

*Southern California Edison*  
**WODUP A.13-10-020**

**DATA REQUEST SET A.13-10-020 WODUP ED-SCE-10**

**To:** ENERGY DIVISION  
**Prepared by:** Ryan Stevenson  
**Title:** Principal Advisor  
**Dated:** 12/05/2014

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**Question ALT-17d - Supplemental:**

Follow-up to ALT-15 (Data Request No. 7, regarding potential Tower Relocation): SCE's response to ALT-15(a) stated the current locations of proposed towers "have been determined based on not only the need to reserve the largest possible amount of ROW available for future expansion, but also to be placed in locations that would allow for the most efficient and safe working environment for the construction of these new towers in close proximity to the existing lines that operate through that corridor."

(D) SCE's previous response stated that a 12 month delay would result from the need to redesign the project and establish a construction process that would allow the relocation of certain towers as anticipated in this configuration. Please describe the specific consequences of a 12 month delay. What known projects would be affected in terms of their deliverability?

**Response to Question ALT-17d:**

As explained in SCE's response to ALT-17d, additional responses will be sent to the CPUC as we receive them. In addition to renewable generators and the CAISO, SCE also requested a response from the Imperial Irrigation District (IID) regarding how a potential 1-2 year delay for the WOD Upgrade Project could impact renewable generation projects in their balancing authority area. Attached is a letter we received from the IID that supports completing SCE's Proposed Project by 2020.



# IID

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January 14, 2015

Mr. Ayman Samaan, P. E.  
Transmission & Interconnection Planning  
Southern California Edison  
2244 South Walnut Grove Avenue  
Rosemead, CA 91770

Subject: Southern California Edison West of Devers Upgrades

Dear Mr. Samaan:

Imperial Irrigation District ("IID") desires to express its support for Southern California Edison's ("SCE") proposed West of Devers Upgrade project. IID views the upgrades as essential to support the export of additional renewable energy from the IID balancing authority area into the California Independent System Operator Corporation ("CAISO") balancing authority area. It is IID's understanding that as currently contemplated, the upgrades are scheduled to be complete and in service by 2020.

IID understands that SCE has filed a Certificate of Public Convenience and Necessity with the California Public Utilities Commission in connection with the West of Devers project. As part of its process, the CPUC and BLM are evaluating alternatives to SCE's proposed project, including analysis of different engineering options. IID understands the desire to consider alternatives but is concerned regarding the impact additional evaluation may have on the scheduled upgrade completion date of 2020 and the impact of that delay on generation and transmission project development in the IID area. IID is in the process of completing its upgrade of Path 42 that will enable IID to export an additional 850 MW of renewable energy into the CAISO. IID's upgrades are scheduled to be complete by March 2015. IID is concerned that any delay of the West of Devers Upgrade project beyond 2020 will have the impact of delaying further generation and transmission project development in the IID balancing authority area. For that reason, IID supports the West of Devers upgrades as proposed by SCE.

Sincerely,

Carl D. Stills  
Energy Manager  
IMPERIAL IRRIGATION DISTRICT

cc: Kevin E. Kelley  
Jamie Asbury, IID  
Tom King, IID  
Ross Simmons, IID  
Robert Laurie, IID