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Comment Received From: Catherine Hackney

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SCE Comments on CEC Docket No. 16-IEPR-06: Joint Agency IEPR Workshop on

Additional submitted attachment is included below.

September 12, 2016

California Energy Commission
Docket Office, MS-4
Re: Docket No. 16-IEPR-06
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 16-IEPR-06: Joint Agency IEPR Workshop on Southern California Reliability

Dear Commissioners:

On August 29, 2016, the California Energy Commission (Energy Commission), held a workshop to review efforts to ensure electricity reliability in Southern California resulting from the closure of the San Onofre Nuclear Generating Station (SONGS) and impending retirement of several fossil-generating units using once-through cooling (OTC) technologies ("the Workshop"). The Workshop was held as part of the 2016 Integrated Energy Policy Report Update (IEPR) proceeding. Southern California Edison (SCE) participated in the Workshop and provided updates on (1) SCE electric transmission projects and (2) western Los Angeles basin energy procurement efforts, including its procurement of preferred resources in support of SCE's Preferred Resources Pilot (PRP).

During the Workshop, SCE received questions regarding the potential delay in the operating date of the Mesa Substation Loop-in project – one of SCE's projects supporting the Southern California Reliability effort. A delay of the Mesa Loop-in project's operating date could occur, depending on the timing and outcome of the California Environmental Quality Act (CEQA) permitting process for the project. If the Mesa Loop-in project's operating date is delayed, an extension may be needed for one or more OTC generating stations beyond 2020 to maintain system reliability.

As the Statewide Advisory Committee on Cooling Water Intake Structures (SACCWIS) noted in its April 2016 Final Report, "...study results for 2021 show that in the event one of the planned transmission projects, Mesa Loop-in, is delayed beyond summer 2021, a resource

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deficiency occurs, and a temporary extension of Redondo Beach or Alamitos beyond the December 31, 2020 compliance date could be a potential mitigation option.”¹

The implications of a potential delay of the Mesa Loop-in project on the OTC compliance dates and Southern California reliability demonstrate how important it is to make the licensing process more efficient. SCE believes that greater efforts may be needed to streamline the current permitting process to ensure that priority projects supporting key reliability needs are able to meet necessary operating dates.

In conclusion, SCE appreciates the state agencies’ consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/ Catherine Hackney

Catherine Hackney

¹ See Report of the Statewide Advisory Committee on Cooling Water Intake Structures at p. 28. April 2016. Report can be found at: http://www.swrcb.ca.gov/water_issues/programs/ocean/cwa316/saccwis/docs/saccwis_report_presentation.pdf