CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

DOCKET	
05-AFC-2C	
DATE	APR 12 2012
RECD.	APR 12 2012

April 12, 2012

Jenifer Morris Lee, Environmental Managing Director
Edison Mission Energy
3 MacArthur Place Suite 100
Santa Ana, CA 92707

SUBJECT: WALNUT CREEK ENERGY PARK (05-AFC-2C)
APPROVAL OF VERIFICATION CHANGES TO CONDITIONS OF CERTIFICATION AND AUTHORIZATION TO COMMENCE CONSTRUCTION ON GENERATION TIE-LINE FACILITIES

Dear Ms. Morris Lee:

California Energy Commission (Commission) staff has reviewed the request submitted by Southern California Edison (SCE) on March 16, 2012 (SCE Letter), on behalf of Edison Mission Energy, for alternative methods of verification for Commission conditions of certification (COCs) applicable to the SCE generation tie-line facilities.

All pre-construction commitments from SCE for verification changes as outlined in the SCE Letter are acceptable to Commission staff and the delegate chief building official (CBO) with the exception of TLSN-3. SCE shall comply with TLSN-3 as adopted by the Energy Commission on February 27, 2008.

Commission staff hereby authorizes SCE to begin construction of the transmission line from Walnut Creek Energy Park to the Walnut Substation, subject to compliance with TLSN-3 and provided that pre-energization measurements are completed prior to energization of the line.

Within ten (10) days of execution of a Non-Disclosure Agreement (NDA) between SCE and the delegate CBO, SCE shall submit a copy of the executed NDA to the Compliance Project Manager (CPM).

If you have any questions or need any additional information, please contact me at (916) 654-5153 or by e-mail at **jwalter**@energy.state.ca.us.

Sincerely,

Joan Walter, AICP
Compliance Project Manager
Siting, Transmission & Environmental
Protection Division

cc:

Chris Marxen, CEC Compliance Program Manager
Kris Kjellman, Edison Mission Energy
DeShawn A. Spencer, Southern California Edison
Todd Bailey, TRB + Associates, Inc.

Attachment:

Southern California Edison letter dated March 16, 2012

March 16, 2012

Joan Walter, AICP
Compliance Project Manager
California Energy Commission
Siting, Transmission & Environmental Protection (STEP) Division
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Re: Walnut Creek Energy Park, Docket Number 05-AFC-2, Conditions of Certification applicable to SCE

Dear Joan,

In follow up to discussions Southern California Edison Company (SCE) has recently had with the California Energy Commission (CEC) staff on the CPV Sentinel Project, and in follow up discussions SCE has had with the project owner of the Walnut Creek Energy Park, SCE is submitting the enclosed letter describing alternate methods for SCE to satisfy applicable Walnut Creek Energy Park Conditions of Certification.

Several of the Conditions for Certification request SCE's transmission design documents. Many of these documents are classified as Critical Energy Infrastructure Information (CEII). The Federal Energy Regulatory Commission (FERC) issued Orders 630, 630-A, 649, 662, and 683 (Orders) setting forth restrictions on the release of CEII as necessitated by the terrorist acts committed on September 11, 2001 and the ongoing terrorist threat. On February 18, 2004, under the authority of the Critical Infrastructure Information Act of 2002 (CII Act), the United States Department of Homeland Security established the Protected Critical Infrastructure Information Program, which offers safeguards for critical infrastructure information such as CEII submitted to the Federal government.

To comply with the Act, SCE may not release CEII documents to another party without executing a CEII Non-Disclosure Agreement (NDA). Every individual who views the documents must be signatory to the agreement (see attachment 1). To avoid the need to execute and track multiple CEII NDAs, SCE submitted a written statement on February 24, 2012, by SCE's Responsible Engineer (RE) declaring that SCE's design and construction is in compliance with all applicable Laws, Ordinances, Regulations, and Standards (LORS)(see attachment 2).

Note that design and construction of SCE facilities in California is already under the jurisdiction of the California Public Utilities Commission (CPUC) governed by applicable General Orders. SCE design and construction is also subject to California Independent System Operator (CAISO) and Western Electricity Coordinating Council (WECC)/North American Electric Reliability Corporation (NERC)-directed maintenance audits. The same standards and procedures developed to satisfy the CPUC, ISO, and WECC/NERC are being utilized for the Walnut Creek Energy Park Generation Tie-Line. See Attachments 3 through 7 for listings of applicable LORS.

In response to the request for documents to be maintained by the project owner in Condition of Certification Compliance-02 all SCE design drawings are maintained in SCE's Corporate Drawing Management System. Walnut Creek Energy Park Generation Tie-Line design drawings

are available and may be audited at an SCE facility at any time through arrangements made by Manuel Alvarez, of SCE's Sacramento Regulatory Affairs Office. Manuel can be reached at (916) 441-2369 for such arrangements.

With regard to TSE-01, TSE-04, TSE-05, and TSE-07, per conversations SCE's CPV Sentinel team had on March 1, 2012, with the CEC relating to a similar Conditions of Certification on the CPV Sentinel Project, SCE will plan to provide "as built" drawings. Accordingly, SCE will plan to provide the "as built" drawings once they become available and in accordance with an executed NDA. As-built drawings are issued through SCE's corporate document management system within 180 days of transmission line completion. Submittal to you will be made within 10 working days of final document availability.

SCE intends to provide the following documentation with the as-built design package:

- Plan and Profile Drawings
- Substation Rack Spans
- General Arrangement Drawings
- Data Sheets
- Tower Erection Detail Drawings
- Tubular Steel Pole Erection Drawings
- Footing Details
- Hardware Drawings
- Material Specifications
- Phasing Diagrams
- Damper/Spacer Schedules

Concerning electric and magnetic fields (EMF), Condition TLSN-03 requires that pre and post energization measurements be taken. The CPUC has found that measurements such as those described in TLSN-03 are not an appropriate method for conducting EMF assessments and consequently has declined to require them for transmission and substation projects. See Decision 06-01-042 (attached), p. 10 ("[P]ost construction measurement of EMF in the field cannot indicate the effectiveness of mitigation measures used..."). Because magnetic fields vary with time and electrical demand, any results from the before-and-after measurements required by this mitigation measure will depend more on when the measurements are taken and load conditions and less on the effectiveness of the field reduction measures.

SCE employs computer models using the same load conditions to assess the effectiveness of field reduction measures. This allows a like-for-like comparison of the field reduction measures that measurements do not allow. The CPUC validated SCE's modeling methods in Decision (D.)06-01-042: "Our review of the modeling methodology provided in the utility [EMF] design guidelines indicates that it accomplishes its purpose, which is to measure the relative differences between alternative mitigation measures. Thus, the modeling indicates relative differences in magnetic field reductions between different transmission line construction methods, but does not measure actual environmental magnetic fields."

The Walnut Creek Energy Park Generation Tie-Line was modeled and submitted as part of the Field Management Plan (FMP) prepared and included as Appendix E (see attachment 3) to SCE's application (A.09-04-010) to the CPUC for a Certificate of Public Convenience and

Necessity (CPCN) to construct the tie line proposed by SCE for the Walnut Creek Energy Project. In D. 09-07-041 approving SCE's CPCN, the CPUC found the modeling sufficient to comply with the EMF policy adopted by the CPUC in D.06-01-042. No further modeling is required unless a substantial modification of the tie-line design occurs.

Included below is a table with Conditions applicable to SCE generation tie-line facilities where SCE is proposing an alternate method to satisfy verification requirements. Please contact me with any questions and/or your response.

Sincerely,

Deshawn Spencer
Project Manager
Southern California Edison
6 Pointe Drive
Brea, CA 92821
Cell: 909-900-5049

Applicable Conditions and proposed method of verification:

Compliance-02	SCE will plan to provide the "as built" drawings once they become available and in accordance with an executed NDA.
TSE-01 TSE-04 TSE-05 TSE-07 TLSN-01	SCE to submit a letter signed by the Transmission Responsible Engineer stating that SCE design and construction is in compliance with all applicable LORS (see attachment 4).
TSE-02	SCE will submit resumes of RE's responsible for reviewing and approving SCE generation tie-line design drawings.
TLSN-02	SCE currently manages "Line Interference" complaints through its Customer Service Call Center. The FCC already requires that SCE investigate, identify, and remedy interference issues. As such, SCE will manage complaints beyond the 5 year period required by TLSN-02. SCE records will be available for audit within SCE facilities.
TLSN-03	SCE's EMF FMP for the Walnut Creek Energy Park Generation Tie-Line was approved by the CPUC in the granting of the CPCN. No further modeling is necessary unless there is a substantial change in design of the generation tie-line.
TLSN-04	SCE inspects and maintains its rights of way (ROW) per established procedure in compliance with all applicable LORS. The ROW will be inspected and maintained for the life of the utility. Inspection records will be available for audit at SCE facilities.
TLSN-05	The ROW is SCE fee owned. No new metallic structures other than SCE facilities are allowed in the ROW. All SCE facilities are grounded per SCE transmission design standard D-2005-198 in compliance with applicable LORS.
VIS-01	All SCE transmission structures for the Walnut Creek Energy Park were designed and are being manufactured with a dulled grey galvanized steel finish (see attachment 13).

Attachments:

1. CEII Non-Disclosure and Use Agreement
2. Design Specification No. D-2005-198, 220kV and 500kV Transmission Lines Revision 1, pp. 1-5 and 1-6
3. Appendix E (Field Management Plan) of SCE's CPCN application (A.09-04-010) to the CPUC for a CPCN to construct the generation tie-line for the Walnut Creek Energy Project
4. Letter dated February 24, 2012 from Albert Melikian, SCE to Dale Rundquist, CEC addressing LORS requirements
5. Specification E-2005-99, Construction of Tower and Tubular Steel Concrete Footings and Foundations, pp. 1-1 thru 1-3
6. Specification SSS6-2010, Structural Engineering and Design Criteria for Electrical Substations & Other Substation Type Facilities, Rev.0, pp. 1-1 and 1-2
7. Standard Specification-Structural, SSS1-1988, Fabrication of Steel Substation Dead End Type Structures, pp. 3.A-1 and 3.A-2
8. Specification SST1-1986, Tubular Steel Structures 220kV and 500kV Transmission Lines, pp. 3-2 thru 3-4
9. CPUC Decision 06-01-042, Opinion on Commission Policies Addressing Electromagnetic Fields Emanating from Regulated Utility Facilities
10. CPUC Decision 09-07-041, Decision Granting SCE a CPCN to construct the generation tie-line for the Walnut Creek Energy Project
11. Transmission Design and Right-of-Way Manual (TDR), Section 900, pp. ix and x
12. Transmission Operations and Maintenance Policies and Procedures (TOM), Section IM-1, pp. 1
13. Letter dated 3/9/2012, from Andres Franzese, Sabre Industries to Fidel Martinez, SCE addressing galvanizing process

Cc

Kris Kjellman, EME
Chris Marxen, CEC
Manuel Alvarez, SCE
Christine McLeod, SCE
Mary Skaar, SCE
Alex Gutierrez, SCE
Matt Botting, SCE