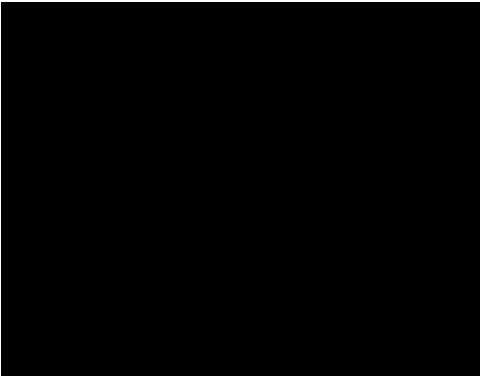
**ADDRESS:** 2244 Walnut Grove

**CITY:** Rosemead

**STATE:** California

**ZIP:** 91770

**PHONE#:** 1 800655 4555



**Return this form when mailing payment**

**MAIL TO:**

Southern California Gas Company  
Sundry Billing  
P.O. Box No 2007  
Monterey Park, CA 91754-0957



Make checks payable to SoCalGas and include internal order number on check

**PLEASE MAKE TIMELY PAYMENT TO AVOID DELAYS IN JOB SCHEDULE**

**Certificate Of Completion**

Envelope Id: A22EBBE08CBF4C1CBA8DFEC469C353F3

Status: Completed

Subject: Change Request ELM 127 AC Mitigation Study SoCal Gas

Custom Envelope Field:

Source Envelope:

Document Pages: 7

Signatures: 3

Envelope Originator:

Certificate Pages: 5

Initials: 0

Veronika Zherdeva

AutoNav: Enabled

P.O. Box 700

Enveloped Stamping: Enabled

Rosemead, CA 91770

Time Zone: (UTC-08:00) Pacific Time (US &amp; Canada)

veronika.zherdeva@sce.com

IP Address: 163.116.248.47

**Record Tracking**

Status: Original

Holder: Veronika Zherdeva

Location: DocuSign

8/11/2023 3:00:23 PM

veronika.zherdeva@sce.com

**Signer Events**

Raj Chiokalingapandian

Raj.Chokalingapandian@sce.com

Security Level: Email, Account Authentication  
(None)**Signature**

DocuSigned by:



0064880A33394E8...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.51

**Timestamp**

Sent: 8/11/2023 3:04:43 PM

Viewed: 8/11/2023 3:05:50 PM

Signed: 8/11/2023 3:06:14 PM

**Electronic Record and Signature Disclosure:**

Accepted: 8/11/2023 3:05:50 PM

ID: 7e725008-11c3-418b-a3f4-0642b884e326

Taeck Yim

Taeck.Yim@sce.com

Security Level: Email, Account Authentication  
(None)

DocuSigned by:



A2250A5BC24A418...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.47

Sent: 8/11/2023 3:04:42 PM

Viewed: 8/11/2023 3:12:42 PM

Signed: 8/11/2023 3:20:28 PM

**Electronic Record and Signature Disclosure:**

Accepted: 1/27/2021 12:40:28 PM

ID: ec2991eb-1e94-4861-9400-dc9805c1b4e2

Selya Arce

Selya.Arce@sce.com

Security Level: Email, Account Authentication  
(None)

DocuSigned by:



C5E622F01349444...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.63

Sent: 8/11/2023 3:20:30 PM

Viewed: 8/15/2023 1:07:03 PM

Signed: 8/15/2023 1:07:36 PM

**Electronic Record and Signature Disclosure:**

Accepted: 1/28/2021 5:05:58 PM

ID: fbfbcdfb-de7c-467b-b905-5a2c62cad2da

**In Person Signer Events****Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp**

Certified Delivery Events	Status	Timestamp
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Carbon Copy Events	Status	Timestamp
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DANIEL SARMIENTO DANIEL.SARMIENTO@SCE.COM Southern California Edison Company Security Level: Email, Account Authentication (None) <b>Electronic Record and Signature Disclosure:</b> Not Offered via DocuSign	<div>COPIED</div>	Sent: 8/15/2023 1:07:37 PM
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Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
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Envelope Summary Events	Status	Timestamps
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Envelope Sent	Hashed/Encrypted	8/11/2023 3:04:43 PM
Certified Delivered	Security Checked	8/15/2023 1:07:03 PM
Signing Complete	Security Checked	8/15/2023 1:07:36 PM
Completed	Security Checked	8/15/2023 1:07:37 PM

Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure
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To contact us by email send messages to: [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com)

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To let us know of a change in your email address where we should send notices and disclosures electronically to you, you must send an email message to us at [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state: your previous email address, your new email address. We do not require any other information from you to change your email address.

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To inform us that you no longer wish to receive future notices and disclosures in electronic format you may:

i. decline to sign a document from within your signing session, and on the subsequent page, select the check-box indicating you wish to withdraw your consent, or you may;

ii. send us an email to [IGInformationgovernance@sce.com](mailto:IGInformationgovernance@sce.com) and in the body of such request you must state your email, full name, mailing address, and telephone number. We do not need any other information from you to withdraw consent.. The consequences of your withdrawing consent for online documents will be that transactions may take a longer time to process..

### **Required hardware and software**

The minimum system requirements for using the DocuSign system may change over time. The current system requirements are found here: <https://support.docusign.com/guides/signer-guide-signing-system-requirements>.

### **Acknowledging your access and consent to receive and sign documents electronically**

To confirm to us that you can access this information electronically, which will be similar to other electronic notices and disclosures that we will provide to you, please confirm that you have read this ERSD, and (i) that you are able to print on paper or electronically save this ERSD for your future reference and access; or (ii) that you are able to email this ERSD to an email address where you will be able to print on paper or save it for your future reference and access. Further, if you consent to receiving notices and disclosures exclusively in electronic format as described herein, then select the check-box next to ‘I agree to use electronic records and signatures’ before clicking ‘CONTINUE’ within the DocuSign system.

By selecting the check-box next to ‘I agree to use electronic records and signatures’, you confirm that:

- You can access and read this Electronic Record and Signature Disclosure; and
- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify Southern California Edison Company as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by Southern California Edison Company during the course of your relationship with Southern California Edison Company.

**Document Set 5**



## MAJOR PROJECTS ORGANIZATION Change Request Form

Change Request Number:	ELM143	Estimate: \$	-
		<i>(ROM - Populated from CIA)</i>	
Change Type (What's driving the change?)			
Project Name (in SAP):	Eldorado Lugo Mohave Series Capacitor		
Pin Number:	7546		
Change Title:			
Impact Level:	<b>Level III - Low Impact</b>		
Initiator Name: <span style="border-bottom: 1px solid black;">Taeck Yim</span>			
Initiator Phone/PAX: <span style="border-bottom: 1px solid black;">63808</span>			
Initiator Dept./Org.: <span style="border-bottom: 1px solid black;">MPO</span>			
Date Initiated: <span style="border-bottom: 1px solid black;">05/29/2024</span>			
Standard CR	<input type="radio"/> The change process in standard estimated time; 4 weeks (20 calendar days).		
Expedited CR	<input checked="" type="radio"/> The change process is placed on a Fast Track in order to have CR and impact analysis completed in time for next CCB (14 calendar days).		
Direct To Proceed (DTP) CR	<input type="checkbox"/> Immediate action required, PM approves the change and directs the team to proceed. (non-discretionary & cannot deviate from authorizations).		
Last TSPOC <u>Approved</u> WISER Stage:	Stage: Approved for Construction (Passed G5)		

### Proposed Change - (Brief Summary Description):

Initiation of new WO to cover "Socal Gas Pipeline AC Mitigation"

### I. Business or Technical Reason for Change: (Specify affected projects, segments, etc.)

**Is change unavoidable?** ☒ Check if yes; explain below.

Included in PIN 7546 ELM FRM Approval. This CR is initiated to open the new WO for "Socal Gas Pipeline AC Mitigation".

### II. Baseline Scope/Cost/Schedule: (Reference pertinent documents: PEA, CPCN, GRC, Project Plan, etc.)

Scope: Install AC mitigation adjacent to the Lugo-Mohave and SoCal gas Pipeline as a result of any induced alternating current effects from the increased power flow.

Cost: As captured and approved by FRM dated 4/12/23, the estimated cost ranges from [REDACTED] Once SoCalGas physical construction scope of work is finalized, a new trend will be created to true-up the costs.

Schedule: Projected completion of the AC mitigation is March 2025. Once physical construction scope of work is finalized, a new trend will be created to true-up the schedule.

### III. Proposed Scope/Cost/Schedule: (Description of the change and how it deviates from the baseline):

**Change in unit counts?** ☒ Yes ☐ No If yes, please note the differences.

Scope: No changes

Cost: No Changes

Schedule: No Changes

### IV. Any additional risks created with this change? OR Does this change mitigate existing risk(s)? List below:





## MAJOR PROJECTS ORGANIZATION Change Request Form

### Change Category (check all that apply)

- |   |  |
|---|--|
| <input type="checkbox"/> Scope / Methods: New / Refine / Delete<br><input type="checkbox"/> Contract Deviation (Change to Ts & Cs)<br><input type="checkbox"/> Change in Standards (Eng/Des)<br><input type="checkbox"/> External Agency/Commission Request<br><input type="checkbox"/> Capital Scope Transfer to O&M | <input type="checkbox"/> Field Change Order<br><input type="checkbox"/> Field Conditions<br><input type="checkbox"/> Licensing / Permitting<br><input type="checkbox"/> Variation From Estimate<br><input checked="" type="checkbox"/> Other (Specify):      Open New WO |
|---|--|

### Change Impact

- ☐ Single significant impact event; OR  
☐ Accumulation of small changes/ Periodic Evaluation/ Reconciliation

If impact to other Projects/Segments/Programs/PINs, please list below.

PIN(s): \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_

### Stakeholders Potentially Impacted (check all that apply)

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Customer<br><input type="checkbox"/> Cost Engineering<br><input checked="" type="checkbox"/> Resource Planning & Perf Mgmt (RPPM)<br><input checked="" type="checkbox"/> Edison Carrier Solutions (ECS)<br><input type="checkbox"/> Environmental (CEH&S)<br><input type="checkbox"/> Estimating: Substation or Transmission Line<br><input type="checkbox"/> Engineering<br><input type="checkbox"/> Generation Interconnection Planning<br><input type="checkbox"/> Grid Operations Management<br><input type="checkbox"/> Information Technology (IT)<br><input type="checkbox"/> Legal Organization<br><input type="checkbox"/> Local Public Affairs (LPA)<br><input type="checkbox"/> Major Projects Organization (MPO) | <input type="checkbox"/> Project Engineering<br><input type="checkbox"/> Real Properties (RP)<br><input type="checkbox"/> Regulatory Affairs<br><input type="checkbox"/> Scheduling<br><input type="checkbox"/> Substation Construction & Maint (SC&M)<br><input type="checkbox"/> Supply (Chain) Management<br><input type="checkbox"/> Sub & Transmission Business Png (S&TBP)<br><input checked="" type="checkbox"/> Technical Planning<br><input type="checkbox"/> Telecommunications<br><input type="checkbox"/> Transmission Commercial Mgmt.<br><input type="checkbox"/> Transmission (TPD/Construct & Maint)<br><input type="checkbox"/> Other (Specify): |
|--|---|

**Has the Customer been notified?**    ☒ Yes    ☐ No    If no, why not? If yes, are supporting docs attached?

Not a customer project

**Supporting documentation attached?**    ☐ Check if yes; list documents below.

20230412 FRM - ELM Change Request.pdf



TIME IMPACT ANALYSIS

Change Request Number: ELM143  
Date Received:

Show Impacts to: Shifting need date  
Shifting O.D.  
Moving major milestone  
Handoff to other group  
Regulatory

Schedule Impact Narrative (What is the Impact on critical activities? on the potential mitigation?):  
No Schedule Impact.

Supporting documentation attached? If Yes, check box and list documents below:

Time Impact

Major Milestone on Critical Path	Regulatory Filing Date	Operating Dates
Changed by (highlight one): > +/- 1 Month > +/- 3 Month > +/- 9 Month > +/- 1 Year > +/- 2 Year > +/- 3 Year	Changed by (highlight one): > +/- 1 Month > +/- 3 Month > +/- 9 Month > +/- 1 Year > +/- 2 Year > +/- 3 Year	Changed by (highlight one): > +/- 1 Month > +/- 3 Month > +/- 9 Month > +/- 1 Year > +/- 2 Year > +/- 3 Year
List New Milestone Dates: <div></div>	List New Regulatory Filing Dates: <div></div>	List New Operating Dates: <div></div>

Complete schedule items below or attach schedule Fragnet Layout in similar format.

OTHER ACTIVITIES IMPACTED:			DATE TYPE:			COMMENTS:	
CURRENT BASELINE SCHEDULE			IMPACT TO BASELINE SCHEDULE			CALENDAR DAYS	
Current Start	Current Finish	Current Float	Impact Start	Impact Finish	Impact Float	Start Variance	Finish Variance
1/15/2014	1/31/2014		2/15/2014	2/28/2014		-31	-28
						0	0
						0	0
						0	0
						0	0
						0	0
						0	0

Completed by:  8/2/2024  
Signature & Date  
Raj Chokalingapandian

**COST IMPACT ANALYSIS**

\*Pick from drop down list

Change Request Number:

ELM143

Date Received:

**Change Description (populates from 1-CR Form 2):**

Initiation of new WO to cover "Socal Gas Pipeline AC Mitigation"

**Change Request Cost Summary:**

PIN or WEP Number(s):

PIN 7546

Project Element:

☐ YES☒ NO

Multiple Work Orders:

Type of Change Cost Class:

When multiple work orders are affected, summarize overall cost in the table and attach the detailed cost breakdown per work order.

Provide additional supporting documentation as required to support the analysis.

Attach monthly/quarterly analysis if expenditure shift is to occur in current year.

Cost reductions should show as (negative) numbers.

**Change Request Estimate**

Home Office	
Material/ Equipment	
Construction	
Overhead	
IMM Chargeback	
Contingency	
Program Impact	
<b>TOTAL CHANGE COST:</b>	<b>-</b>

**Cost Impact to Budget/Contingency****Source or Destination of Funds:**

<sup>A</sup> Total Change Cost: Inc/(Dec)	-
<sup>B</sup> Contingency Inc/(Dec)	-
<sup>C</sup> Other (Known Risks)	
<sup>D</sup> O&M Budget Request Incr/ (Dec)	
<b>TOTAL:</b>	<b>\$ -</b>

Accounting:

Comments:

Note: The following cost is related to the above change, not the total budget.

**BASELINE Expenditure Plan (if Change Cost > \$1 M)**

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -				\$ -

**PROPOSED Expenditure Plan (if Change Cost > \$1 M)**

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
				\$ -

**VARIANCE (Baseline vs. Proposed)**

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -	\$ -	\$ -	\$ -	\$ -

**<sup>D</sup>O&M Budget Request: Expenditure Plan**

Current Year	Current Year +1	Current Year +2	Current Year +3	TOTAL
\$ -	\$ -	\$ -	\$ -	\$ -

Comments:

<sup>D</sup> Required when O&M Budget is Requested. Consult an assigned O&M Manager for available budget and approval.

Completed by:

Track by Uim

Signature &amp; Date



## CHANGE REQUEST DISPOSITION

**Change Request Number:** ELM143  
**CCB Meeting Date:** See note below  
 \_\_\_\_\_  
 \_\_\_\_\_

**Total Cost Impact:** \$ -  
**Total O&M Cost Impact:** \$ -

### Change Control Board (CCB) Disposition:

**Status:** Closed **Note:** Verify documentation will be updated; use the Documentation  
**Disposition:** Approved Verification Checklist.  
**Date:** 6/12/2024

**Revisit Date (Deferred CR Only):** \_\_\_\_\_

**Change impacts Earned Value** ☐ YES ☐ NO

**Expected Implementation Date:** \_\_\_\_\_  
 (s/b one month after approved change date)

- ☐ INITIAL BASELINE  
☐ REPLANNING

### Additional Comments:

Discussed in the project team meeting on 6/11/24. Follow-up email will be provided to team.

### CCB: Change Request Decision Makers/ Approvers (Licensed Projects) :

Title:	Print Name:	Signature:	Date:
MPO Development PM	_____	_____	_____
MPO Execution PM	*06=-Ä' Ä%; .0	DocuSigned by: Selma J Arce 13061027-01340444	\$/"/" "#
MPO Development Manager 3	_____	_____	_____
MPO Execution Manager 3	_____	_____	_____
MPO Director	_____	_____	_____
MPO Vice President	_____	_____	_____
	_____	_____	_____

**Certificate Of Completion**

Envelope Id: 94DD9BB110B14D6EA401223909A70E76

Status: Completed

Subject: Complete with DocuSign: 20240612 ELM143 SoCalGas AC Mitigation Work Order Initiation.pdf

Custom Envelope Field:

Source Envelope:

Document Pages: 18

Signatures: 3

Envelope Originator:

Certificate Pages: 5

Initials: 0

Daniel Sarmiento

AutoNav: Enabled

P.O. Box 700

Enveloped Stamping: Enabled

Rosemead, CA 91770

Time Zone: (UTC-08:00) Pacific Time (US &amp; Canada)

daniel.sarmiento@sce.com

IP Address: 163.116.248.48

**Record Tracking**

Status: Original

Holder: Daniel Sarmiento

Location: DocuSign

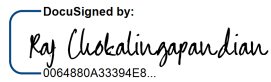
8/1/2024 1:24:38 PM

daniel.sarmiento@sce.com

**Signer Events**

Raj Chokalingapandian

raj.chokalingapandian@sce.com

Security Level: Email, Account Authentication  
(None)**Signature**DocuSigned by:  
  
0064880A33394E8...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.132.113

**Timestamp**

Sent: 8/1/2024 1:28:22 PM

Viewed: 8/2/2024 1:34:44 PM

Signed: 8/2/2024 1:35:27 PM

**Electronic Record and Signature Disclosure:**

Accepted: 8/2/2024 1:34:44 PM

ID: 61bacdec-ef59-4f24-a021-d5db29e677b3

Taeck Kyu Yim

taeck.yim@sce.com

Security Level: Email, Account Authentication  
(None)DocuSigned by:  
  
A2250A5BC24A418...

Signature Adoption: Pre-selected Style

Using IP Address: 163.116.248.39

Sent: 8/1/2024 1:28:22 PM

Viewed: 8/1/2024 2:14:08 PM

Signed: 8/1/2024 2:14:25 PM

**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign

Selya J Arce

selya.arce@sce.com

Security Level: Email, Account Authentication  
(None)DocuSigned by:  
  
C5E622F01349444...

Signature Adoption: Pre-selected Style

Using IP Address: 35.129.90.175

Signed using mobile

Sent: 8/2/2024 1:35:29 PM

Viewed: 8/2/2024 1:38:23 PM

Signed: 8/2/2024 1:39:05 PM

**Electronic Record and Signature Disclosure:**

Not Offered via DocuSign

**In Person Signer Events****Signature****Timestamp****Editor Delivery Events****Status****Timestamp****Agent Delivery Events****Status****Timestamp****Intermediary Delivery Events****Status****Timestamp****Certified Delivery Events****Status****Timestamp**

Carbon Copy Events	Status	Timestamp
Crystal Hawkins crystal.hawkins@sce.com Business Relationship Manager Southern California Edison Company Security Level: Email, Account Authentication (None)	<b>COPIED</b>	Sent: 8/2/2024 1:35:29 PM
<b>Electronic Record and Signature Disclosure:</b> Not Offered via DocuSign		

Witness Events	Signature	Timestamp
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Notary Events	Signature	Timestamp
---------------	-----------	-----------

Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	8/1/2024 1:28:22 PM
Certified Delivered	Security Checked	8/2/2024 1:38:23 PM
Signing Complete	Security Checked	8/2/2024 1:39:05 PM
Completed	Security Checked	8/2/2024 1:39:05 PM

Payment Events	Status	Timestamps
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Electronic Record and Signature Disclosure
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If you decide to receive notices and disclosures from us electronically, you may at any time change your mind and tell us that thereafter you want to receive required notices and disclosures only in paper format. How you must inform us of your decision to receive future notices and disclosure in paper format and withdraw your consent to receive notices and disclosures electronically is described below.

### **Consequences of changing your mind**

If you elect to receive required notices and disclosures only in paper format, it will slow the speed at which we can complete certain steps in transactions with you and delivering services to you because we will need first to send the required notices or disclosures to you in paper format, and then wait until we receive back from you your acknowledgment of your receipt of such paper notices or disclosures. Further, you will no longer be able to use the DocuSign system to receive required notices and consents electronically from us or to sign electronically documents from us.

### **All notices and disclosures will be sent to you electronically**

**Document Set 6**



## TSPM Invoice Processing Request Form Cover Sheet

Vendor Name Southern California Gas Company Invoice # \_\_\_\_\_  
Invoice Date 2/28/2025

Payment Type:

<input checked="" type="radio"/> Non-PO	Vendor # GL #	<u>10085535</u> <u>6165150 - Construction Services Others</u>
<input type="radio"/> PO	Purchase Order # Work Performed Period	_____ _____

Project Name	SAP Accounting (Order # or Cost Center)	PO Line Item	Service Line Item (if applicable)	Amount
PIN 7546 ELM	904539746			
TOTAL				

Cost Engineer: Taeck Yim DocuSigned by: Taeck Yim 4/3/2025  
Print Name A2250A5BC24A418... Date

**Cost Engineer: Please complete the top portion of this Cover Sheet and submit document and Invoice to MPO**

**Approvals - According to the Approval Authorization Matrix (AAM)** Doc# \_\_\_\_\_  
Click link to view AAM [T&D Approval Authorization Matrix](#) SES# \_\_\_\_\_

Title	Print Name	Signature	Date
Project Manager	<u>Selya Arce</u>	<u>Selya Arce</u>	<u>4/3/2025</u>
Principal Manager	<u>Janos Kakuk</u>	<u>Janos Kakuk</u>	<u>4/3/2025</u>
Director	<u>Kenneth Borngrebe</u>	<u>Kenneth Borngrebe</u>	<u>4/3/2025</u>
Managing Director	<u>Jim Buerkle</u>	<u>Jim Buerkle</u>	<u>4/3/2025</u>
SVP	_____	_____	_____
EVP	_____	_____	_____
(Insert Title)	_____	_____	_____

☒ Invoice Attached ☒ Back-Up Attached ☐ Will Call Tuesday or Friday afternoons at GO1

☐ Pick Up By Name \_\_\_\_\_ PAX \_\_\_\_\_

**MPO: Once approvals have been obtained, please email Vendor Invoice and this Cover Sheet to [MPOInvoicing@sce.com](mailto:MPOInvoicing@sce.com).  
Please include the vendor name and invoice number in the subject line.  
Place hard copy of all documents (if available) in the Invoice Inbox located at PIV-2, 3rd Floor Column K4**



**BILL TO :** Southern California Edison  
2244 Walnut  
Rosemead CA 91770

Return this form when mailing payment

**MAIL TO:** Southern California Gas Company  
Sundry Billing  
P.O. Box 2007  
Monterey Park, CA 91754-0957

**CAPITAL WO#:**

**BUSINESS AREA:**

**CONTACT:**

**WORK REQ#:**

**INTERNAL ORDER#:**

**SAP COST CENTER:**

**COST ELEMENT:**

**DATE PREPARED:**

**TOTAL AMOUNT DUE**

\$

Make checks payable to **SoCalGas**  
and include internal order number on check

**PLEASE MAKE TIMELY PAYMENT TO AVOID DELAYS IN JOB SCHEDULE**



SOUTHERN CALIFORNIA GAS COMPANY  
COLLECTIBLE WORK AUTHORIZATION

<b>Request Number:</b> 51220					
<b>Date Prepared:</b> 9/26/2024		<b>WO#:</b> 94098.000		<b>IO#:</b> 300803531	
<b>Estimate Prepared By:</b> Seeley, Dave G		<b>ML:</b> GT18P1		<b>Phone#:</b> (213) 231-5652	
<b>Purchaser Name and Job Location</b>			<b>Billing Name and Address, If Different</b>		
<b>Name:</b> Southern California Edison Company			<b>Name:</b> SCE Accounts Payable		
<b>Job Location:</b> See below			<b>Address:</b> 2244 Walnut Grove Ave.		
<b>City:</b>	<b>State:</b>	<b>Zip:</b>	<b>City:</b>	<b>State:</b>	<b>Zip:</b>
			Rosemead	California	91770

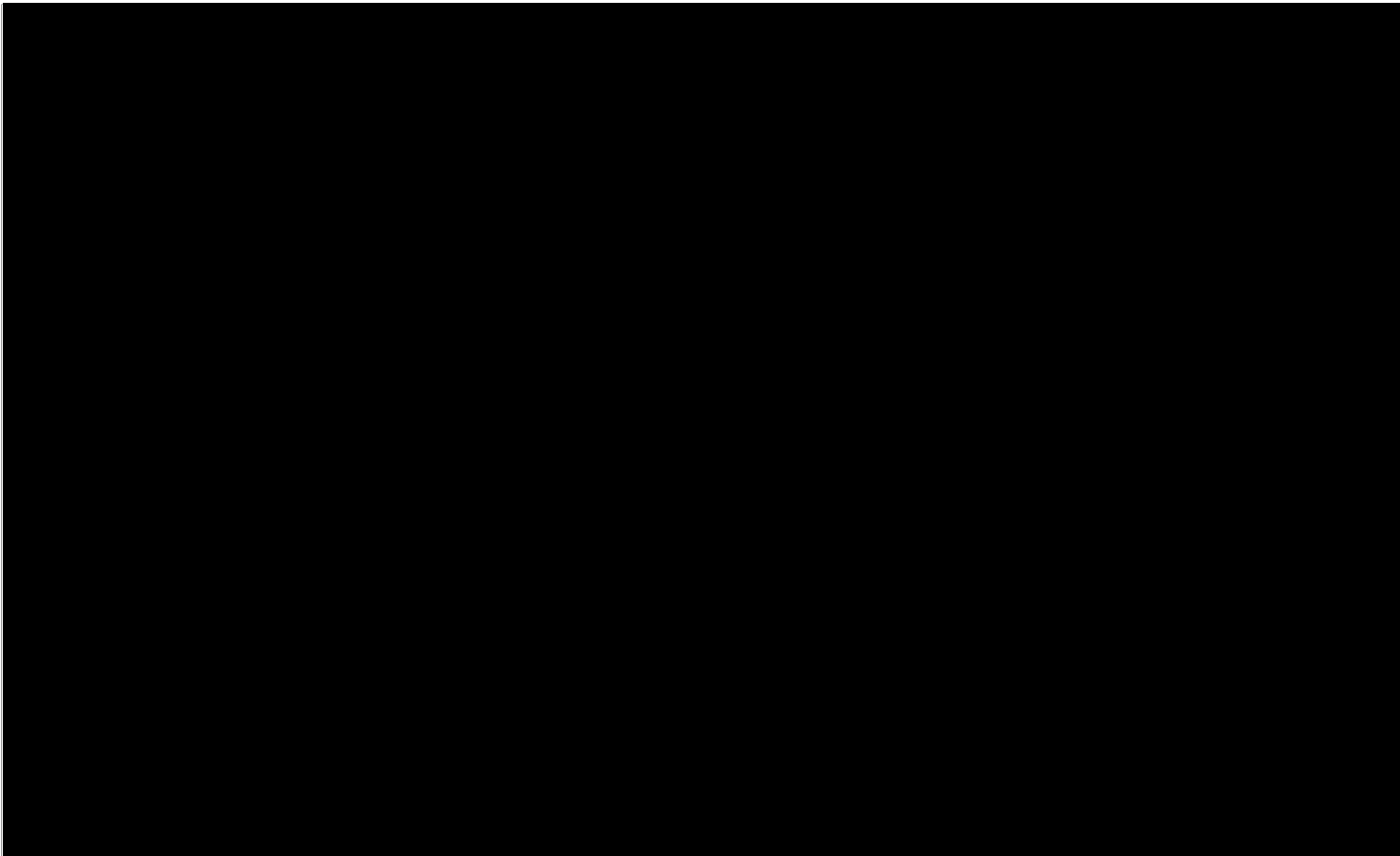
Purchaser requests and authorizes Southern California Gas Company (SoCalGas) to perform the following work:

See Exhibit A attached to this Collectible Work Authorization (CWA).  
This is the CWA for Phase II Part 1 activities.



AGREED AND ACCEPTED	March 31, 2025 (DATE)	AGREED AND ACCEPTED	3/28/2025 (DATE)
SoCalGas BY	Devin Zornizer NAME (PRINT)	PURCHASER	SCE (NAME OF COMPANY)
		Jim Buerkle	Managing Director Project
		<b>PURCHASER OR AUTHORIZED REPRESENTATIVE (PRINT)</b>	<b>TITLE</b>
		Jim Buerkle	
		06625E64195D44A	
		<b>SIGNATURE OF PURCHASER OR AUTHORIZED REPRESENTATIVE</b>	

SIGNATURE OF SOCALGAS REPRESENTATIVE



**Document Set 7**

# MPO Invoice Processing Request Form

## Cover Sheet

Vendor Name Southern California Gas Company Invoice # 300803531-A  
 Invoice Date 7/30/2025

Payment Type:

<input checked="" type="radio"/> Non-PO	Vendor # <u>10085535</u> GL # <u>6165150 - Construction Services Others</u>
<input type="radio"/> PO	Purchase Order # _____ Work Performed Period _____

Project Name	SAP Accounting (Order # or Cost Center)	PO Line Item	Service Line Item (if applicable)	Amount
PIN 7546 ELM	904539746			
TOTAL				

Cost Engineer:

Taeck Yim

Print Name

DocuSigned by:

Taeck Yim

A2250A5BC24A418...

Signature

) # #!#&

Date

**Cost Engineer: Please complete the top portion of this Cover Sheet and submit document and Invoice to MPO**

**Approvals** - According to the Approval Authorization Matrix (AAM)

Doc# \_\_\_\_\_

Click link to view AAM

[T&D Approval Authorization Matrix](#)

SES# \_\_\_\_\_

Title	Print Name	Signature	Date
Project Manager	Selya Arce	DocuSigned by: <u>Selya Arce</u> Signed by: _____	) # ( #!#&
Principal Manager	Janos Kakuk	DocuSigned by: <u>Janos Kakuk</u> Signed by: _____	) # ( #!#&
Director	Kenneth Borngrebe	DocuSigned by: <u>Kenneth Borngrebe</u> Signed by: _____	) # ( #!#&
Managing Director	Jim Burkele	DocuSigned by: <u>Jim Burkele</u> Signed by: _____	) # ( #!#&
_____	_____	_____	_____
_____	_____	_____	_____

(Insert Title)

☒ Invoice Attached

☒ Back-Up Attached

☐ Will Call Tuesday or Friday afternoons at GO1

☐ Pick Up By Name \_\_\_\_\_

PAX \_\_\_\_\_

**MPO: Once approvals have been obtained, please email Vendor Invoice and this Cover Sheet to [MPoInvoicing@sce.com](mailto:MPoInvoicing@sce.com).**

**Please include the vendor name and invoice number in the subject line.**

**Place hard copy of all documents (if available) in the Invoice Inbox located at PIV-2, 3rd Floor Column K4**



**BILL TO :** Southern California Edison  
2244 Walnut  
Rosemead CA 91770

**Return this form when mailing payment**

**MAIL TO:** Southern California Gas Company  
Sundry Billing  
P.O. Box 2007  
Monterey Park, CA 91754-0957

**CAPITAL WO#:**  
**BUSINESS AREA:**

**CONTACT:**  
**WORK REQ#:**  
**INTERNAL ORDER#:**  
**SAP COST CENTER:**  
**COST ELEMENT:**  
**DATE PREPARED:**

**TOTAL AMOUNT DUE**

Make checks payable to **SoCalGas**  
and include internal order number on check

**PLEASE MAKE TIMELY PAYMENT TO AVOID DELAYS IN JOB SCHEDULE**



**Boramy Ith**  
Portfolio Manager  
Construction

555 West Fifth St.  
Los Angeles, CA 90013

Cell: (213) 248-0939  
email: bith@socalgas.com

July 30, 2025

Southern California Edison Company  
Attention: Selya Arce  
PO Box 700  
Rosemead, CA 91770

Subject: ELM A/C Mitigation for L-235 and L-3000

Attachment: Ph II Part 2 CWA\_7-30-25  
Ph II Part 2 Remittance\_7-30-25

Dear Ms. Arce:

Attached are the Phase II Part 2 CWA and remittance in the amount of [REDACTED] for the A/C mitigation system needed on SCG's pipeline L-235 and L-3000 due to the planned Eldorado-Lugo-Mojave (ELM) 500 kV series capacitor increase project. Ph II Part 2 CWA will include construction, project reconciliation and close out.

Sincerely,  
*Boramy Ith*

Boramy Ith  
Portfolio Mgr  
Construction – Pipeline



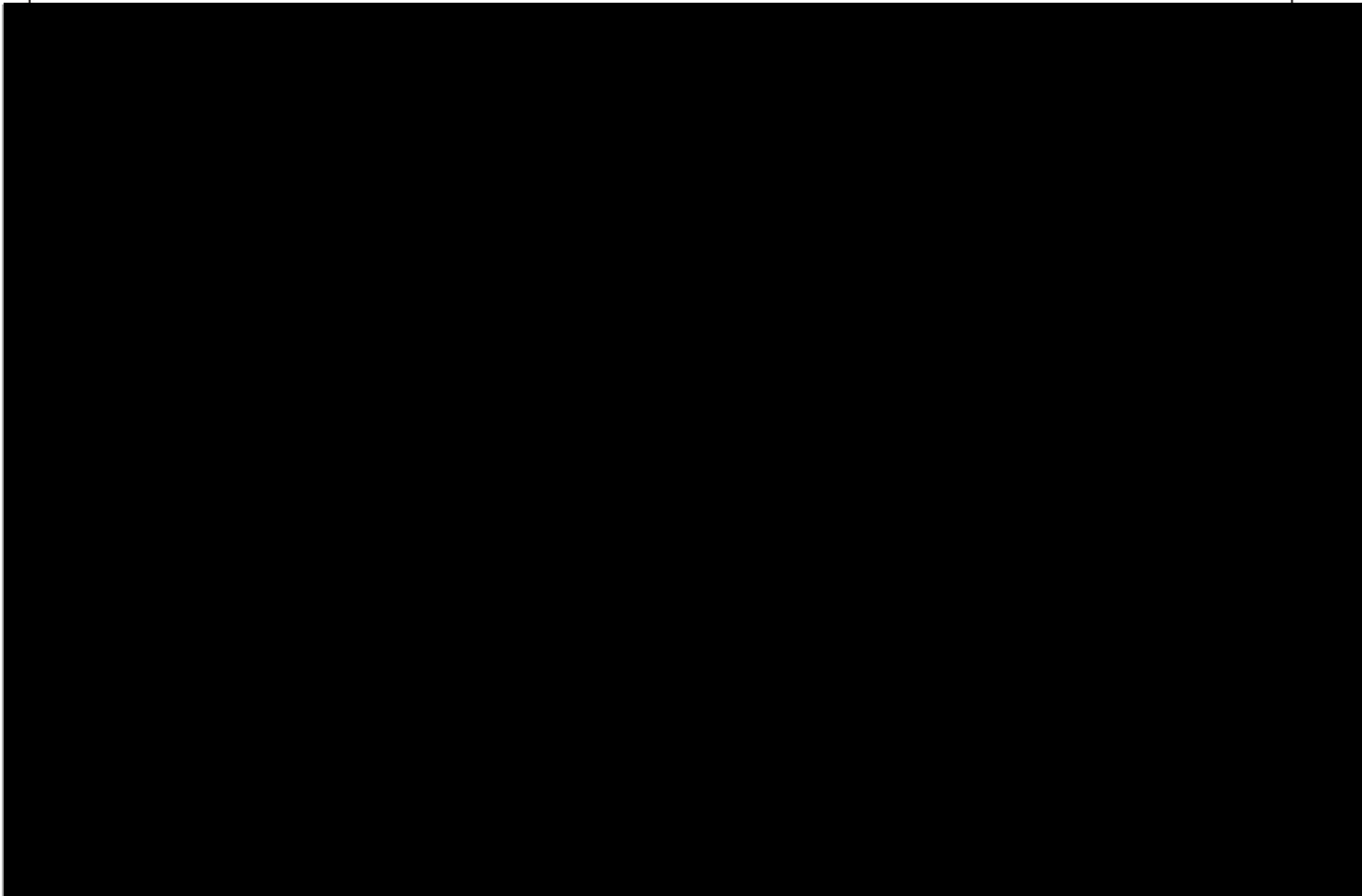


SOUTHERN CALIFORNIA GAS COMPANY  
COLLECTIBLE WORK AUTHORIZATION

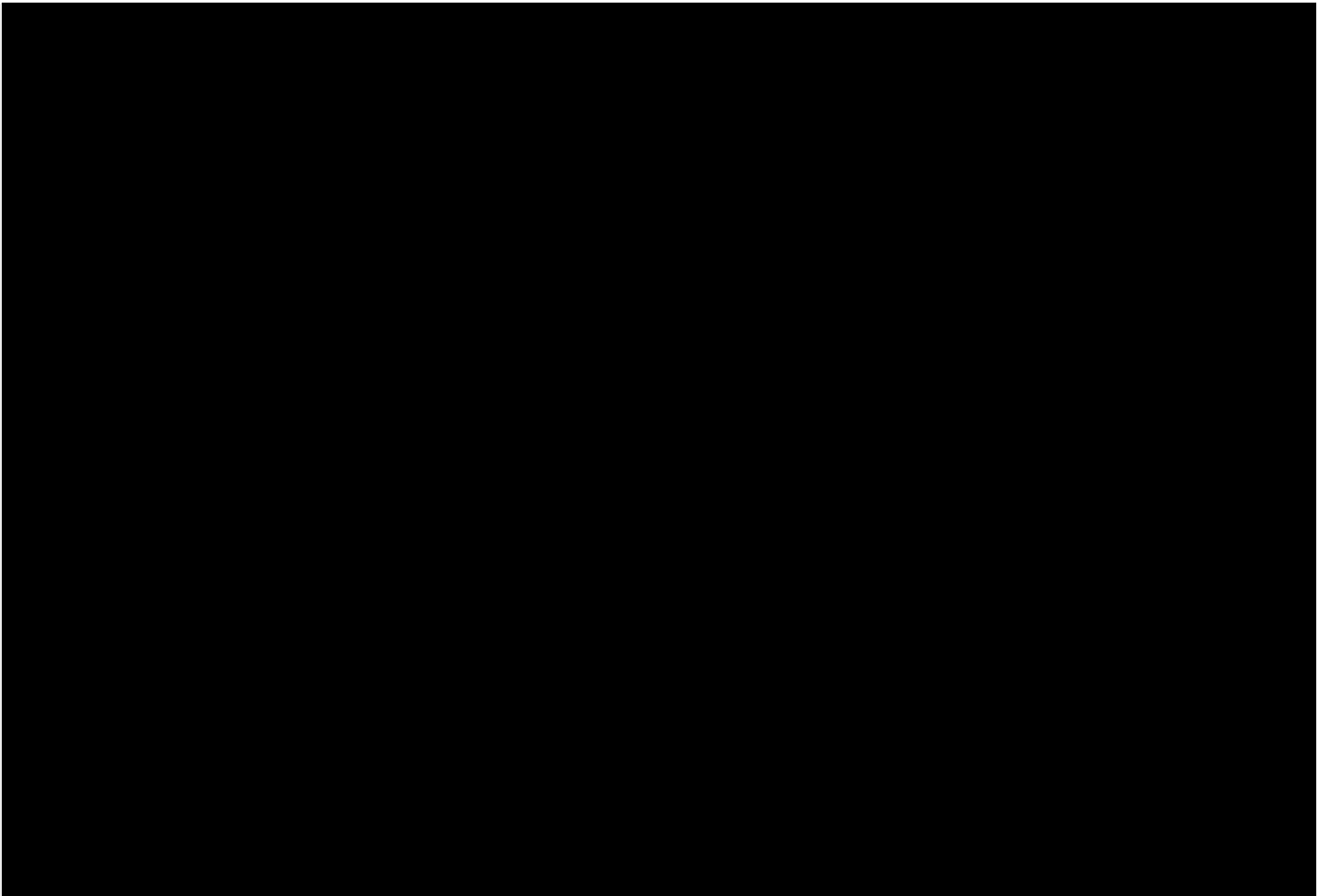
<b>Request Number:</b> 59545					
<b>Date Prepared:</b> 7/21/2025		<b>WO#:</b> 94098.000		<b>IO#:</b> 300803531	
<b>Estimate Prepared By:</b> Seeley, Dave G		<b>ML:</b> GT18P1		<b>Phone#:</b> (213) 231-5652	
<b>Purchaser Name and Job Location</b>			<b>Billing Name and Address, If Different</b>		
<b>Name:</b> Southern California Edison Company			<b>Name:</b> SCE Accounts Payable		
<b>Job Location:</b> See below			<b>Address:</b> 2244 Walnut Grove Ave.		
<b>City:</b>	<b>State:</b>	<b>Zip:</b>	<b>City:</b>	<b>State:</b>	<b>Zip:</b>
			Rosemead	California	91770

Purchaser requests and authorizes Southern California Gas Company (SoCalGas) to perform the following work:

See Exhibit A attached to this Collectible Work Authorization (CWA).  
This is the CWA for Phase II Part 2 activities.



AGREED AND ACCEPTED  SoCalGas BY	August 11, 2025 (DATE)	AGREED AND ACCEPTED  PURCHASER	8/8/2025 (DATE)
	Devin Zornizer NAME (PRINT)	Jill Anderson EVP & Chief Operating Officer TITLE	
E-SIGNED by Devin Zornizer on 2025-08-11 06:45:19 PDT		PURCHASED OR AUTHORIZED REPRESENTATIVE (PRINT) Jill Anderson	
SIGNATURE OF SOCALGAS REPRESENTATIVE		SIGNATURE OF PURCHASER OR AUTHORIZED REPRESENTATIVE	



## **Appendix C**

### **Declaration of Mukhtar Taslim**

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

In the Matter of the Application Of SOUTHERN  
CALIFORNIA EDISON COMPANY (U 338-E)  
for a Certificate of Public Convenience and  
Necessity: Eldorado-Lugo-Mohave Series  
Capacitor Project.

A.18-05-007

**DECLARATION OF MUKHTAR TASLIM IN SUPPORT OF SOUTHERN  
CALIFORNIA EDISON COMPANY'S (U 338-E) JANUARY 2026 PETITION FOR  
MODIFICATION OF DECISION 25-10-012**

ROBERT D. PONTELLE  
LAUREN P. GOSCHKE

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-4906  
Facsimile: (626) 302-1910  
E-mail: Lauren.P.Goschke@sce.com

Dated: **January 6, 2026**

## **DECLARATION OF MUKHTAR TASLIM**

I, MUKHTAR TASLIM, declare that:

1. I am currently employed by Southern California Edison Company (SCE) as a Senior Manager in SCE's Project Cost Controls - Project and Program Management department within SCE's Transmission & Distribution (T&D) organization. My business address is 3 Innovation Way, Pomona, CA 91768. I have been employed by Southern California Edison Company for 15 years. My responsibilities include leading teams in monitoring and forecasting project costs. My duties include preparation of cost forecasts for Transmission and Substation work, and cost tracking/monitoring review to ensure alignment with SCE's governing processes. I have provided the following for the Eldorado Lugo Mohave Project (ELM Project) – I oversee staff that have monitored and forecasted the project cost, including cost details, for SCE's request to increase the MRPC. I submit this Declaration in support of *Southern California Edison Company's (U 338-E) January 2026 Petition For Modification Of Decision 25-10-012*.

2. I have provided financial support to the ELM Project team in my role as a Senior Manager from September 2022 to present. In this role, I am responsible for providing updated detailed cost information (recorded and forecast) for the Project as displayed in the workpapers attached as Attachment A to the *Declaration of Jack Huang In Support Of Southern California Edison Company's (U 338-E) January 2026 Petition For Modification Of Decision 25-10-012*.

3. To support the January 2026 PFM, I provided oversight to the team that compiled cost information related to ELM project expenditures associated with implementing mitigation measures necessary to mitigate potential impacts of the ELM Project on neighboring Southern California Gas Company (SoCalGas) gas pipelines. To develop these costs, the Cost Controls team relied on costs tracked in SCE's SoCalGas pipeline mitigation work order,

including those costs incurred after October 2024 when the work order was established and costs incurred before October 2024 that were transferred into that work order. The SoCalGas A/C pipeline mitigation work order includes all the recorded cost information associated with the A/C mitigation work, such as direct payments to SoCalGas, SCE work times and other expenses from SAP financial system. This information was used to create the cost tables provided in the January 2026 PFM. My team also compiled the cost information related to forecast or “to-go” costs to complete the remainder of the SoCalGas A/C mitigation work. To compile the forecast, my team and I collected information regarding “recorded costs” (*i.e.*, those actually spent), “committed costs” (those for which SCE has already approved) and “to go” costs related to expected future expenditures and for which no change order is likely, including administrative and SCE personnel time. It is SCE’s practice that the Cost Controls group collects this information during regular (typically monthly) meetings with project team at the guidance of Project Manager, which provides Cost Controls with information regarding developments and changes affecting overall project costs, including expectations regarding the remaining work yet to be performed. The Cost Controls team performs reconciliations on a monthly basis. For recorded costs and committed costs, Cost Controls extrapolates information from cost changes that have been approved. With respect to costs associated with SoCalGas or outside contractors, cost information is derived from the actual collectible work agreements or purchase orders approved by. We also reconcile the actual recorded costs by cross-checking the information through the SAP financial software system.

4. Some of the cost estimates included in the tables in the January 2026 PFM include SCE administrative “Project Management, Support, and Engineering” costs.<sup>1</sup> During the early stages of a project, SCE Cost Controls personnel estimate project support values by assigning these categories percentages of the overall project costs based on historical data and SCE experience gleaned from time commitments and expenditures for similar projects and input from SCE’ Transmission and Substation Project Management (TSPM) during their regular meetings. As the project progresses and more information regarding administrative time and expenses becomes available, TSPM creates a more detailed staffing plan for the project, and that plan is shared with and discussed during meetings with Cost Controls personnel. Based on the information in the staffing plan, Cost Controls allocates individualized work time and expense estimates for each staff position therein. That information is then used to project overall administrative costs for the project based on a formulaic multiplication of the estimated time and resource commitments per administrative staff member, times an estimated dollar value. My team performed these activities for the ELM Project to reach the cost estimate information used throughout the project life cycle, including for purposes of this January 2026 PFM.

5. I have personal knowledge of the information in this declaration, including the process for compiling Tables 1-3 included as part of the January 2026 PFM as well as the materials used and relied upon for compilation of those tables, and I incorporate the information therein as part of this declaration. If called as a witness, I could and would competently testify thereto.

---

<sup>1</sup> These categories are intended to reflect the services and expenses of SCE personnel actually assigned to support the project, compared to Direct Allocation values which represent more generic company-wide administrative costs.

6. Insofar as the materials and information referenced in this Declaration are factual in nature, I believe them to be correct.

7. Insofar as the material in this Declaration is in the nature of opinion or judgment, it represents my best judgment.

8. I supervised the preparation of this Declaration.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 6<sup>th</sup> day of January, 2026, at Tustin, California.

By: /s/ Mukhtar Taslim  
Mukhtar Taslim  
Senior Manager, Cost Controls  
Southern California Edison Company



## **Appendix D**

### **Declaration of Jack Huang**

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

In the Matter of the Application Of SOUTHERN  
CALIFORNIA EDISON COMPANY (U 338-E)  
for a Certificate of Public Convenience and  
Necessity: Eldorado-Lugo-Mohave Series  
Capacitor Project.

A.18-05-007

**DECLARATION OF JACK HUANG IN SUPPORT OF SOUTHERN CALIFORNIA  
EDISON COMPANY (U 338-E)'S JANUARY 2026 PETITION FOR MODIFICATION  
OF DECISION 25-10-012**

**PUBLIC VERSION**

ROBERT D. PONTELLE  
LAUREN P. GOSCHKE

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-4906  
Facsimile: (626) 302-1910  
E-mail: Lauren.P.Goschke@sce.com

Dated: **January 6, 2026**

## **DECLARATION OF JACK HUANG**

I, JACK HUANG, declare that:

1. I am currently employed by Southern California Edison Company (“SCE”) as a Senior Manager in SCE’s Project Controls - Project and Program Management department within SCE’s Transmission & Distribution (“T&D”) business unit. My business address is 3 Innovation Way, Pomona, CA 91768. I have been employed by Southern California Edison Company for 15 years. My responsibilities include leading teams in development of project baseline costs. My duties include preparation of cost estimates for Bulk Transmission and Substation work, and cost review to ensure alignment with SCE’s governing processes. I have held the following positions and responsibility on the Eldorado Lugo Mohave Project (“ELM Project”) – I oversee staff that have organized the cost justifications, including cost details, for SCE’s request to increase the MRPC. I submit this Declaration in support of *SCE’s January 2026 Petition For Modification Of Decision 25-10-032*.
2. I have provided financial support to the ELM Project team in my role as a Senior Manager from March 2022 to present. In this role, I am responsible for compiling updated cost information as displayed in the workpapers.
3. To support preparation of SCE’s January 2026 PFM, I provided oversight to the team that compiled the cost information related to ELM Project expenditures and cost estimates.
4. In addition, to further support SCE’s January 2026 PFM, I, along with others from my team, prepared the workpapers attached hereto as Appendix A. The balance of this Declaration includes explanations of what the workpapers contain, as well as the sources of information and methodology used to compile the workpapers.

5. The workpapers in Appendix A identify details regarding the various types of project costs, reflecting their relationship to the various components of the project: Southern California Gas Company (SoCalGas) alternating current (A/C) and gas pipeline mitigation work, SCE Project Management, Support, and Engineering, and Direct Allocations.<sup>1</sup>
6. As discussed further below, the information in the workpapers in Appendix A is derived from three general sources: 1) purchase orders documenting costs for the procurement of services or materials from external vendors; and 2) internal estimates of SCE employee time and expenses; and 3) Direct Allocations.<sup>2</sup>
7. When there is a need to compile cost information, such as for a submittal in a regulatory proceeding, Cost Controls shares with my group the most up-to-date information that has been reconciled. Upon receipt of updated information from Cost Controls, my group compiles the information made available to us.

---

<sup>1</sup> Appendix A.

<sup>2</sup> Within each of the Project Support, Material, and Construction cost categories, there is an amount of cost described as “Direct Allocations.” Direct Allocations represents incurred costs that cannot be assigned to a specific activity, group, or project. Under 4A of the Electric Plant Instructions, which are part of the General Instructions under the Uniform System of Accounts, a utility is required to account for expense and capital in uniform ways, so that “each job or unit shall bear its equitable proportion” of total costs, both direct and allocated. Direct material and labor are easily identifiable. However, the support costs, such as supervision, budgeting and quality assurance, are not traceable to a specific task or function. Other costs, such as insurance, tax, scheduling, and field accounting, typically support a large number of activities, and it is not practical to directly charge them to each task or function. For these reasons, SCE allocates these types of support costs to each project. T&D direct allocations is allocated to the type of work being performed. For example, transmission overhead is allocated to all transmission work (O&M and capital) such that the amount cleared to O&M and capital is determined by the amount of O&M and capital work performed. SCE’s accounting system performs the division overhead allocations each month. The support costs are accumulated and then divided by the total base costs to arrive at an allocation rate. Then, that allocation rate is applied to the total base costs recorded in the individual project to determine the amount of division overhead assigned to the project.

8. To reflect changes to the overall project cost forecast resulting from work scope, staffing, equipment and material procurement costs over time, the workpapers in Appendix A are organized to show specific references to the purchase orders altered by any cost change in a line-item layout. The workpapers are organized by project element and show the specific cost associated with each element. The detailed tables in the workpapers for each element identify the purchase order amount for each line item in nominal dollars.
9. To facilitate the identification of costs associated with the January 2026 PFM, a summary table provided at pages 2-3 of Appendix A, which sets forth cost changes in nominal dollars, which my team has also converted into 2019 constant dollars for ease of comparison against the MRPC approved in D.20-08-032 as modified by D.25-10-012.
10. The workpapers in Appendix A represent the ELM Project costs as documented and forecasted as of the time the January 2026 PFM was filed. I understand that the project is close to complete and that SCE and SoCalGas have largely agreed to project cost. However, once work begins estimates could change somewhat compared to the information reflected in Appendix A, but I believe the information therein to accurately reflect the estimated project costs as of the time of the January 2026 PFM filing. I either provided, or can attest to, the cost calculations (including incurred costs and estimates for “to go” costs) identified in January 2026 PFM Sections V and VI.
11. I have personal knowledge of the information in this declaration, including the process for compiling the workpapers attached as Appendix A as well as the materials used and relied upon for compilation of those workpapers, and if called as a witness, I could and would competently testify thereto.

12. Insofar as the materials and information referenced in this Declaration are factual in nature, I believe them to be correct.

13. Insofar as the material in this Declaration is in the nature of opinion or judgment, it represents my best judgment.

14. I supervised preparation of this Declaration.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 5th day of January, 2026, at Pomona, California.

By: /s/ Jack Huang  
Jack Huang  
Senior Manager, Estimating  
and Project Cost Development  
Southern California Edison Company

## Eldorado-Lugo-Mohave PFM2

SoCalGas Mitigation

### Annual Cash Flows - Total Cost

(Nominal \$)

	2024	2025	2026	2027	Total
Direct Cost, Recorded (as of Oct 2025)	\$ 441,891	\$ 22,607,235	\$ -	\$ -	\$ 23,049,126
Direct Cost, To Go	\$ -	\$ 159,614	\$ 14,860,763	\$ 6,240,247	\$ 21,260,624
<b>Total Direct Cost</b>	<b>\$ 441,891</b>	<b>\$ 22,766,849</b>	<b>\$ 14,860,763</b>	<b>\$ 6,240,247</b>	<b>\$ 44,309,750</b>
Contingency (15% of Direct Cost To-Go)	\$ -	\$ 23,942	\$ 2,229,114	\$ 936,037	\$ 3,189,094
<b>Total Direct + Contingency</b>	<b>\$ 441,891</b>	<b>\$ 22,790,791</b>	<b>\$ 17,089,877</b>	<b>\$ 7,176,284</b>	<b>\$ 47,498,843</b>

### Annual Cash Flows - Total Cost

(Constant 2019 \$)

	2024	2025	2026	2027	Total
Direct Cost, Recorded	\$ 309,808	\$ 15,606,998	\$ -	\$ -	\$ 15,916,806
Direct Cost, To Go	\$ -	\$ 110,190	\$ 10,345,235	\$ 4,383,181	\$ 14,838,605
<b>Total</b>	<b>\$ 309,808</b>	<b>\$ 15,717,188</b>	<b>\$ 10,345,235</b>	<b>\$ 4,383,181</b>	<b>\$ 30,755,411</b>
Contingency (15% of Direct Cost To-Go)	\$ -	\$ 16,529	\$ 1,551,785	\$ 657,477	\$ 2,225,791
<b>Total Direct + Contingency</b>	<b>\$ 309,808</b>	<b>\$ 15,733,717</b>	<b>\$ 11,897,020</b>	<b>\$ 5,040,658</b>	<b>\$ 32,981,202</b>

## Eldorado-Lugo-Mohave PFM2

*SoCalGas Mitigation*

### Summary

*(Nominal \$)*

<b>Craft</b>	\$	
SoCalGas CWA Phase 1	\$	
SoCalGas CWA Phase 2 Part 1		
SoCalGas CWA Phase 2 Part 2		
SoCalGas Environmental Mitigation		
SCE Environmental Mitigation & Restoration		
Known Risk		
<b>Non-Craft</b>	\$	
<i>SCE Labor</i>		
<i>Contract</i>		
<i>Other</i>		
<b>Direct Allocations</b>	\$	
<b>Direct Cost, Recorded:</b>	\$	
<b>Direct Cost, To Go:</b>	\$	
<b>Total Direct Cost</b>	\$	<b>44,309,750</b>
	ISO: \$	44,309,750
	Non-ISO: \$	-



## Eldorado-Lugo-Mohave PFM2

*SoCalGas Mitigation*

### Summary

*(Constant 2019 \$)*

<b>Craft</b>	\$	
SoCalGas CWA Phase 1		
SoCalGas CWA Phase 2 Part 1		
SoCalGas CWA Phase 2 Part 2		
SoCalGas Environmental Mitigation		
SCE Environmental Mitigation & Restoration		
Known Risk		
<b>Non-Craft</b>	\$	
<i>SCE Labor</i>		
<i>Contract</i>		
<i>Other</i>		
<b>Direct Allocations</b>	\$	
<b>Direct Cost, Recorded:</b>	\$	
<b>Direct Cost, To Go:</b>	\$	
<b>Total Direct Cost</b>	\$	<b>30,755,411</b>
	ISO: \$	30,755,411
	Non-ISO: \$	-

## Eldorado-Lugo-Mohave PFM2

SoCalGas Mitigation

### Craft

(Nominal \$)

Category	SCE Labor	Contract Labor	Other Cost	Total Cost
<b>Gasline Mitigation</b>				
SoCalGas CWA Phase 1				
SoCalGas CWA Phase 2 Part 1				
SoCalGas CWA Phase 2 Part 2				
SoCalGas Environmental Mitigation				
SCE Environmental Mitigation & Restoration				
Known Risk				
<b>Total Craft, Recorded:</b>				
<b>Total Craft, To Go:</b>				
<b>Total Non-Craft:</b>	\$ 91,011	\$ 35,965,944	\$ 22,500	\$ 36,079,455

## Eldorado-Lugo-Mohave PFM2

SoCalGas Mitigation

### Non-Craft

(Nominal \$)

Category	SCE Labor	Contract Labor	Other Cost	Total Cost				
Project Management & Support	\$							
Engineering	\$							
Total Non-Craft, Recorded:	\$							
Total Non-Craft, To Go:	\$							
Total Non-Craft:	\$	896,478	\$	438,413	\$	121,000	\$	1,455,891

Eldorado-Lugo-Mohave PFM2

SoCalGas Mitigation

Direct Allocations - Cost  
(Nominal \$)

Category	Amount
Direct Allocation Costs	
Total Craft, Recorded:	\$
Total Craft, To Go:	\$
Total Direct Allocations:	\$