

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

Application of Southern California Edison
Company Eldorado-Lugo-Mohave Series
Capacitor Project

Application A.18-05-007
(Submitted May 2, 2018)

**COMMENTS OF THE NATURAL RESOURCES COUNCIL ON THE
INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION FOR THE
EL DORADO-LUGO-MOHAVE SERIES CAPACITOR PROJECT**

September 13, 2019

Carl Zichella
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INITIAL STUDY/ MITIGATED NEGATIVE DECLARATION (ISMND) FOR
THE EL DORADO-LUGO-MOHAVE SERIES CAPACITOR PROJECT**

The Natural Resources Defense Council respectfully submits the following comments in support of the adoption of the IS/ MND for the E Dorado-Lugo-Mohave Series Conductor Project (ELM).

I. DESCRIPTION OF NRDC

NRDC is a non-profit membership organization with more than 95,000 California members who have an interest in receiving affordable energy services while reducing the environmental impact of California's energy consumption. We have participated in numerous California Public Utilities Commission proceedings over the last 40 years with a particular focus on representing our California members' interest in the utility industry's delivery of cost-effective energy efficiency programs, renewable energy resources, and other sustainable energy alternatives.

II. STATEMENT OF INTEREST

NRDC has long advocated for the more efficient use of the electrical delivery system to rapidly and reliably integrate the renewable energy resources needed to meet California's critical renewable energy and climate goals. We have strongly supported efforts to upgrade and modernize existing transmission resources to avoid having to build unnecessary rights of way (ROW) and to size new transmission resources to meet present and future needs. The ELM project will accomplish these goals by increasing the capacity of the existing transmission line,

increasing the ability to import renewable generation from neighboring resource areas, and integrating new transmission communications technology without substantially changing the existing footprint of the transmission line. The ELM project as described in the IS/MND will defer the need to construct and permit a new transmission line and ROW across environmentally sensitive California lands. It will increase reliability in both the Southern California Edison and LADWP service territories by improving power flows and reducing congestion between their systems and in the California ISO (CAISO system). NRDC strongly supports the ELM project as described in the IS/MND.

Specifically, the project would:

- Construct two 500 kV mid-line series capacitors near Interstate 40, approximately 18 miles southeast of Newberry Springs.
- Construct three new fiber optic repeater facilities within the Lugo-Mohave Transmission ROW.
- Address 16 potential overhead clearance discrepancies at 14 locations.
- Replace approximately 235 miles of existing overhead ground wire (OHGW) with new optical ground wire (OPGW) between Eldorado, Mohave, and Lugo substations.
- Include other upgrades including underground telecommunications facilities, modifying existing series capacitors, installing or replacing equipment at existing substations.
- Install cathodic protection on nearby pipelines as needed.

II. ADEQUACY OF THE IS/MND

NRDC believes the mitigation measures as proposed by the applicant and augmented by the CPUC staff are sufficient to warrant an MND for the project. We commend both the applicant and the CPUC reviewing staff for comprehensively assessing and proposing mitigations to avoid and compensate for environmental damage these upgrades might cause.

NRDC concurs with the IS/ MND finding that: “Implementation of the mitigation measures, listed below (in the IS/ MND) by resource topic, would avoid or reduce to less than significant levels all potentially significant impacts identified in the Initial Study.”¹

¹ The full text of mitigation measures also is provided in the resource analysis sections of

NRDC notes that Edison has agreed to incorporate all mitigation measures proposed by the CPUC staff into their project plan.

IV. CONCLUSION

NRDC's urges that the IS/MND for the ELM project be accepted as adequate for meeting the purposes of CEQA for the reasons stated above, NRDC respectfully requests the Commission so approve it.

September 13, 2019

Respectfully submitted,

A handwritten signature in blue ink that reads "Carl Zichella". The signature is written in a cursive style and is centered within a light gray rectangular box.

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Section 5, under Environmental Impacts and Mitigation Measures, as well as in Section 6. Mitigation Monitoring Plan.) In some instances, a mitigation measure for one resource is also applicable to a different resource and is cross referenced in the text.