

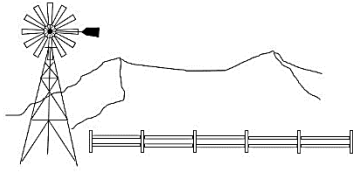
DOCKETED

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SORT Opposition to Extension Request

Additional submitted attachment is included below.



SAVE OUR RURAL TOWN

Lisa Worrall, Project Manager
California Energy Commission
715 P Street, MS-40
Sacramento, CA 95814

August 19, 2026

Subject: Save Our Rural Town Objections to a Requested Schedule Modification.

Reference: Applicant Submittal Dated August 19, 2026.
Docket Number 25-OPT-02.

Dear Ms. Worrall;

Save Our Rural Town (SORT) understands that the applicant in the referenced Docket filed a request on August 18 to extend the project schedule by an additional 60 days pursuant to California Public Resources Code Section 25545.4(e)(2)(F). The applicant alleges that this 60 day extension is needed to accommodate “scope of work” changes initiated by Southern California Edison (SCE) which affect proposed interconnection facilities. SORT notes that SCE is permitted to modify its own facilities up to the “Point of Change of Ownership” (POCO) so long as such modifications comply with restrictions in the Large Generator Interconnection Agreement (TN# 265695 in the referenced Docket); however, the applicant does not clarify how modifications that SCE makes on its own side of the POCO would affect the applicant’s proposed transmission facilities. Accordingly, SORT opposes the requested extension because the applicant has failed to demonstrate that an extension is actually necessary.

Moreover, and as SORT has previously explained in comments filed in the referenced Docket on June 24, 2026, Section 25545.4(e)(2)(F) only allows the Commission to grant an extension request when the applicant has demonstrated that there is a “reasonable need” for the extension. The applicant has not met this burden:

- The applicant fails to disclose the nature and extent of SCE’s alleged “Scope of Work” modifications, and a review of recent General Order 131-E submittals to the California Public Utilities Commission do not indicate that SCE is making any substantive changes to the Vincent 500 kV substation.
- The applicant fails to demonstrate how alleged modifications to SCE facilities will affect interconnection equipment outside of SCE property.

The applicant's request does not demonstrate that there is a reasonable need for an extension; therefore, the Commission is precluded by California Public Resources Code Section 25545.4(e)(2)(F) from granting the request. This deficiency will only be corrected when the applicant explains how SCE "Scope of Work" revisions substantively alter the configuration and alignment of the applicant's proposed transmission interconnection.

SORT understands that SCE system modifications often involve plans and diagrams that are deemed "Critical Energy Infrastructure Information" (CEII) and thus not subject to public disclosure; accordingly, we are not asking that SCE documentation be placed in the record. However, we are asking that the applicant describe in general terms how modifications that SCE makes to its own facilities are creating substantive changes to the applicant's proposed interconnection. Without this clarification, the Commission lacks the requisite statutory basis to find that there is a "reasonable need" for the requested extension.

For all these reasons, SORT respectfully requests that the Commission either deny the requested extension or direct the applicant to submit supplemental information into the Docket which demonstrates there is a reasonable need for the extension.

Respectfully submitted;

/S/Jacqueline Ayer
Jacqueline Ayer, Director
Save Our Rural Town