*Southern California Edison*
**MESA PTC A.15-03-003**

**DATA REQUEST SET A1503003 ED-SCE-02 Follow-Up**

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**Question 03.A (06-01):**

Please describe the actions SCE would take if the proposed project were not implemented.

A. What would SCE do in the short-term if the project is not approved? As part of the no project alternative, potential mitigation could include but may not be limited to:
    a. Load shedding
    b. Installation of reactive support equipment
    c. Redispatch of generation
    d. Dispatch of available preferred resources
    e. Fast demand response

**Response to Question 03.A (06-01):**

SCE has an obligation to provide reliable service to its load in the Western LA Basin. This load can either be served by generation outside of the Western LA Basin which is transported into the area via the transmission system or generation sited inside of the Western LA Basin. CAISO performed a robust analysis of alternative transmission projects and determined that alternative transmission projects would "represent higher costs, new transmission ROW's, possibly lengthier development timelines, and greater regulatory uncertainty." The Proposed Project would instead meet reliability requirements while providing the least risk of a need to delay compliance with OTC generation requirements. In addition to this analysis by the CAISO, an environmental analysis performed by ASPEN to inform both CEC staff and the CAISO. This analysis determined that the Proposed Project would result in the fewest potential environmental impacts and could be implemented in a shorter timeframe than the other transmission alternatives. This is described in pages 5-12 through 5-15 of the PEA.

Without the Proposed Project, the flexibility of siting generation outside of the Western LA Basin would be compromised and additional local generation would be necessary to serve load. If the project is not implemented, the alternative would be a delay of OTC compliance in the Western LA Basin until generation facilities incremental to current plans could be constructed. Longer delays would be necessary if an alternative transmission project were selected. The State Water Resources Control Board describes the environmental impacts that would result from the continued operation of these OTC units.

"The 19 power plants that are regulated by the [Statewide Policy on the Use of Coastal

and Estuarine Waters for Power Plant Cooling] are collectively able to withdraw billions of gallons of water every day to cool steam for generating electricity. In the process, millions of fish, larvae, eggs, seals, sea lions, turtles, and other creatures are killed each year because they are either trapped against screens or are drawn into the cooling system where they are exposed to pressure and high heat. The marine life that is killed is mainly at the base of the food chain and that can adversely affect the future of certain species and adversely impact recreational and commercial fishing." (Once Through Cooling Fact Sheet pp. 1 Located at: http://www.swrcb.ca.gov/publications_forms/publications/factsheets/docs/oncethroughcooling.pdf)

Furthermore, as described in response to 1.B, load shedding is not a feasible alternative. Other available “short-term” solutions are already being utilized to address the critical contingency along with the Proposed Project.

b. Over 2,100 MVAR of reactive support is projected to be installed by SCE and SDG&E prior to 2020.
c. All available generation in the Western LA Basin has been dispatched to address the critical contingency.
d. Projected levels of preferred resources have been modeled and dispatched
e. Demand response has been utilized as forecasted