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November 28, 2005

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Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Notice of Intent to Prepare a Programmatic Environmental Impact Statement,
Federal Register Vol. 70, No. 187, page 56447, September 28, 2005.

Dear Ms. Souder:

Southern California Edison Company appreciates the opportunity to comment on the Notice of Intent to prepare a programmatic environmental impact statement implementing Section 368 of the Energy Policy Act of 2005 (P.L. 109-58).

While SCE provided oral comments at the November 2, 2005 NOI scoping meeting held in Las Vegas, Nevada, SCE would like to supplement its oral comments with the attached written comments.

Should you have any questions, please do not hesitate to contact me at (626) 302-9644.

Sincerely,

/s/ Patricia L. Arons
Patricia L. Arons
Manager, Transmission &
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Southern California Edison Company
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Comments of Southern California Edison Company

Designation of Energy Corridors on Federal Land in the 11 Western States (DOE/EIS-0386)

Pursuant to the Notice of Intent to Prepare a Programmatic Environmental Impact Statement, Amend Relevant Agency Land Use Plans, Conduct Public Scoping Meetings, and Notice of Floodplain and Wetlands Development ("NOI") published September 28, 2005 in the Federal Register, Southern California Edison Company ("SCE") hereby submits its written comments.

Due to significantly increased load growth in Southern California, and specifically within SCE's service territory, it is imperative that a more streamlined process is developed for siting, approving, and ultimately constructing transmission. Current siting processes are very fragmented, time-consuming and labor-intensive. While SCE appreciates the existing processes and the need for them, there is certainly room for improvement in the environmental review of corridors as well as coordination between governmental and regulatory agencies, and other parties.

In these comments, SCE will address the "Proposed Action and Alternatives" and the "Identification of Environmental Issues" sections in the NOI and also provide comments on some of the technical requirements for any corridor that may be identified through this process.

Proposed Action and Alternatives

SCE believes the No Action Alternative and the Increased Utilization Alternative proposed in the NOI are not sufficient enough to address many of the facility siting and construction issues facing the utility industry today. SCE's system has experienced a tremendous amount of customer growth over the last four years. As a result, SCE expects to invest \$1.6 billion in transmission upgrades and expansion through 2009. SCE is not alone. The Edison Electric Institute ("EEI") is an association of the nation's

shareholder-owned electric utilities, including SCE. EEI's members serve almost 97 percent of the end-use customers in the shareholder-owned segment of the industry and 71 percent of all electric utility end-use customers in the nation, and generate over 60 percent of all electricity produced by U.S. electric utilities. EEI members were recently asked to identify the level of planned transmission investment in their capital budgets over the period of 2004-2008. According to the results, EEI members are planning to invest in transmission at levels not seen in 30 years. In fact, EEI member companies plan on investing \$28 billion over the period of 2004-2008, a 60 percent increase over the \$18 billion invested during the period 1999-2003. Importantly, EEI members indicate that only a small portion of this investment, 6.5 percent, is attributed to direct generator interconnections. This means that the remainder of the projected investments in the nation's transmission infrastructure will support the integration of new generator additions through network upgrades; improve transfer capability between regions; improve grid reliability; and enhance local, regional, and inter-regional markets.

A very large percentage of these investments will therefore require the utilization of newly designated transmission rights-of-way and corridors. As such, the No Action Alternative and Increased Utilization Alternative are simply insufficient to support the expected levels of transmission investment by utilities. It is imperative that new corridors be studied and established as soon as possible to ensure that customer growth and other system demands will not impact the reliability of the grid. Therefore, SCE proposes that the Department of Energy ("DOE"), the Bureau of Land Management ("BLM"), and the Department of Interior ("DOI") (collectively referred to as "Agencies") proceed with the New Corridor and the Optimization Criteria Alternatives to begin assessing the impacts associated with the existing corridors and the designation of new energy corridors on federal land.

SCE fully supports the identification of preliminary corridors through scoping and other information obtained from the utility industry and the regional and state-wide efforts, as identified in the NOI, such as the Western Utility Group; the Seams Steering Group—Western Interconnection; Colorado Coordinating Planning Group; the Northwest

Transmission Assessment Committee; the Southwest Area Transmission Study; the Southwest Transmission Expansion Plan; and the Rocky Mountain Area Transmission Study. SCE already has a number of corridors established and believes it is important that those corridors also be included in the Agencies' assessments and any resulting PEIS. Therefore, the Agencies need to ensure that in addition to any corridors identified by the Agencies, the energy transport industry is given an opportunity to submit specific corridors for inclusion in the analysis of the PEIS.

Expedited Environmental Permitting Process

SCE supports the consideration of each of the environmental issues identified for analysis in the NOI and also believes that environmental issues identified should be related to: restriction of conflicting uses within the corridors, adequacy of potential plan direction within the corridors, any identifiable environmental concerns within the potential corridors. SCE understands that any corridor designation and subsequent incorporation into an agency's land use plan by this plan amendment process does not, itself, authorize project activities. While new proposed project activities, such as construction of a new pipeline or electric transmission line or retrofitting utilities within an existing corridor, would be assessed in subsequent NEPA analyses which would also involve public notice and comment, SCE believes that a more streamlined and effective environmental review process will result through the corridor designation. In addition to evaluating the specific issues identified in the NOI, SCE believes that the NEPA analysis should also evaluate the impacts associated with loss or removal of existing corridors and the impact that inadequate energy transmission infrastructure would have on the economy and future growth of the region and the western United States.

Expected Outcomes of the Process

SCE is hopeful that the efforts put forth in this process will result in a more streamlined and expedited environmental permitting process for projects crossing federal lands. SCE expects that the DOE, through its lead agency authority, will develop and administer the necessary interagency protocols for the designation and use of corridors. DOE's lead agency authority should be developed in conjunction with the corridor designation

process so all corridor designation proceedings developed through the Energy Policy Act of 2005 are as seamless as possible. The DOE should also plan to review the designated corridors periodically through a similarly coordinated process. The energy corridor alternatives selected should be sufficiently flexible to accommodate changes brought about by population growth, population movement or other economic factors. The PEIS should be reviewed and updated every five to ten years to ensure the designated energy corridors are still effective and consistent with the public's energy needs and the obligations of public utilities to serve those needs. SCE also supports the development of federal policies that preserve the ability to build energy infrastructure through federal lands.

Technical Suggestions and Guidance

SCE will offer more detailed comments below. These detailed comments are specifically related to the physical and technical requirements for the corridors and will help to ensure the corridors will lend themselves to future energy projects.

A. Need for Sufficient Corridor Width

SCE believes sufficient accommodation within each corridor is needed to provide room for new overhead extra high-voltage ("EHV") transmission lines (generally, EHV is used to describe facilities above 345 kV) and other transmission lines that are operating above distribution voltage levels (i.e., above 50 kV) in order to provide for future growth needs. The minimum width for a corridor should be at least one mile to allow for at least 3 new EHV transmission lines with usable accommodation for siting purposes, and sufficient separation as discussed below. Each single overhead EHV transmission line requires approximately 200 feet of right-of-way ("ROW") width within a corridor. Voltage and tower design may necessitate somewhat more or less width as different utility design factors are considered. SCE recommends that corridor planning consider only overhead technologies for long-term corridor planning purposes because today, in the West, where long overhead lines dominate, overhead construction is considerably less expensive than underground construction. Furthermore, underground construction through various terrain types presents additional problems of reliability.

Additionally, ROW width should accommodate access roads for maintenance vehicles and allow for vegetation management for brush fire and physical clearance considerations. The recommended width for this purpose alone is 50 feet for grading purposes, of which 20 feet is usable access road. Although access roads may depart significantly from the EHV facility due to terrain or other issues, it is important that permanent access roads for the purpose of operations and maintenance activities be included in corridor designations.

B. Need for Sufficient Facility Separation

Sufficient facility separation is needed to minimize the possibility of simultaneous outages of multiple transmission facilities caused by a single event that could adversely affect system reliability and possibly result in system cascading. For example, plane crashes, brush fires, earthquakes, and flash floods are events that could affect multiple facilities and result in adverse consequences. This reliability consideration may limit the number of transmission lines within a single corridor and require a separate path for additional transmission lines that would otherwise create system vulnerability if located within a single corridor. Adequate separation should be provided to prevent a failure and adverse reliability consequences of a transmission line falling laterally and affecting an adjacent transmission facility. SCE's current transmission reliability guidelines require at least 2,000 feet of separation between two physically adjacent parallel EHV transmission lines and a third EHV transmission line, where practicable. This separation ensures the low probability of the simultaneous loss of three or more EHV lines by physically separating the third line from the two lines that are in close proximity to each other.

Following the Northeast Blackout (November 9-10, 1965), the Federal Power Commission ("FPC") with the assistance of technical personnel from the electric utility industry, reported to the President of the United States on the prevention of power failures. The report to the President following the Northeast Blackout¹ contained an analysis of the causes and effects of the blackout and set out guidelines and

¹ Report to the President by the Federal Power Commission on the Power Failure in the Northeastern United States and the Province of Ontario on November 9-10, 1965, dated December 6, 1965.

recommendations designed to assure that major system interruptions and cascading outages would not recur. One recommendation made for transmission system planning was to avoid locating critical transmission circuits on any one common right-of-way. Therefore, SCE recommends that two corridors be identified through each federal land area under consideration to comply with the FPC recommendation.

SCE has also attached a copy of the California Oregon Transmission Project Report ("COTP Report") which provides further support and rationale behind the 2,000 foot separation between facilities.

C. Coordination with State, Local and Tribal Governmental Agencies

It is our understanding that the California Energy Commission ("CEC") has initiated a similar effort at the state level to identify corridors for energy use. The DOE's effort on the PEIS should be coordinated with the CEC and other public agencies so that a seamless and contiguous alignment of state and federal corridors results in a feasible and useful accommodation for new EHV transmission lines. Also, the State of California has adopted a renewable portfolio standard which will require utilities to connect substantial new renewable energy resources. These resources are typically remotely located and require long generation tie lines to be built to connect them to the utility grid. These resources will likely need to use corridors on federal lands designated for electric facilities. Sufficient accommodation for these facilities should be incorporated into the PEIS. For detailed information on the corridors that have been identified and proposed by the California utilities, SCE recommends that the DOE consult a CPUC December 2003 report to the California Legislature. In preparing this report, each California investor-owned utility was asked to identify corridors that may be necessary to develop the renewable generation resources required under California law. This report can be found online through the CPUC website at the following address:

http://www.cpuc.ca.gov/word_pdf/REPORT/32197.pdf

Tribal governments and local public agencies should be encouraged to participate in this effort to incorporate into this process public utility, tribal energy and local public agency

growth needs as well as public utility, tribal and local public agency energy development plans on both public and American Indian lands. SCE recognizes that under the present state of the law, attempting to obtain rights-of-way across American Indian Reservation lands poses an additional set of issues that are apparently outside the scope of this NOI. However, it is important that these issues be worked out. Cooperative planning activities offer the opportunity for local governments and agencies to incorporate into their master plans provisions for energy corridors that provide access to federally designated corridors.

D. Need for Public Utilities to Acquire Rights of Way

Public utilities need to acquire land ROW for future transmission development, particularly in areas where residential, commercial, or industrial development is beginning to occupy available open land.

Federal policy should recognize that rights-of-way over private lands should be preserved for the future. One way to encourage preservation is to allow public utilities to recover costs through rates for land acquired for future use, even though no identified project is yet under development. Rate recovery is a particularly urgent issue that will allow and perhaps encourage utilities to acquire rights that would eventually assure access to the federally designated corridors.

E. Data Adequacy

The federal agencies involved in this effort should use their best efforts to ensure that the best possible information is gathered as part of its corridor assessment and PEIS. For example, spring bloom is generally considered a critical part of environmental impact assessment in California, and the lead agencies should consider whether a draft PEIS issued in the first quarter of 2006 will ensure adequate environmental data is included in the environmental assessment of any newly designated corridors. A document with inadequate data would bring the sufficiency of the environmental review process into question.

F. Existing Facilities

SCE owns existing transmission facilities through federal lands that include parks, preserves and forests. The lead agencies should include designation of corridors around these facilities that would preserve current uses and allow the siting of new facilities adjacent to or near the existing facilities.

SCE is particularly concerned that the corridor designations on the following federal lands or under lead agency direction have adequate provisions for both existing and future EHV transmission facilities, including, but not limited to the following:

- i. Big Creek T/L System: Sierra National Forest, Los Padres National Forest and Angeles National Forest;
- ii. Midway-Vincent T/L: Angeles National Forest, Los Padres National Forest, and Bureau of Land Management;
- iii. Vincent-Rio Hondo T/L: Angeles National Forest and Corps of Engineers;
- iv. Serrano-Valley T/L: Cleveland National Forest;
- v. Lugo-Eldorado T/L: Bureau of Land Management (BLM) and National Park Service;
- vi. Mohave-Lugo T/L: Bureau of Land Management (BLM) and National Park Service;
- vii. Lugo-Mira Loma T/L: San Bernardino National Forest;
- viii. Lugo-Serrano T/L: San Bernardino National Forest;
- ix. Devers-Valley T/L: BLM and San Bernardino National Forest;
- x. Devers-Palo Verde T/L: BLM and U.S. Fish and Wildlife (KOFA Wildlife Reserve Arizona); and,
- xi. Other transmission lines, including Control-Inyokern, Coolwater-Kramer, Kramer-Victor, Vincent-Lugo, Devers-Mirage, Devers-Julian Hinds, etc.

G. Proposed Corridors

SCE also requests that the following corridors crossing federal lands be included for consideration in the draft PEIS report and for corridor designation recommendations.

These corridors are considered critical in meeting future growing demand, accessing new diversified generating resources, and mitigating potential congestions due to significant load growth in Southern California, which is mostly surrounded by federally-owned lands.

San Bernardino National Forest

- ◆ A new corridor crossing the San Bernardino National Forest, south of Interstate 10 and adjacent to the San Jacinto Wilderness State Park in Riverside County, California should be designated and preserved to accommodate future transmission facilities. The corridor should begin in the north Palm Springs area, traverse the San Bernardino National Forest in an east-to-west direction, and end near the San Jacinto area. The transmission facilities situated in this corridor would bring needed power to the load centers in western Riverside County from the Desert Southwest as well as improve reliability in the area.

Cleveland National Forest

- ◆ A new corridor crossing the northern end of the Cleveland National Forest should be developed to accommodate future transmission facilities. The corridor should begin in the northeastern foothills of the Santa Ana mountain range south of the city of Corona, Riverside County, cross the northern edge of the Cleveland National Forest south of state highway 91, and end at the northwestern foothills of the Santa Ana mountain range in the proximity of state highway 91 and 241 interchange in Orange County, California. The new transmission facilities situated on this corridor would bring needed power from the Desert Southwest to the load centers in Orange County

Angeles National Forest

- ◆ A new corridor should be developed to accommodate future transmission facilities that would provide additional transmission capacity to bring needed power from northern California as well as renewable resources located in the Mojave Desert to the major load centers in the Los Angeles basin. The corridor should begin in the northern foothills of the San Gabriel mountain range near SCE's Vincent Substation in the city of Palmdale, California, cross over the Angeles National Forest in a north to south direction, and stop at the southern edge of the Angeles National Forest near SCE's Rio Hondo Substation in the city of Irwindale, California.
- ◆ New corridors crossing the Angeles National Forest and potential National Conservation Area should be developed to accommodate future intra-state transmission facilities. A new corridor should start near PG&E's Midway Substation near Buttonwillow, CA, cross over potential National Conservation Area in a northwestern to southeastern direction, and end at

the Tehachapi area north of Lancaster, CA. A separate north to south corridor should continue from the Tehachapi area, traverse the Angeles National Forest in a north to south direction near Palmdale, CA, and end at the southern edge of the Castaic mountain range near Santa Clarita Valley. The new transmission facilities situated on these corridors would be needed to bring economic power from the northern California and the Pacific Northwest areas to southern California, and integrate renewable resources developed in the Mojave Desert.

Mojave National Preserve

- ◆ A new east-to-west corridor should be designated in order to accommodate future inter-regional transmission facilities that would bring economic power to the major load centers in southern California from Nevada/Arizona/New Mexico area. This corridor would start from the southern tip of Nevada near the Nevada/California/Arizona border, cross the Mohave National Preserve paralleling to Interstate 40 and Bureau of Land Management (BLM) land, and end near Barstow, California.

Los Padres National Forest

- ◆ A new corridor should be designated and preserved in order to accommodate future transmission facilities from Ventura to Goleta, California. This corridor should cross southern portions of the Los Padres National Forest, paralleling to interstate highway 101 in an east to west direction. The new transmission facilities situated on this corridor would provide additional transmission capacity to serve loads as well as improve reliability to customers in the Santa Barbara and Ventura areas

Joshua Tree National Park

- ◆ A new corridor should be designated and preserved to accommodate future inter-state transmission facilities from southern Arizona near the Palo Verde area to SCE's Devers Substation near Palm Springs, California. This corridor should cross southern portions of the Joshua Tree National Park in an east to west direction.

Conclusion

SCE appreciates the opportunity to submit comments in this proceeding and respectfully requests the DOE consider all of SCE's comments in its corridor designation, PEIS, and other proceedings related to the development of energy corridors in the United States.