

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**  
1-06-16  
04:59 PM

In the Matter of the Application of  
SOUTHERN CALIFORNIA EDISON  
COMPANY (U338E) For a Permit to  
Construct Electrical Facilities With  
Voltages Between 50 kV and 200 kV:  
Circle City Substation and Mira  
Loma-Jefferson Subtransmission Line  
Project.

Application 15-12-007  
(Filed December 4, 2015)

**PROTEST OF  
THE OFFICE OF RATEPAYER ADVOCATES**

Pursuant to Rule 2.6 of the Commission's Rules of Practice and Procedure, the Office of Ratepayer Advocates (ORA) hereby files its Protest to the Application of Southern California Edison Company (SCE) for a Permit to Construct Electrical Facilities with voltages between 50 kilovolt (kV) and 200 kV; Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project.

SCE filed this Application on December 4, 2015, and the application first appeared on the Commission's Daily Calendar of December 7, 2015. Therefore, ORA's Protest is timely.

**I. BACKGROUND**

SCE seeks a Permit to Construct (PTC) a new 66/12 kV substation (Circle City Substation), four new 66 kV Subtransmission source lines, one new 10.9 mile, 66 kV Subtransmission line (Mira Loma-Jefferson Subtransmission Line), upgrade the existing Mira Loma Substation to accommodate the new Mira Loma-Jefferson

Subtransmission Line. The Application also proposes to construct approximately six new underground 12 kV distribution gateways exiting the proposed Circle City Substation, relocate approximately 1.9 miles of an existing 33 kV distribution line to an underground position and install telecommunications facilities to connect the proposed Project to SCE's existing telecommunications system.

SCE maintains that the PTC is necessary because the amount of electrical power that can be distributed throughout the Electrical Needs Area (ENA) that would be served by these facilities is about to exceed the maximum operating limits of the existing infrastructure in the area. While "[t]he combined operating capacity of these substations is limited to 434.6 MVA under a normal system configuration"<sup>1</sup>, the forecasted demand for the year 2021 is 435.6 MVA. Thus, SCE maintains that the proposed project is necessary to improve both transformer capacity and distribution circuitry to serve the ENA.

Regarding the cities that comprise the ENA, the Application states: 'The Proposed Project is located in portions of northwestern Riverside County, including the cities of Corona, Eastvale, and Norco; and in portions of San Bernardino County, including the cities of Chino and Ontario.'<sup>2</sup>

## **II. POTENTIAL ISSUES**

ORA does not have adequate information at this time to validate SCE's assessment of the need for the PTC, but is in the process of discovery to obtain such information. Further, SCE recently submitted application (A).15-04-013, for a Certificate of Public Convenience and Necessity (CPCN) to construct double circuit 220 kV transmission lines and a 220 kV substation to improve power supply

---

<sup>1</sup> Application of Southern California Edison Company (U 338-E) for a Permit to Construct Electrical Facilities with Voltages Between 50 kV and 200 kV: Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, (hereinafter: SCE's Application), p. 2-3.

<sup>2</sup> SCE's Application, p. 2.

reliability for City of Riverside. Given that portions of Northwest Riverside County are in the ENA and the PTC Application shows the City of Riverside near the rest of the ENA, ORA is concerned that SCE did not explain the relationship between the CPCN Application (A.15-04-013) and this PTC Application, or the impact that this PTC Application would have on the CPCN Application.

Therefore, ORA anticipates the following issues in this proceeding:

- 1) Need: Whether the proposed project is necessary to serve demand in the ENA as described in the PTC.
- 2) Scope: Whether the proposed PTC project should have been part of the earlier CPCN Application (A.15-04-013) or constitutes a piece of the CPCN Application that has been separated for the ease and convenience of a PTC over a CPCN.
- 3) Completeness: SCE does not provide a detailed electrical interconnection diagram of the transmission system in the ENA. As a result, it is difficult for ORA to do a detailed analysis of the Proposed Project. Therefore, there is an issue as to whether the PTC is complete without the full electrical interconnection of the transmission system in the ENA.

ORA continues to review the Application and conduct discovery. Therefore, ORA reserves the right to add to the issues in this Protest as more information becomes available.

### **III. CATEGORIZATION**

SCE requests that this Application be categorized as ratesetting. ORA agrees with this categorization.

### **IV. HEARINGS**

At this time ORA is not prepared to propose a schedule for hearings, but expects to present a proposed schedule at the prehearing conference. Hearings may or may not be necessary depending on the outcome of ORA's ongoing review and discovery requests.

Respectfully submitted,

/s/ NOEL OBIORA

---

Noel Obiora  
Attorney

Office of Ratepayer Advocates

California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102  
Phone: (415) 703-5987  
Fax: (415) 703-2262

January 6, 2016