

April 11, 2013

President Michael R. Peevey
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

The Honorable Jean Vieth
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: A.07-06-031 Application of Southern California Edison Company for a Certificate of Public Convenience and Necessity Concerning the Tehachapi Renewable Transmission Project

Dear President Peevey:

On April 18, 2012, the California ISO sent you a letter outlining concerns about the 3.5 miles of 500 kV underground transmission in Chino Hills being considered as a replacement for the overhead circuits originally approved as part of the Tehachapi Renewable Transmission Project (TRTP). In that letter, we noted that some of the underground alternatives being explored in testimony presented by Southern California Edison (SCE) could unduly limit the capabilities of the transmission system both in the immediate future and well beyond the current planning horizon.

Specifically, the California ISO explained that the scarcity of transmission corridors in the area, the potential for future capacity needs and the need to minimize additional construction activities lead the ISO to approve double circuit construction through this particular area. The same would still hold true for the underground options. As noted in our earlier letter, it would not be a prudent or reasonable step to limit the underground configuration to a single circuit and prevent future expansion by building a "choke point" into the transmission line project. If the circuits on the double circuit tower would need to be operated as two separate circuits, it would be necessary to dig up the streets and right of way to complete the second circuit.

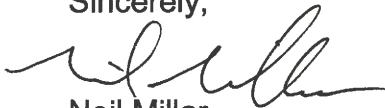
Therefore, should the Commission determine that undergrounding is the preferred environmental option, the impact of future construction could be minimized by at least installing the appropriate duct banks and splice vault capacity to accommodate a second circuit at the time of initial construction of the first circuit. We also noted that that while three cables per phase construction is necessary to match the overhead capacity in the other segments of the Mira Loma-Vincent line, a minimum of two cables

per phase could provide sufficient capacity to meet the needs forecasted when TRTP was originally studied.

The California ISO's April 18, 2012, letter was based on SCE testimony submitted in response to a November 10, 2011 Assigned Commissioner's Ruling that directed SCE to address routing alternatives for Segment 8A. We now have reviewed the more detailed testimony submitted by SCE on February 28, 2013, that evaluates both single- and double-circuit underground facilities with two or three cables per phase (options UG1-5). SCE recommends the single circuit, three cables per phase design with conduit in place for the second circuit option (option UG-2).

The updated analysis of the underground options presented by SCE is consistent with their earlier testimony and also with the California ISO's previous recommendations with respect to the preferred double circuit, two-or-three cables per phase design and construction alternatives. The California ISO once again encourages the Commission to take into consideration ongoing operational benefits and future flexibility of the entire 500 kV line in relation to lower-cost options.

Sincerely,



Neil Millar
Executive Director, Infrastructure Development

cc: All parties of record in A. 07-06-031