

DOCKETED

Docket Number:	24-OPT-03
Project Title:	Soda Mountain Solar
TN #:	267947
Document Title:	ROC Re_Communication about utility switchyard and interconnection with existing Mead-Adelanto Transmission Line
Description:	Report of Conversation (ROC) Conversation between Lisa Worrall, from CEC and Amanuel Selassie, Los Angeles Department of Water and Power
Filer:	Marichka Haws
Organization:	California Energy Commission
Submitter Role:	Commission Staff
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*Siting, Transmission and
Environmental Protection
Division*

FILE:

PROJECT TITLE: Soda Mountain Solar Project

Docket: 24-OPT-03

TECHNICAL AREA(s): Project Description, Transmission System Engineering, Transmission Line, Safety, and Nuisance		
<input type="checkbox"/> Telephone	<input checked="" type="checkbox"/> Email	<input type="checkbox"/> Meeting Location:
NAME(s) Lisa Worrall	DATE: Oct 22, Nov 17 and 24, and Dec 3, 2025	TIME:
WITH: Amanuel Selassie, Los Angeles Department of Water and Power		
SUBJECT: Communication about utility switchyard and interconnection with existing Mead-Adelanto Transmission Line		

COMMENTS:

On October 22, 2025, Lisa Worrall, project manager, communicated with Los Angeles Department of Water and Power (LADWP) staff with a list of questions about the new utility switchyard, its interconnection with the existing Mead-Adelanto 500 kilovolt (kV) Transmission line, including the applicable design standards and regulations. The following are the responses to CEC staff's initial questions and subsequent questions:

- A. On November 17, 2025, LADWP provided the following response:

The Marketplace-Adelanto 500kV transmission line is a joint owned facility among many participants, and that is why it took us a while to put together a response back to you. ... I will go ahead cancel tomorrow's meeting, and please reach out if you have additional questions.

CEC's Questions:

1. We are wondering whether compliance with design standards for the switchyard and sections of transmission loop in line would be verified by the Los Angeles Board of Water and Power at the time the switchyard is turned over to LADWP or would it be under the CEC's jurisdiction during construction. Please let us know what the process is for such facilities.
2. We are used to CPUC standards like General Order 131E, regulating the planning and construction of electric generation, transmission, power, distribution line facilities, and substations located in California. Is LADWP required to follow the CPUC standards or does LADWP have their own standards they must comply with? If the latter is the case, please provide us the applicable standards that the switchyard and sections of transmission loop



in lines be constructed to, in addition to whether compliance with these regulations is determined by the Los Angeles Board of Water and Power, or would it be under the jurisdiction of the CEC.

3. Would the switching station serve only Soda Mountain Solar, or would it serve other customers as well (this will help answer the jurisdictional question)
4. If the switching station is jurisdictional to LADWP, what would the coordination look like between our DCBO and LADWP inspector? You asked about this when asking who is responsible for ensuring compliance with building codes during construction, but if the responsibility lies with LADWP, is there some level of coordination with our DCBO for the portions where the project interconnects? Some level of overlap or handoff to LADWP?
5. If they deliver substantially less MW than their agreement, it will trigger a "material modification process". We are wondering how many MW short of 300 would trigger such a modification.

LADWP response:

(#1 & #2) The developer of Soda Mountain Solar Project has proposed interconnecting to the Marketplace-Adelanto 500kV Transmission Line, which is part of the Mead-Adelanto Project (MAP). MAP is jointly owned by multiple participants, with LADWP serving as the Operating Agent (OA).

Upon completion of the switchyard and the two looped-in transmission line segments, ownership of these assets will be transferred to MAP Participants, LADWP has executed an Engineering & Procurement Agreement with the developer to facilitate progress on the interconnection, including the construction of the switchyard and the looped-in transmission lines.

To support the construction phase, LADWP has provided the developer with applicable standards and specification. LADWP will oversee and verify the developer's work throughout all phases, engineering, procurement, construction, and commissioning, prior to final turnover to MAP participants. Compliance with these requirements will fall under MAP jurisdictions.

(#3) The proposed switching station is intended for the Soda Mountain Solar Project but once MAP acquires the switching station, it will be opened to future interconnection customers.

(#4) We recommend that the CEC's recommended EIR include language that: a) describes the respective areas that are subject to CEC/DCBO inspection authority and those that are subject to LADWP inspection authority; and b) requires coordination between the CEC's DCBO and the LADWP inspector regarding where the infrastructure in those areas interconnect. For example, where there are technical ratings that need to be aligned with one another, e.g., the same specifications have to be in place on either side in order for the infrastructure to work safely and reliably, the DCBO and LADWP's inspector should inquire



whether those specifications are aligned and compare notes. The point in time when that comparison would occur likely would be near the end of construction.

(#5) The Soda Mountain Solar Project has an existing and executed LGIA with SPPA and Startrans IO, LLC. Material Modifications are defined in that LGIA as "modifications that have a material impact on the cost or timing of any Interconnection Request with a later queue priority date." Typically, analysis of the impacts of Material Modifications are conducted during the Large Generator Interconnection Process before an LGIA is reached between MAP and the Interconnection Customer, not after execution of the LGIA.

The executed Soda Mountain LGIA provisions on Modifications indicate that permitted modifications cannot necessitate a new Interconnection Request. The definition of "Interconnection Request" in the Soda Mountain LGIA includes a request: "to interconnect a new Generating Facility, or to increase the capacity of, or make a Material Modification to the operating characteristics of, an existing Generating Facility that is interconnected with the JPP."

We are unaware of any industry standard that deems downsizing a facility to be a Material Modification but are aware that some entities, such as CAISO, offer limited downsizing opportunities. MAP does not have standard criteria to determine at what point a project downsizing would be deemed a Material Modification, such that a new Interconnection Request would be required.

- B. On November 24, 2025, CEC staff had the following subsequent questions. LADWP responses follow:
 1. Please send us the applicable standards and specifications that the utility switchyard to be constructed by the applicant and operated by LADWP would need to comply with. We will need to note these in our Environmental Impact Report (part of the Staff Assessment).

LADWP response:

The Interconnection Customer (IC) shall engineer, procure equipment, and construct Joint Participation Project's Interconnection Facilities and Standalone Network Upgrades (or portions thereof) using Federal Energy Regulatory Commission's Good Utility Practice and using standards and specifications provided in advance by LADWP. As previously stated, these standards and specifications related to station design, metering, and overhead transmission towers have been shared with Soda Mountain Solar Project developer. These documents are considered confidential, and cannot be shared with anyone without a Non-Disclosure Agreement (NDA). LADWP would oppose sharing any confidential information publicly.

LADWP is available for a call to discuss this matter. In addition, we can connect you with our Environmental Group to better address this specific question for inclusion in this project's EIR.



2. Are there any standard mitigation measures the LADWP would apply to the downstream network upgrades to the protection settings at the Marketplace and Adelanto substations for construction and operation of the new utility switchyard? If so, please provide these measures and indicate which ones would apply to the downstream upgrade work and which ones would apply to operation of the new utility switchyard.

LADWP response:

The IC is required to comply with LADWP protection standard to design, procure, and install the primary and two redundant 500 kV line protection systems for all the 500kV lines connecting to the new Soda Mountain Switching Station.

Additionally, IC shall design, procure, and install primary and redundant 500 kV Bus protection in the new Soda Mountain Switching Station, and provide the required relay protection panels to LADWP for testing and verification prior to installation by IC. IC shall design, procure, and install breaker failure protection system for the new Soda Mountain Switching Station. IC shall perform final checkout and testing/commissioning of the protection, and control systems at the new switching station and the SMSP Project's collector substation.

LADWP will design, procure, and install primary and two redundant 500 kV line protection system (including transfer trip) and breaker failure protection system located inside Marketplace and Adelanto Switching Stations. LADWP will perform final checkout and testing/commissioning of the protection, and control systems in the new switching station.

Finally, the 500 kV transmission line relay protection requires two redundant communication paths. The redundant paths between Marketplace/Adelanto and new switching station shall be Power Line Carrier and microwave communications.

All 500 kV transmission lines protection coordination needs to be reevaluated at Marketplace and Adelanto in accordance with PRC-027. New relay setting needs to be developed at Marketplace and Adelanto Switching Stations for Marketplace and Adelanto lines terminating into the Soda Switching Station.

3. How long would it take for MAP to evaluate and determine if a project downsizing would be considered a material modification that requires a new interconnection request?

LADWP response:

There is no standard time in which MAP is required to determine if a project downsizing would be a Material Modification, and the time required would depend on a number of circumstances, including the specific proposed change and other workload at the time of the request. Soda Mountain has executed an LGIA with MAP, and that LGIA provides a definition for "Material Modification," though the LGIA does not set forth a process for assessing whether a proposed modification is a Material Modification. To the extent that the MAP LGIP



is applicable, and there is uncertainty as to whether it is applicable given the existence of a fully executed LGIA for Soda Mountain, the following considerations apply:

The MAP LGIP addresses procedures for Interconnection Customer requests for requested modifications, including the determination for whether such modifications would be considered a Material Modification (LGIP Sections 4.4.3-4.4.4). MAP LGIP Section 4.4.4 provides that the Operating Agent "shall commence and perform any necessary additional studies as soon as practicable, ... making good faith efforts to commence such studies no later than thirty (30) Calendar Days after receiving notice" of an Interconnection Customer's request for modification. After that point, the LGIP provides no timeline for completing a study as to whether a material modification exists.

MAP is unaware of an industry-wide standard for completing downsizing studies. MAP understands that the California Independent System Operator Corporation ("CAISO") in its Business Practice Manual ("BPM") for Generator Management provides with respect to assessments as to whether modifications are material, Section 6.4.1, that the CAISO "shall use reasonable efforts to commence and complete modification assessments within sixty (60) calendar days." Even then, the CAISO BPM for Generator Management allows for longer time periods to complete assessments upon providing an estimate and explanation, and the time period to conduct assessments does not begin until all information necessary to perform the assessments is provided to the CAISO. See Section 6.4.4. However, MAP has not adopted the CAISO's BPM, and the timelines and language in CAISO's BPM are not mandated for all Transmission Providers.

4. If a project downsizing requires a new interconnection request, how long that that process take, including approval of such request?

LADWP response:

If a project downsizing constitutes a Material Modification and triggers a new interconnection request, MAP will require the Interconnection Customer to apply for interconnection using the same process and timelines for other interconnection requests. MAP does not offer a fast-track review of new interconnection requests as a result of a previously terminated request due to downsizing constituting a Material Modification, and MAP is unaware of other transmission providers offering this option.

MAP offers no guarantee to downsized projects that constitute a Material Modification that they will be processed in advance of other projects in the existing interconnection queue. In fact, projects subject to Material Modification should assume that their renewed interconnection request will be processed at the end of the interconnection queue.

Indicative timelines in MAP's LGIP include: 1) acknowledgment of an interconnection request by MAP (10 Business Days, per Section 3.2.2); 2) completion of a Feasibility Study (45 Calendar Days, per Section 6.3); 3) completion of System Impact Study (90 Calendar Days, per Section 7.4); and 4) completion of a Facilities Study (90 Calendar Days, per Section 8.3). These dates can be variable depending on, *inter alia*, the circumstances and complexity of

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the Interconnection Request, and these dates do not include intermediate and subsequent steps, such as negotiation of study agreements and the LGIA itself.

CEC question:

I also would like to post your responses to our first set of questions and the responses to this set of questions in the project's docket (electronic repository). This would be publicly available. This would be very helpful to support our analysis. Please confirm you are okay with our posting these to the project's docket.

LADWP response:

MAP provides these responses in order to assist the CEC as part of its review of the Soda Mountain Solar Project. To the extent the responses below describe applications of MAP's Large Generating Interconnection Process ("LGIP") and related processes, those applications are based on MAP's knowledge of the facts and circumstances as they exist presently, and MAP reserves the right to change how it applies its processes based on further information that it receives. Further, MAP reserves the right to change its processes in the future.

C. On December 3, 2025, CEC staff had the following question. LADWP provided their response as shown below.

CEC questions:

We need to know how many operation workers would be required for operation and maintenance of the new LADWP switchyard?

Also, how often would operations workers would be at the switchyard? This information will help estimate the number of traffic trips that would be generated during operations.

Do you anticipate any truck trips during operations?

LADWP response:

The Soda Mountain Solar Project has not been designed and built yet; therefore, it is premature to speculate the number of Operation and Maintenance (O&M) personnel required to support the station. We are happy to reach out to our O&M staff to investigate these questions further.

CC:	Signed: _____ /S/ Name: Lisa Worrall, Senior Environmental Project Manager
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