

**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 for the RTRP Transmission Project)
_____)

A.15-04-013
(Filed April 15, 2015)

**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) NOTICE OF EX PARTE
COMMUNICATION**

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Dated: **May 19, 2017**

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STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN)	
CALIFORNIA EDISON COMPANY (U 338-E))	A.15-04-013
for a Certificate of Public Convenience and)	(Filed April 15, 2015)
Necessity for the Riverside Transmission)	
Reliability Project)	

**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) NOTICE OF EX PARTE
COMMUNICATION**

Pursuant to California Public Utilities Code Section 1701.1 and Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“CPUC” or “Commission”), Southern California Edison Company (“SCE”) hereby gives notice of the following *ex parte* communication in the above referenced proceeding.

On Wednesday May 17, 2017, at approximately 9:00 a.m., representatives from SCE and Riverside Public Utilities (“RPU”) met with Rachel Peterson, Chief of Staff to Commissioner Liane Randolph, for approximately 35 minutes. Ron Nichols, President, and Laura Genao, Managing Director of Regulatory Affairs, were present on behalf of SCE. Girish Balachandran, General Manager, and George Hanson, Assistant General Manager, were present on behalf of RPU. The meeting was convened at SCE and RPU’s request and took place at the Commission’s offices at 505 Van Ness Avenue, San Francisco, California. SCE and RPU representatives discussed a PowerPoint presentation, which is included with this notice as Attachment A.

During the discussion, SCE described the history of the Riverside Transmission Reliability Project (“RTRP” of “Project”), noting that since the Project’s approval by the California Independent System Operator (“CAISO”) in 2006, it and RPU have had several discussions with various developers, as well as, since its incorporation as a municipality on or

about July 1, 2011, the City of Jurupa Valley (“Jurupa Valley”). These discussions ultimately led to a settlement with two developers and the resulting proposal of SCE’s “Hybrid Alternative,” which includes undergrounding a portion of the Project within Jurupa Valley.

RPU described its large city size, growing industry, available local generation, and electrical demand (noting that demand has exceeded available generation during peak load conditions) as reasons why the timely resolution of this proceeding is necessary. RPU specifically noted that while it has actively looked to use energy efficiency, solar, and other resources to manage load growth, its reliability and resiliency needs cannot be met without an additional transmission connection to the CAISO grid because the largest source of its local generation is subject to air quality restrictions and gas supply availability issues.

It was noted that various potential transmission corridors were studied as different ways of developing a new transmission connection to SCE’s grid for RPU. Ultimately, routing RTRP’s proposed line through, what is now, the City of Jurupa Valley between the Mira Loma-Vista 220 kV Transmission Line and the City of Riverside was selected. The degree of development surrounding RPU’s service territory made selection of a feasible transmission corridor, which minimized environmental impacts at the least cost to SCE customers and which would be acceptable to all potentially interested parties, particularly challenging.

[Continued on the next page]

SCE also stated that while it supports undergrounding a portion of the RTRP transmission route, it could not support proposing additional undergrounding solely in anticipation of speculative and undefined future growth in Jurupa Valley. Accordingly, SCE proposed the Hybrid Alternative as a feasible compromise to expeditiously provide RPU and the City of Riverside with the second point of interconnection they require, while reasonably accommodating planned development in Jurupa Valley.

Respectfully submitted,

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/s/ Ian Michael Forrest

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May 19, 2017

EXHIBIT A

RTRP Briefing Document



RTRP Briefing Document

May 17, 2017

RTRP Overview

- Riverside Transmission Reliability Project (RTRP) is designed to provide Riverside Public Utility (RPU) and its customers with adequate transmission capacity to serve existing and projected load, to provide for long-term system capacity for load growth, and to provide needed system reliability.
- CAISO determined the need for RTRP and directed its construction in June 2006. Key drivers for RTRP include:
 - The sole source of bulk electrical energy supply for RPU electric customers (City of Riverside and surrounding communities) is through SCE's Vista Substation.
 - Beginning in 2006, RPU's electrical demand has exceeded the available 557 MW of capacity from SCE's Vista Substation, requiring local generation during peak load conditions.
 - Available local generation does not meet RPU's forecast needs.

RTRP is required to address transmission capacity shortages for the City of Riverside which were recognized by CAISO more than a decade ago. As further evidenced by CAISO's recent motion for party status on July 14, 2016, RTRP is still needed.

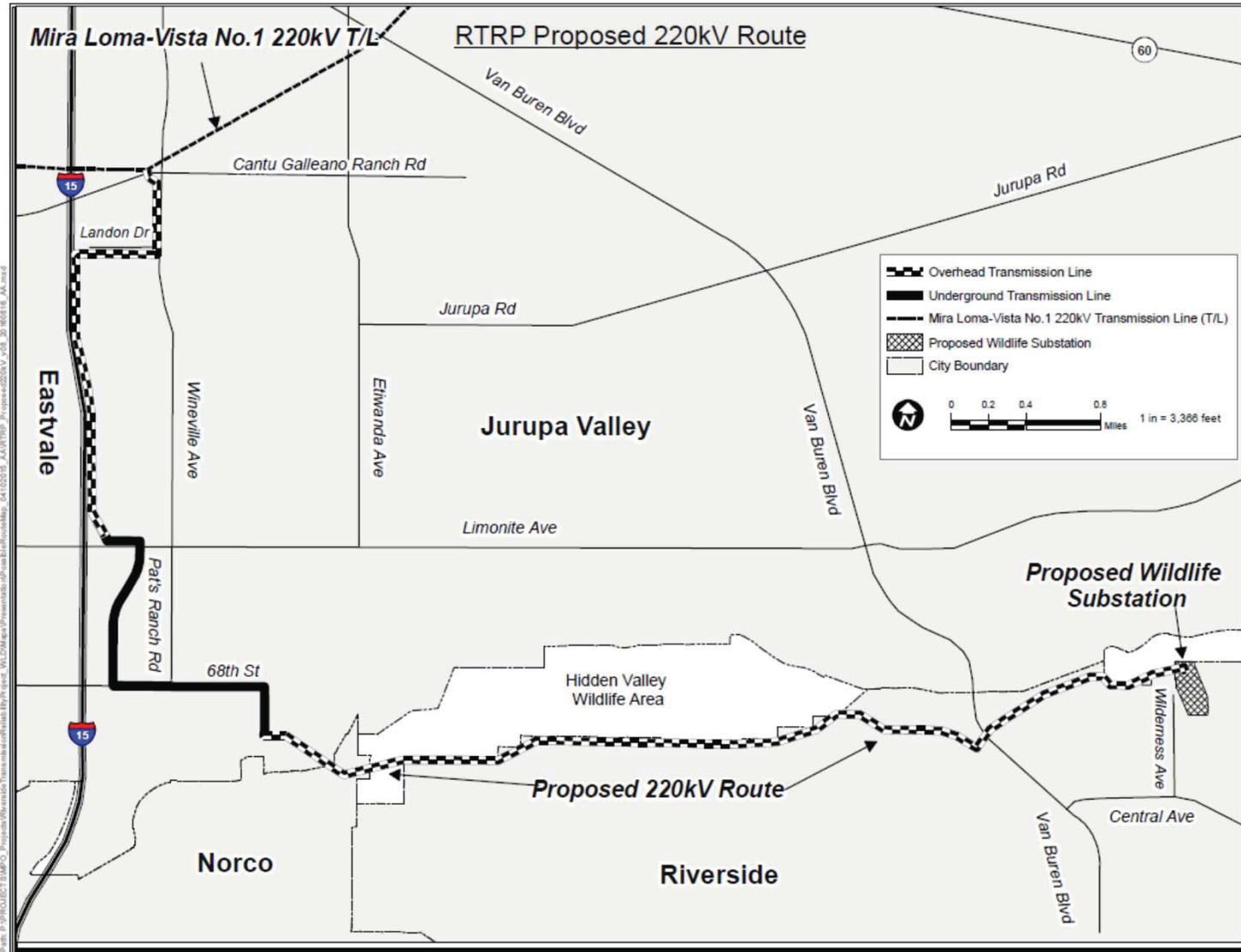
RTRP Procedural History

- CAISO approved a project to address the City of Riverside's transmission issues on June 7, 2006.
- The City of Riverside circulated a Notice of Preparation for RTRP on November 18, 2009 and certified an EIR for RTRP on February 5, 2013, including SCE's proposed 220 kV transmission line and Wildlife Substation.
- CEQA Litigation ensued beginning with a March 2013 lawsuit by the City of Jurupa Valley.
- SCE's RTRP CPCN Application was filed in April 2015 to construct RTRP in conjunction with RPU, including the Proposed Project approved in the FEIR.
- In May 2015, the CPUC found under CEQA that the approved Riverbend and Vernola Apartment Community projects constituted "changed circumstances" warranting a subsequent CEQA review of the project.

RTRP Procedural History cont.

- In July and August 2016, SCE reached settlement agreements with two developers resulting in SCE's proposed modifications to the RTRP project to address newly entitled residential developments.
 - SCE proposed a "Hybrid" (UG/ OH) Alternative as its preferred alternative in lieu of the originally supported project.
 - The Hybrid Alternative is acceptable to SCE, RPU and the developers of the Riverbend and Vernola Apartment Community.
- CPUC is currently completing a Subsequent EIR to analyze the environmental impacts based on the Hybrid Alternative.

RTRP 220kV Route Proposed w/Hybrid Alternative



RTRP Hybrid Alternative

- The RTRP Hybrid Alternative was developed to address the “changed circumstances” since the February 2013 approval of the FEIR as well as concerns regarding direct impacts to the Riverbend and Vernola Apartment projects which were already approved projects (with entitlements).
 - The Hybrid Alternative allows RTRP to meet the project objectives while accommodating the noted changed circumstances.
 - The Hybrid Agreement was intended to limit an UG precedent to approved developments.
 - The OH portions of the Hybrid Alternative in Jurupa Valley are appropriate for undeveloped properties without entitlements
- The CPUC’s Energy Division has inquired about the option of full undergrounding in Jurupa Valley.
 - City of Jurupa Valley is actively seeking to entitle other development projects, allegedly incompatible with RTRP, in order to “stymie”* the connection between SCE and RPU grids.
 - RTRP CEQA Scoping Meeting comments indicate desire for a 100% undergrounding solution in Jurupa Valley.
 - Such undergrounding will significantly increase the overall costs to SCE and Transmission Access Charge (TAC) customers and delay the Project’s implementation.
 - Original Proposed Project costs \$222M (\$2015)
 - Proposed Hybrid Alternative costs** \$353M (\$2015); 50%+ increase to original Proposed Project
 - Other full underground Alternatives** \$420-445M (\$2015); 89%+ increase to original Proposed Project

**“And we need to put something along that freeway if we are going to stymie that project in some way or another.” (Jurupa Valley Planning Commissioner George Ruiz, February 25, 2015 Jurupa Valley Planning Commission meeting)*

***SCE’s cost estimates for the Hybrid Alternative and Other full underground Alternatives are conceptual, representing a preliminary design and based on planning level assumptions. The precise design of these alternatives, and costs for its construction, are subject to change following completion of final engineering.*

RTRP Hybrid Alternative effectively addresses changed ground conditions while minimizing the overall cost to customers and construction delays.

Community Concerns and Outreach

- Comments provided in recent community forums mirror those raised in the Draft EIR which are addressed in RTRP FEIR including:
 - EMF Concerns
 - Economic & Social Impacts
 - Environmental Justice
 - Involvement of City of Jurupa Valley and other communities in proceedings
- Considerable public outreach has been conducted on the project since 2006 including:
 - Project Newsletters
 - Public Notices – *The Press Enterprise, La Prensa, Hispanic News, Black Voice News, The Riverside County Record*
 - Press Releases
 - RPU, SCE, and CPUC Websites
 - Telephone Information Line
 - Public Open Houses
 - Agency & Elected Official Briefings

RTRP Interested Parties

- City of Riverside/ Riverside Public Utility
- City of Jurupa Valley
- Other local cities
- Jurupa Valley Chamber of Commerce
- Temescal Valley MAC
- Goose Creek Golf Course
- Lennar Homes
- Vernola Trust
- Sky Country
- Stratham Homes
- Center for Community Action and Environmental Justice (CEERT)

Conclusions and Next Steps

- The RTRP Hybrid Alternative is the best solution for all parties, addressing the ENA (Electrical Needs Area) while avoiding unnecessary and unwarranted costs to TAC customers.
- Anticipated timeline for next steps toward construction include:
 - NOA and Draft Subsequent EIR - August 2017
 - Final Subsequent EIR issued - February 2018
 - ALJ prehearing conference - March 2018
 - ALJ Proposed Decision - August 2018
 - Final Decision - September 2018

Back Up Information

Jurupa Valley Ex Parte Comments

Comment	Response
<p>“Jurupa Valley takes the full negative environmental impact burden for a sole benefit to Riverside.”</p>	<p>Project will benefit entire region (including JV) in addition to RPU, as there are many commercial amenities provided and supported by RPU’s grid, e.g., local hospitals, employers, schools, universities, emergency services, etc.</p>
<p>“\$500 million in private development investment along the I-15 corridor is held up and may be lost due to the overhead route through Jurupa Valley- the last major developable acreage on the I-15 between the southern border of Corona and Rancho Cucamonga.”</p> <p>“Jurupa Valley loses an estimated \$2-4 million in annual revenue (sales, hotel and property taxes) from loss of commercial/retail opportunity on I-15 corridor”</p> <p>“There will be a regional economic impact on loss of commerce and jobs due to loss of I-15 corridor opportunities.”</p>	<p>SCE is not aware of such proposals north of Limonite. There has been a specific plan in place for the area in question since 1996, and yet no development has been entitled there. Note: There has been entitlement and approval of the Riverbend and the Vernola Apartment Projects.</p> <p>RPU has completed estimates of the positive impact of new property taxes to be paid by SCE, post RTRP.</p> <p>Southern California Edison operates numerous transmission lines in highly urbanized areas of Southern California. SCE’s facilities co-exist and are entirely compatible with commercial, residential, and industrial uses located proximate to SCE’s right-of-way.</p>
<p>“Jurupa Valley is comprised of a 65% minority, low income population. This project devastates Jurupa Valley’s ability to adequately generate the revenues necessary to serve this community, revenues for adequate public safety, community social programs, and street maintenance. Environmental Justice issues related to this must be considered.”</p>	<p>Though Environmental Justice analysis is not required under CEQA, impact analysis was conducted for RTRP in the EIR. Proposed Project Significant Impacts were found to not occur disproportionately to minority populations versus the entire population impacted.</p> <p>Environment Justice is not compromised via the Hybrid (OH portions occurring on commercially zoned properties).</p>

Jurupa Valley Ex Parte Comments cont.

Comment	Response
<p>“SCE has woefully underestimated the costs for right of way acquisition from the private landowners. If undergrounding the entire route as an alternative is to be considered, all undergrounding would be through public right of way with no acquisition costs to SCE. This in our estimation will result in less costs to the rate payer overall.”</p>	<p>By SCE’s estimates, acquisition of vacant, undeveloped, and unentitled land will cost less than UG the remainder of the route in JV.</p>
<p>“Commission Hearing is requested to be held in Jurupa Valley in support of the City's Environmental Justice Element of the City General Plan.”</p>	<p>In the February 8 Scoping Meeting, Panorama indicated the Commission will possibly have an additional public meeting in Jurupa Valley in Summer 2017 after Draft Subsequent EIR is prepared.</p>

Jurupa Valley Ex Parte Comments cont.

Comment	Response
<p>“Riverside Public Utilities refuses to consider paying any incremental additional cost to SCE to underground versus overhead along the I-15 corridor, if there actually is an additional cost. Why when only Riverside benefits from this project?”</p>	<p>Regardless of construction methods (OH/UG), all ratepayers within the State of California including the City of Riverside pay for the construction and use of California’s electrical transmission system controlled by California’s Independent System Operator (ISO or CAISO) through a Transmission Access Charge (TAC) applied on a regional basis for facilities 200kV and above regardless of construction methods. The TAC will fund the cost of RTRP related 230kV facilities from the tap point north-west of Cantu-Galleano Ranch Road and Wineville Avenue in Jurupa Valley to SCE’s Wildlife Switchyard in Riverside. In addition, Riverside’s ratepayers absorb the cost of the Non-ISO controlled facilities serving RPU’s Wilderness Substation.</p> <p>RTRP benefits Riverside <u>and</u> it strengthens the electric grid serving the region by creating additional pathways for power flow and providing a means for Riverside to provide emergency generation power back into the grid if directed to do so by the ISO. In addition, RTRP adds nearly 560 MW of capacity to the system enabling Riverside to provide reliable electrical service to its customers and it frees up capacity for SCE to use to serve its customers.</p> <p>Riverside and the nearby communities depend on Riverside providing reliable electric service to critical facilities, especially during emergency conditions. Riverside is the county seat. A few of the critical facilities within Riverside serving the local region include Riverside County Administration, Riverside County Emergency Operations Center, Riverside County Communications Center, Riverside City Emergency Operations Center, four Major Hospitals, Mills Filtration Plant, and the Regional Water Quality Control Plant.</p>