

goals. SCE has worked with CPUC Staff and TNHC and will continue to work with them on the development of a new substation in the Glen Ivy/Alberhill area that will serve as an alternative to the Lake switchyard site.

II. THE PROPOSED LAKE SWITCHYARD SITE IS INFERIOR TO SCE'S PREFERRED ALBERHILL SUBSTATION SITE

As stated in the PEA, SCE is developing a new 500/115 kV substation on an approximately 50-acre site in the Glen Ivy/Alberhill area of unincorporated Riverside County (the Alberhill site).¹ The Applicant recognizes that its proposed Lake switchyard site, adjacent to Lee Lake, may not be of sufficient size to accommodate the configuration of SCE's need for a substation in the area.² SCE has advised TNHC that the size of the plot at the Lake switchyard location will not be sufficient for the full 500/115kv substation. SCE investigated another option for using the Lake switchyard site in which the substation would be split to the left and right of the dry wash at the site. This configuration also fails to provide sufficient space for the full substation.

The Applicant's discussion of aesthetics impacts of the Lake switchyard site does not consider that the site will require routing two separate 500 kV transmission line circuits (two sets of towers) crossing over Lee Lake and Temescal Canyon Road.³ In contrast, the alternative Alberhill site would require only one 500 kV transmission line circuit crossing Lee Lake and Temescal Canyon Road.

The PEA did not evaluate the concealed or buried fault directly beneath the proposed Lake switchyard site. The westernmost portion of Applicant's proposed site is crossed by a Late Quaternary age fault, but the PEA did not evaluate fault rupture hazards at the Lake site. In addition, the proposed site may overlie an area defined by Riverside County as a moderate

¹ PEA at 6-65.

² *Id.*

³ PEA at 6-67.

liquefaction hazard zone. At the alternative Alberhill site, the County defined the potential liquefaction hazards as low. Therefore, SCE believes that the two sites would not have “a generally comparable impact on geology and soils” as claimed by Applicant.

The PEA does not evaluate the high-pressure natural gas transmission pipeline adjacent to the Lake switchyard site.⁴ Construction activities near such lines may present potential risks and hazards; the pipeline location should be provided in the PEA. The risks at both the proposed Lake switchyard site and alternative sites should be evaluated.

Potential flood hazards are not adequately addressed in the PEA. Although the PEA states that “as illustrated in FEMA’s applicable FIRM map, neither the proposed Lake switchyard nor the alternative Lake switchyard sites are located within a 100 year flood plain,”⁵ the PEA does not address other potential flood hazards. Because the proposed site is adjacent to a FEMA-designated 500-year flood hazard zone, it should discuss this hazard. The Lake switchyard site is also immediately adjacent to a substantial active drainage channel which poses potential flooding and erosion hazards that were not addressed in the PEA. Based on site-specific drainage issues, potential flooding appears to be greater at the proposed site than at the alternative switchyard site.

SCE will work with the Commission Staff, its consultants, and TNHC to locate a sufficiently large and accessible site for a timely environmental review.

⁴ PEA at 6-73.

⁵ *Id.*

**III. TWO 115 KV DISTRIBUTION FEEDER CIRCUITS INCLUDED
IN THE PEA SHOULD NOT BE CONSIDERED AS THEY DO NOT SUPPORT
THE GOALS OF THE PROJECT, WERE NOT PART OF THE
INTERCONNECTION REQUEST, AND HAVE NOT BEEN STUDIED**

The Project Conceptual Single Line Diagram shows an installation of a single 500/115/20 kV transformer bank with two 115 kV distribution feeder circuits.⁶ TNHC states:

[T]he new Santa Rosa Substation will be constructed above ground and may later be integrated into the design of the LEAPS powerhouse. The substation will serve two local 115 kV circuits reinforcing SCE’s Skylark and Elsinore Substations. The approximate load is 100 MW per circuit, for a total of 200 MW of new load served. The load served is the Lake Elsinore area [sic] both incorporated and unincorporated Riverside County. The 115 kV circuits also supply starting and facilities power required by the LEAPS project.⁷

The Commission Staff should not consider or review the 115 kV circuits described in the PEA. The purpose (“goals”) of the Project, as described by the Applicant, is to take advantage of an existing water body and proximity to southern California energy markets to construct and operate a pumped storage facility and to connect it “to the CAISO-controlled grid” which allows the power to serve “the San Diego and Los Angeles metropolitan areas.”⁸ The two 115 kV distribution feeder circuits and the Santa Rosa substation do not support the purpose of the project, even if one accepts them as described by Applicant’s “goals” or its “objectives.”

In addition, these 115 kV facilities were not identified in the data submitted as part of the LEAPS interconnection requests. Thus, they have never been modeled in any of SCE’s studies. The two independent studies referenced by Applicant (see PEA at 2-2, footnotes 8 and 9) also do

⁶ PEA, Figure 3.1.1-2 at 3-26.

⁷ PEA at 3-70.

⁸ PEA at 2-4. The Applicant also describes six “objectives” of the transmission project: reduce congestion on the high-voltage CAISO grid; provide 1,100 MW of import capability to San Diego; provide 1,100 MW of import capability to San Diego under G-1/N-1 conditions; provide a 500 kV interconnection between SCE and SDG&E’s systems; further long-term interconnection planning; and provide access to the pumped storage facility. Only the last of those “objectives” is related and integral to the goals. PEA at 2-4 to 2-5.

not include a description or analysis of such facilities. Load flow, short-circuit duty, and contingency condition analyses must be performed before any definitive statements can be made about the impact of the facilities on the SCE and ISO-controlled systems.

SCE performs an annual planning assessment to identify required distribution-level upgrades needed to maintain service to load. None of the studies performed to date identify the need for Santa Rosa substation to maintain reliable service to local area load. Applicant's proposal to use the Santa Rosa Substation as a means to reinforce SCE's Skylark and Elsinore Substation will cause a paralleling in the underlying 115 kV system with the 500 kV system and will potentially result in significant system issues. Moreover, as a result of SCE's annual planning assessment, SCE is developing a stand-alone project that satisfies the load requirement for this area.⁹

Although the purpose of a PEA is to assess the environmental impacts of an applicant's proposed project, Applicant's PEA provides no such assessment for the new 115 kV lines. For example, there are potential visual impacts, and land use and planning impacts, associated with additional 115 kV transmission lines between Santa Rosa Substation and the Elsinore and Skylark Substations. The PEA provides no assessment of these or other impacts from the 115 kV facilities.

In summary, the 115 kV facilities described as part of the Santa Rosa Substation should not be considered in the review of the PEA because the PEA does not provide any environmental impact assessment for these proposed new 115 kV lines, they are not needed to satisfy the two goals or the six objectives of the Project, they were not part of Applicant's interconnection request and thus were not studied, and construction of them will result in a parallel system arrangement causing potential significant system issues. Furthermore, SCE is developing a stand-alone project to satisfy local load requirements in the area of the proposed facilities.

⁹ Applicant mentions this project in the PEA at 6-65 in its discussion of "Alternative No. 5."

IV. THE PROJECT SHOULD BE COORDINATED WITH THE LEAPS PROJECT

The Applicant identifies the TE/VS Project as a “stand alone transmission line authorization request to the Commission.”¹⁰ Although the Commission is not licensing the LEAPS project, it should not approve the TE/VS Project in isolation, or as a “stand alone” project, separate from the hydro facility because the purpose and need for the Project is based on LEAPS. As discussed in Section III, above, the purpose and need for the Project is described in the Applicant’s “goals”:

(1) [T]ake advantage of the unique combination of an existing water body, sufficient topographic variation (high head), and proximity to southern California energy markets to allow for the construction and operation of a modern and efficient pumped storage facility; and (2) connect the pumped storage facility to the CAISO-controlled grid in a manner which allows the stored power to serve the power needs of both the San Diego and Los Angeles metropolitan areas.¹¹

If the CPUC grants a CPCN for the TE/VS Project, it should be made contingent on the construction of the LEAPs hydropower generation plant in order to satisfy the PEA-stated primary purpose project goals. Construction should be consistent with the operating date of the generation plant.¹²

V. THE PURPOSE AND NEED FOR THE PROJECT CAN BE MET WITH THE CONSTRUCTION OF ONE PART OF THE PROJECT – THE CONNECTION TO EITHER SCE’S SYSTEM OR TO SDG&E’S SYSTEM

TNHC’s “goals” of taking advantage of water/geography and interconnecting LEAPS to the CAISO grid to meet power needs in both San Diego and Los Angeles can be satisfied with the construction of a portion of the TE/VS Project. Connecting to either SCE’s network or to

¹⁰ PEA at 3-28.

¹¹ PEA at 2-4.

¹² If the TE/VS Project were, in fact, a stand-alone transmission project, then it should have been reviewed under the CAISO’s transmission planning process.

SDG&E's network will provide the CAISO grid with access to the plant. Two radial interconnections which would connect the Project to both networks are unnecessary to satisfy the PEA-stated primary project goals. Such single radial interconnections to one system are typical of new generation interconnection because two line service is not necessary for a generation project the size of LEAPS. The radial generation-tie distances between LEAPS and SCE or LEAPS and SDG&E are similar to the radial gen-tie distances for other generation projects. Once the LEAPS Project is interconnected to the CAISO grid through either SCE's or SDG&E's system, the stored power will be capable of being used in both regions. Two interconnections are not necessary to achieve this goal.

VI. CONCLUSION

SCE will work with Commission Staff and its consultants and TNHC to determine and study an appropriate substation site for the interconnection of the LEAPS project to SCE's system. The Commission should not issue a CPCN for the two 115 kV distribution feeder circuits because they are not necessary to satisfy the need for the Project, were not part of the interconnection request, and their effects on the system have not been studied. The TE/VS Project, or some portion of it, is needed only if the LEAPS Project is constructed; the CPCN should be contingent on the construction of LEAPS in order to satisfy the PEA-stated primary project goals. A radial interconnection to either SCE or SDG&E is sufficient. Two generation tie lines are unnecessary to satisfy the PEA-stated primary project goals. SCE intends to participate fully in the hearings on the TE/VS Project.

Respectfully submitted,

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Dated: August 21, 2008

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the **PROTEST OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) CONCERNING THE REVISED PROPONENT'S ENVIRONMENTAL ASSESSMENT SUBMITTED BY THE NEVADA HYDRO COMPANY, INC.**, on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **21st day of August, 2008**, at Rosemead, California.

/s/ Christine M. Sanchez
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