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DOCKET
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July 13, 2007

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 07-OIR-1
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Transmission Corridor Designation Workshop, Docket No. 07-OIR-1

Dear California Energy Commission:

Southern California Edison Company appreciates the opportunity to comment in the California Energy Commission's process to implement California Senate Bill 1059 and specifically on the staff's proposed draft regulations.

SCE is filing these comments as a supplement to the comments made on the record during the June 29, 2007 workshop on this issue.

Should you have any questions, please do not hesitate to contact me at (916) 441-2369.

Sincerely,

Manuel Alvarez (SLS)

/s/ Manuel Alvarez

Manuel Alvarez
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Southern California Edison Company
2244 Walnut Grove Avenue
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Comments of
Southern California Edison Company

July 13, 2007
California Energy Commission

Transmission Corridor Designation Workshop, Docket No. 07-OIR-1

Southern California Edison appreciates this opportunity to provide comments regarding the California Energy Commission (CEC) staff's proposed draft regulations related to the designation of energy corridors pursuant to Senate Bill 1059 (SB 1059). SCE strongly supports the CEC's efforts in this endeavor and looks forward to continued dialogue with the CEC and other stakeholders. SCE is embarking on a multi-billion dollar transmission investment program and is hopeful that a more streamlined transmission planning and permitting process will lead to the more timely completion of these and future proposed transmission projects.

While SCE supports this process, one issue which SCE has commented on before and which SCE believes will continue to affect this process, despite the implementation of any regulations related to SB 1059, is the inability for utilities to "hold" or "bank" land for more than five years. Currently, regulatory policy prohibits utilities from ratebasing unused land for more than a five year period. SCE continues to experience very high levels of customer growth on its system. As more homes are constructed and more customers move into the SCE service territory, the land available for siting transmission lines and substations is becoming scarce. If utilities are able to purchase land in areas where they will likely construct transmission facilities in the future and hold that land for more than five years ahead of project construction, the utilities will likely be able to procure the land at lower cost and with less concern over right-of-way issues and eminent domain proceedings. As Commissioner Geesman indicated at the June 29, 2007 workshop, the CEC recognizes the need for utilities to bank land for long-term periods. SCE is hopeful that this support can be carried over into changes to the laws which currently limit the holding period to five years.

SCE believes it is important that all entities involved in transmission permitting and siting look for long-term solutions. Any lands that are ultimately set aside for future use may be available

for use as a park, bikeway, or other open space that benefits the public as long as future utility uses are not subject to interference. Further, from an environmental perspective, allowing utilities to designate and set aside corridors upfront could be a means to implement mitigation strategies and land conservation arrangements for environmental concerns. Such a process will allow utilities to set aside land for future use while preserving certain qualities associated with that land before, during, and after the construction of transmission facilities in the corridor. Finally, once a corridor is designated, it should be protected from changes without notice and with an appropriate level of review of the impact of the proposed change.

SCE also believes that this process streamline the overall siting and permitting processes in California to the greatest extent possible. SCE looks at corridor designation under SB 1059 as a long-term process that will facilitate the construction of future transmission facilities. SCE does not envision that this process will facilitate any transmission projects currently being reviewed by the California Public Utilities Commission (CPUC) or other regulatory and governmental agencies. Rather, SCE believes this process will benefit transmission providers by identifying areas that will best support high-voltage transmission lines with the least amount of environmental impact. Therefore, SCE believes a programmatic-level environmental assessment, rather than a more formal master environmental review will fit best with a long-term approach. Environmental data easily becomes stale and SCE recognizes that preparing a detailed environmental review for a corridor that may not be used for five or more years would be counter-productive.

Further, SCE continues to believe that consideration of alternative routes is an important aspect of this corridor designation process. Sufficient alternative routes should be evaluated up front by the CEC so that when a corridor is designated there will be little, if any, need to evaluate alternatives outside the corridor when a specific project is proposed. Instead, all alternatives for specific projects would be located within the corridor. Thus, the CEC should designate a corridor that is wide enough to allow for greater siting alternatives within the corridor itself.

SCE also believes that this process could be further streamlined by cities and counties agreeing to incorporate the corridors into the general and specific plans developed by the respective cities

and counties. This could eliminate the need for other routing alternatives outside of the corridors and could serve as a means to ensure that the originally designated corridor and ultimate project routing are one in the same.

SCE has provided a number of detailed comments related to the specific sections in staff's proposed draft regulations. SCE will not reiterate those comments. Further, it appeared that other workshop attendees did not take issue with those comments. SCE intends to provide further comments when staff issues the revised draft regulations in the coming weeks.

SCE appreciates this opportunity for comment and looks forward to continued participation and input into this process.