

Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-07

To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question ALT-10:

Please confirm whether an alternative that achieves at least 2,479.5 MW of transfer capacity in the WOD corridor, in lieu of the 4,800 MW anticipated under the Proposed Project (PEA p. 3-6), would provide full capacity deliverability status for the generation projects identified in PEA Table 1.1.

Response to Question ALT-10:

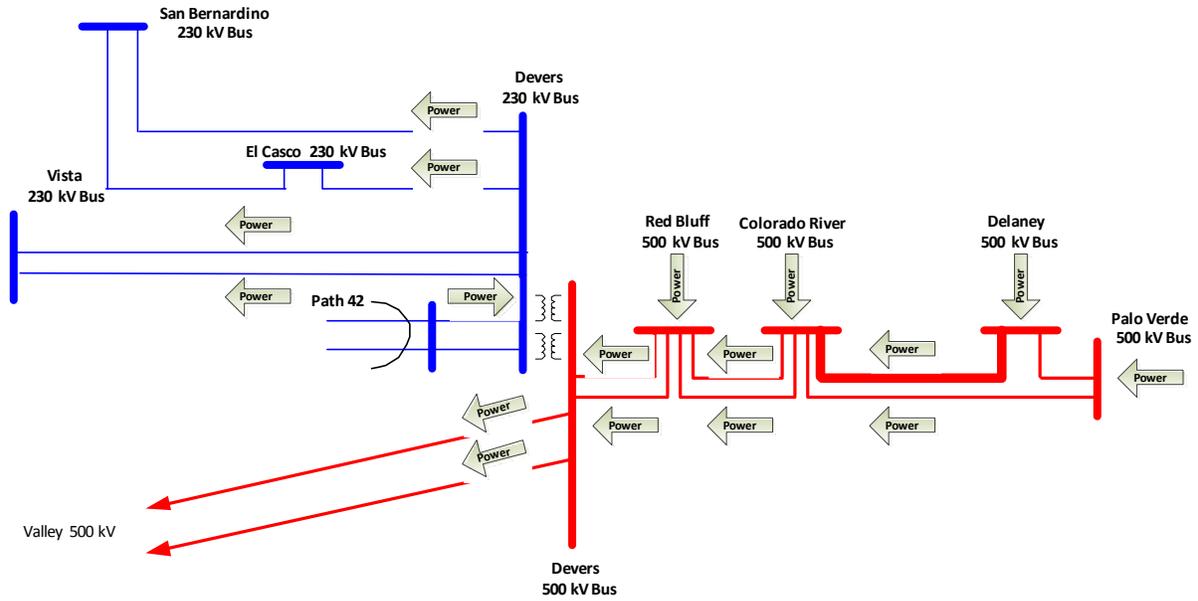
An alternative that achieves at least 2,479.5 MW of transfer capacity would be sufficient to provide full capacity deliverability status to only the generation projects identified in PEA Table 1.1. However, such a proposal would not be sufficient to accommodate additional flow associated with new generation in excess of that identified in Table 1.1 as well as increased flow from IID's Path 42 Upgrade Project and the Delaney-Colorado River Project. Limiting the scope of the Proposed Project to only accommodate the generation projects listed in Table 1.1 would not fully address the bottleneck on the existing WOD corridor. Since the PEA was filed in October 2013, the CAISO has received three additional requests for interconnection, totaling 500 MW of new renewable generation that require the WOD Upgrade Project to achieve Full Capacity Deliverability status. In addition, and as discussed in the PEA, the Proposed Project is also needed to facilitate the increased power flows that would result from the Path 42 Upgrade Project.

Currently, SCE and IID are in the process of upgrading the WECC Path 42 Rating from 600 MW to 1,500 MW (incremental of 900 MW). CAISO approved this project as a Policy Driven Project to increase deliverability of renewable generation out of IID's system to CAISO. The increased flow out of Path 42 would ultimately flow on the WOD corridor. Focusing only on providing for a WOD corridor transfer capacity of 2,479.5 MW would therefore have a negative impact on the ability to make use of the Path 42 upgrade and therefore impact deliverability out of IID.

The increased flow from Arizona would be enabled with the Delaney-Colorado River Project, which recently obtained CAISO Board approval based on sufficient economic benefits. The CAISO also identified that the Delaney-Colorado River Project would further increase the deliverability from Imperial Valley area. However, the Delaney-Colorado River study assumed that the WOD Upgrade Project would be in place and relied on its incremental capacity to

accommodate the additional flow corresponding to the Delaney-Colorado River Project. As a consequence, limiting the design of the WOD Upgrade Project to meet only the need of generation projects in Table 1.1 would have a negative impact on the CAISO-identified Delaney-Colorado River Project economic benefits and would limit the ability to increase the deliverability from the Imperial Valley area.

Below is a schematic that shows the expected power flow from the generation located in Riverside County, the Path 42 Upgrade Project and the Delaney-Colorado River Project.



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Prepared by: Ayman Samaan
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Dated: 09/05/2014

Question ALT-11:

During CPUC completeness review of the PEA, SCE stated (in the 12/6/2013 Response to Question 01) that the system transfer capability increase is determined by the maximum amount of MW that can be accommodated on the facilities taking into account the NERC Transmission Planning standards. Please specifically describe the methodology used by SCE to calculate the capacity (in MW) and ampacity (Amps) for the existing and proposed transmission lines affected by the Proposed Project, including whether the controlling condition is a short term (emergency rating) or normal operation.

Response to Question ALT-11:

The CAISO and the Participating Transmission Owners (PTOs) analyze the existing transmission infrastructure and any proposed transmission upgrades in accordance with NERC Reliability Standards. These Standards set forth applicable system performance requirements that must be met under a specific set of operating conditions. The following NERC Reliability Standards are applicable to the CAISO, as a registered NERC Planning Authority, and the PTOs, as the registered Transmission Planners, and are the primary standards for the interconnection of new facilities and system performance (which can be found at: <http://www.nerc.com/page.php?cid=2%7C20>).

- FAC-001: Facility Connection Requirements (which can be found at: <http://www.nerc.com/files/FAC-001-1.pdf>)
- FAC-002: Coordination of Plans for New Facilities
- TPL-001: System Performance Under Normal Conditions (formerly Category A)
- TPL-002: System Performance Following Loss of a Single Bulk Electric System (BES) Element (formerly Category B)
- TPL-003: System Performance Following Loss of Two or More BES Elements (formally Category C)

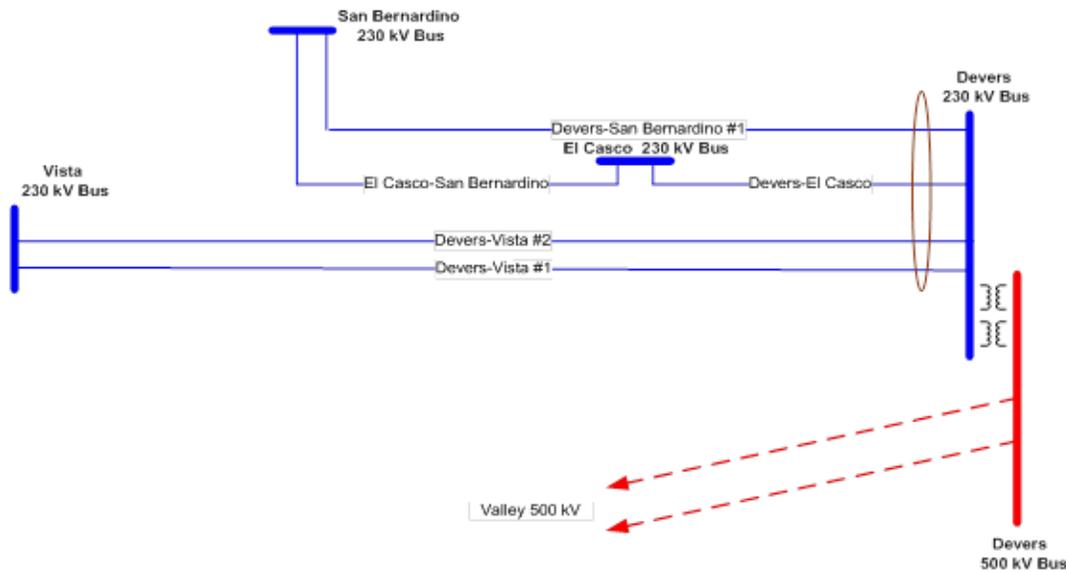
To ensure system reliability, the system maximum transfer capacity is calculated based on TPL – 003, taking into account the potential of tripping of up to 1,400 MW of generation per CAISO Planning Standards (as defined in the ISO Transmission Planning Standards ISO SPS3) (can be found at:

<http://www.caiso.com/Documents/FinalDraftStrawProposal-RevisionTransmissionPlanningStan>

dards.pdf)

Existing WOD infrastructure:

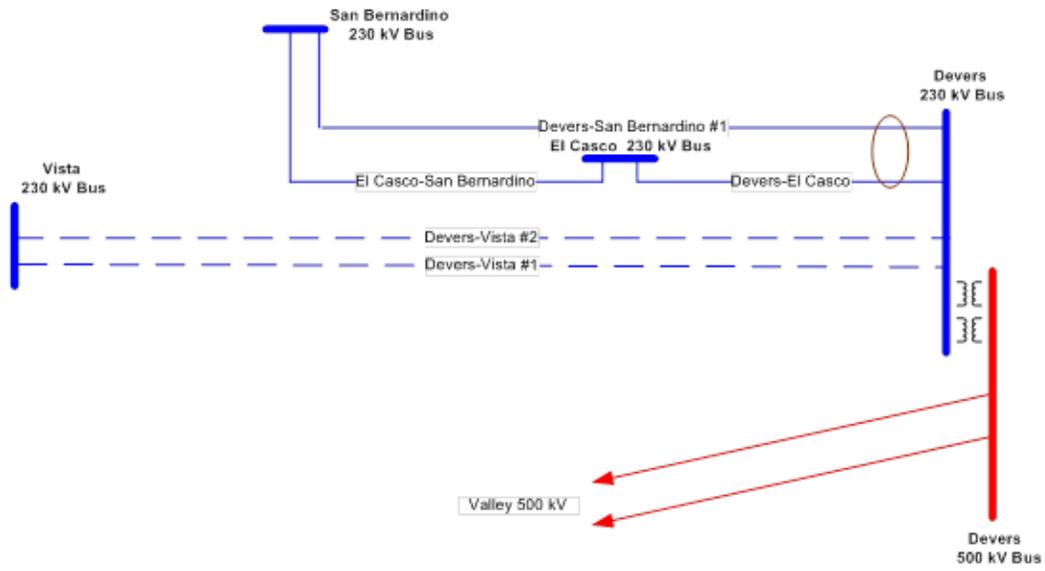
SCE reliability studies identified that the critical contingency under TPL-003 was the loss of Devers-Valley No. 1 and 2 500 kV transmission lines. The WOD corridor maximum transfer capacity was calculated under this contingency. The existing WOD transmission lines have no emergency capability due to limited ground clearance. The maximum flow that can be accommodated on the WOD corridor following the loss of the Devers-Valley No. 1 and 2 500 kV transmission lines contingency is 1,600 MW (which is the combined total normal rating for the four existing WOD transmission lines).



Proposed Project maximum transfer capacity:

After the completion of the Proposed Project, the upgraded WOD transmission lines would have higher normal ratings and emergency ratings that can be utilized under TPL-003 contingencies. As a result, the loss of Devers-Valley No. 1 and 2 transmission lines is no longer the most critical contingency because the combined emergency ratings of the four WOD upgraded transmission lines would be higher than the combined emergency rating of two of the upgraded WOD lines under the loss of the other two upgraded 220 kV line and with the utilization of Remedial Action Scheme (RAS) that would be programmed to trip up to 1,400 MW of generation (per ISO SPS3 standards), as appropriate.

SCE reliability studies determined the maximum transfer capacity (continuous flow) to be approximately 4,800 MW under the most significant contingency loss of two of the upgraded WOD 220kV transmission lines. For example, under the loss of Devers-Vista No. 1 and 2 220 kV transmission lines (an N-2 contingency), the maximum allowable flow on the remaining two upgraded transmission lines would be 3,474 MW, which is the combined emergency rating of both lines (each remaining line has an emergency rating of 1,737 MW). With the implementation of the RAS to trip up to 1,400 MW of generation under this N-2 condition, the resultant maximum flow that could be accommodated would be 1,400 MW plus 3,474 MW, which is 4,874 MW or approximately 4,800 MW.



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To: ENERGY DIVISION
Prepared by: Brent Scharnberg
Title: Project Manager
Dated: 09/05/2014

Question ALT-16.b:

Whitewater Northern ROW. Proposed Project towers 6N38, 6N39, 6N40, 6N41 appear to be positioned completely within the parcel boundaries of properties on Amethyst Drive and Haugen-Lehman Way (per Google Maps; Verbenia Ave. per the SCE Mapbook, page 13).

On the approximately 20 parcels that are at least partially within the ROW in this segment, there are currently 9 or 10 existing homes along the north side of Amethyst Drive which, given the proposed location of these towers, may have new conductors swaying over their homes. The new towers are moving south by about 55 feet (centerline to centerline).

In addition, between Towers 6N16 and 6N17 (just west of Hwy 62), the new towers would move south so the conductor moves about 60 feet closer to a residence (but not within its parcel boundary).

b. Is SCE proposing to purchase in fee these or any other parcels as part of this project?

Response to Question ALT-16.b:

The ROW exists currently via grants of easement over the subject parcels. If additional rights are necessary for the this Project, SCE would acquire those rights via additional or modified grants of easement, not via fee-owned purchases. The additional or modified easements would not require that SCE acquire the entire parcel just those portions of the parcel where additional rights may be necessary.

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To: ENERGY DIVISION
Prepared by: Ryan Stevenson
Title: Principal Advisor
Dated: 09/05/2014

Question ALT-6:

No Project Scenario. If the proposed WOD-UP project is not approved, please describe whether SCE may be required to remove certain transmission lines from Morongo tribal lands because their easements have expired. If this were to occur, specifically which transmission lines would SCE need to remove. Also, what would need to be constructed and where in order to preserve operation of the four existing 220 kV circuits?

Response to Question ALT-6:

SCE and the Morongo entered into a new 50-year ROW Agreement in November 2012 that provides SCE the right to continue operating the existing WOD transmission facilities and other SCE facilities as well as construct and operate the proposed WOD Upgrade Project facilities across the trust lands of the Morongo Indian Reservation. Pursuant to the terms of the ROW Agreement, the Morongo have the right to terminate the ROW Agreement if either the Proposed Transaction between SCE and Morongo Transmission is not approved, or if SCE is unable to obtain a CPCN for the WOD Upgrade Project. As such, if the WOD Upgrade Project is not approved and the Morongo terminate the ROW Agreement, SCE would not have the necessary property rights to continue operating the existing WOD transmission facilities and other SCE facilities that traverse the Reservation. Because SCE does not have the power of eminent domain over the Morongo trust lands, in the event the Morongo terminate the ROW Agreement, SCE would be required to remove the existing WOD transmission lines that traverse the Reservation and relocate such facilities to a location outside of the Reservation.

- Devers-San Bernardino No. 1 220 kV transmission line
- Devers-Vista No. 1 220 kV transmission line
- Devers-Vista No. 2 220 kV transmission line
- Devers-El Casco 220 kV transmission line

Additionally, other existing SCE facilities that traverse the Reservation would also need to be moved to a location outside of the Reservation. These include:

- Banning-Bottle-Maraschino 115 kV subtransmission line
- Bottle-Garnet-Windfarm 115 kV subtransmission line
- Devers-Banning-Wind Park 115 kV subtransmission line
- Banning-Zanja 115 kV subtransmission line
- Fiber-optic telecommunications lines utilizing the same support structures as the

Devers-Vista No. 1 220 kV transmission line, the Banning-Bottle-Maraschino 115 kV subtransmission line, and the Bottle-Garnet-Windfarm 115 kV subtransmission line

If the Morongo terminate the ROW Agreement, SCE would try and negotiate a new ROW agreement that would permit SCE to operate the existing WOD transmission facilities and other SCE facilities across the Reservation. However, it is unlikely that SCE and the Morongo could reach an agreement for SCE's facilities to remain on the Reservation in the absence of the WOD Upgrade Project. If a new agreement could not be reached, SCE would propose to construct System Alternative 1 as generally described in Section 2.1.2.2 of SCE's PEA and shown in Figure 2-1. This alternative, though, is more expensive and environmentally impactful than the Proposed Project.

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question ALT-7:

No Project Scenario. If the proposed WOD-UP project is not approved, please describe the feasibility and necessity of expanding the WOD Interim Project to achieve deliverability for 1,485 MW of new generation shown as having executed Large Generation Interconnection Agreements (LGIA) in PEA Table 1.1.

Response to Question ALT-7:

The WOD interim project does not add any additional capacity to the system. With the utilization of series reactors, the WOD interim project is designed to maximize the use of the existing transmission capacity by balancing line loading on the existing WOD transmission lines and redirecting some flows onto the 500 kV system. The 12 series reactors that were installed on the four existing WOD transmission lines (3 series reactors per line) were each uniquely sized and rated based on the existing lines' ratings and impedances. As such, there are no additional modifications to the interim project that would provide any increase in flow capacity to the WOD corridor. Reconductoring the WOD transmission lines (the Proposed Project) is the more cost-effective and least environmentally impactful option to provide the required additional capacity. As noted in SCE's response to Question No. ALT-6, System Alternative 1 is a feasible option; however, that option is comparatively more expensive and environmentally impactful.

Under the terms of the ROW Agreement, if the WOD Upgrade Project is not approved by the CPUC, the Morongo Tribe would have the right to terminate the ROW Agreement and, if that occurred, SCE would lose its ability to site the WOD Upgrade Project and the existing SCE facilities across the Reservation. Without the ROW Agreement, SCE would have to develop a new project that bypasses the Reservation, which would be comparatively more expensive, and SCE would have to seek a new agreement with the Morongo Tribe for the right to continue to operate the portion of its existing facilities on the Reservation until such time the new project could be constructed and the existing facilities that cross the Reservation could be removed.

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question ALT-8:

No Project Scenario. Please describe whether the No Project Alternative could cause a delay or potentially lead to outright failure of any of the generation projects with executed interconnection agreements (shown in PEA Table 1.1). This response should specifically address the generation projects that presently have interconnection agreements shown with a status of “under negotiation” (PEA Table 1.1) and describe what kinds of changes could be triggered within these agreements if the proposed WOD-UP project is not approved.

Response to Question ALT-8:

The No Project Alternative would likely lead to outright failure of generation projects listed in table 1.1 of the PEA. The No Project Alternative cannot provide Full Capacity Delivery Status (“FCDS”) for all projects in Table 1.1. The interconnection customers for the projects listed in Table 1.1 have requested FCDS in their respective interconnection applications in order to qualify for Resource Adequacy (RA) as required in power purchase agreements with potential off-takers. Given the requirement for RA in power purchase agreements, it is highly unlikely that the projects in Table 1.1 would proceed without FCDS. Therefore, if the proposed WOD Upgrade Project, or a comparable alternative such as Alternative 1, as described in the PEA, is not selected to provide the requested FCDS, then SCE believes the projects would likely fail. In addition, since the PEA was filed in October 2013, the CAISO has received three additional requests for interconnection, totaling 500 MW of new renewable generation, that would require the WOD Upgrade Project to achieve FCDS. The No Project Alternative would also likely lead to outright failure of those generation projects.

Furthermore, the No Project Alternative would have an adverse impact to the proposed Maximum Import Capability (MIC) increase associated with the Imperial Irrigation District's (IID) Path 42 Upgrade Project affecting the ability of proposed IID generation to be imported into the CAISO control area and contribute towards Resource Adequacy. Also, the economic benefits and the deliverability increase to the Imperial Valley area associated with the proposed Delaney – Colorado River Project would be degraded because of the ongoing, unmitigated WOD corridor constraints.

Lastly, and as described in SCE's response to Question No. ALT-6, if the WOD Upgrade Project is not approved by the CPUC, the Morongo could terminate the ROW Agreement. If this

occurred, SCE would not have the necessary land rights to keep its current facilities on the Morongo Reservation, and would likely need to reroute the facilities to bypass the Reservation. SCE also believes that the additional time it would take to reroute the facilities around the Reservation could also cause generation projects to fail.

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Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question ALT-9:

No Project Scenario. The PEA (pg.1-8) shows that the CAISO Transmission Planning Process anticipates rebuilding the West of Devers corridor for “policy-driven” purposes or to facilitate achieving California’s renewable energy goals. Please describe whether any other means exist to achieve these goals if the Proposed Project is not approved.

Response to Question ALT-9:

If the Proposed Project is not approved, the other means to achieve California’s renewable energy goals would involve shifting development of renewable resources out of the Riverside East and Imperial Valley areas, both of which have been identified to be rich renewable areas. Such a proposal also contradicts both the Renewable Energy Transmission Initiative (RETI) and Desert Renewable Energy Conservation Plan (DRECP) studies which defined these two areas as preferred areas for renewable resource development.

Moreover, and as discussed in the PEA and in SCE’s response to Question No. ALT – 10, the WOD corridor is a critical path for renewable resources being developed in eastern Riverside County and for both the Path 42 Upgrade Project and the Delaney – Colorado River Project, which was recently approved by the CAISO Board. Utilizing other means to achieve California’s renewable energy goal instead of the Proposed Project would negatively impact renewable generation projects that:

- are significantly advanced in their project development, including completion of their own permitting;
- have executed Commission-approved Power Purchase Agreements that will further the state’s RPS goals;
- have advanced through the FERC-mandated interconnection process; and
- have executed or shortly will execute Large Generation Interconnection Agreements (LGIAs).

In addition, not approving the Proposed Project would:

- limit the transfer capability out of Path 42 and therefore would impact the IID’s proposed Maximum Import Capacity (MIC) increase;
- impact the economic benefits related to the Delaney – Colorado River Project, and
- underutilize transmission infrastructure that was approved, constructed and placed in

service to interconnect and transmit new generation in the Eastern Area to meet California's renewable targets.

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question PD-19:

PEA Section 1.1.1, Integrate Planned Generation Resources, discusses the existing West of Devers (WOD) Interim Project, which is explained as allowing temporary deliverability of up to 1,050 megawatts (MW) (PEA pg. 1-9). Elsewhere, the PEA, in Section 3.0 (pg.3-6) states that the proposed WOD Upgrade Project would increase system transfer capacity from 1,600 MW to 4,800 MW (Sect 3.0, pg. 3-6). Please describe the difference between the 1,050 MW capability stated on page 1-9 and the stated 1,600 MW system transfer capacity stated on page 3-6.

Response to Question PD-19:

The WOD interim project does not add any additional capacity to the system. The WOD interim project better utilizes existing transmission capacity by balancing line loading on the existing WOD transmission lines and redirecting some flows onto the 500 kV system. Prior to the WOD interim project, the transfer capability on the WOD corridor was limited to approximately 550 MW. The implementation of the WOD interim project increased the system transfer capability by 1,050 MW through balancing of the flow on the existing WOD 220 kV transmission lines. This resulted in a temporary increase to the deliverability transfer capability from approximately 550 MW to 1,600 MW and served as a temporary bridge to satisfy a few generation projects' PPA requirements in advance of the completion of the WOD Upgrade Project.

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question PD-20.a:

WOD Interim Project. Under CPUC Advice Letter 2343-E (U 338-E), dated October 21, 2011, SCE has constructed the West of Devers Interim Project “to provide partial deliverability to renewable generators in the I-10 corridor until the future and separate WOD Upgrade Project is completed.” As part of the WOD Interim Project, SCE installed series reactors on the four 220 kV transmission lines that extend westward of the Devers Substation and a Special Protection System (SPS) on SCE fee-owned property on the west side of Diablo Road within the Devers Substation fence line. SCE stated in the Advice Letter that it plans to remove the new reactors after the completion of the WOD Upgrade Project.

- a. Please explain why SCE proposes to remove the WOD Interim Project. Would use of the WOD Interim Project after completion of the Proposed Project be either necessary or beneficial for operational flexibility to help achieve the 4,800 MW system transfer capacity anticipated as part of the Proposed Project?

Response to Question PD-20.a:

It is not beneficial to use the series reactors installed for the WOD interim project after the completion of the WOD Upgrade Project. As explained in SCE’s response to Question No. ALT-7, the WOD interim project’s series reactors were uniquely sized and rated based on the existing lines’ ratings and impedances in order to balance the flow on the exiting WOD lines. In fact, the use of those series reactor after the completion of the WOD Upgrade Project would actually limit the flow to these series reactors’ ratings and would create a new unbalance flow condition and therefore reduce the resultant post-WOD Upgrade Project transfer capability.

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To: ENERGY DIVISION
Prepared by: Patty Nevins
Title: Technical Specialist
Dated: 09/05/2014

Question PD-20.d:

WOD Interim Project. Under CPUC Advice Letter 2343-E (U 338-E), dated October 21, 2011, SCE has constructed the West of Devers Interim Project “to provide partial deliverability to renewable generators in the I-10 corridor until the future and separate WOD Upgrade Project is completed.” As part of the WOD Interim Project, SCE installed series reactors on the four 220 kV transmission lines that extend westward of the Devers Substation and a Special Protection System (SPS) on SCE fee-owned property on the west side of Diablo Road within the Devers Substation fence line. SCE stated in the Advice Letter that it plans to remove the new reactors after the completion of the WOD Upgrade Project.

d. Please describe site restoration activities that would occur, if any.

Response to Question PD-20.d:

The property utilized for the WOD interim project's series reactors was previously utilized as a fenced construction laydown yard and was devoid of vegetation. After completion of the project, the property would be returned to those same pre-project conditions.

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question PD-21:

In the PEA (pg.1-7), three Large Generator Interconnection Agreements (LGIA) totaling 1,485 MW of new solar generation identify the Proposed Project as the required transmission line project needed to achieve Full Capacity Deliverability Status requested by the generation facilities. These appear to be: 500 MW of solar thermal in FERC Docket No. ER11-4358-000 [NextEra Desert Center Blythe, LLC (Genesis McCoy)]; 485 MW of solar photovoltaic in FERC Docket No. ER11-2318-000 [Palo Verde Solar II, LLC (Palo Verde) subsequently purchased by NextEra]; and 500 MW of solar thermal in FERC Docket No. ER11-2455-000 [Palen Solar II, LLC (Palen) subsidiary of BrightSource Energy]. Please describe whether the existing WOD Interim Project presently achieves full capacity deliverability for these three generators having executed LGIA. If not, please describe why not.

Response to Question PD-21:

The deliverability study conducted by the CAISO determined that the temporary deliverability for Riverside County generation projects provided by the WOD interim project is limited to the incremental increase of 1,050 MW, which is insufficient to provide for 1,485 MW of deliverability. Furthermore, the WOD interim project will not provide the Full Capacity Deliverability Status required for the remaining generation projects identified in PEA Table 1.1, the additional generation projects added to the queue since the development of the PEA, nor the needs of the Path 42 Upgrade Project or the Delaney-Colorado River Project (as described in SCE's response to Question No. ALT-10).

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To: ENERGY DIVISION
Prepared by: Ayman Samaan
Title: Planner
Dated: 09/05/2014

Question PD-22.A.iii:

Project Objectives.

A.) Please elaborate on the Project Objectives for each of the individual circuits that would be modified as part of the proposed WOD Upgrade Project. For each circuit listed below, please provide the following information.

iii. Provide this information for the controlling case, normal operation or short-term emergency operation.

iv. The circuits to be addressed for items (i) through (iii) above are the following:

- Devers-San Bernardino No 1
- Devers – El Casco
- El Casco – San Bernardino
- San Bernardino – Vista
- San Bernardino – Etiwanda
- Devers-Vista No 1
- Devers-Vista No 2

Response to Question PD-22.A.iii:

SCE does not understand the term “controlling case” in the context of system operation. Therefore, SCE’s response to this question is based on normal and emergency ratings. The proposed line conductor for the WOD Upgrade Project is a bundled 1590 Aluminum Conductor Steel Reinforced (ACSR). When operated under normal conditions, the maximum thermal rating of this conductor is 3,230 Amps (1,287 MVA) and under the emergency conditions the maximum thermal rating is 4,360 amps (1,737 MVA). However, actual flow on the conductor is limited by the maximum amount of generation tripping under Remedial Action Scheme (RAS) or other real-time system operation limitation that may arise. Please refer to SCE's response to Data Request Question No. ALT-11 for the Proposed Project's maximum transfer capacity.

The answer provided above applies to the following circuits:

- Devers-San Bernardino No 1

- Devers – El Casco
- El Casco – San Bernardino
- Devers-Vista No 1
- Devers-Vista No 2

Regarding the San Bernardino – Vista and San Bernardino Etiwanda transmission lines, the upgrade would not change the normal operation or short-term emergency ratings. This is because the upgrades are limited to the first portion of these lines (from San Bernardino Substation to the San Bernardino Junction) and the lines normal operation or short-term emergency ratings would remain as they exist prior to the upgrade.