

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

In the Matter of the Application of SOUTHERN)
CALIFORNIA EDISON COMPANY (U 338-E)) Application No. _____
for a Permit to Construct Electrical Facilities)
With Voltages Between 50 kV and 200 kV:)
Moorpark-Newbury 66 kV Subtransmission Line)
Project)

**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR A
PERMIT TO CONSTRUCT ELECTRICAL FACILITIES WITH VOLTAGES
BETWEEN 50 KV AND 200 KV: MOORPARK-NEWBURY 66 KV
SUBTRANSMISSION LINE PROJECT**

**(PUBLIC VERSION)
(PORTIONS OF APPENDIX G.3 ARE CONFIDENTIAL)**

The PEA prepared as an Attachment to this Application is being filed separately as an Archival DVD and CD-Rom
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**APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR A
PERMIT TO CONSTRUCT ELECTRICAL FACILITIES WITH VOLTAGES BETWEEN 50
KV AND 200 KV: MOORPARK-NEWBURY 66 KV SUBTRANSMISSION LINE PROJECT**

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I. INTRODUCTION

Pursuant to Decision (D.) 11-11-019 and California Public Utilities Commission (Commission or CPUC), General Order 131-D (GO 131-D), Southern California Edison Company (SCE) respectfully submits this application (Application) for a permit to construct (PTC) authorizing SCE to construct the proposed project known as the Moorpark-Newbury 66 kV Subtransmission Line Project (Project).

The Project consists of the following major components: (1) construction of approximately 1,200 feet of new underground 66 kilovolt (kV) subtransmission line entirely within Moorpark Substation; (2) construction of approximately 5 miles of the new Moorpark-Newbury 66 kV Subtransmission Line on the south and east sides of SCE's existing Moorpark-Ormond Beach 220 kV Right-of-Way (ROW); (3) construction of approximately 3 miles of the

new Moorpark-Newbury 66 kV Subtransmission Line within the existing Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line ROW (the existing single-circuit Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line in this section would be reconstructed and reconducted in a double circuit configuration to accommodate the reconducted Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line and the new Moorpark-Newbury 66 kV Subtransmission Line); (4) construction of approximately 1 mile of the new Moorpark-Newbury 66 kV Subtransmission Line within the existing Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line ROW into Newbury Substation (the existing single circuit Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line would be reconstructed in a double circuit configuration to accommodate the reconducted Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line and the new Moorpark-Newbury 66 kV Subtransmission Line); (5) construction of new 66 kV subtransmission line positions and associated infrastructure within Moorpark Substation and Newbury Substation to facilitate the termination of the new Moorpark-Newbury 66 kV Subtransmission Line; and (6) transfer of existing distribution circuitry and telecommunication facilities to new subtransmission poles as necessary.

As discussed in greater detail in Section II below, SCE originally commenced construction of the Project in October 2010 under the assumption that the Project was exempt from CPUC permitting pursuant to GO 131-D Section III.B.1.g. (“Exemption G”). SCE commenced construction after undergoing an 18-month process at the CPUC initiated by SCE’s Advice Letter filing, subsequent protests, CPUC review of the protests, including a public participation hearing, and ultimately the CPUC’s issuance of multiple resolutions confirming that the Project qualified for the exemption. From October 2010 through November 2011, approximately 60% of the Project was constructed. However, in response to an Application for

Rehearing of its decisions regarding the exemption, the CPUC in November 2011 ordered SCE to cease construction activity, provide certain additional information and file an application for a PTC if it wished to complete the Project. In order to comply with the CPUC's direction, SCE has prepared this application for a PTC to complete construction of the Project.

II. BACKGROUND AND SUMMARY OF REQUEST

The purpose of the Project is to ensure the availability of safe and reliable electric service to meet customer demand in the area served by Newbury Substation and Pharmacy Substation within the Moorpark 66 kV Subtransmission System (Electrical Needs Area, or ENA).

The substations serving the ENA have historically received electricity from a variety of different transmission sources in and around Ventura County. Among these sources was a third-party generator (Camgen), located on the California State University Channel Islands campus in Camarillo. Energy from that generator was transmitted to the ENA along a portion of SCE's Camgen-Colonia-Newbury-Thousand Oaks 66 kV Subtransmission Line. However, in 2005, SCE was required to remove a portion of SCE's Camgen-Colonia-Newbury-Thousand Oaks 66 kV Subtransmission Line due to loss of property rights. The removal of this interconnection resulted in a loss of approximately 28 megawatts (MW) of generation that previously had served the Moorpark 66 kV Subtransmission System. This loss of generation resulted in a situation where a larger portion of the electricity serving the ENA would have to be served from other sources within the Moorpark System, including the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line.

The additional burden on the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line was projected to cause an overload in 2005 (and several subsequent years) on the Moorpark-Newbury tap of the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line under normal

operating system conditions. Accordingly, SCE began the process of designing the Project to remedy the projected overload conditions, and on October 2, 2008, SCE filed Advice Letter 2272-E, notifying the CPUC of the proposed construction of Project and explaining that the Project was exempt from CPUC PTC requirements pursuant to Exemption g. During the 20-day protest period associated with SCE's Advice Letter, numerous protests to the Advice Letter were filed. Both in response to the initial protests, and thereafter in response to ongoing concerns raised by the protesters, staff from the CPUC Energy and Legal divisions requested additional information and documentation regarding the Project from SCE, including biological surveys and alternatives. In February 2009, the CPUC issued Executive Director's Action Resolution E-4225, finding that the Project qualified for Exemption g and dismissed the protests.

Thereafter, the Executive Director's issuance of Resolution E-4225 was appealed and the CPUC prepared Commission Resolution E-4243 for consideration at the June 18, 2009 Commission Business Meeting. As originally drafted, Resolution E-4243 would have affirmed Resolution E-4225. However, in response to a subsequent request from a local official, the CPUC removed Resolution E-4243 from the June 18, 2009 Commission Business Meeting agenda, and in September 2009, held a public participation hearing where comments from the public were received. In addition, SCE participated in a series of meetings with interested stakeholders and a local official during late 2009 and early 2010. Following these additional meetings, Resolution E-4243 (updated to reflect the meetings and hearing which took place during 2009 and 2010) was heard and approved by the Commission at a Business Meeting in March 2010. As approved, Resolution E-4243 affirmed the findings of the previously issued Resolution E-4225, found that SCE's Moorpark-Newbury 66 kV Subtransmission Line Project qualified for Exemption g, and dismissed the protests. In dismissing the protests, Resolution E-

4243 stated that the protests "...did not allege facts that would trigger the Exception Criteria contained within GO 131-D, Section III, Subsection B.2.a.-c." By its own terms, Resolution E-4243 went into effect on the day it was approved.

In April 2010, three parties filed a joint Application for a Rehearing of the Commission's approval of Resolution E-4243. SCE filed a Response to the Application for Rehearing (the "Rehearing Response") on April 29, 2010, providing answers to claims raised by the individuals seeking rehearing and referencing specific documentary materials. In addition, because the Application for Rehearing did not request a stay of construction, and because the CPUC did not issue a stay of construction, SCE informed the CPUC Energy Division that it planned to start construction of the Project in fall 2010. Consistent with that communication, SCE commenced construction of the Project in October 2010, with a planned operational date of June 2012.

However, in November 2011, all construction activity was halted due to the issuance of CPUC D.11-11-019. D.11-11-019 granted rehearing of Resolution E-4243, stating that the administrative record developed pursuant to Advice Letter 2272-E did not allow the CPUC to decide if SCE correctly applied Exemption g to the Project. Accordingly, D.11-11-019 ordered SCE to cease all construction activity, provide certain specified information and file a PTC application if it wished to build the Project.¹

¹Although D.11-11-019 specifically required the filing of an application, it also maintained the possibility that the CPUC may still decide that the Project qualifies for Exemption g, if the information submitted by SCE so demonstrates:

"We do not believe we are now in a position to consider whether Exemption G applies to this proposed power line, or whether CEQA review should be conducted, given the type of information we have before us. That means we are not now deciding that this power line is required to undergo CEQA review. If the material SCE formally submits, when it applies for a PTC, shows that the Moorpark-Newberry [*sic*] Line is exempt from CEQA, then the PTC will be granted without further review."

SCE still wishes to build the Project, particularly because electrical system forecasts developed for each of the years since construction commenced have continued to demonstrate that the Project is needed. Originally, because construction of the Project had already commenced, SCE's 2011 and 2012 peak demand forecasts assumed that the Project would be operational for years 2011 and beyond, and therefore neither the 2011 nor the 2012 forecast identified an overload on the Moorpark-Newbury tap. However, as discussed above, because the Project was not completed due to the issuance of D.11-11-019, the benefits of the Project were not realized. Therefore, SCE remodeled its 2011 and 2012 forecasts with the assumption that the Project had not been operational since 2011. In each of those remodeled forecasts, data showed projected overloads on the Moorpark-Newbury tap beginning in 2014.

In addition, SCE's current 2013-2022 forecast also assumes no benefits from the yet-to-be-completed Project. That forecast determined that the Project is still needed to address: 1) a projected voltage drop that would exceed the acceptable 5% limit on the 66 kV bus at Newbury Substation under abnormal system conditions in 2020; and 2) a projected overload on the Moorpark-Newbury tap of the Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line under a normal system configuration in 2021.

Accordingly, because SCE has determined that the Project is still needed to address a projected voltage drop and a projected overload condition (either of which would trigger the need for the Project), SCE has prepared this application consistent with D.11-11-019.

A Proponent's Environmental Assessment (PEA) prepared for the Project is attached to this Application. The PEA will be referenced in this Application, where appropriate, as the

Continued from the previous page
(D.11-11-019, at p. 20.)

source of the information required in an Application for a PTC pursuant to GO 131-D, Section IX.B.² A complete project description is located in Chapter 3 of the PEA. A statement of purpose and need is located in Chapter 2 of the PEA.

In addition to the information normally required to be included in PTC applications pursuant to GO 131-D, this application also includes information specifically requested by the CPUC in D.11-11-019, as well as other information and documentary evidence that SCE believes would be helpful to the CPUC in compiling a comprehensive record of this proceeding. The materials and documents submitted with this application in Appendix G (Additional Materials Provided for a Complete Record of Proceedings) include:

- **Appendix G.1: *Documents related to the history of the Advice Letter process and the CPUC's determinations regarding Exemption g for the Project:***
 - SCE Advice Letter 2272-E
 - CPUC Resolution E-4225
 - CPUC Resolution E-4243
 - CPUC D.11-11-019
- **Appendix G.2: *Materials provided by SCE in response to questions from CPUC staff regarding additional information to support the Project's qualification for Exemption g:***
 - November 2008 email from SCE to CPUC staff responding to questions regarding biological resources, potential alternatives and outreach to local agencies, as well as attaching an August 2008 PowerPoint presentation confirming negative results of biological surveys along the Project route, copies of actual 2008 biological survey data and a report prepared by Bonterra Consulting and maps and pictures of the Project route.

² Other required information for a PTC application (e.g. Balance Sheet, Articles of Incorporation, etc.) is contained in this Application or its appendices.

- September 2009 e-mail from SCE in response to questions from CPUC staff inquiring about protesters' concerns regarding applicability of a certain brush clearance requirements, including a summary memorandum of brush clearance information relating to fire hazards and attaching a copy of relevant State laws regarding brush clearance.
- **Appendix G.3: Documents demonstrating that the Project has independent utility, separate from SCE's Presidential Substation Project which is under separate CPUC review:**
 - Submittals of electric system load flow information provided by SCE to CPUC staff during late June 2009 and early July 2009 as requested by CPUC staff.³
 - June 2009 memorandum from Environmental Science Associates (ESA, the CPUC's environmental consultant for the Presidential Substation Project) to CPUC staff confirming that ESA agrees with SCE's assessment of the independent electrical system utility between the Project and the Presidential Substation Project.
- **Appendix G.4: Documents containing additional information in response to issues raised by protesting parties:**
 - SCE's October 31, 2008 letter from Mr. Akbar Jazayeri to Mr. Honesto Gatchalian, regarding Response to Protests to Advice Letter No. 2272-E (responding to protest issues regarding the applicability of Exemption g).
 - SCE's April 29, 2010 Response of Southern California Edison Company (U 338-E) to Application Of Alan and Peggy Ludington, Danalynn Pritz, and David J. Tanner for Rehearing of Resolution E-4243 (responding to concerns regarding potential impacts to cultural resources, property rights and compliance with CPUC regulations governing advice letter proceedings).
 - SCE's June 16, 2010 Response of Southern California Edison Company (U 338-E) to Motion Of Alan and Peggy Ludington, Danalynn Pritz, and David J. Tanner for Permission to File Appellants' Reply Brief to Southern California Edison Company's Response for Rehearing of Resolution E-4243 (addressing similar

³ Some of the information provided related to load flows contains Critical Energy Infrastructure Information (CEII) and is therefore being separately provided under confidential cover.

issues addressed in the April 29, 2010 Response, as well as procedural and CEQA-related matters).⁴

The estimated cost of construction of the Project is approximately \$23 million in 2013 nominal dollars. Construction of the remaining portions of the Project is expected to take approximately eight months. SCE anticipates that construction activities would resume within approximately three months after a PTC is issued, meaning that if the CPUC determines that the Project does not qualify for Exemption g (and a full CEQA process is required), construction would likely begin in or around November 2015 and the entire Project would be completed by mid 2016. Schedules for each of these potential processes for the Project are included in this Application as Appendix C.

Based on the foregoing, SCE respectfully requests that upon completion of its review of this Application, the CPUC confirm its prior determination that the Project qualifies for Exemption g and issue a PTC without further proceedings. Should the CPUC instead assume that Exemption g does not apply, SCE requests that the CPUC proceed with the preparation of an Initial Study and appropriate environmental document pursuant to CEQA, certify that document and issue a PTC authorizing SCE to construct the Project described in this Application and the attached PEA within the timelines set forth in Section III.H. of this Application.

⁴ Where related to the Project's potential environmental impacts, some of the evidence identified by the CPUC in D.11-11-019 has been included in Appendices F.1-F.3 to the Proponent's Environmental Assessment attached to this Application. Those PEA appendices include documents discussing potential impacts to biological resources, including sensitive species, such as the 2008 biological survey memoranda and reports prepared by Bonterra Consulting and referenced in D.11-11-019, as well as updated biological impact surveys and monitoring reports from 2011. In addition, the cultural resources report referenced in the Rehearing Response and D.11-11-019 also has been submitted to CPUC staff under separate confidential cover.

III. STATUTORY AND PROCEDURAL REQUIREMENTS

A. Applicant

The applicant is Southern California Edison Company, an electric public utility company organized and existing under the laws of the State of California. SCE's principal place of business is 2244 Walnut Grove Avenue, Post Office Box 800, Rosemead, California 91770.

Please address correspondence or communications in regard to this Application to:

Tammy Jones
Attorney
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2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Phone: (626) 302-6634
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With a copy to:

Case Administration
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770
Phone: (626) 302-3101
Fax: (626) 302-3119

B. Articles Of Incorporation

A copy of SCE's Restated Articles of Incorporation, as amended through June 1, 1993, and as presently in effect, certified by the California Secretary of State, was filed with the Commission on June 15, 1993, in connection with Application No. 93-06-022⁵ and is incorporated herein by reference; pursuant to Rule 2.2 of the Commission's Rules of Practice and Procedure.

⁵ Application No. 93-06-22, filed June 15, 1993, regarding approval of a Self-Generation Deferral Agreement between Mobile Oil Corporation Torrance Refinery and Southern California Edison Company.

C. Balance Sheet And Statement Of Income

Appendix A to this Application contains copies of SCE's balance sheet and statement of income as of June 30, 2013. The balance sheet reflects SCE's utility plant at original cost, less accumulated depreciation.

Since 1954, pursuant to Commission Decision No. 49665 dated February 16, 1954, in Application No. 33952, as modified by Decision No. 91799 in 1980, SCE has utilized straightline remaining life depreciation for computing depreciation expense for accounting and ratemaking purposes in connection with its operations.

Pursuant to Commission Decision No. 59926, dated April 12, 1960, SCE uses accelerated depreciation for income tax purposes and "flows through" reductions in income tax to customers within the Commission's jurisdiction for property placed in service prior to 1981. Pursuant to Decision No. 93848 in OII-24, SCE uses the Accelerated Cost Recovery System (ACRS) for federal income tax purposes and "normalizes" reductions in income tax to customers for property placed in service after 1980 in compliance with the Economic Recovery Tax Act of 1981, and also in compliance with the Tax Reform Act of 1986. Pursuant to Decision No. 88-01-061, dated January 28, 1988, SCE uses a gross of tax interest rate in calculating the AFUDC Rate, and income tax normalization to account for the increased income tax expense occasioned by the Tax Relief Act of 1986 provisions requiring capitalization of interest during construction for income tax purposes.

D. Description of Southern California Edison Company

SCE is an investor-owned public utility engaged in the business of generating, transmitting, and distributing electric energy in portions of central and southern California. In addition to its properties in California, it owns, in some cases jointly with others, facilities in

Nevada, Arizona, and New Mexico, its share of which produces power and energy for the use of its customers in California. In conducting such business, SCE operates an interconnected and integrated electric utility system.

E. Service Territory

SCE's service territory is located in 15 counties in central and southern California, consisting of Fresno, Imperial, Inyo, Kern, Kings, Los Angeles, Madera, Mono, Orange, Riverside, Santa Barbara, San Bernardino, Tulare, Tuolumne,⁶ and Ventura Counties, and includes approximately 188 incorporated communities as well as outlying rural territories. A list of the counties and municipalities served by SCE is attached hereto as Appendix B. SCE also supplies electricity to certain customers for resale under tariffs filed with the Federal Energy Regulatory Commission.

F. Location Of Items Required In A Permit To Construct Pursuant To GO 131-D, Section IX.B

Much of the information required to be included in a PTC application pursuant to GO 131-D, Section IX.B is found in the PEA.

Required PTC application information has been cross-referenced to the PEA in the following text. The PTC application requirements of GO 131-D, Section IX.B are in ***bold italics***, and the PEA references follow in plain text.

- a. A description of the proposed power line or substation facilities, including the proposed power line route; proposed power line equipment, such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc., and a proposed schedule for authorization, construction, and commencement of operation of the facilities.***

⁶ SCE provides electric service to a small number of customer accounts in Tuolumne County and is not subject to franchise requirements.

- Descriptions of the Project are found throughout the PEA in Chapter 1, Chapter 2, Chapter 3, Chapter 4 and Chapter 5.
- The proposed power line route is described in Sections 3.0 (“Project Description”); 3.1 (“Project Location”); 3.4 (“Proposed Project”) [including Subsections 3.4.1 (“Summary of Project Components by Project Section”), 3.4.1.1 (“Project Section 1”); 3.4.1.2 (“Project Section 2”); 3.4.1.3 (“Project Section 3”) and 3.4.1.4 (“Project Section 4”)]; and illustrated in Figures 3.1-1 (“Project Sections and Substations”); 3.2-1b (“Proposed Future Moorpark 66 kV Subtransmission System”); 3.4-1a (“Past Activities”); 3.4-1b (“Future Activities”); 3.4-2a (“Transmission and Subtransmission Lines in the Vicinity of the Project: Index”); 3.4-2b (“Transmission And Subtransmission Lines in the Vicinity Of The Project: Sections 1 and 2”); 3.4-2c (“Transmission and Subtransmission Lines in the Vicinity of the Project: Sections 2 and 3”); 3.4-2d (“Transmission and Subtransmission Lines in the Vicinity of the Project: Sections 3 and 4”); 4.2-1a (“Important Farmlands and Williamson Act Lands (North)”); 4.2-1b (“Important Farmlands and Williamson Act Lands (South)”); and 4.4-2 (“Critical Habitat Areas”). The locations where work would be done at substations are described in Sections 3.0 (“Project Description”) and 3.5 (“Project Components”) [including Subsections 3.5.4 (“Substations”), 3.5.4.1 (“Modifications to Existing Substations”), 3.5.4.1.1 (“Moorpark Substation”) and 3.5.4.1.2 (“Newbury Substation”)], and illustrated in Figures 3.1-1 (“Project Sections and Substations”); 3.4-1a (“Past Activities”); 3.4-1b (“Future Activities”); 3.5-3a (“Existing Moorpark Substation Area”); 3.5-3b (“Existing Newbury Substation Area”).
- The physical characteristics of the Project’s components are described in Sections 3.0 (“Project Description”); 3.1 (“Project Location”); 3.4 (“Proposed Project”) [including Subsections 3.4.1 (“Summary of Project Components by Project Section”), 3.4.1.1 (“Project Section 1”); 3.4.1.2 (“Project Section 2”); 3.4.1.3 (“Project Section 3”) and 3.4.1.4 (“Project Section 4”)]; 3.5 (“Project Components”) [including Subsections 3.5.1 (“66 kV Subtransmission Lines”), 3.5.2 (“66 kV Subtransmission Poles”), 3.5.2.1 (“Lightweight Steel Poles”), 3.5.2.1.1 (“Grounding”), 3.5.2.1.2 (“Guying and Guy Poles”), 3.5.2.2 (“Tubular Steel Poles”), 3.5.3 (“Conductor”), 3.5.3.1 (“Above-Ground Installation”), 3.5.3.2 (“Below-Ground Installation”), 3.5.4 (“Substations”), 3.5.4.1 (“Modifications to Existing Substations”), 3.5.4.1.1 (“Moorpark Substation”), 3.5.4.1.2 (“Newbury Substation”), 3.5.4.1.3 (“Substation Access”), 3.5.4.1.4 (“Substation Parking Area”), 3.5.4.1.5 (“Substation Grading”), 3.5.4.1.6 (“Substation Drainage”), 3.5.4.1.7 (“Ground Surface Improvements”), 3.5.4.1.8 (“Substation Lighting”), 3.5.4.1.9 (“Substation Perimeter”), and illustrated in Figures 3.1-1 (“Project Sections and Substations”); 3.4-1a (“Past Activities”); and 3.4-1b (“Future Activities”); 3.5-1 (“Typical Pole Design”); 3.5-2 (“Subtransmission Duct Bank Detail”); and 3.7-2 (“36: Marker Ball Dimensions”).
- The Project Schedule is discussed in Section 3.7.6 (“Construction Schedule”) and attached to this Application as Appendix C.

b. A map of the proposed power line routing or substation location showing populated areas, parks, recreational areas, scenic areas, and existing electrical transmission or power lines within 300 feet of the proposed route or substation.

- Regional [Figures 1.1-1 (“Regional Map”), 4.1-1 (“Regional Landscape Context”) and 4.1-2 (“Photograph Viewpoint Locations”)] and Project area [Figures 1.1-2 (“Electrical Needs Area”); 3.1-1 (“Project Sections and Substations”); 3.4-1a (“Past Activities”); 3.4-1b (“Future Activities”); 4.2-1a (“Important Farmlands and Williamson Act Lands (North)”); 4.2-1b (“Important Farmlands and Williamson Act Lands (South)”); 4.4-2 (“Critical Habitat Areas”); 4.3-1a (“Potentially Sensitive Receptor Locations (North)”); 4.3-1b (“Potentially Sensitive Receptor Locations (South)”); 4.10-1a (“Moorpark Substation, Land Use Designations”); 4.10-1b (“Moorpark Substation, Zoning”); 4.10-2a (“Project Sections 2 & 3, Land Use Designations”); 4.10-2b (“Project Sections 2 & 3, Zoning”); 4.10-3a (“Newbury Substation, Land Use Designations”); 4.10-3b (“Newbury Substation, Zoning”); 4.14-1a (“Public Services and Schools (North)”); 4.14-1b (“Public Services and Schools (South)”); 4.15-1a (“Local Parks (North)”); and 4.15-1b (“Local Parks (South)”)] maps and aerial photographs showing existing features, including land uses and populated areas, are provided in the PEA.
- Maps and aerial photographs designating and showing current land uses, including parks, recreational, and scenic areas, are provided as Figures 3.5-3a (“Existing Moorpark Substation Area”); 3.5-3b (“Existing Newbury Substation Area”); 3.7-1a (“Access Roads And Control Features (North)”); 3.7-1b (“Access Roads And Control Features (South)”); 4.1-1 (“Regional Landscape Context”); 4.2-1a (“Important Farmlands and Williamson Act Lands (North)”); 4.2-1b (“Important Farmlands and Williamson Act Lands (South)”); 4.10-1a (“Moorpark Substation, Land Use Designations”); 4.10-1b (“Moorpark Substation, Zoning”); 4.10-2a (“Project Sections 2 & 3, Land Use Designations”); 4.10-2b (“Project Sections 2 & 3, Zoning”); 4.10-3a (“Newbury Substation, Land Use Designations”); 4.10-3b (“Newbury Substation, Zoning”); 4.14-1a (“Public Services and Schools (North)”); 4.14-1b (“Public Services and Schools (South)”); 4.15-1a (“Local Parks (North)”); 4.15-1b (“Local Parks (South)”); and 4.15-2 (“Existing And Proposed Trails Near Newbury Substation”).
- Maps and aerial photographs showing the locations of the existing substations where work was and would be done as part of the Project, as well as the location of the 66 kV subtransmission line route, and proximity to existing electrical transmission and power lines, are provided as Figures 3.1-1 (“Project Sections and Substations”); 3.2-1a (“Existing Moorpark 66 kV Subtransmission System”); 3.2-1b (“Proposed Future Moorpark 66 kV Subtransmission System”); 3.4-1a (“Past Activities”); and 3.4-1b (“Future Activities”); 3.4-2a (“Transmission and Subtransmission Lines in the Vicinity of The Project: Index”); 3.4-2b (“Transmission and Subtransmission Lines in the Vicinity of the Project: Sections 1 and 2”); 3.4-2c (“Transmission and Subtransmission Lines in the Vicinity of the Project: Sections 2 and 3”); and 3.4-2d (“Transmission and Subtransmission Lines in the Vicinity of the Project: Sections 3 and 4”); 3.5-3a (“Existing Moorpark Substation Area”); and 3.5-3b (“Existing Newbury Substation Area”).

c. Reasons for adoption of the power line route or substation location selected, including comparison with alternative routes or locations, including the advantages and disadvantages of each.

- Reasons for the adoption of the route for the 66 kV subtransmission line work and substation modifications, including the challenges and additional environmental impacts associated with alternative routes and sites, are discussed in PEA Sections 2.2 (“Project Objectives”) [including Subsections 2.2.1 (“Add 66 kV Subtransmission Line Capacity to Meet Forecasted Electrical Demand While Providing Long-Term, Safe and Reliable Electrical Service in the ENA”), 2.2.2 (“Maintain Sufficient Voltage at the 66 kV Substation Buses During Normal and Abnormal System Conditions”), 2.2.3 (“Provide Greater Operational Flexibility to Transfer Load Between 66 kV Subtransmission Lines and Substations Serving the ENA”), 2.2.4 (“Maintain and Improve System Reliability Within the ENA”), 2.2.5 (“Utilize Existing Facilities Constructed to Date for the Project to Minimize Environmental Impacts and Reduce Construction Schedule”), 2.2.6 (“Utilize Existing ROW and Manage Existing ROW in a Prudent Manner in Expectation of Possible Future Needs”), and 2.2.7 (“Design and Construct the Project in Conformance with SCE’s Applicable Engineering, Design, and Construction Standards for Substation, Transmission, Subtransmission, and Distribution System Projects”)]; 5.2 (“Description of Project Alternatives and Impact Analysis”); 5.2.1 (“System Alternatives Screening Methodology”); 5.2.2.1 (“System Alternative 1 Benefits”); 5.2.5 (“System Alternatives Analysis and Rationale for Evaluation or Elimination of Alternatives”) [including subsections 5.2.5.1 (“System Alternative 1”), 5.2.5.2 (“System Alternative 2”), and 5.2.5.3 (“No Project Alternative”); 5.2.6 (“Subtransmission Line Route Alternatives”) [including Subsections 5.2.6.1 (“Subtransmission Line Route Alternative 1, Construct New and Reconstruct Existing 66 kV Facilities Within Existing Utility ROW on the South and East Sides of Moorpark-Ormond Beach 220 kV Corridor”), 5.2.6.2 (“Subtransmission Line Route Alternative 2, Locate Portion of New 66 kV Subtransmission Line on the West Side of Moorpark-Ormond Beach 220 kV Corridor”) and 5.2.6.3 (“Subtransmission Line Route Alternative 3, Construct New 66 kV Subtransmission Line In Existing Moorpark-Newbury-Pharmacy 66 kV Subtransmission Line ROW and in New ROW”)]; 5.2.7 (“Subtransmission Line Route Alternatives Analysis and Rationale for Evaluation or Elimination of Alternatives”); and 5.2.8 (“Alternatives Analysis Conclusion”). As discussed therein, no alternative subtransmission routings could reasonably be expected to allow for development of the Project as feasibly as the proposed route, while also reducing environmental impacts. In addition, the Project would be generally consistent with the policy of the CPUC, as reflected in the Garamendi Principles (SB 2431, Chapter 1457, Statutes of 1988, Garamendi), to encourage the use of existing utility ROWs. Locating electric facilities in the same ROW maximizes the use of property already used for utility purposes and minimizes the potential environmental impacts.

d. A listing of the governmental agencies with which proposed power line route or substation location reviews have been undertaken, including a written agency response to applicant’s

written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.

In addition to the public meetings and hearings between SCE and members of the public and certain elected officials during the Advice Letter process, SCE separately met and/or had conversations with representatives from the City of Thousand Oaks; the Conejo Open Space Conservation Agency (COSCA), a joint powers agency established by the City of Thousand Oaks and the Conejo Recreation and Parks District; the City of Moorpark; and the County of Ventura on several occasions over the past several years. Communications with these agencies (and others) occurred prior to SCE's filing of Advice Letter 2272-E in 2008, between the filing of Advice Letter 2272-E and the commencement of construction in 2010 and since the issuance of D.11-11-019. In addition, SCE also had communications with the Native American Heritage Commission (NAHC) and individual Native Americans. Summaries of all of these communications follow:

- **City of Thousand Oaks:** As discussed in PEA Sections 1.5 (“Agency Coordination”) and 1.5.8 (“City of Thousand Oaks”), prior to filing Advice Letter 2272-E, SCE provided an information briefing about the Project to city planner Kristen Foord (who as discussed below is also the COSCA Manager) in August 2008. As required by GO 131-D, when SCE filed the Advice Letter, notice was provided to the City of Thousand Oaks via a letter along with the Notice of Proposed Construction to Community Development Director John Prescott. Thereafter, following the filing of Advice Letter 2272-E and prior to the CPUC issuance of Resolution E-4243, SCE held multiple meetings with representatives of the City of Thousand Oaks between October 2008 and September 2009. Meetings were held with several individual City Councilmembers, the full City Council, and City staff members including City Manager Scott Mitnick and Community Development Director John Prescott. Following the issuance of CPUC Resolution E-4243 and prior to the start of construction on the Project, SCE provided additional updates to representatives of the City of Thousand Oaks during the second and third quarters of 2010. Following the CPUC's issuance of D.11-11-019 and the cessation of construction activities, SCE provided additional updates to representatives of the City of Thousand Oaks during the second and third quarters of 2013. SCE believes the position of the City of Thousand Oaks to be neutral towards the Project.

- **COSCA:** As discussed in PEA Sections 1.5 (“Agency Coordination”) and 1.5.6 (“COSCA”), prior to filing Advice Letter 2272-E, SCE provided an information briefing about the Project to COSCA Manager Kristen Foord in August 2008. Thereafter, following the filing of Advice Letter 2272-E and prior to the CPUC issuance of Resolution E-4243, SCE held multiple meetings with COSCA staff between October 2008 and September 2009, including a site visit with COSCA Manager Kristin Foord and Associate Planner Shelly Austin. Details from the site visit were shared with Thousand Oaks Community Development Director John Prescott. Mr. Prescott communicated to SCE that based on staff reports, he felt the Project would have minimal environmental impacts to COSCA property. Following the issuance of CPUC Resolution E-4243 and prior to the start of construction on the Project, SCE provided regular updates to COSCA staff. In addition, following SCE’s commencement of construction, SCE on September 23, 2011 conducted another site visit with COSCA representatives in furtherance of determining appropriate mitigation fees payable to COSCA by SCE to fund restoration, enhancement, or preservation activities in conjunction with SCE’s execution of a Streambed Alteration Agreement with the then-titled California Department of Fish and Game. Further consultation and coordination with COSCA representatives resulted in the development of an In-Lieu-Fee Mitigation Memorandum of Agreement (MOA) for off-site mitigation fees dated October 2011 and ratified by the COSCA Board of Directors at a March 14, 2012 meeting. Following the CPUC’s issuance of D.11-11-019 and the cessation of construction activities, SCE continued to provide additional updates to COSCA staff. The most recent Project update was provided during the third quarter of 2013. SCE believes the position of COSCA to be neutral towards the Project.
- **City of Moorpark:** As discussed in PEA Sections 1.5 (“Agency Coordination”) and 1.5.7 (“City of Moorpark”), as required by GO 131-D, when SCE filed Advice Letter 2272-E, notice was provided to the City of Moorpark via a letter along with the Notice of Proposed Construction to City of Moorpark Community Development Director Dave Bobart. Thereafter, following the filing of Advice Letter 2272-E and prior to the CPUC issuance of Resolution E-4243, SCE held multiple meetings with representatives of the City of Moorpark between October 2008 and October 2009. Meetings were held with several individual City Councilmembers; the full City Council; and City staff members, including City Mayor Janice Parvin, Assistant City Manager Hugh Riley and Community Development Director Dave Bobart. Following the issuance of CPUC Resolution E-4243 and prior to the start of construction on the Project, SCE provided additional updates to representatives of the City of Moorpark during the second and third quarters of 2010. Following the CPUC’s issuance of D.11-11-019 and the cessation of construction activities, SCE provided additional updates to representatives of the City of Moorpark during the second and third quarters of 2013. SCE believes the position of the City of Moorpark to be neutral towards the Project.
- **County of Ventura:** As discussed in PEA Sections 1.5 (“Agency Coordination”) and 1.5.5 (“County of Ventura”), prior to filing Advice Letter 2272-E, SCE provided an information briefing about the project to Steve Williams, Real Estate Services Manager, in August 2008. As required by GO 131-D, when SCE filed the Advice Letter, notice was

provided to the County of Ventura via a letter along with the Notice of Proposed Construction to Kim Prillhart, Planning Director for the County. Thereafter, following the filing of Advice Letter 2272-E and prior to the CPUC issuance of Resolution E-4243, SCE held multiple meetings with individual members of the Board of Supervisors as well as the entire Board of Supervisors of the County of Ventura between October 2008 and September 2009. Following the issuance of CPUC Resolution E-4243 and prior to the start of construction on the Project, SCE provided additional updates to representatives of the County of Ventura during the second and third quarters of 2010. Following the CPUC's issuance of D.11-11-019 and the cessation of construction activities, SCE provided additional updates to representatives of the County of Ventura during the second and third quarters of 2013. Representatives from the County of Ventura previously expressed opposition to any exemption of the Project from environmental review; however, the County's official position is not currently known.

- **Native American Heritage Commission:** As discussed in PEA Sections 1.5 (“Agency Coordination”) and 1.5.4 (“Native American Heritage Commission and Tribal Coordination”), at the request of SCE, the NAHC conducted a search in late 2007 of the Sacred Lands File to identify cultural resources or areas of concern to Native Americans within the vicinity of the Project Area. (A copy of SCE’s December 11, 2007 letter from Koral Ahmet to Ms. Carol Gaubatz regarding “Lands File Search Request for the Moorpark-Newbury 66 kV New Source Line Project, Ventura County, California” is attached to the PEA in Appendix C.) The NAHC’s search “failed to indicate the presence of Native American cultural resources in the immediate project area”, and provided a list of 11 Native American individuals/organizations that may have knowledge of cultural resources in the Project Area. (See December 13, 2007 letter from Katy Sanchez, NAHC to Koral Ahmet, SCE, re: “Proposed Moorpark-Newburry [sic] 66 kV New Source Like [sic] Project, Ventura County.” attached to the PEA in Appendix C.) SCE sent letters to all recommended contacts on December 11, 2007. To date, a response noting interest has been received from the Owl Clan, Qun-tan Shup. Mrs. A-lul’Koy Lotah expressed concern for Chumash cultural sites “located in the New Source Line proposed project site and up to a 5 mile radius around the proposed project areas.” A second NAHC inquiry was made in November 2012. (A copy of SCE’s November 13, 2012 letter from Christopher Doolittle to Mr. David Singleton regarding “Lands File Search Request for the Moorpark-Newbury 66 kV New Source Line Project, Ventura County, California” is attached to the PEA in Appendix C.) In response, NAHC provided a list of 22 Native American individuals/organizations that may have knowledge of cultural resources in the Project Area. (See November 20, 2012 letter from Dave Singleton, NAHC to Christopher Doolittle, SCE re: Sacred Lands File Search and Native American Contacts list for the proposed Sacred Lands File Search and Native American Contacts list of the proposed “Moorpark-Newbury 66 kV New Source Line Project;” located in Ventura County, California, attached to the PEA in Appendix C attached to the PEA in Appendix C.) Ten of these individuals/organizations were on the list received in 2007, and 12 are new. SCE has sent letters to all 22 individuals/organizations; one response has been received to date. (A copy of the form letter sent to these recipients is also included in PEA Appendix C.) Ms. Isabella Ayala, the Ventura County Regional Representative, Coastal Band of

the Chumash Nation, requested that she be contacted if the Project will impact Native American cultural resources.

e. A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rules of Practice and Procedure Rule 2.4 [formerly 17.1 and 17.3]. If a PEA is filed, it may include the data described in Items a. through d. above.

A PEA is attached to this Application.

G. Compliance With GO 131-D, Section X

GO 131-D, Section X, requires applications for a PTC to describe measures taken to reduce potential exposure to electric and magnetic fields (EMF) generated by the proposed facilities. A complete description of EMF-related issues is contained in SCE's EMF Field Management Plan for the Project, which is attached as Appendix F to this Application.

H. Compliance With Rule 2.1(c)

In compliance with Rule 2.1(c) of the Commission's Rules of Practice and Procedure (California Code of Regulations, Title 20), SCE is required to state in this Application "[t]he 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 rate-setting proceeding. SCE anticipates that a hearing will not be necessary. This proceeding involves the Commission's: (1) environmental review of the Project in compliance with the California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 *et seq.*) and the Commission's GO 131-D; and (2) issuance of a PTC authorizing SCE to construct the Project.

Should the CPUC determine that the Project qualifies for Exemption g, SCE suggests the following proposed schedule for this Application:

- October 2013 Application filed

- November 2013 Application accepted as complete
- February 2014 Final Decision issued

In the event that the CPUC determines that the Project does not qualify for Exemption g, SCE suggests the following proposed schedule for this Application:

- October 2013 Application filed
- November 2013 Application accepted as complete
- January 2014 Initial Study issued
- October 2014 Draft CEQA document issued
- April 2015 Final CEQA document issued
- July 2015 Proposed Decision issued
- August 2015 Final Decision issued

I. Statutory Authority

This Application is made pursuant to the provisions of CEQA, GO 131-D, the Commission’s Rules of Practice and Procedure, and prior orders and resolutions of the Commission.

J. Public Notice

Pursuant to GO 131-D, Section XI.A, notice of this Application shall be given: (1) to certain public agencies and legislative bodies; (2) to owners of property located on or within 300 feet of the project area; (3) by advertisement in a newspaper or newspapers of general circulation; and (4) by posting a notice on-site and off-site at the project location. SCE has

given, or will give, proper notice within the time limits prescribed in GO 131- D.⁷ A copy of the Notice of Application for a Permit to Construct and list of newspapers which will publish the notice are contained in Appendix D. A copy of the Certificate of Service of Notice of Application for a Permit to Construct and a service list are contained in Appendix E.

K. Supporting Appendices And Attachment

Appendices A through G and the attached PEA listed below are made a part of this Application:

- Appendix A: Balance Sheet and Statement of Income as of June 30, 2013.
- Appendix B: List of Counties and Municipalities Served by SCE
- Appendix C: Moorpark-Newbury 66 kV Subtransmission Line Project Schedules
- Appendix D: Notice of Application for a Permit to Construct
- Appendix E: Certificate of Service of Notice of Application for a Permit to Construct
- Appendix F: Field Management Plan
- Appendix G: Additional Materials Provided for a Complete Record of Proceedings
- Attachment: Proponent's Environmental Assessment

L. Compliance With Rule 2.5

In accordance with Rule 2.5 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 a negative declaration or an environmental impact report for the Project.

M. Request For Ex Parte Relief

SCE requests that the relief requested in this Application be provided *ex parte* as provided for in GO 131-D, Section IX.B.6.

⁷ In addition to providing notice to the owners of property located on or within 300 feet of the project area, because the Project involved prior proceedings on SCE's Advice Letter 2272-E, SCE is also providing notice to those persons who were involved in those proceedings.

N. Request For Timely Relief

SCE requests the Commission issue a decision within the time limits prescribed by Government Code Section 65920 *et seq.* (the Permit Streamlining Act) as provided for in GO 131-D, Section IX.B.6.

Moreover, as addressed in the same subsection of GO 131-D, SCE requests that the Commission refrain from assigning an ALJ to this proceeding, unless a valid protest is received by the Commission, and in the absence of any valid protest allow the Energy Division to process this Application.⁸

⁸ D.95-08-038, Appendix A, p. 25.

IV. CONCLUSION

SCE respectfully requests the Commission to issue a PTC authorizing SCE to construct the Project described in this Application and the attached PEA. SCE further requests that the relief be provided *ex parte* and within the time limits prescribed by the Permit Streamlining Act.

Respectfully submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

/s/Kevin R. Cini

By: Kevin R. Cini
Vice President

/s/Tammy Jones

By: Tammy Jones
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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 28th day of October, 2013, at Brea, California.

/s/Kevin R. Cini

By: Kevin R. Cini

Vice President

SOUTHERN CALIFORNIA EDISON COMPANY

Telephone: (714) 255-4894

October 28, 2013