

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR
A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO
CONSTRUCT THE DEVERS-PALO VERDE NO. 2
TRANSMISSION LINE PROJECT**

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

In the Matter of the Application of)	
SOUTHERN CALIFORNIA EDISON)	
COMPANY (U 338-E) for a Certificate of)	Application No. _____
Public Convenience and Necessity)	(Filed April 11, 2005)
Concerning the Devers-Palo Verde No. 2)	
Transmission Line Project)	
_____)	

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY
(U 338-E) FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND
NECESSITY TO CONSTRUCT THE DEVERS-PALO VERDE NO. 2
TRANSMISSION LINE PROJECT**

I.

INTRODUCTION

Pursuant to Sections 1001, 1003.5, and 1004 *et seq.* of the California Public Utilities Code, the California Public Utilities Commission’s (“Commission”) General Order 131-D (“GO 131-D”), and Article 5 of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (“SCE”) respectfully requests that the Commission issue a Certificate of Public Convenience and Necessity (“CPCN”) to permit SCE to construct the Devers-Palo Verde No. 2 Transmission Line Project (“DPV2”).

II.

OVERVIEW AND SUMMARY

DPV2 is a proposed 230-mile, 500 kilovolt (“kV”) alternating current transmission line between California and Arizona. DPV2 would connect SCE’s existing Devers 500 kV Substation (“Devers”) near Palm Springs, California to the

existing Harquahala Generating Company (“HGC”) Switchyard (“Harquahala”), located approximately 49 miles west of Phoenix, Arizona.¹ For most of its route alignment, DPV2 would be located adjacent to an existing high-voltage transmission line. Additionally, upgrades to four of SCE’s 230 kV transmission lines within California, west of Devers, and to certain existing electrical transmission facilities in California and Arizona, would be required. The four lines are located within an existing 47-mile transmission corridor from Devers to SCE’s San Bernardino and Vista Substations.² Collectively, this proposed project is known as DPV2. The estimated cost of constructing DPV2 for an operating date of 2009, including the upgrades west of Devers and other project elements described in this application, is \$591 million (2005 dollars and excluding Allowance for Funds Used During Construction) (“AFUDC”). This cost-estimate may change due to permitting and environmental requirements, final design criteria, changes in the project start date, inflation and deflation factors, and unforeseen events. See, Section VI., Project Cost and Ratemaking for a more complete discussion.

A. Background

In 1979, SCE was granted a CPCN to construct a 500 kV transmission line, approximately 238 miles in length, between the Palo Verde Nuclear Generating Station (“PVNGS”) in Arizona and SCE’s Devers Substation in California. The line is referred to as Devers-Palo Verde 1 (“DPV1”). SCE completed construction of DPV1 in 1982. The purpose of DPV1 was to deliver SCE’s ownership share of power

¹ Generally, the proposed route between Devers and Harquahala runs parallel to SCE’s existing DPV1 Transmission Line. The proposed route is 230 miles, of which 128 miles are in California and 102 miles are in Arizona.

² SCE’s San Bernardino and Vista Substations are located approximately two miles from the City of San Bernardino.

from PVNGS to the Los Angeles Basin.³ Although DPV1 was constructed primarily to meet system reliability needs, DPV1 has also been used to import cost-effective energy from the Southwest into California.

In 1985, SCE filed Application (“A.”) 85-12-012, requesting a CPCN to construct a second 500 kV transmission line parallel to DPV1 on SCE’s existing transmission corridor (“1985 Project”).⁴ On December 9, 1988, the Commission granted SCE’s request for a CPCN to construct the 1985 Project, subject to compliance with conditions ordered by the Commission.⁵ Although the Commission granted a CPCN for the 1985 Project, SCE advised the Commission in October 1999 that SCE was unable to comply with some of the Commission’s conditions, e.g., that by November 1, 1989, SCE: (a) submit copies of signed contracts for transmission service over DPV1, the 1985 Project, and SCE’s transmission system West-of-Devers, including the final amendments to the Los Angeles Department of Water and Power Exchange Agreement; and (b) submit an amended cost-estimate for the 1985 Project reflecting adjustments for factors such as, inflation, fuel design criteria, and environmental mitigation measures.⁶ Although the Commission

³ See, Re Application of SoCal Edison Co. for Certificate to Construct and Operate a 500 kV Transmission Line, D.90552, 2 CPUC 2d 55 (1979).

⁴ See, D.88-12-030 (1988). At that time, SCE’s primary objective was to bring additional transmission capacity to SCE and other project participants. Secondary objectives included increased access to economy energy and the displacement of more costly oil and gas generation in California.

⁵ In the Matter of Southern California Edison Company for a Certificate that the present and future public convenience and necessity require or will require the construction by Applicant of a 500 kV line between Palo Verde Switchyard and Devers Substation, D.88-12-030, 30 CPUC 2d 4 (1988) (The Commission granted SCE’s application and found DPV2 will provide SCE with the following benefits: increased transmission service revenues, reduced production costs, reduced transmission losses, improved utility interconnection support, improved air quality, and enhanced transmission stability. D.88-12-030, Finding of Fact No. 16, p. 58.).

⁶ See, Petition Requesting the Commission to Extend the time for Southern California Edison Company (U 338-E) to Comply With Ordering Paragraph Nos. 6 and 12 of Decision No. 88-12-030 (October 10, 1989) (“Although Edison stipulated to this condition, Edison did not anticipate the degree of reluctance to sign contracts exhibited by potential purchasers of transmission service (whether benefit enhancement measures or other relevant transmission service) until DPV2 construction and in-service dates were certain.”) The Commission granted SCE’s request for an extension of time to February 1, 1990 to submit the final contracts to the Commission. See also,

Continued on the next page

granted SCE additional time to submit signed contracts and amended cost-estimates, SCE again advised the Commission in 1991 that it was unable to do so, and that it considered the DPV2 project essentially inactive.⁷ In 1996, great uncertainty surrounding the utilities' ability to recover costs in a new, unproven market, and the uncertainty in SCE's customer base due to the implementation of Direct Access, led SCE to request that the Commission allow SCE to abandon the 1985 Project. In 1997, the Commission allowed SCE to abandon construction of the 1985 Project due to electric industry restructuring.⁸

B. Reasons For SCE's Request

SCE requests the Commission approve DPV2 for four reasons. First, DPV2 is cost-effective for California electricity customers. DPV2 will allow for greater access to low-cost, surplus generation in Arizona, displacing higher-cost generation in California. The benefits of DPV2 to California Independent System Operator ("CAISO") customers⁹ clearly exceed the costs by a wide margin. Second, DPV2 will enhance competition among the generating companies that supply energy to California. DPV2 will facilitate SCE's approved resource procurement approach of relying primarily on short- and medium-term contracting by giving greater access to low-cost, existing generating plants in the Southwest.¹⁰ Third, DPV2 will provide additional transmission infrastructure to support and induce the development of future energy suppliers selling energy into the California energy market. DPV2 is

Continued from the previous page

D.97-05-081, 72 CPUC 2d 552, 558 (1997). Appendix, Historical Background (describing how SCE was unable to file signed agreements and an amended cost estimate by February 1990, as required by D.88-12-030, and that SCE advised the Commission that it was unable to file these documents).

⁷ See D.97-05-081, 72 CPUC 2d 552, 558 (1997).

⁸ See, Joint Motion of Division of Ratepayer Advocates and Southern California Edison Company, Docket No. A.85-12-012 (mimeo), p. 16 (February 27, 1996) ("Active development of DPV2 concluded in early 1994. After that date, the project was effectively cancelled because of changes in the electric services industry. After early 1994, SCE did not pursue satisfying the conditions in the certificate.").

⁹ Those benefits accruing to ratepayers whose transmission facilities are under the operational control of the CAISO.

also expected to increase liquidity in the market which can help mitigate market power and attract new generation development. Fourth, DPV2 will provide resource reliability benefits, flexibility in operating California's transmission grid, and provide additional import capability that may be urgently needed during a major outage or emergency event or during periods of unanticipated high energy demand.

For all of these reasons, SCE believes that construction and generation of DPV2 is in the best interest of California electricity customers. The substantial economic benefits accruing to California customers, and the impact this new transmission line may have in attracting new generation and providing emergency support, will be lost if DPV2 is not constructed.

III.

PROPOSED SCOPE

Please refer to Chapter 3.0, "Description of the Proposed Project", of the attached Proponent's Environmental Assessment ("PEA") for a detailed description of the proposed project. The major elements are summarized briefly below.

A. Devers-Harquahala Transmission Line Facilities

For most of its alignment, the route of DPV2 would be located adjacent to DPV1, and within an established transmission line corridor. The length of transmission line to be constructed within California is 128 miles. Another 102 miles of the transmission line will be constructed within Arizona.

The new 230-mile-long transmission line would use both single and double-circuit tower construction. SCE estimates that a total of 784 towers would be used. The proposed 500 kV transmission line would use a combination of four types of 500 kV structures: two-legged (or H-frame) single-circuit, lattice steel

Continued from the previous page

¹⁰ Approved in D.04-12-048 on December 16, 2004.

towers in the Palo Verde Valley; existing four-legged, double-circuit towers in the Copper Bottom Pass of the Dome Rock Mountains in Arizona; tubular steel poles parallel to the existing Harquahala-Hassayampa 500 kV single-pole line east of Harquahala; and four-legged, single-circuit, lattice steel towers for the remaining portions of the line.

B. Substation Facilities

In addition to the transmission line facilities described above, DPV2 will require substation facilities, a Special Protection Scheme, series capacitor banks and fiber optic telecommunications equipment. Please refer to the attached PEA at Chapter 3.4, “Related Facilities”, for a detailed description of these facilities.

C. West Of Devers Upgrades

With the addition of DPV2, the East of River (“EOR”) system path rating will increase the transfer capability by 1,200 MW, increasing the total rating of EOR to 9,255 MW. This increase in transfer capability would result in line-overloads on the four 230 kV lines west of the Devers Substation if there were an outage of the Devers-Valley 500 kV transmission line.¹¹ To eliminate potential line overloads, two 40-mile long existing, single-circuit lines, the Devers-San Bernardino No. 1 and the Devers-Vista No. 1 230 kV lines, will be replaced with a new double-circuit 230 kV tower line, and strung with bundled 1033 Aluminum Conductor Steel Reinforced (“ACSR”) wire (“conductor”). In addition, the conductor on the existing double-circuit tower line will be replaced with bundled 1033 ACSR conductors for both the Devers-San Bernardino No. 2 and Devers-Vista No. 2 230 kV lines.

¹¹ All four existing 230 kV lines would load beyond their emergency loading capability, violating the SCE Reliability Criteria requirements not to load above 100% of the lines’ normal rating for all facilities in-service, 115% of the lines’ normal rating for loss of one system element (N-1 contingency), and 135% of the lines’ normal rating for loss of two system elements (N-2 contingency).

IV.

PURPOSE AND NEED

The main purpose of constructing DPV2 is to lower the cost of electricity for Californians. This project will allow a considerable increase in low-cost energy imports from the Southwest, where the average market price for energy is about \$7 per MWH lower than in California.¹² This increased access to lower-cost energy should enhance competition among energy suppliers, and facilitate SCE's procurement strategy as approved in SCE's Long-Term Procurement Plan.¹³

Other benefits¹⁴ of DPV2 include the potential to mitigate price increases resulting from droughts that impact hydro production, heat storms that create high peak demand for electricity, or rapid population growth that increases overall demand for electricity ahead of California supply, and provide additional operational flexibility for dealing with major generation and transmission outages. An additional benefit of DPV2 is that it may provide incentives for future generation siting and development that will provide new energy sources to serve California customers. Please refer to PEA Section 2.0, "Purpose and Need for the Proposed Project", for a more detailed discussion of the purpose and need for DPV2.

SCE's view that DPV2 is cost-effective is shared by CAISO, which also determined that DPV2 is a necessary and cost-effective addition to the CAISO-controlled grid.¹⁵ The CAISO Board approved the DPV2 project on February 24, 2005, and directed SCE to proceed with the permitting and construction of DPV2, preferably to be completed by the summer of 2009. Please

¹² Based on February 23, 2005, broker quotes between Palo Verde and SP 15. Average of Prebon, TullettLiberty, and TFS.

¹³ Approved in D.04-12-048 on December 16, 2004.

¹⁴ These benefits were not quantified, but are expected because historically, transmission lines have provided such benefits. See, CEC report at: http://www.energy.ca.gov/reports/2003-10023_700-03-009.pdf.

¹⁵ <http://www.caiso.com/docs/09003a6080/34/e4/09003a608034e440.pdf>.

refer to PEA Section 2.2.3, “CAISO’s Evaluation of DPV2”, for a more detailed discussion.

V.

ALTERNATIVES TO THE PROPOSED PROJECT

Before selecting the proposed project, SCE analyzed routing alternatives to DPV2 based on three primary criteria: maximize the use of existing, previously-disturbed transmission line right-of-ways to minimize the effects on previously-undisturbed land and resources; select route and tower locations with the lowest potential for environmental impacts while meeting project objectives; and, select the shortest feasible route to minimize potential environmental impacts and project costs. SCE also considered “no-project” alternatives and various options for transmission project alternatives. Finally, SCE considered several supply-side and demand-side alternatives, such as new generation, demand response programs, and energy efficiency programs. The alternatives are discussed in depth in Chapter 2.0, “Purpose and Need”, and Chapter 3.0, “Description of the Proposed Project”, of the PEA.

VI.

PROJECT COST AND RATEMAKING

The estimated cost of constructing DPV2 is \$591 million. This estimate includes: (1) the costs of all work on the project, including necessary upgrades west of Devers and elsewhere on SCE’s system, and (2) appropriate contingencies. This estimate excludes AFUDC.

Public Utilities Code Section 1005.5, states that, when issuing a CPCN, for projects costing greater than \$50 million, the Commission shall establish a maximum reasonable and prudent construction cost. Section 1005.5 – added in 1985, eleven years before the Commission initiated restructuring by issuing Decision No. 95-12-063 -- does not reflect the ratemaking responsibilities of the

FERC for FERC-jurisdictional facilities. Namely, FERC (and not the Commission) will determine the ratemaking treatment for DPV2. Because the facilities that comprise DPV2 are electric transmission facilities that will be used to provide interstate transmission service, the reasonableness of costs and the associated ratemaking and revenue requirement are under the exclusive jurisdiction of FERC. Consequently, although the Commission will need to comply with the statutory requirements, the maximum reasonable cost established under Section 1005.5(a) will not necessarily establish the cost which will ultimately be reflected in rates.

Should the Commission decide to establish a maximum reasonable cost, SCE proposes the use of deflation factors to convert actual expenditures in future years to their equivalent value in 2005 dollars. SCE believes the deflation factors should be calculated using an index such as the Handy-Whitman Index of Public Utility Construction Costs and considering other factors that have significant influence on the cost of the project. SCE's estimated cost of constructing DPV2 may change due to permitting and environmental requirements, final design criteria, changes in the project start date, inflation and deflation factors, and unforeseen events.¹⁶ SCE requests that any Commission order granting the CPCN include an ordering paragraph authorizing the use of the Commission's advice letter process so that after the CPCN has been issued, SCE may apply to the Commission to adjust the

¹⁶ See, e.g., Southern California Edison Company, Decision No. 88-12-030, Application No. 85-12-012, 100 PUC 4th 566, 30 CPUC 2d 4, 8, 32 (1988) (adopting a cost cap for DPV2, but allowing SCE to file a summary of any changes in the cost-estimates, after the CPCN decision was issued, including as appropriate:

- (a) adjustments in project costs due to anticipated delays in starting the project or inflation;
- (b) adjustments in project costs as a result of final design criteria; and
- (c) additional project costs resulting from adopted mitigation measures (and mitigation monitoring programs).

maximum cost to reflect changes in the cost estimates, if necessary, as provided by Section 1005.5(b).¹⁷

VII.

PUBLIC INVOLVEMENT

SCE encourages communication and outreach related to proposed projects with local communities, local businesses, elected and appointed officials, and other interested parties. In October 2003, the company began community outreach activities for DPV2. The target audiences for the activities are the local communities, local business, elected and appointed officials, and other interested parties.

SCE developed a Project Fact Sheet and mailed it to elected and appointed officials, and other interested parties in the project area, including all property owners within 300 feet of the proposed transmission line route. The Project Fact Sheet provided basic information about the project's scope and purpose. It also provided the names and contact information for local SCE Region Managers.

Following the distribution of the Project Fact Sheet, SCE used an independent public involvement specialist to talk directly with a small sample of potentially impacted residents, local businesses, elected and appointed officials, and other interested parties. These in-person interviews were conducted during October and November of 2003. In August 2004, SCE provided a Project Update to those parties in the project area that were provided the Project Fact Sheet previously, plus anyone who requested to be added to the project's mailing list.

¹⁷ Pub. Util. Code § 1005.5(b) specifies that "After the certificate has been issued, the corporation may apply to the Commission for an increase in the maximum cost specified in the certificate. The Commission may authorize an increase in the specified maximum if it finds and determines that the cost has, in fact, increased and the present or future public convenience and necessity require construction of the project at the increased cost; otherwise, it shall deny the application".

In the Summer and Fall of 2004, SCE hosted open houses in Blythe, Loma Linda, Calimesa, Beaumont and the Coachella Valley. Invitations were mailed to elected and appointed officials, and other interested parties in the project area, including all property owners within 300 feet of the proposed transmission line route. Additionally, SCE placed advertisements in local newspapers to inform residents and others interested in the project about the open houses. Following the open houses, SCE mailed a fact sheet entitled "Frequently Asked Questions" to elected and appointed officials, and other interested parties in the project area, including property owners within 300 feet of the proposed transmission route.

VIII.

PROCEEDING CATEGORY, NEED FOR HEARINGS, AND SCHEDULE

In compliance with Rule 6(a)(1) of the Commission's Rules of Practice and Procedure (California Code of Regulations Title 20), SCE is required to state in this Application "the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule". SCE proposes to categorize this Application as a ratesetting proceeding. SCE anticipates that hearings will be necessary. This proceeding involves the Commission's (i) environmental review of the proposed project in compliance with the California Environmental Quality Act ("CEQA") (Public Resources Code § 21000 *et seq.*) and the Commission's G.O. 131-D, and (ii) issuance of a CPCN authorizing SCE to construct the project.

SCE suggests the following proposed schedule for this CPCN. The schedule assumes the Commission will approve the final CEQA document at the first Commission Meeting following the expiration of the one-year period following the Commission's acceptance of a complete application as required by Public Resources Code § 21100.2.

Application Filed	04/11/05
Daily Calendar Notice Appears	04/12/05
Protests and Responses	05/05
Application Found Complete	05/11/05
First Prehearing Conference	05/05
Interested Party Testimony Due	06/30/05
SCE Reply Testimony Due	08/01/05
Public Scoping Meetings	08/05
Second Prehearing Conference	10/31/05
Draft CEQA Document Circulated	12/05/05
Evidentiary Hearings	12/12–12/16/05
Concurrent Opening Briefs Due	01/23/06
Comments on Draft CEQA Document Due	01/19/06
Concurrent Reply Briefs Due	02/20/06
Final CEQA Document Issued	02/06
Proposed Decision Issued	03/06
Comments on Proposed Decision Due	03/06
Reply Comments Due	03/06
Final Decision Issued	04/06

IX.

DPV2 PERMITTING PROCESS

SCE submits this CPCN application requesting the Commission to issue a CPCN to permit SCE to construct DPV2. SCE also requests the Commission to issue and certify an environmental document (i.e., an Environmental Impact Report (“EIR”) or Mitigated Negative Declaration) pursuant to CEQA for the California portion of the project. SCE will submit an application to the Bureau of Land Management (“BLM”) for an Amended Right-of-Way Grant. If approved, the BLM would issue a Notice to Proceed, allowing construction on federal land administered by the BLM in California and Arizona. Based on discussions with Commission and BLM staff prior to filing this CPCN, SCE anticipates that the Commission and BLM will work cooperatively and will conduct a joint CEQA and National

Environmental Policy Act (“NEPA”) review of the DPV2 project in California. This cooperation will include use of a single environmental consultant by both agencies.

The Arizona Siting Committee (“ASC”) and the Arizona Corporation Commission (“ACC”) are responsible for the environmental review on state-jurisdictional lands in Arizona; and the BLM has jurisdiction for environmental review for federal lands in Arizona. The ASC and ACC siting process in Arizona is equivalent to CEQA review, and the ACC will conduct the environmental review of the Arizona portion of the project. The ASC staff has indicated a strong preference that SCE time the filing of its application to coincide with the Commission’s and BLM’s issuance of their draft EIR/EIS. This is to allow the ASC and ACC to complete their environmental permitting process concurrently with the final decision by the Commission and BLM. (The ASC and ACC process timelines are shorter than CEQA and NEPA.) Thus, for a project that traverses state and federal lands in California and Arizona, the Commission and ASC/ACC will conduct permitting processes on their respective state lands only, while the BLM will conduct permitting on federal lands in both states. SCE anticipates that all three agencies will work cooperatively together and encourages the use of a single environmental consultant.

X.

DEPOSIT FOR COSTS

In accordance with Rule 17.1 of the Commission’s Rules of Practice and Procedure, SCE is enclosing a deposit to be applied to the costs the Commission incurs to prepare an environmental document for this project.

XI.

LOCATION OF ITEMS REQUIRED BY PUBLIC UTILITIES CODE 1003, COMMISSION RULE 18 AND GENERAL ORDER 131-D

The Public Utilities Code, the Commission's Rules of Practice and Procedure, and the Commission's General Orders require various items of information to be submitted with CPCN applications. The table below lists the items, the authority which dictates the submittal, and where the information is included in SCE's filings.

CPCN APPLICATION FILING REQUIREMENTS

Requirement	Authority	Appendix	PEA
A detailed description of the proposed project	G.O. 131-D, IX.A.1.a; Rule 18(a); Public Utilities Code 1003(a)		3.0
A project map	G.O. 131-D, IX.A.1.b; Rule 18(c)		Figure 1-1; Figure 1-2; Figure 3-2a; Figure 3-2b; and Figure 3-2c
A purpose and need statement	G.O. 131-D, IX.A.1.c; Rule 18(e)		2.0
Project Implementation Plan	Public Utilities Code 1003(b)	A Project Plan	
Design, Construction Management and Cost Control Plan	Public Utilities Code 1003(e)	A Project Plan	
A detailed statement of the estimated cost	G.O. 131-D, IX.A.1.d; Rule 18(f); Public Utilities Code 1003(c)		Table 3-9
Route selection including comparison with alternative routes	G.O. 131-D, IX.A.1.e		3.0; 4.0; 5.0; 6.0; 7.0

CPCN APPLICATION FILING REQUIREMENTS

Requirement	Authority	Appendix	PEA
A project schedule showing the program of right-of-way acquisition and construction	G.O. 131-D, IX.A.1.f		3.5.1
Governmental Agency Notification and Position Statements	G.O. 131-D, IX.A.1.g		Appendix E
PEA	G.O. 131-D, IX.A.1.h		Submitted with Application
EMF Field Management Plan	G.O. 131-D, Section X.A	B	
Notice of Application	G.O. 131-D, XI.A.3	C	
Articles of Incorporation (Rule 16)	CPUC Information and Criteria List Appendix B, I.7	D	
Financial Statement (Rule 17); Statements and/or exhibits showing financial ability of applicant to render service; Annual Report and/or Proxy Statement	CPUC Information and Criteria List Appendix B, I.8; Rule 18(g); Rule 18(i)	E	
Names/addresses of all utilities, corporations, persons or entities with which the proposed construction is likely to compete	Rule 18(b)	F	
List identifying the health & safety permits required	Rule 18(d)		3.1.4
Revenue requirement	Rule 18(h); Public Utilities Code 1003(d)		2.2.2

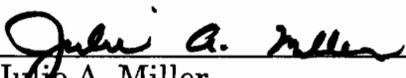
XII.

CONCLUSION

SCE respectfully requests the Commission to issue a decision:

- (1) Authorizing SCE to construct DPV2 as described in this application, PEA, and accompanying appendices; and
- (2) Providing the requested relief within the time limits proposed by SCE in this application.

Respectfully submitted,

By: 
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SOUTHERN CALIFORNIA EDISON COMPANY

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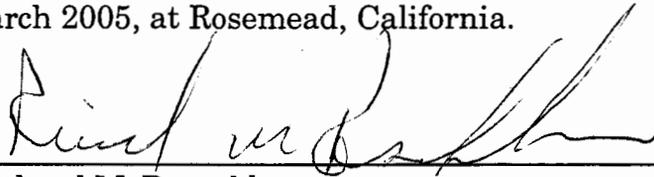
Dated: April 11, 2005

VERIFICATION

I am an officer of the applicant corporation herein, and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing document are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of March 2005, at Rosemead, California.



Richard M. Rosenblum
Senior Vice President
Transmission and Distribution

SOUTHERN CALIFORNIA EDISON COMPANY
2244 Walnut Grove Avenue
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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 **APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO CONSTRUCT THE DEVERS - PALO VERDE NO. 2 TRANSMISSION LINE PROJECT** on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

- Placing the copies in properly addressed sealed envelopes and depositing such envelopes in the United States mail with first-class postage prepaid (via first class mail):
 - To all parties, or
 - To those parties without e-mail addresses or whose e-mails are returned as undeliverable;
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by hand or by overnight courier to the offices of the Commission or the other addressee(s);
- Transmitting the copies via e-mail to all parties who have provided an address.

Executed this 11th day of April, 2005, at Rosemead, California.



Lizette Vidrio, Case Analyst

SOUTHERN CALIFORNIA EDISON COMPANY

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A.05-04-XXX
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