

City of Jurupa Valley

Verne Lauritzen, Mayor. Micheal Goodland, Mayor Pro Tem.
Anthony Kelly, Council Member. Brian Berkson, Council Member. Laura Roughton, Council Member.

October 30, 2017

[Via Overnight Mail]

Commissioner Liane M. Randolph
California Public Utilities Commission
505 Van Ness
San Francisco, CA 94102

Re: Request for Documents on Costs of Chino Hills Transmission Line Undergrounding in Tehechapi proceeding (A0706031); and Suncrest proceeding (A1508027)

Dear Commissioner Randolph:

As a matter of introduction, the City of Jurupa Valley (City) is a party in the Riverside Transmission Reliability Project (RTRP) proceeding (A1504013). The RTRP is contemplated to pass through our City. Southern California Edison (SCE) has filed an application for construction of overhead 220kV transmission lines through major portions of our City, while agreeing to underground the RTRP in neighboring areas. We believe that the rest of the RTRP that crosses through our city should also be undergrounded. SCE rejects the City's requests as not being cost-effective.

A similar situation had existed in the Tehachapi proceeding (A0706031) which resulted in the SCE's undergrounding of several miles of 550kV transmission lines in Chino Hills. Due to the extreme relevance of the Chino Hills undergrounding, the City has diligently attempted to locate information about the specific costs of undergrounding transmission lines (i.e., the cost to manufacture aerial transmission lines, the costs of installation of such lines, removal costs, the land acquisition costs, the engineering costs, trenching, underground material costs, etc.). So far, the City has been unsuccessful in finding these documents which ordinarily should be publicly available. They are not located anywhere in the CPUC's docket.

These documents are relevant to evaluate SCE's rejection of the City's request (and other parties including ORA) for undergrounding the RTRP through our City. While we realize that a formal legal request for this information is possible, we are trying to save money and time by obviating the need to make official data requests on SCE. SCE has been extremely slow and not forthright in responding to data requests.

In the case of Chino Hills, we know from the record that this specific type of information was submitted to the Commission by SCE in the form of "testimony", but no one at the Commission

has been able to locate those documents so far. We have contacted numerous individuals at all levels in the Energy Division and elsewhere in the Commission without success. Division personnel know that the information exists, but suggest that because it was not the subject of cross examination, it cannot be located.

We believe that this information will be very useful to all parties to evaluate the possibilities of undergrounding the rest of the RTRP project in our community, and that it should be in the public record, thus being available without the costs of seeking it through legal submittals. We would like to request your help in finding this information.

We also suspect that similar circumstances exist for other pending undergrounding projects (e.g., Suncrest in the SDG&E territory (A1508027). So, the City requests similar information in the Suncrest proceeding as well.

Please let us know if there is any other less expensive and proper way of finding this information without the formality of data requests for this important information. Thank you so much for your consideration.

Sincerely,



Gary Thompson,
City Manager
City of Jurupa Valley