



ORA

Office of Ratepayer Advocates
California Public Utilities Commission
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San Francisco, California 94102
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January 10, 2017

Rob Peterson, CPUC
c/o Tom Engels
Horizon Water and Environment, LLC
180 Grand Avenue, Suite 1405
Oakland, CA 94612

Re: Office of Ratepayer Advocates Comments on the Draft Environmental Impact Report for the Suncrest Reactive Power Support Project, Proposed by NextEra Energy Transmission West, LLC; Application (A.) 15-08-027

Dear Mr. Peterson:

The Office of Ratepayer Advocates (ORA) hereby submits the following comments in support of the Draft Environmental Impact Report (DEIR) for the Suncrest Reactive Power Support Project (Project) proposed by NextEra Energy Transmission West, LLC (NEET West).

The Commission published the DEIR on November 23, 2016 and evaluated the following four alternatives for the Suncrest Project:

- No Project Alternative,
- Northeast Site Alternative,
- Suncrest Substation Alternative, and
- Overhead Transmission Line Alternative.

Of these alternatives, the DEIR selected the No Project Alternative as the environmentally superior alternative, and stated “that in cases when the No Project Alternative is the environmentally superior alternative, an EIR must also identify an environmentally superior alternative from among the other alternatives (State CEQA Guidelines Section 15126.6[e][2]). Accordingly, in addition to the No Project Alternative, the Suncrest Substation Alternative is considered to be the environmentally superior alternative.” (DEIR, p.ES-8)

ORA supports the DEIR selection of the two environmentally superior alternatives in accordance with State CEQA Guidelines. To the extent that voltage support is needed, ORA requested, in its comments on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) on February 8, 2016, that the EIR study the Suncrest Substation Alternative, which would require the

Reactive Power Support Project to be placed within the immediate footprint of the San Diego Gas & Electric (SDG&E) Suncrest Substation facility.

The Suncrest Substation Alternative is the most reasonable option for the following reasons:

- 1) From an engineering perspective, this alternative would be more effective than the other alternatives because the Status Var Compensator (SVC) facility would be directly interconnected to the substation, which would allow the SVC to adjust the voltage level of the power equipment at the substation. Conversely, with the Proposed Project, the Overhead Transmission Line Alternative and the Northeast Site Alternative, there would be a voltage drop due to the power being conveyed for more than one mile to the Suncrest Substation. Due to this voltage drop, the SVC project would not provide reactive power support or voltage support to the Suncrest Substation in the most effective and efficient way.
- 2) From a construction perspective, co-locating the SVC facility with the Suncrest Substation would avoid unnecessary construction of the following components of the Proposed Project and their associated environmental impacts :
 - Two new 20-foot-wide by 95-foot-long access driveways from Bell Bluff Truck Trail to the SVC;
 - A stormwater detention basin, sized to capture the runoff from the 85th percentile of a 25-year, 24-hour rain event, and earthen swales to divert run-on stormwater;
 - A Mechanically Stabilized Earth retaining wall approximately 480 feet long and 15 feet tall at its highest point (an average height of 8 feet) along the east side of the facility;
 - Chain link and barb wire security fencing approximately 7 feet high with secure 31 gates accessible only by NEET West staff and emergency services personnel;
 - Transformer oil containment basins designed to contain the oil volume of the transformers plus stormwater from the 25-year, 24-hour storm event;
 - A 10,000-gallon water tank for fire suppression outside the Suncrest SVC fence and adjacent to the northeastern driveway; and

- Signage and lighting.
- 3) From a communications perspective, the Suncrest Substation Alternative would be more reliable as there would be no need for separate communication facilities between the substation and the SVC site. Since they would be co-located, the communications would be easier to implement and more reliable. However, under the Proposed Project, communications facilities would need to be installed between the SVC facility and the Suncrest Substation. (DEIR, p.ES-5.)
 - 4) From operational and coordination perspectives, locating the SVC within the substation footprint would be more effective with regards to operating and mitigating potential safety issues that could occur from operators' miscommunications. However, under the Proposed Project, there would be two groups of operators: one for the SVC facility and one for the Suncrest Substation that are more than one mile away from each other. This distance creates a higher risk of errors. For example, it would be difficult for two groups of operators to follow the "check and tag" requirements when they operate the devices either during routine operation or during maintenance. This could result in a compromise of safety operation at the Suncrest Substation and the SVC facility. Approval of any of the alternatives other than the Suncrest Substation Alternative increases the risk of safety hazards.
 - 5) From a cost perspective, co-locating the SVC facility within the Suncrest Substation facility would eliminate the cost of constructing and maintaining a one mile 230 kV transmission line that would be required to connect the SVC to the substation. Constructing the SVC facility at the Suncrest Substation also would incur lower costs.

Sincerely,

/s/ Chloe Lukins

Chloe Lukins

Program Manager, Office of Ratepayer Advocates

Cc: Administrative Law Judge Colette Kersten
Tom Engels, Horizon Water and Environment, LLC
Service List for A.15-08-027