

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 4, 2018

Advice Letter 3888-E

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, CA 91770

**SUBJECT: Notice of Proposed Construction Project Pursuant to General Order
131-D, Lee Vining Substation Project.**

Dear Dr. Stern:

Advice Letter 3888-E is effective as of December 9, 2018.

Sincerely,

A handwritten signature in cursive script that reads "Edward Randolph".

Edward Randolph
Director, Energy Division

November 9, 2018

ADVICE 3888-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Notice of Proposed Construction Project Pursuant to
General Order 131-D, Lee Vining Substation Rebuild Project

Southern California Edison Company (SCE) hereby submits notice pursuant to General Order (GO) 131-D, Section XI, Subsection B.4 of the Construction of Facilities that are exempt from a Permit to Construct. GO 131-D was adopted by the California Public Utilities Commission (Commission) in Decision (D.)94-06-014 and modified by D.95-08-038.

PURPOSE

This advice letter provides a copy of the Notice of Proposed Construction (Attachment A) and the Notice Distribution List (Attachment B) which comply with the noticing requirements found in GO 131-D, Section XI, Subsections B and C.

This submittal includes a discussion explaining the basis for Proposed Project's exemption from the Public Utilities Code Section 320 ("Section 320") requirements for the undergrounding of electric distribution and communication facilities that are in proximity to a designated state scenic highway.¹

BACKGROUND

Southern California Edison Company (SCE) is proposing to construct the Lee Vining Substation Rebuild Project ("Proposed Project"). The Proposed Project is needed to increase the Lee Vining Substation 55 kilo-volt (kV) transformer capacity from 1.5 Megavolt Ampere (MVA) to 5 MVA to serve additional customer load and to improve operating flexibility in order to minimize impacts to customers during routine maintenance and unplanned outages. The Lee Vining Substation is located along US Route 395 (US 395) in the community of Lee Vining, located in Mono County.

¹ Streets and Highway Code Section 260 et seq.

Construction of the Proposed Project will include work within 1,000 feet of State Designated Scenic Highway US 395 and consists of the following major components:

Substation Work

- Temporarily install eight 115 kV wood poles ranging in height from approximately 48 to 66 feet on existing substation property
- Re-route two existing 115 kV lines and two existing 55 kV lines into new switch racks by:
 - Removing approximately five wooden structures consisting of two (2) H-frame wood structures and three (3) wood poles ranging in height from approximately 48 to 61 feet
 - Installing six new “patina” (i.e., brownish) colored tubular steel poles approximately 78 feet tall within existing substation property
- Replacement of existing 115 kV, 55 kV, and 2.4 kV substation equipment (transformers circuit breakers, disconnect switches, conductors, and other supporting devices) with new 115 kV, 55 kV, and 12 kV substation equipment
- Install new construction/emergency entrance from US-395

Temporary Substation Work

- Temporarily place 115/12 kV transformer within new fenced enclosure under the existing Lee Vining-Rush Creek 115 kV Line.

Distribution Line and Telecommunications Work

- Re-route 4 kV and 12 kV distribution circuits by installing approximately seven new poles approximately 39 feet tall and replacing approximately three wood poles ranging in height from approximately 30 feet to 43 feet with three wood poles ranging in height from approximately 39 feet to 48 feet. This re-route will require the removal of approximately nine poles ranging in height from approximately 30 feet to 48 feet, the installation of approximately 1,500 feet of underground conduit and new pad-mounted equipment, and installation of underbuilt facilities on three existing 55 kV wood poles
- Modify existing overhead fiber optic route to Poole Power House via new fiber cable on a combination of new and existing wood poles and underground conduit (as described above).

GO 131-D Licensing

GO 131-D requires a Permit To Construct (PTC) for a new or upgraded substation with high side voltage exceeding 50 kV before a public utility can begin construction.² The Proposed Project does not involve an increase in substation land area beyond the existing utility-owned property or an increase in the voltage rating of the substation. Consequently, a PTC is not required for the substation work as the work is considered part of a substation modification project and not a substation upgrade project.³

² GO 131-D Section III.B “An upgraded substation is one in which there is an increase in substation land area beyond the existing utility-owned property or an increase in the voltage rating of the substation above 50 kV.”

³ *Id.*

Pursuant to GO 131-D, Section III.B.1, projects meeting specific conditions are exempt from the CPUC's requirement to file an application requesting a PTC. The proposed 115 kV work outside the Lee Vining Substation involves the temporary use of land outside of the Lee Vining Substation property and qualifies for the following exemption:

“h. the construction of projects that are statutorily or categorically exempt pursuant to § 15260 et seq. of the Guidelines adopted to implement the CEQA. 14 Code of California Regulations § 15000 et seq. (CEQA Guidelines).”

CEQA Categorical Exemption Section 15304 Minor Alterations to Land
Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

...

(e) Minor temporary use of land having negligible or no permanent effects on the environment ...

...

The remaining less than 50 kV work involving distribution and telecommunications “does not require the issuance of a ... permit by this Commission.”⁴

Public Utilities Code Section 320 Discussion

Section 320 requires a statewide plan that “whenever feasible and not inconsistent with sound environmental planning, the undergrounding of all future electric and communication distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway . . . and which would be visible from such scenic highways if erected above ground.”⁵ The Commission was authorized to prepare this plan and through its Decision 80864 (D.80864) implemented it for compliance to the undergrounding of these facilities.

A scenic highway designation exists for State Highway 395 south of the Proposed Project, and portions of the Proposed Project lie within 1,000 feet of the scenic highway designation. Approximately 1,500 feet of new and existing overhead distribution lines will be constructed underground, and approximately 310 feet of existing overhead distribution will cross over the nearby Lee Vining Creek and remain overhead due to the undergrounding risk of disrupting subsurface materials causing water diversion from the creek, and greater costs (i.e., 3 to 6 times more costly to underground). An existing third party telecommunication line will remain overhead on the distribution poles and SCE will be adding a new telecommunication line to the overhead span.

CPUC Decision No. (D.) 80864, which implemented Section 320, ordered that

⁴ GO 131-D, Section III.C.

⁵ Public Utilities Code Section 320.

“. . . no respondent electric or communication utility . . . shall **install** overhead distribution facilities in proximity to any highway designated a State Scenic Highway . . . and which would be visible from such scenic highways if erected aboveground, unless (a) a showing is made before the Commission and a finding made by the Commission that undergrounding would not be feasible or would be inconsistent with sound environmental planning,” (**emphasis added**)

D.80864 further specifies that “**install**” “shall **not** include repairs **or replacements of existing overhead facilities in the same location unless the visual impact would be significantly altered**, but shall include moving to, or replacing at, a new location.

The overhead distribution and telecommunication span of the Proposed Project does not meet the definition of “install” set forth in D.80864. The single span will be reconstructed in the **same location** as the existing span. Further, Caltrans has already opined that the reconstructed span will **not significantly alter the existing visual impact in the area.**⁶

Therefore, since the “install” trigger for the D.80864 underground requirement is not met as the span will be reconstructed in the same location as the existing and no significant alteration to the view shed will occur, no undergrounding deviation request to the Commission is required.

GO 131-D, Section XI, Subsection B.4, requires that this advice letter be made not less than 30 days before the date such construction is intended to begin. Construction of the Proposed Project is anticipated to begin on or after December 24, 2018 and is expected to be completed by October 2020.

No cost information is required for this advice letter.

This advice letter will not cause the withdrawal of service, or conflict with any other rate schedule or rule.

TIER DESIGNATION

Pursuant to GO 96-B, Energy Industry Rule 5.2(4), this advice letter is submitted with a Tier 2 designation.

⁶ July 31, 2018 email from Gayle Rosander, External Project Liaison/Scenic Highway Coordinator, Caltrans District 9, to Joyce Steingass, Utilities Engineer – Infrastructure Permitting and CEQA, CPUC, “Given the existing viewshed with the proposal that some existing overhead lines spanning the highway and along the highway will be placed underground, the utilization of any pole risers to span the line overhead Lee Vining Creek would not significantly alter the scenic highway viewshed.”

EFFECTIVE DATE

Because this advice letter is being made in accordance with the noticing requirements described in GO 131-D, Section XI, Subsection B.4, this will become effective on December 9, 2018, the 30th calendar day after the date submitted.

NOTICE

Anyone wishing to protest this advice letter may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than November 29, 2018. Protests should be submitted to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Gary A. Stern, Ph.D.
Managing Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Telephone: (626) 302-9645
Facsimile: (626) 302-6396
E-mail: AdviceTariffManager@sce.com

Laura Genao
Managing Director, State Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may submit a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice letter to the interested parties shown on the attached GO 96-B service list. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping this advice letter at SCE's corporate headquarters. To view other SCE advice letters submitted with the Commission, log on to SCE's web site at <https://www.sce.com/wps/portal/home/regulatory/advice-letters>.

For questions, please contact Thomas Diaz at (626) 302-1164 or by electronic mail at Thomas.Diaz@sce.com.

Southern California Edison Company

/s/ Gary A. Stern
Gary A. Stern, Ph.D.

GAS:td:cm
Enclosures



ADVICE LETTER SUMMARY

ENERGY UTILITY



MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.:

Utility type:

ELC GAS WATER
 PLC HEAT

Contact Person:

Phone #:
E-mail:
E-mail Disposition Notice to:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #:

Tier Designation:

Subject of AL:

Keywords (choose from CPUC listing):

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date:

No. of tariff sheets:

Estimated system annual revenue effect (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed¹:

Pending advice letters that revise the same tariff sheets:

¹Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Name:
Title:
Utility Name:
Address:
City:
State: Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

ENERGY Advice Letter Keywords

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

NOTICE OF PROPOSED CONSTRUCTION

Lee Vining Substation Rebuild Project

SCE Advice Letter Number: 3888-E

Submittal Date: November 9, 2018

Proposed Project Description:

Southern California Edison Company (SCE) is proposing to construct the Lee Vining Substation Rebuild Project ("Proposed Project"). The Proposed Project is needed to increase the Lee Vining Substation 55 kilo-volt (kV) transformer capacity from 1.5 Megavolt Ampere (MVA) to 5MVA to serve additional customer load and to improve operating flexibility to minimize impacts to customers during routine maintenance and unplanned outages. The Lee Vining Substation is located along US Route 395 (US 395) in the community of Lee Vining, located in Mono County.

Construction of the Proposed Project will include work within 1,000 feet of State Designated Scenic Highway US 395 and consists of the following major components (*see attached map below for work area*):

Substation Work

- Temporarily install eight 115 kV wood poles ranging in height from approximately 48 to 66 feet on existing substation property
- Re-route two existing 115 kV lines and two existing 55 kV lines into new switch racks by:
 - Removing approximately five wooden structures consisting of two (2) H-frame wood structures and three (3) wood poles ranging in height from approximately 48 to 61 feet
 - Installing six new "patina" (i.e., brownish) colored tubular steel poles approximately 78 feet tall within existing substation property
- Replacement of existing 115 kV, 55 kV, and 2.4 kV substation equipment (transformers circuit breakers, disconnect switches, conductors, and other supporting devices) with new 115 kV, 55 kV, and 12 kV substation equipment
- Install new construction/emergency entrance from US-395

Temporary Substation Work

- Temporarily place 115/12 kV transformer within new fenced enclosure under the existing Lee Vining-Rush Creek 115 kV Line.

Distribution Line and Telecommunications Work

- Re-route 4 kV and 12 kV distribution circuits by installing approximately seven new poles approximately 39 feet tall and replacing approximately three wood poles ranging in height from approximately 30 feet to 43 feet with three wood poles ranging in height from approximately 39 feet to 48 feet. This re-route will require the removal of approximately nine poles ranging in height from approximately 30 feet to 48 feet, the installation of approximately 1,500 feet of underground conduit and new pad-mounted equipment, and installation of underbuilt facilities on three existing 55 kV wood poles
- Modify existing overhead fiber optic route to Poole Power House via new fiber cable on a combination of new and existing wood poles and underground conduit (as described above).

Construction of the Proposed Project is anticipated to begin on or after December 24, 2018 and is expected to be completed by October 2020.

EMF Compliance: The CPUC requires utilities to employ "no cost" and "low cost" measures to reduce public exposure to electric and magnetic fields (EMF). In accordance with "EMF Design Guidelines" filed with the CPUC in compliance with CPUC Decisions 93-11-013 and 06-01-042, SCE would implement the following measure(s) for this project:

- Utilize pole heights that meet or exceed SCE's preferred EMF design criteria
- Place major substation electrical equipment (such as transformers, switch racks, buses and underground duct banks) away from the substation property lines.

Exemption from CPUC Authority: Pursuant to CPUC General Order 131-D, Section III.B.1, projects meeting specific conditions are exempt from the CPUC's requirement to file an application requesting authority to construct. This project qualifies for the following exemption:

"h. the construction of projects that are statutorily or categorically exempt pursuant to § 15260 et seq. of the Guidelines adopted to implement the CEQA. 14 Code of California Regulations § 15000 et seq. (CEQA Guidelines)."

- CEQA Categorical Exemption Section 15304 Minor Alterations to Land
Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.
...
(e) Minor temporary use of land having negligible or no permanent effects on the environment ...
...

Public Review Process: Persons or groups may protest the proposed construction if they believe that the utility has incorrectly applied for an exemption or believe there is a reasonable possibility that the proposed project or cumulative effects or unusual circumstances associated with the project, may adversely impact the environment.

Protests must be filed **November 29, 2018**, and should include the following:

1. Your name, mailing address, and daytime telephone number.
2. Reference to the SCE Advice Letter Number and Project Name Identified.
3. A clear description of the reason for the protest.

The letter should also indicate whether you believe that evidentiary hearings are necessary to resolve factual disputes. Protests for this project must be mailed within 20 calendar days after the submittal to:

California Public Utilities Commission
Director, Energy Division
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

AND

Southern California Edison Company
Law Department - Exception Mail
2244 Walnut Grove Avenue
Rosemead, CA 91770
Attention: A. Gamboa

SCE must respond within five business days of receipt and serve copies of its response on each protestant and the CPUC. Within 30 days after SCE has submitted its response, the Executive Director of the CPUC will send you a copy of an Executive Resolution granting or denying the request and stating the reasons for the decision.

Assistance in Filing a Protest: For assistance in filing a protest, contact the CPUC's Public Advisor in San Francisco at (415) 703-2074 or Toll Free at (866) 849-8390.

Additional Project Information: To obtain further information on the proposed project, please contact:

Mike Calvitti
Project Manager
2 Innovation Way
Pomona, CA 91768
(909) 274-3707

Attachment B

Lee Vining Substation Rebuild Project

Distribution List

1) Agencies

Drew Bohan, Executive Director
California Energy Commission
1516 9th Street, MS-39
Sacramento, CA 95815-5512

Wendy Sugimura
Mono County Community Development Dept
PO Box 347
Mammoth Lakes, CA 93546

Supervisor Bob Gardner
c/o Clerk of the Board
PO Box 715
Bridgeport, CA 93517

2) Newspaper

Mammoth Times
645 Old Mammoth Road, Suite A
Mammoth Lakes, CA 93546

The Sheet
3343 Main St.
P.O. Box 8088
Mammoth Lakes, CA 93546