Question 01.a:

CEQA Guidelines section 15126.6(e) provides the scope and purpose of an EIR’s no project alternative analysis. The inclusion of a “no project” alternative in the EIR “is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project.” The no project alternative must “discuss . . . what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Please provide the following information relevant to the no project alternative in the short term:

A. CPUC notes that SCE has stated that load shedding is not a feasible alternative, but has not substantiated this statement. The California ISO Planning Standards (effective April 1, 2015) state that “[i]n the near-term planning, where allowed by NERC standards, load dropping, including high density urban load, may be used to bridge the gap between real-time operations and the time when system reinforcements are built.” Given this statement, SCE should state if load shedding would be undertaken in the short-term if the proposed project was not approved.

Response to Question 01.a:

Refer to Page 1, lines 17-31 of the attached document for response to this question.