

DOCKET 11-IEP-1E

December 14, 2010

DATE	DEC 14 2010
RECD.	DEC 14 2010

California Energy Commission
Docket Office, MS-4
Re: Docket No. 11-IEP-1E
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

Re: California Energy Commission Docket No. 11-IEP-1E: Comments on Forms and Instructions for Electric Transmission-related Data

To Whom It May Concern:

Southern California Edison Company (“SCE”) appreciates this opportunity to provide the following comments on the Forms and Instructions for Electric Transmission-related Data (“Transmission Forms & Instructions”) in connection with the 2011 Integrated Energy Policy Report (“2011 IEPR”).

First, on page 7, Section 3a of the Transmission Forms & Instructions, the Energy Commission requests submittal of maps showing SCE’s planned transmission upgrades to existing facilities. Because SCE’s transmission maps are protected as critical energy infrastructure information,¹ SCE will not be able to provide these maps except those cases where the information in the maps is limited such that the maps do not constitute CEII.

Second, on page 7, Section 3c of the Transmission Forms & Instructions, the Energy Commission requests that SCE describe the alternatives it has considered to developing transmission upgrades, including non-wires alternatives such as development of additional generation capacity and use of demand-side management. SCE does not always perform an evaluation of non-wires alternatives for each transmission upgrade project. The CAISO in some cases performs assessments of non-wires alternatives such as for local capacity reliability requirements. Accordingly, SCE will provide this information, as available.

Third, on page 8, Section 5 of the Transmission Forms & Instructions, the Energy Commission requests a general description of any transmission upgrades that are expected to begin

¹ See, U.S. Federal Energy Regulatory Commission, *Order No. 630, Critical Energy Infrastructure Information*, 102 FERC ¶ 61, 190, 18 CFR Parts 375 and 388 (Docket Nos. RM02-4-000, PL02-1000), February 21, 2003, at P 34.

operating after December 2020. Because SCE's planning window only extends for a 10-year period, SCE will not be able to provide accurate information responsive to this request.

As always, SCE appreciates the opportunity to be part of the 2011 IEPR process and submit comments on the Transmission Forms & Instructions. Feel free to contact me regarding any questions or concerns.

Sincerely,

/s/ Manuel Alvarez

Manuel Alvarez, Manager
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