



# ORA

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May 17, 2018

Riverside Transmission Reliability Project  
c/o Panorama Environmental, Inc.  
717 Market Street  
San Francisco, CA 94103

**Subject: Office of Ratepayer Advocates Comments on the Draft Subsequent Environmental Impact Report (DSEIR), SCH Nos. 200701113, Regarding 230 kiloVolt (kV) Substation Options for the Riverside Transmission Reliability Project. Application (A.) 15-04-013.**

## Background

On April 2, 2018, the California Public Utilities Commission's (Commission) Energy Division issued a Draft Subsequent Environmental Impact Report (DSEIR) for Southern California Edison Company's (SCE) Riverside Transmission Reliability Project (RTRP), for which SCE seeks a Certificate of Public Convenience and Necessity (CPCN) in A.15-04-013. The Energy Division staff requests comments to the DSEIR by May 17, 2018. Therefore, these comments are timely submitted. The Office of Ratepayer Advocates (ORA) offers the following comments on the DSEIR for consideration.

The DSEIR evaluated thirty alternative projects<sup>1</sup> to SCE's Proposed Project,<sup>2</sup> including ORA's proposed Alternative 26.<sup>3</sup> (See Figure 1) Alternative 26 involves modifying SCE's proposed 66 kiloVolt (kV) Circle City Substation Project and constructing new 115 kV and 230 kV transmission lines to replace a number of SCE projects.<sup>4</sup> This alternative would construct the Circle City Substation as a 230/115/66 kV Substation, and interconnect it to the Mira Loma Substation in the City of Ontario, with approximately 11 miles of 230 kV lines, using existing and some new rights of way (ROW). Approximately 27 (17 +10) miles<sup>5</sup> of 115 kV line along I-15 freeway would be constructed to connect Ivyglen and Fogarty 115 kV Substations to the new Circle City 230 kV Substation. The Circle City Substation would then supply power to the Corona, Pedley, Data Bank, Chase, Jefferson, Cleargen,

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<sup>1</sup> DSEIR, p. 3-8.

<sup>2</sup> DSEIR, p. 2-1.

<sup>3</sup> DSEIR, p. 3-44.

<sup>4</sup> SCE's Proposed 230 kV Wildlife Substation in SCE's service area in the City of Riverside and the Riverside Public Utilities' (RPU) 66 kV Wilderness Substation in RPU's service area in the City of Riverside.

<sup>5</sup> See Figure 1: Proposed 115kV transmission lines to connect Circle City to Ivyglen and Circle City to Fogarty Substations.

and Delgen Substations, as well as provide power to some of the Riverside Public Utilities' (RPU) load. The new Circle City 230 kV Substation would also supply power to the Ivyglen and Fogarty Substations.<sup>6</sup>

The DSEIR concludes that Alternative 26 should be rejected because Alternative 26 does not meet the basic project objectives, does not meet the regulatory feasibility criteria, and does not reduce environmental impacts.<sup>7</sup>

On April 4, 2018, Administrative Law Judge Yacknin issued a Proposed Decision (PD) to approve SCE's Petition to Construct Valley-Ivyglen 115 kV Subtransmission Line Project (Ivyglen, A. 07-04-028) and to deny SCE's application for a CPCN to construct the Alberhill System Project (Alberhill, A.09-09-022). If this PD (approving Valley-Ivyglen project) is adopted by the Commission, there would not be a need to construct the 27 mile 115 kV transmission line to connect ORA's proposed Circle City 230 kV Substation to Ivyglen and Fogarty Substations. Instead, the Ivyglen Substation, when constructed, would sufficiently supply power to the Valley South system.

Based on this new information, Alternative 26 should be modified ( Modified Alternative 26)<sup>8</sup> to eliminate the need to construct the 27 mile 115kV transmission line. (See Figure 2) ORA's Modified Alternative 26 would construct the Circle City Substation as a 230/66 kV Substation instead of constructing SCE's proposed 66 kV Substation. The Circle City Substation would interconnect to the Mira Loma Substation, which is in the City of Ontario, with approximately 11 miles of 230 kV transmission lines. Then the Circle City Substation would connect to Riverside with a 66 kV transmission lines to serve the RPU's load.

ORA recommends that Modified Alternative 26 be evaluated in the Final Subsequent Environmental Impact Report (FSEIR) to consider the potential approval of Valley-Ivyglen Substation. Modified Alternative 26 meets the basic project objectives, meets the regulatory feasibility criteria, and reduces environmental impacts as discussed below. In addition, ORA recommends the Commission evaluate another bulk transmission alternative (Proposed Bulk Transmission Alternative, see Figure 3) in the FSEIR as discussed below.

### **The Modified Alternative 26 Meets the Basic Project Objectives**

As defined in the DSEIR, the basic project objectives for the RTRP are to (i) increase capacity to meet existing and future load growth, and (ii) provide an additional point of delivery for bulk power into the RPU electrical system. If an alternative did not meet at least one of the basic project objectives, the DSEIR rejected it from further analysis.<sup>9</sup>

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<sup>6</sup> DSEIR, p. 3-44.

<sup>7</sup> DSEIR, p. 3-44.

<sup>8</sup> Modified Alternative 26 should be evaluated in the FSEIR regardless of whether the PD is adopted by the Commission or not.

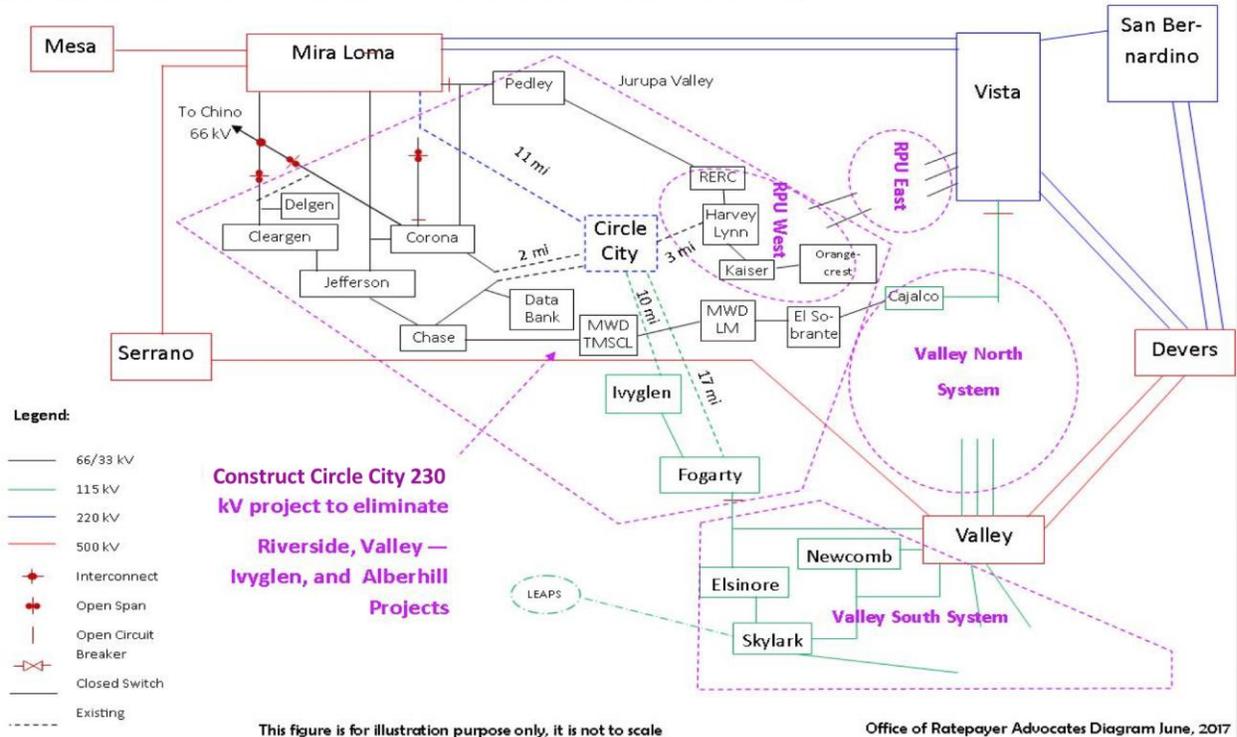
<sup>9</sup> DSEIR, p. 3-4.

The DSEIR eliminated twenty-six alternatives from formal review and provided brief explanations for their elimination.<sup>10</sup> The remaining four alternatives that proceeded to the California Environmental Quality Act (CEQA) formal ranking process are a variation of SCE's proposed project, which is a ten mile 230 kV line tapped from the Mira Loma – Valley line that routes overhead and underground for approximately eight miles to SCE's Wildlife Substation.<sup>11</sup>

ORA's proposed Modified Alternative 26 meets all of SCE's proposed project objectives, and also would result in less cost and less environmental impact by eliminating the construction of two substations: SCE's Proposed 230 kV Wildlife Substation in the City of Riverside and the RPU's 66 kV Wilderness Substation in the RPU service area. Therefore, the Modified Alternative 26 should be compared to the DSEIR's Alternatives 1 – 4 in the FSEIR.

**Figure 1 – Alternative 26**

**Figure 1:  
Construct the 230 kV Circle City 230 kV Substation and eliminate ASP and RTRP**



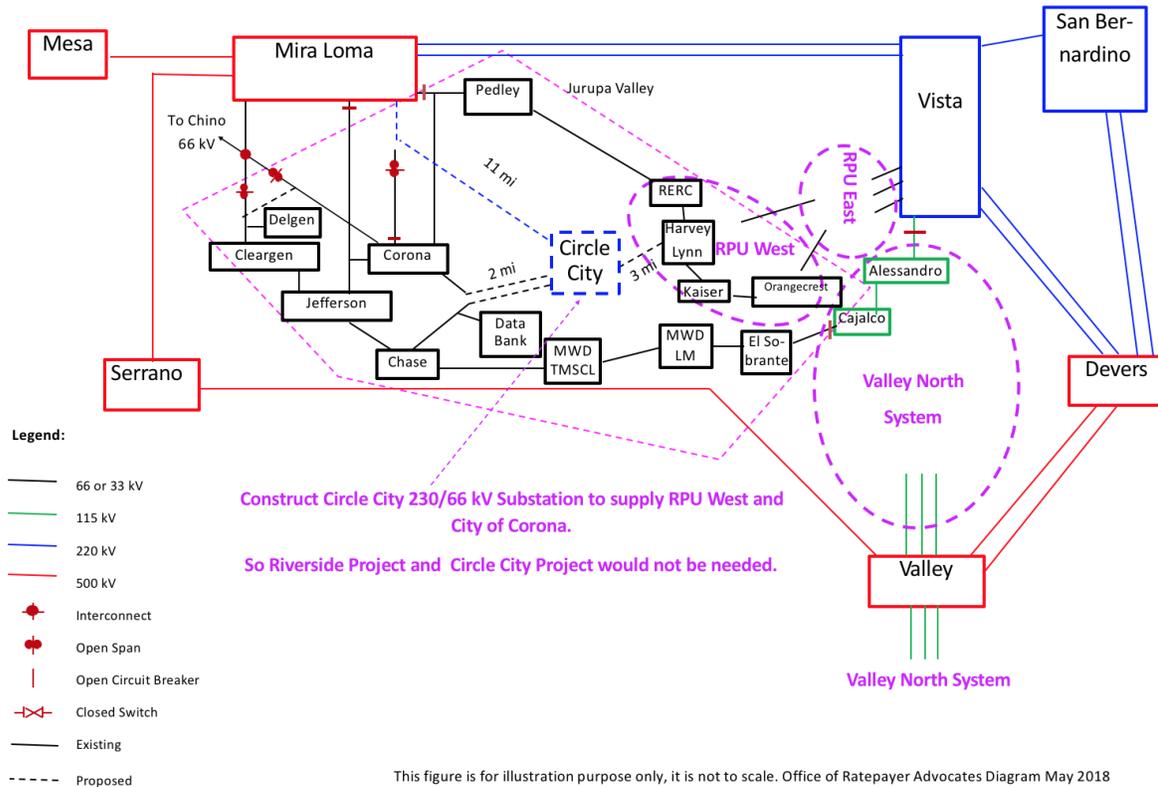
<sup>10</sup> DSEIR, p. 3-3.

<sup>11</sup> DSEIR, p. 3-22.

**Figure 2 – Modified Alternative 26**

**Figure 2:**

**Construct Circle City 230 kV Substation to eliminate RTRP and Circle City Project**



**The Modified Alternative 26 Meets Regulatory Feasibility Criteria**

As defined in the DSEIR for the RTRP, regulatory feasibility criteria consider factors such as: limitations to permitting a high-voltage transmission line and other required electrical infrastructure, lands with legal protections, consistency with regulatory standards, whether the cost of the alternative would be prohibitive, and the consideration of current technology. Alternatives that were not potentially feasible were rejected from further analysis.<sup>12</sup>

The Modified Alternative 26’s 230 kV high voltage line route should not have any permitting limitations. In fact, the line route may have fewer environmental impacts compared to the proposed project. For example, there is no need to build two substations (one for the SCE’s 230 kV line and one for the RPU’s 66 kV lines). Also, construction of the Modified Alternative 26, may not impact lands with legal protection along the transmission route. In addition, the Modified Alternative 26 is consistent with regulatory standards and uses the same technology as the DSEIR’s Alternatives 1-4. In fact, a major part of the Modified Alternative 26’s 230 kV lines follow SCE’s proposed 230 kV Substation siting and routing,

<sup>12</sup> DSEIR, p. 3-4.

which is in SCE's existing ROW, thus eliminating the acquisition of a major additional ROW. Therefore, the Modified Alternative 26 will improve the feasibility and permitting of a high-voltage transmission line, and reduce the overall cost and environmental impact of the RTRP.

### **The Modified Alternative 26 Avoids or Reduces Significant Environmental Impacts**

As defined in the DSEIR for the RTRP, potentially significant impacts of the Revised Project<sup>13</sup> include aesthetic impacts from the riser poles proposed at Limonite Avenue, overhead transmission poles along Wineville Avenue, and noise and traffic impacts from the construction of the underground transmission line. Alternatives that would not avoid or reduce any significant impacts of the Revised Project, or would create or substantially increase significant impacts compared to the Revised Project were rejected from further analysis.<sup>14</sup>

The Modified Alternative 26 may reduce environmental impacts from noise, traffic, utilities, and other hazards identified in comparison to the four alternatives that received full analysis. The DSEIR's four alternatives would use Wineville Avenue and other routes before transitioning from overhead to underground.<sup>15</sup> In contrast, the Modified Alternative 26 will not use Wineville Avenue for the construction of special riser poles for the required transmission lines. Without the overhead line towers and underground transitions, which require special riser poles, the Modified Alternative 26's aesthetics at Key Observation Points (KOP) will lessen the environmental impact for the RTRP. Also, construction time for the Modified Alternative 26 will be less than the Revised Project's construction time, as there will be no trenching and installation of underground ducts. Traffic impacts along Wineville, Limonite, and Pats Ranch Road will not be affected. Given these attributes, ORA recommends that the Modified Alternative 26 be considered for a full environmental review and compared to the four screened alternatives in the FSEIR.

### **Proposed Bulk Transmission Alternative**

ORA also recommends that the FSEIR evaluate the construction of a new 500 kV Substation to be located at the Metropolitan Water District Substation at Temescal Canyon (MWD-TMSCL). The new 500 kV Substation at MWD-TMSCL would connect to SCE's existing 500 kV Serrano to Valley transmission line and also would connect to RPU's Harvey Lynn 66kV Substation. (See Figure 3) This bulk transmission alternative would: 1) meet all of the project objectives of a bulk transmission resource for SCE and RPU; 2) eliminate the construction of SCE's proposed 230 kV Wildlife Substation and the RPU's 66 kV Wilderness Substation; 3) eliminate all 230 kV underground routings that are recommended in the DSEIR's Alternatives 1–4; 4) cost significantly less than the Proposed Project and Alternatives 1-4; and 5) cause fewer environmental impacts than the Proposed Project. Additionally, this alternative would further reduce the bulk transmission route to about a mile

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<sup>13</sup> The Revised Project includes transmission line route changes and two miles of underground that were not included in RPU's 2013 certified EIR.

<sup>14</sup> DSEIR, p. 3-44.

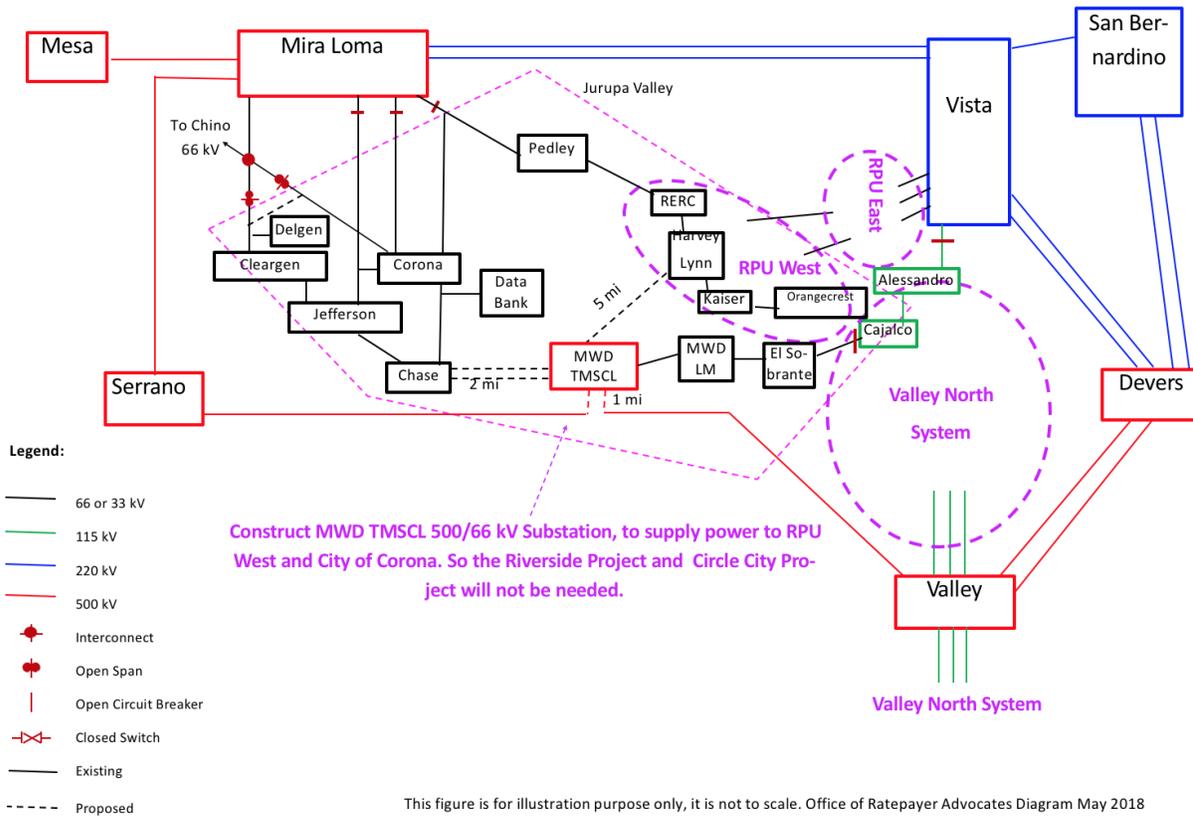
<sup>15</sup> DSEIR, p. 3-8 – p. 3.9.

of 500 kV transmission line to connect with the Serrano/Valley 500 kV transmission line (See Figure 3), while the four alternatives analyzed in the DSEIR and Modified Alternative 26 require 10 – 11 miles of 230 kV transmission lines. In addition to meeting all of the RTRP bulk transmission system objectives, the bulk transmission alternative would cost significantly less and have fewer environmental impacts compared to SCE’s Proposed Project and Alternatives 1-4. Therefore, the Commission should conduct a full environmental review on this alternative in the FSEIR and compare it to the four screened alternatives and Modified Alternative 26.

Figure 3 – Proposed Bulk Transmission Alternative

**Figure 3:**

**Construct MWD TMSCL 500 kV Substation to eliminate RTRP and Circle City Project**



**Conclusion**

ORA recommends that the Commission conduct full environmental reviews of ORA’s Proposed Modified Alternative 26 and Proposed Bulk Transmission Alternative.

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Respectfully submitted,  
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