



ORA

Office of Ratepayer Advocates
California Public Utilities Commission

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LINDA SERIZAWA
Interim Director

February 8, 2016

Rob Peterson, Project Manager
Infrastructure Permitting and CEQA, Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Comments on the Notice of Preparation of an Environmental Impact Report for the Suncrest Reactive Power Support Project, Proposed by NextEra Energy Transmission West, LLC; Application (A.) 15-08-027

Dear Mr. Peterson:

The Office of Ratepayer Advocates (ORA) hereby submits the following comments to the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Suncrest Reactive Power Support Project (Project) proposed by NextEra Energy Transmission West, LLC (NextEra). ORA seeks to ensure that the EIR considers all the potential environmental impacts of the Project, including the difference between placing the Project outside the locational footprint of the Suncrest substation and inside the locational footprint. ORA believes that placing the Project inside the site of the Suncrest substation will prove the preferable alternative on environmental and other grounds, and requests that the Commission evaluate this among the alternatives considered.

Table 1 of the NOP identifies the summary of potential impacts and issues for the EIR and notes the following with respect to alternatives to the Project:

Alternatives.

- Concerns regarding inclusion, evaluation of a project alternative co-located within existing Suncrest substation site, (i.e. concerns that such an alternative wouldn't be evaluated in an MND,¹) which could have induced environmental impacts.²

¹ Mitigated Negative Declaration, California Code of Regulations, Section 15070.

² Notice of Preparation of EIR, p. 3.

Locating the proposed Project within the site of the existing Suncrest substation mitigates significant impacts and should be studied even if the Commission decides to prepare an MND for the project. As well as being lead agency for California Environmental Quality Assessment (CEQA), the Commission is also the agency ultimately charged with determining if a project can be located within the site of the existing Suncrest substation³. Thus, ORA has requested that the scope of this proceeding include a determination of whether locating the proposed Project outside the existing Suncrest substation was based on the assumption that California Independent System Operator (CAISO) and/or San Diego Gas & Electric company (SDG&E) would need to authorize or approve co-locating the proposed Project within the Suncrest substation.⁴

Public Utilities Code, Section 762, in relevant part states:

Whenever the commission, after a hearing, finds that additions, extensions, repairs, or improvements to, or changes in, the existing plant, equipment, apparatus, facilities, or other physical property of any public utility or of any two or more public utilities ought reasonably to be made, or that new structures should be erected, to promote the security or convenience of its employees or the public, or in any other way to secure adequate service or facilities, the commission shall make and serve an order directing that such additions, extensions, repairs, improvements, or changes be made or such structures be erected in the manner and within the time specified in the order. If the commission orders the erection of a new structure, it may also fix the site thereof. If the order requires joint action by two or more public utilities, the commission shall so notify them and shall fix a reasonable time within which they may agree upon the portion or division of the cost which each shall bear.

If co-location of the proposed Project and the Suncrest substation is not studied in this EIR, and the Commission ultimately determines that the project should be located inside the substation site, then another EIR would likely ensue to study the co-location alternative.

Therefore, ORA recommends that the following issues be included in the scope of the EIR:

1. Whether the proposed Project should be co-located within the footprint of the existing Suncrest Substation.

³ See Public Utilities Code, Section 762 et. seq; see also Public Utils. Code, Section 851 et seq.

⁴ *Id.*; See also ORA's Response to NextEra's Application.

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2. Whether the existing Suncrest substation needs to be expanded to accommodate inclusion of the proposed Project within its site or current footprint.

There is no need for the one mile 230 kV transmission line interconnecting the proposed Project and the existing Suncrest substation. Locating the Project within the footprint of the Suncrest substation would more effectively provide voltage support services to the Suncrest substation, operate more reliably and be easier to coordinate from an engineering standpoint. Co-locating the Project within the substation also costs less and might have less impact on the environment than building the Project outside the site of the substation.

Sincerely,

/s/ LINDA SERIZAWA

Linda Serizawa Interim Director,
Office of Ratepayer Advocates

Cc: Tom Engles, Horizontal Water and Environment, LLC
Administrative Law Judge Todd Edmister
Service List for A.15-08-027