



November 18, 2015

Jack Horne  
Southern California Edison  
8631 Rush Street, General Office 4 – G10Q (Ground Floor)  
Rosemead, CA 91770

**Re: Data Request No. 7 for the Mesa 500-kV Substation Project (CPUC Proceeding A. 15-03-003)**

Mr. Horne:

Upon further review of Southern California Edison's Proponent's Environmental Assessment (PEA) and responses to Data Request #6, the Energy Division requests additional information related to the objectives of the proposed project, as discussed herein.

The information in SCE's PEA as well as SCE's responses to Data Requests regarding project objectives and alternatives are insufficient, in whole, for the CPUC to determine the project objectives for the EIR and formulate a reasonable range of alternatives. Objectives appear to be incomplete, unclear, or are overly broad. For example:

- The PEA states that the proposed project is meant to address reliability issues arising from SONGS and OTC retirement. The proposed project is meant to address the reliability concerns though allowing flexibility of siting future generation projects and by complying with NERC, WECC, and CAISO standards.
- The PEA named two specific contingencies (N-1-1 outage of the Lewis-Serrano No. 1 230 kV Transmission Line followed by an outage of the Serrano-Villa Park No. 2 230 kV Transmission Line; N-1-1 outage of the Eco-Miguel 500 kV Transmission Line followed by an outage of the Ocotillo-Suncrest 500 kV Transmission Line) that result in voltage collapse and thermal overloads. These contingencies would be addressed by the proposed project.
- In response to a request for power flow data in Data Request #1 Q.1, SCE provided power flow data only for the contingency involving an outage of the Ocotillo-Suncrest 500-kV transmission line.
- In response to Data Request #6 Q.3a, SCE stated that the presented alternative would not meet "contingencies not anticipated in planning assessments."
- In response to Data Request #6 Q.4a, SCE named two additional contingencies that were not identified in the PEA, but that the proposed project should address. In addition, SCE stated in this same response that the proposed project is meant to maintain or improve overall system reliability.

Broad objectives do not help to focus the alternatives analysis under CEQA. An innumerable number of actions could "maintain or improve overall system reliability." Furthermore, the CPUC cannot independently verify that the proposed project meets the stated objectives for contingencies that were not identified in the PEA, for which power flow data was not provided, and particularly for contingencies that are not yet known. In order to adequately assess a reasonable range of alternatives, CPUC requests SCE provide:

1. A finite list of contingencies the proposed project is meant to address. SCE should identify the voltage performance issue, thermal overload, or other adverse result of the contingency that the proposed project is intended to address. The first two contingencies listed in Attachment 1 were included in the PEA and are provided as examples of information sought in response to this data request.
2. Power flow data, consistent with Data Request #1, Q.1, for all contingencies the proposed project is meant to address.

In an effort to expedite scheduling per SCE's request, we request that the responses to this item be provided to us within 14 days. In addition, the CPUC encourages SCE to send a response to Part 1 of this data request separately, if completed prior to Part 2, in order to avoid further delay.

The Energy Division reserves the right to request additional information at any point in the process. Questions relating to the Mesa 500-kV Substation Project should be directed to me at (415) 703-1966 or [lisa.orsaba@cpuc.ca.gov](mailto:lisa.orsaba@cpuc.ca.gov).

Sincerely,

*MJ Orsaba*

Lisa Orsaba,  
California Public Utilities Commission  
Energy Division

CC: Claire Hodgkins, Ecology and Environment, Inc.  
Kristi Black, Ecology and Environment, Inc.

Attachment 1: List of Contingencies

Contingency	Contingency Type (e.g., N-1, N-1-1)	Affected Facility	Adverse Result (e.g., voltage collapse, thermal overload)
Lewis–Serrano No. 1 230-kV Transmission Line outage followed by Serrano–Villa Park No. 1 230-kV transmission line outage	N-1-1	Serrano–Villa Park No. 2 230-kV transmission line	Thermal overload
Lewis–Serrano No. 1 230-kV Transmission Line outage followed by Serrano–Villa Park No. 2 230-kV transmission line outage	N-1-1	Serrano–Villa Park No. 3 230-kV transmission line	Thermal overload