SCE Transmission Project Review (TPR) Process

Stakeholder Meeting

August 28, 2024

Agenda

Time	Duration	Topic	Presenter
9:00am - 9:10am	10 min	Roll Call	J. Huerta
9:10am - 9:20am	10 min	Safety and Meeting Logistics	R. Mahfud
9:20am - 9:30am	10 min	Welcome and TPR Overview	J. Nelson
9:30am – 9:45am	15 min	Placing Project on Hold	B. Gokbudak and J. Jacobs
9:45am – 10:00am	15 min	SCE TPR Process Data Sheet	A. Leung & R. Mejia
10:00am – 10:15am	15 min	Transmission Planning Process and Other Previously Approved Projects	R. Mejia
10:15am – 10:25am	10 min	PB 20 – Phasor Measurement System Install	A. Flores
10:25am – 10:35am	10 min	SP 01 – Calcite Substation Construction	B. Gokbudak
10:35am – 10:45am	10 min	SP 10 Riverside Transmission Reliability Project	K. Spear
10:45am – 11am	15 min	Break	
11:00am – 11:10am	10 min	DesertXpress Rail Project Updates	R. Preijers
11:10am – 11:20am	10 min	PB 06 and Others – Tracking Spending for Blanket Programs	A. Leung
11:20am – 11:30am	10 min	TLRR Project Statuses	N. Harris
11:30am – 11:40am	10 min	SP 25 – Ivanpah Control TLRR Remediation Project	S. Lacy
11:40am – 11:50am	10 min	CPUC Filing Type and Filing Date (Fields 43 and 44)	L. Charpentier
11:50am – 12:00pm	10 min	Cancelled Projects	A. Leung
12:00pm – 1:00pm	60 min	Lunch Break	
1:00pm – 1:10pm	10 min	SP 101 – Tehachapi Renewable Transmission Project (TRTP)	E. Webb
1:10pm – 1:20pm	10 min	Generator Interconnection-related Network Upgrades	A. Leung
1:20pm – 1:40pm	20 min	Transmission Vs. Distribution Voltage levels Determination of CAISO Control Criteria	M. Avendano
1:40pm – 1:50pm	10 min	Close Out and Next Steps	R. Mahfud

Safety and Meeting Logistics

Rahab Mahfud, Sr. Advisor – FERC Rates & Tariffs – TPR Team

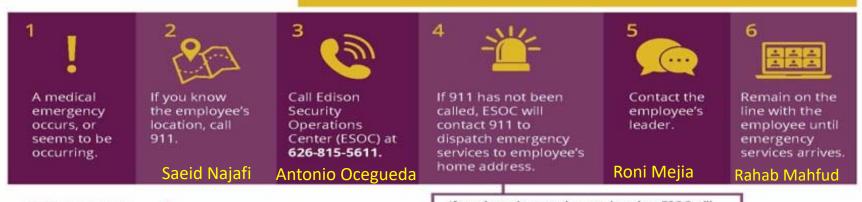
Virtual Meeting Emergency Protocol

VIRTUAL MEETING EMERGENCY PROTOCOL

Follow these steps when a virtual or hybrid meeting attendee is incapacitated.

BEFORE THE MEETING STARTS -ASSIGN ROLES

- Who will call ESOC? (626-815-5611)
- Who will contact the leader?
- Who will stay on the call with the employee?
- Identify the location of employees who may be in transit or out in the field.





Edison Safety

If employee is a supplemental worker, ESOC will contact the vendor to provide known information; if unavailable, 911 will be contacted.

Safety Moment – Hot Weather Precautions

- Stay indoors and in an air-conditioned environment as much as possible
- ➤ If air conditioning is not available, stay on the lowest floor out of the sunshine
- Drink plenty of fluids but avoid beverages that contain alcohol, caffeine or a lot of sugar
- ➤ Avoid extreme temperature changes. A cool shower immediately after coming in from hot temperatures can result in hypothermia, particularly for elderly or very young people
- Wear a wide-brimmed hat, sun block and light-colored, loose-fitting clothes when outdoors
- > Take frequent breaks when working outdoors



Meeting Logistics

- No NERC CIP confidential information will be discussed
- Please mute your line if you are not speaking
- Presenters will take questions at the end of their section
- Please use raise your hand (icon) and we will call on you in the order it was raised; Reminder to put hand down after question
- When asking questions, please state your name and organization first
- Presenters will be joining throughout the day at a specific times, so we will work to stay on schedule
- SCE welcomes your feedback on how to improve this process during next steps and in written comments

Welcome and TPR Overview

Jeff Nelson, Director FERC Rates and Market Integration

TPR Overview and Meeting Objectives

- The Transmission Project Review Process provides the Commission and all Stakeholders semi-annually with current, specific, comprehensive, and system-wide transmission data for projects with capital additions to rate base in the last five years and forecasted or actual capital expenditures in the current year and future four years.
- SCE hosts a semi-annual Stakeholder Meeting on February 28 and August 28, to engage and address Stakeholder's questions and discussion topics.
 - SCE has made a good faith effort to identify the appropriate subject matter experts to speak on each topic and to provide accurate information throughout this presentation but reserves the right to correct or supplement the information provided if it becomes aware of needed modifications or additions

TPR Process Milestones

Date	Milestone	
June 1	SCE provides semi-annual Project Data Spreadsheet and project authorization documents to Stakeholders	
July 16	Deadline for Stakeholders to provide questions/ comments	
August 6	SCE publishes written responses to questions / comments	
August 13	CPUC and Stakeholders provide agenda items for Stakeholder meeting	
August 28	SCE hosts Stakeholder meeting	
September 12	Stakeholders provide questions/ comments within 15 calendar days following Stakeholder meeting	
October 3	SCE publishes written responses to questions/ comments	
October 15	Deadline for Stakeholders to provide project-specific follow-up questions/ comments	
October 29	SCE publishes written responses to project-specific follow-up questic comments	
October 31	Stakeholders may provide comments to SCE by this date	
December 1	Repeat	

SCE's June 2024 TPR Materials & Questions Received

- SCE's June 2024 TPR Project Spreadsheet included all FERCjurisdictional electric transmission projects with actual or forecasted capital costs of one million dollars or more in the prior five calendar years, the current year, or the next four years (2019 – 2028)
- SCE's June 2024 TPR Submission included:
 - Project Data Spreadsheet included 50 Program Blankets, 261 programmatic projects, and 116 Specific Projects.
 - 722 Authorization Documents that correspond to Projects in the Spreadsheet.
 - 9 Procedures
- SCE received two data request sets from Energy Division/GridSME on July 16
 - 72 public questions with subparts
 - 6 confidential questions

Placing Projects on Hold

Brent Gokbudak, Principal Manager Major Project Construction Joanna Jacobs, Sr. Manager – General Accounting

Placing Projects on Hold

Describe SCE's current process for determining whether a project should be placed on hold or released from hold.

- Major Project Organization (MPO) reviews projects and shares deferral/onhold status with Plant Accounting teams on a monthly basis
- This review identifies projects that are deferred & placed on hold, as well
 as deferred projects that are subsequently moved back to active status
- MPO project managers are tasked with notifying Plant Accounting of any additional projects to be placed on hold, after which Plant Accounting will manually turn off AFUDC until such time it is moved back to active status
- MPO Project Controls also updates project-specific on hold status in SAP, as well as in P6 (project scheduling system)
- MPO criteria defines project on hold as inactivity for at least 3 months with minimal charges (under \$10K) for that period
 - Project managers exercise judgment based on their knowledge of the projects in question

Placing Projects on Hold

SCE currently has two processes to suspend AFUDC (i.e., turn off)

- Automatic system process
 - AFUDC accrual for inactive work orders (i.e., work orders that have no direct recorded spend for >= 6 months) will be automatically turned off by PowerPlan and will accrue when direct charges hit the work order again
- Manual process
 - Per the Project deferral/hold process described above, OU reviews projects that will be placed in deferred status and will reach out to Plant Accounting to manually turn off AFUDC accrual in PowerPlan until which time the OU directs Plant Accounting to change back to active status

Albert Leung, Sr. Advisor – Financial Analyses Roni Mejia, Engineering Manager– Compliance and Coordination

a. Describe SCE's process for pulling data and identifying source systems, records, accounting data, etc.

As it pertains to financial data, forecast information is sourced from the annual capital operating plan, which is also utilized for the annual Formula Transmission Rate Filing.

Recorded costs are obtained from PowerPlan. New projects that meet the threshold criteria for inclusion in the TPR are identified through the analysis of recorded and forecasted data and subsequently incorporated into the TPR spreadsheet.

For these newly identified projects, subject matter experts (SMEs) update the required fields in the TPR spreadsheet using various data sources, ensuring compliance with the requirements of Resolution E-5252. SMEs also update individual fields for existing TPR projects or programs already included in the spreadsheet, as necessary.

Moreover, for the June TPR filing, a thorough review is conducted to ensure alignment between the TPR filing and the annual Formula Transmission Rate Filing.

- a. Describe SCE's process for pulling data and identifying source systems, records, accounting data, etc.
- Each cell in the TPR spreadsheet is managed by a dedicated SME team.
- SCE does not have a single, comprehensive data source that includes all TPR required fields. It is the responsibility of the SME teams to utilize the available data sources to complete and update their respective sections. Below are some examples of key data sources that have been leveraged:
 - P6 Production Database
 - P6 Archive Database
 - SAP
 - Trend SharePoint Site
 - CMT SharePoint Site
 - ATP SharePoint Site (Programs)
 - PMWIF SharePoint Site (Programs)
 - PMWIF SharePoint Site (MPO)

- GICD's iREQ Access Data Base
- Copperleaf C55
- MDI/IWP (Integrated Work Plan)
- PowerPlan
- CAPMAR
- COBRA
- CAISO Annual Transmission Plans

- Project Cost ElementDetails (PCED) Report
- Google Earth
- EHSync system
- ArcGIS
- Wildfire Mitigation Plan

b. Describe any issues in preparing the first TPR Project Spreadsheet and planned improvements for Cycle 2.

The transition from SRP to TPR necessitated a comprehensive understanding of the new process, data field definitions and formatting requirements by all SMEs. To address this, SCE implemented

- enhanced training,
- comprehensive job aids, and
- data column supervisor role

Data integrity and accuracy was achieved through a multi-tiered review process conducted by SCE's TPR core team, leadership team and regulatory and legal advisors.

SCE will continue to apply the lessons learned from its first TPR submission and continue trainings where necessary to ensure continuous improvement in subsequent submissions

Transmission Planning Process and Other Previously Approved Projects

Roni Mejia, Engineering Manager– Compliance and Coordination

Transmission Planning Process and Other Previously Approved Projects

a. Describe SCE's process/timeline for incorporating new TPP projects into the TPR Project Spreadsheet.

SCE does not maintain a separate process for incorporating TPP projects into the TPR Project Spreadsheet. Any project with FERC-jurisdictional capital spend that meets the inclusion criteria set forth in Resolution E-5252 is included in the TPR Project Spreadsheet.

b. Provide a guide that indicates where all previously-approved TPP projects are located in the TPR Project Spreadsheet. If there are any previously-approved TPP projects not included in the June 2024 TPR Project Spreadsheet, please explain why.

Please reference Column 36 "Year(s) when considered in CAISO TPP." These projects can be filtered to show the year inputs. The projects that appear in the TPR Project Spreadsheet as a result of the data filter applied to Column 36 are previously-approved TPP projects.

If a TPP project has FERC-jurisdictional spend in the TPR nine-year window 2019 – 2028 and has met all other inclusion TPR criteria, then it will appear in the TPR Project Spreadsheet.

Instances when a previously-approved TPP project is not included can be due to Project Summaries not completed in time which falls within the window defined in TPR. These projects would be captured in the next TPR filing cycle.

Transmission Planning Process and Other Previously Approved Projects, continued.

c. Provide breakouts for any subprojects of TPP-approved projects with greater than \$1 million estimated spending.

All TPP Projects are Specific Projects and the majority appear with a TPR ID (i.e. Column 1) that starts with SP in the TPR Project Spreadsheet. SCE shows the data for Specific Projects on a PIN level and not on an individual work order level, consistent with the requirements set forth in Resolution E-5252 and consistent with how SCE presented its data through the previous Stakeholder Review Process (SRP).

In accordance with Section 3 of the Resolution, upon receipt of a written data request, SCE can break out the financial data for TPP Specific Projects of interest and provide to TPR stakeholders.

PB 20 – Phasor Measurement System Install

Adrian Flores, Sr. Project Manager – Major Construction

PB 20 – Phasor Measurement System Install

a. Explain the current status of this project.

 The overall program status is "In Construction" which reflects the status of the individual programmatic projects that are not all yet operational

b. Describe how many 500 kV and 220 kV units have or do not have PMUs.

 In total, 18 PMU projects have been completed, with 1 PMU project remaining

c. Explain what the current plan is for completing installation of PMUs and current cost forecast.

 The current plan is to complete the one remaining PMU project by 12/30/2025. The current 2024 forecast is \$140K and the 2025 forecast is \$89K Calcite Substation Construction

Brent Gokbudak, Principal Manager Major Project Construction

SP 01 – Calcite Substation Construction

a. Describe the status of projects associated with SP-01.

Project Overview

The Calcite Substation is planned as a 220 kV switching station situated near Lucerne Valley in San Bernardino County, California. This project is intended to strengthen the local electrical grid infrastructure and facilitate the integration of renewable energy sources. It plays a critical role in advancing California's commitment to expanding its clean energy portfolio, focusing on sustainable and reliable energy supply.

Interconnection Customers

- **1. Avantus Energy:** Actively developing the Sienna Solar project, which includes a 200 MW solar farm combined with a 55 MW battery energy storage system (BESS).
- **2. Aurora Solar, LLC:** An affiliate of Avangrid, Aurora is proposing the Stagecoach Solar project, consisting of 200 MW of solar generation along with a 200 MW BESS.

Current Status

Southern California Edison (SCE) continues ongoing coordination efforts with both interconnection customers. Regular meetings are held to discuss and refine the design of the 220 kV generation tie lines essential for interconnecting the respective projects to the Calcite Substation. These meetings are critical for addressing technical specifications, aligning project timelines, and resolving various interconnection logistics to ensure successful integration of the solar and battery energy storage solutions into the local grid.

SP 01 – Calcite Substation Construction

b. Explain the status of the project's regulatory approval.

As of August 2024, the regulatory approval status for the Calcite Substation project, particularly in connection with Avantus' Sienna Solar and Battery Energy Storage project, is as follows:

- 1. **Lead Agency:** San Bernardino County (SBC) is the lead agency tasked with evaluating environmental impacts for both the Sienna Project and the Calcite Substation.
- 2. Environmental Impact Report (EIR): SBC has prepared an Environmental Impact Report (EIR) that comprehensively analyzes the potential environmental effects of both the Sienna project and the Calcite Substation. As of August 2024, the Draft EIR was recirculated with comments due by September 30, 2024.
- **3. Final EIR Certification Timeline:** The timeline for certifying the Final EIR is projected for May 2025. This certification will be a significant milestone for the projects as it will finalize the environmental review process and pave the way for subsequent approvals.
- **4. Permit to Construct Application:** Once the Final EIR is certified, SCE plans to submit a Permit to Construct (PTC) Application to the California Public Utilities Commission (CPUC) (or Advice Letter, if applicable) for the Calcite Substation in June 2025. SCE intends to utilize the SBC EIR in lieu of conducting its own Proponent's Environmental Assessment (PEA) for this PTC application (or Advice Letter), streamlining the regulatory process.
- **5. Project Construction and Operation:** The anticipated timeline for the construction and testing of the Calcite Substation is set between January 2027 and April 2028. If all regulatory approvals are secured as planned, the substation is expected to commence operations by May 2028.

Riverside Transmission Reliability Project

Kenneth Spear, Sr. Project Manager – Major Construction

SP 10 – Riverside Transmission Reliability Project

a. Explain what the current status of this project is.

The project is currently in the preconstruction phase. RTRP project activities were fully reactivated as of May of this year. Current preconstruction activities include re-bidding project to consultants, contractors and suppliers and acquisition of remaining right of way easements.

b. Explain the current projected cost.

In SCE's 2019 CPCN Direct Testimony for RTRP, the estimated cost was \$521M in Constant 2018 dollars (equivalent to the \$584M Nominal dollars at the time of estimation). Out of the \$584M estimated cost, about \$581M falls under FERC jurisdiction.

In June 2024, SCE submitted a data request response in the Transmission Project Review (TPR) process identifying a total cost of \$587M, which included \$33M actual direct cost and \$6M of corporate overheads through the end of 2023, and \$548M remaining until project completion.

However, due to the passage of time, the project is being rebid, and upon receipt of updated bids, SCE will update the complete project cost estimate. The updated estimate will not likely be available until mid-2025 at the earliest.

SP 10 – Riverside Transmission Reliability Project

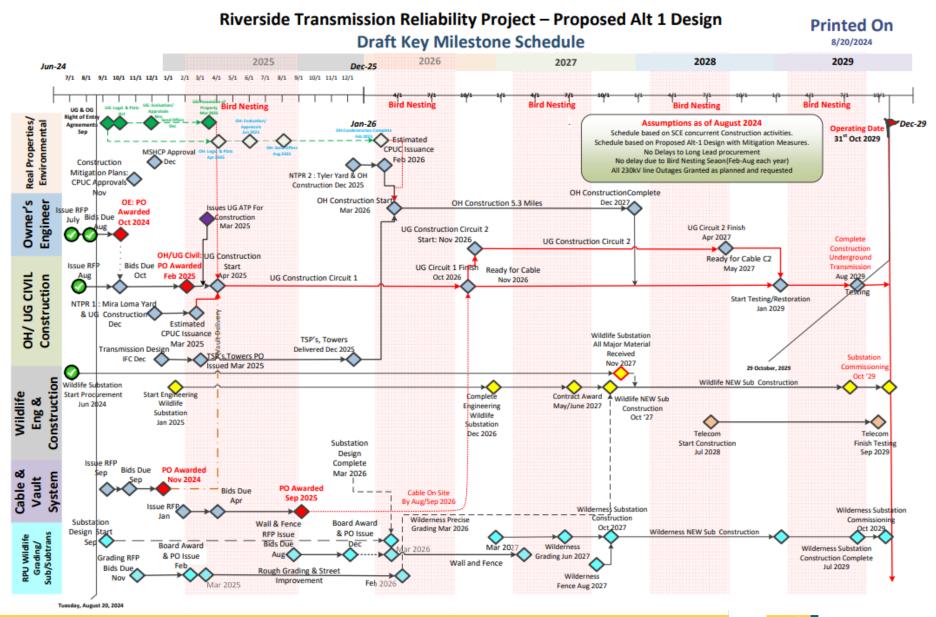
c. Discuss when SCE expects regulatory approvals to be completed.

SCE has obtained all discretionary approvals needed for construction of the RTRP project. Remaining regulatory approvals include construction mitigation plans and Notice to Proceed to satisfy conditions of previous approval as well as obtaining ministerial permits.

d. Provide a detailed projected schedule for the next two years.

The next slide illustrates the current forecasted project schedule.

SP 10 – Riverside Transmission Reliability Project





DesertXpress Rail Project Updates

Rodney Preijers, Project Manager – Major Construction

DesertXpress Rail Project Updates

a. Describe the project's current status and expected completion timing and identify changes to project in the past 12 months.

The project is a CPUC Added Facility (Rule 2H) type project and has been on hold since August 2021 pending customer payment. The timing of completion has been revised to March 31, 2027, but is dependent on customer payment to proceed with project activities. There have been no changes to the project within the last 12 months. However, there is an additional project that provides 115kV service to the train - PIN 8678 – with a projected load of 48MVA. Both projects are effectively on hold pending customer payment.

DesertXpress Rail Project Updates, continued

b. Describe any interdependencies between Project SP- 162 Las Vegas HSR DesertXpress (Virgin/Brightline West Train) and Project SP-152 (Coolwater 1A 230/115 kV Bank), which was originally identified as a necessary mitigation for the Brightline West HSR project.

The completion and in-servicing of the Cool Water 1A 230/115kV Bank is still required for the Brightline West Train to commence operation to ensure safety and reliability during normal and outage operating conditions. An outage operating condition can include the unavailability of a subtransmission line, transmission line, and/or transformer bank due to a planned or unplanned outage.

Tracking Spending for Blanket Programs

Albert Leung, Sr. Advisor – Financial Analyses

PB 06 and Others – Tracking Spending for Blanket Programs

In several data responses, including PB-06 "Substation Planned Capital Maintenance", SCE stated that it is unable to provide historical actual costs for blanket programs. Understanding the existing challenges, it would be useful for stakeholders to understand how the historical spending aligns with current and forecast spending for these programs. Provide details of how SCE tracks actual spending for projects that fall under the blanket program PB-06.

The management of forecasted and actual programmatic expenditures is conducted by individual organizational units (OUs) and is typically executed at the work order level. This process encompasses an annual analysis and review of both project and programmatic spending to evaluate progress towards work completion, ensure accurate financial and accounting tracking, and identify any variances between recorded and forecasted costs.

Within T&D, various teams perform updating, tracking, management, and review of projects and programs through work orders. This enables T&D to monitor and revise capital forecasts, recorded expenditures, and operational timelines, as well as to assess and analyze variances against recorded costs monthly.

Ultimately, only actual spend is recovered through transmission rates via the FERC Formula Rate.

TLRR Project Statuses

Nora Harris, Sr. Project Manager – Major Construction

TLRR Project Statuses

a. Does SCE's June 2024 TPR Project Spreadsheet contain all the TLRR Projects submitted to the CPUC?

- SCE's June 2024 TPR Project Spreadsheet contains all TLRR Projects submitted to the CPUC that are FERC-jurisdictional.
- The four projects included on the TPR Project Spreadsheet that have been submitted to the CPUC include PB-22.45, SP-23, SP-25, and SP-26.

b. Provide a general status update on all TLRR Projects to the CPUC.

- PB-22.45 Eagle Mountain-Blythe 161kV: Application filed
 7/31/2024
- SP-23 Eldorado-Pisgah-Lugo 220kV: Application filed 4/21/2023
- SP-25 Ivanpah-Control 115kV: Application currently under review by CPUC and BLM
- SP-26 Control-Silver Peak 55kV: Application currently under review by CPUC and BLM

Ivanpah Control TLRR Remediation Project

Scott Lacy, Sr. Project Manager – Major Construction

SP 25 – Ivanpah Control TLRR Remediation Project

- a. Clarify if SP-25 is a line under CAISO control and address per FERC Docket RC15-1-000 (December 31, 2015).

 Yes, all circuits associated with this project are under CAISO control.
- b. Are SP-25 capital expenditures allocated to the CAISO TAC or SCE GRC? Yes, the capital expenditures for SP-25 are FERC jurisdictional and flow to the CAISO TAC.
- c. Similarly to the SP-25 Project, please clarify if the Gorman-Kern River 66kV TLRR Project is under CAISO control? And if so, should the Gorman-Kern River 66kV TLRR Project also be included in the TPR Project Spreadsheet? The Gorman-Kern River 66kV circuitry is not under CAISO control and therefore should not be included in the TPR Project Spreadsheet.

CPUC Filing Type and Filing Date (Fields 43 and 44)

Lori Charpentier, Sr. Manager – Regulatory Affairs and Compliance -Infrastructure Licensing

CPUC Filing Type and Filing Date (Fields 43 and 44)

For the majority of projects' CPUC Filing Type (Field 43), SCE has listed "NA". Does SCE file Type 2 Advice Letters (per GO 131-D requirements)?

TPR field 43 (CPUC Filing Type) contains one of the following data entries:

CPCN - Certificate of Public Convenience and Necessity

PTC – Permit to Construct

AL - Advice Letter

NA – Indicates that project is not subject to GO 131-D filing requirements

SCE confirms that none of the projects currently listed in the 2024 TPR Project Data Spreadsheet required SCE to submit Tier 2 Advice Letters per GO 131-D requirements.

SCE submits Tier 2 advice letters to the Commission when required by GO 131-D. Projects with an "NA" in Field 43 do not require CPCN, PTC, or AL (e.g., substation modification work).

Cancelled Projects

Albert Leung, Sr. Advisor – Financial Analyses

Cancelled Projects

No projects in SCE's June 2024 TPR Project Spreadsheet were listed as "Cancelled" for Field 47. Confirm if it is accurate that SCE has no cancelled projects that meet the requirements of Resolution E-5252 to be included in the June 2024 TPR Project Spreadsheet.

SCE confirms that there are no cancelled projects that meet the criteria set forth in Resolution E-5252 for inclusion in the June 2024 TPR spreadsheet. All programs or projects that satisfy the requirements for inclusion in the TPR, as outlined in Resolution E-5252, have been duly included in the spreadsheet, regardless of whether they were cancelled or not. Additionally, as this is the first cycle of the TPR, SCE had the opportunity to remove any cancelled projects that were previously included in SCE's December 2023 Stakeholder Review Process (SRP) spreadsheet that do not meet the criteria for inclusion in the June 2024 TPR.

Tehachapi Renewable Transmission Project (TRTP) - Segment 11 System Upgrades: New Mesa-Vincent T/L (Via Gould) 500/230 kV

Elizabeth Webb, Project Manager – Major Construction SP-101 – Tehachapi Renewable Transmission Project (TRTP) - Segment 11 System Upgrades: New Mesa-Vincent T/L (Via Gould) 500/230 kV

Clarify what the CAISO TPP approval process timeline was for this Segment 11 project, including what year it was first considered and what year it was ultimately approved. Additionally, describe the "upgrade" nature of this project and why it was attached to the TRTP Project rather than included as a separate new project in SCE's June 2024 TPR Project Spreadsheet.

SCE clarifies that SP-101 is part of the original TRTP Segment 11 project. It is not a separate stand-alone upgrade. This project qualifies for inclusion in the TPR process because it meets the inclusion criteria. This project was inserviced 4/2015*.

SCE incurred \$1.3 million in 2019 for TRTP project. This amount encompassed permit fees payable to National Forest Foundation, and other agency required costs tied to compensatory mitigation property fees and visual mitigation due to permanent land and visual project impacts. This amount includes associated de minimis labor and other support costs.

^{*}SCE's June TPR spreadsheet shows an erroneous in-service date of November 2024. SCE's December 2023 SRP spreadsheet reflected the correct in-service date of April 2015. SCE will correct for this in its subsequent TPR submission.

Generator Interconnection-related Network Upgrades

Albert Leung, Sr. Advisor – Financial Analyses

Generator Interconnection-related Network Upgrades

- a. Please discuss the process SCE uses to determine whether network upgrades related to generator interconnection are included in the TPR data.
- b. Describe if and how this process has changed in the past several years.

Network capital upgrades are included in the TPR, to the extent they will be ultimately funded by FERC ratepayers, (i.e., not customer-funded) and have FERC-related spend that meet the criteria set forth in Resolution E-5252 for inclusion.

This process has remained consistent and has not undergone any changes in the past several years.

Transmission Vs. Distribution Voltage Levels, and Determination of CAISO Control Criteria

Manuel Avendano – Sr. Engineering Manager, Transmission Planning

Transmission Vs. Distribution Voltage Levels

Please explain what voltage level SCE considers transmission and what voltage level SCE considers distribution? a. What voltage levels fall under SCE's transmission tariff b. What voltage levels fall under SCE's WDAT c. Please provide any other factors that SCE uses to determine if an asset is transmission or distribution.

Assets that are under CAISO operational control fall under SCE's Transmission Owner Tariff (TOT). There is no prescribed voltage level in determining ISO control, rather, it is based on the CAISO's determination of operational need based on functional tests established by FERC (next slide)

For SCE, as a consequence of the functional tests:

Assets >200kV are under ISO control Small number of assets at 115KV, 66KV, and 55KV are ISO controlled No assets <50KV are under ISO control

Wholesale service over non-ISO facilities fall under SCE's Wholesale Distribution Access Tariff (WDAT). Per above, there is no prescribed voltage level.

Criteria to determine facilities under CAISO control

What criteria does SCE use to determine if facilities should be under CAISO control? a. Are all SCE facilities under CAISO control in the CAISO register? b. Are all facilities in the CAISO register subject to transmission rate base recovery?

Mansfield Test (97 FERC ¶ 61,134) – Identification of Transmission Facilities

- (1) whether the facilities are radial, or whether they loop back into the transmission system;
- (2) whether energy flows only in one direction, from the transmission system to the customer over facilities, or in both directions, from the transmission system to the customer, and from the customer to the transmission system;
- (3) whether the transmission provider is able to provide transmission service to itself or other transmission customers over the facilities in question;
- (4) whether the facilities provide benefits to the transmission grid in terms of capability or reliability, and whether the facilities can be relied on for coordinated operation of the grid; and
- (5) whether an outage on the facilities would affect the transmission system

Criteria to determine facilities under CAISO control

7 Factor Test (FERC Order 888) – Identification of Distribution Facilities

- (1)local distribution facilities are normally in close proximity to retail customers;
- (2)local distribution facilities are primarily radial in character;
- (3) power flows into local distribution systems and it rarely, if ever, flows out;
- (4)when power enters a local distribution system, it is not re-consigned or transported on to some other market;
- (5)power entering a local distribution system is consumed in a comparatively restricted geographical area;
- (6)meters are based at the transmission/local distribution interface to measure flows into the local distribution system; and
- (7) local distribution systems are of reduced voltage.

Whitewater case (Docket No. ER02-2189)

Pursuant to the Commission's ruling FERC's current methodology classifies all circuit breakers that connect both ISO controlled operating buses as FERC jurisdiction

The CAISO Register maintains the official listing of transmission lines, associated facilities, and Entitlements that are subject to the CAISO's Operational Control

Energy for What's Ahead**

Close Out & Next Steps

Rahab Mahfud, Sr. Advisor – FERC Rates & Tariffs – TPR Team

Close Out & Next Steps

- Stakeholders to submit comments to <u>ferccaseadmin@sce.com</u>
 [Please cc: Jerry Huerta (<u>JERRY.HUERTA@SCE.COM</u>.)]
- Stakeholder questions and/or comments are to be submitted by September 12, 2024
 - SCE will respond to questions within 15 business days of receipt
- Project-specific follow-up questions and/or comments are to be submitted by October 15, 2024
 - SCE will respond to questions within 10 business days of receipt
- Stakeholder may provide comments to SCE by October 31, 2024
- Next TPR submission to occur on December 2, 2024 (December 1, 2024 falls on a Sunday)