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# **Addendum to Appendix A – WDT1281**

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[REDACTED]

[REDACTED]

## **Addendum #1**

### **Cluster 8 Phase I Final Report**

February 25, 2016

This study has been completed in coordination with the California Independent System Operator Corporation (CAISO) per Southern California Edison Company's Wholesale Distribution Access Tariff, Attachment I Generator Interconnection Procedures (GIP)

Project No.	Project Name	No	Date	Document Title	Description of Document
WDT1281	[REDACTED]	2	2/25/2016	Addendum #1 to Queue Cluster 8 Phase I Appendix A Final Report	The purpose of this report is to update Attachment 1 & 3, and publish the written comments provided by the IC to SCE in accordance with the timelines stated per Section 4.5.7 in GIP
WDT1281	[REDACTED]	1	1/15/2016	Queue Cluster 8 Phase II Appendix A Final Report	Report to disclose results of QC8 Phase I cluster.

## Executive Summary

██████████ an Interconnection Customer (IC), received a Queue Cluster 8 Phase I (QC8 Phase I) study report dated January 15, 2016 for its Interconnection Request (IR) to Southern California Edison (SCE) for their proposed ██████████ ██████████ queue position WDT1281.

During the QC8 Phase I study results meeting held on February 19, 2016, it was determined that the following item(s) in the QC8 Phase I report package dated January 15, 2016 for the Project required an update:

1. Interconnection Facilities, Network Upgrades, and Distribution Upgrades (Attachment 1 to Project Appendix A (item 7 on Page 9) One-Line for Project), during the results meeting it was determined that the one-line provided in inadvertently called out a different project number, and consequently was to be updated to reflect the WDT1281 project number.
2. Allocation of Network Upgrades for Cost Estimates and Maximum Network Upgrade Cost Responsibility (Attachment 3 to Project Appendix A report dated January 15, 2016), to reflect the appropriate ADNU escalated costs.

These item(s) have been updated accordingly, and are attached as part of this QC8 Phase I Addendum report package. The corresponding changes replace and supersede those same sections in the Project's QC8 Phase I Appendix A report dated January 15, 2016, and the remainder of the Phase I study report is unaffected by this addendum report.

In addition, SCE is obligated to publish any written comments submitted by the IC within the timelines described below in accordance with the GIP, as modified by FERC Order 792:

- Within ten (10) Business Days of receipt of the QC8 PI report, but in no event less than three (3) Business Days before the Results Meeting conducted to discuss the report; and/or
- Additional comments on the final QC8 Phase I Interconnection Study report up to (3) Business Days following the Results Meeting

This addendum report discloses below the written comments provided by the IC to SCE in accordance with the timelines stated in GIP for QC8 Phase I study report dated January 15, 2016.

**Attachment 1**  
**Interconnection Facilities, Network Upgrades, and Distribution Upgrades**  
Please refer to separate document

**Attachment 3**  
**Allocation of Network Upgrades for Cost Estimates and Maximum Network Upgrade Cost Responsibility**

Queue #

WDT1281

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	Total NU Cost (2015 \$k)	Incremental MW	Cost Rate (2015 \$/MW)	Project MW	Allocated Cost (2015 \$k)	Allocated Cost (Escalated \$k)
<b>ADNU</b>						
Coolwater - Lugo 220kV T/L						
Modify SPS for:						
N-1 of Jasper-Lugo 220 kV T/L;						
N-1 of Coolwater-Jasper 220 kV T/L						
N-2 Cool Water-Kramer & Kramer-Sandlot 220 kV T/L;						
N-2 Cool Water-Kramer & Kramer-Victor No.2 220 kV T/L;	\$365,957	462	\$792	12.00	\$9,505	\$12,424
Lugo 500/230kV transformer bank No. 3	\$126,625	969	\$131	12.00	\$1,568	\$1,825
<b>Grand Total</b>					<b>\$11,073</b>	<b>\$14,249</b>

QC8 Phase I – WDT1281 – [REDACTED]

1. Written comments provided by IC within ten (10) Business Days of receipt of the QC8 PI report.

**Q1)** Appendix A of study report (Page 4) suggests that SCE will build the following facilities:

- [REDACTED]
- [REDACTED]

The IC wishes to build its facilities to within a pole of the POI (the utility pole). Would that eliminate the need for these facilities?

**Q2)** Appendix A of study report (Page 5) suggests that SCE will:

- Reconductor approximately [REDACTED]
- Replace existing LTC controllers at [REDACTED]
- Install a [REDACTED] to monitor the reverse power flow (MW/MVAR) caused by the Generating Facility.

First, the POI for this project is only about 3000 ft. away from the substation. Why does 6000 ft. of line need to be reconducted?

Second, all three upgrade as already assigned to WDAT 1203 project, or other similarly located earlier queued projects, in contradiction to the basic assumption of this study which says: "The Phase I Study assumes the upgrades triggered by previously queued projects, including Rule 21 projects under CPUC jurisdiction as In-Service, are included in the base case for the Phase I Projects." Why unconditionally assign to this project?

**Q3)** Appendix A of study report (Page 14) states that:

- The IC will own, operate, maintain, and construct diverse telecommunication paths associated with the IC's generation tie line, excluding terminal equipment at both ends. In addition, the telecommunication requirements for SPS were assumed based on tripping of the generator breaker as opposed to tripping the circuit breakers at the Distribution Provider substation.

First, why should a distribution level project, such as WDAT 1281, develop diverse telecom paths for its gen-tie line? Does SCE even have a second telecom channel at the POI?

Second, SCE, as a matter of policy has not applied SPS to distribution level projects. Has that policy changed?

**Q4)** Attachment 3 to Appendix A of study report (Page 18) shows that the [REDACTED] WDAT 1281 project is responsible for 2.6% ([REDACTED]) of the cost of [REDACTED]. Does [REDACTED] refer to capacity of [REDACTED] projects in QC8 or the deliverability capacity that these two transmission lines add to [REDACTED] area? Why is there 30% escalation (such a high number) in this cost?

**Q5)** Attachment 3 to Appendix A of study report (Page 18) shows that the [REDACTED] WDAT 1281 project is responsible for 1.2% ([REDACTED]) of the cost of [REDACTED]. Does [REDACTED] refer to capacity of [REDACTED] projects in QC8 (if yes why different from Q4) or the deliverability capacity that the transformer bank adds to [REDACTED] area? Why is there 17% escalation (such a high number) in this cost?

**Q6)** Attachment 1 to Appendix A (item 1.a.xiii on Page 3) requires the project to:

- Install, in coordination with, and as specified by, the Distribution Provider, a [REDACTED] from the local telephone company to support the [REDACTED] communication to the [REDACTED]

QC8 Phase I – WDT1281 – [REDACTED]

Distribution Provider's [REDACTED] in accordance with the Distribution Provider's Interconnection Handbook if a RTU is installed locally at the Generating Facility.

Please confirm that this requirement should allow another telecom media with capabilities similar to [REDACTED] So the language should be modified to read:

- Install, in coordination with, and as specified by, the Distribution Provider, a [REDACTED] or broadly equivalent telecommunication capability, from the local telephone company to support the [REDACTED] communication to the Distribution Provider's [REDACTED] [REDACTED] in accordance with the Distribution Provider's Interconnection Handbook if a [REDACTED] is installed locally at the Generating Facility.

The remaining terms in the Attachment should be changed to reflect this equivalent telecom solution.

Q7) Attachment 1 to Appendix A (item 1.b.i on Page 5) requires the project to pay SCE to:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Please confirm that items 1 and 3 in the above list will not be required if the project builds its facilities to within one pole of the POI.

Q8) Attachment 1 to Appendix A (item 3 on Page 8) requires the project to pay SCE to upgrade its substation protection as related to [REDACTED]. There upgrades are already assigned to WDAT 1203 project, or similarly located earlier queued projects. Why are they assigned to this project as well?

Q9) Attachment 1 to Appendix A (item 7 on Page 9) shows a diagram with project WDAT 1185. Please confirm that this is actually WDAT 1281 project. Please show all other projects and interconnect applications up to QC8 (with queue number) interconnecting to the [REDACTED]

Q10) Attachment 2 to Appendix A of study report require the remove of [REDACTED] and installation [REDACTED] in their place for WDAT 1281. Should we assume that this upgrade is for the [REDACTED]. Wouldn't this upgrade have been put in place by WDAT 1203 project, or other similarly located earlier queued projects?

Q11) Please confirm that Attachment 7 to Appendix A on Northern Hemisphere nomogram is added for informational purposes only and that no upgrade decisions were made based on that presentation.

Q12) The NOL Area Report section of reliability study (Section D.1.1.i on Page 26) states that: "Although the [REDACTED] [REDACTED] were retired as of January 1, 2015, the units were fully dispatched in the analysis in accordance with the CAISO Business Practice Manual (BPM) whereby any retired generator retain Full Capacity Deliverability Status (FCDS) for a period of three years beginning at the time when the unit(s) seized operating."

First, while it is clear the CAISO BPM is related to deliverability study, why the [REDACTED] was assumed in service for reliability study?

Second, the CAISO BPM keeps a retired project FCDS for up to three years only or until 2018. None of the projects in QC8 will have a COD before 2018. In fact, the study year for QC8 is the year 2020 (Section B.7, Page 12)

Q13) Please confirm that the third columns of the tables in Appendix E of the Area Report are intended to show escalated costs?

IC WRITTEN COMMENTS

QC8 Phase I – WDT1281 – [REDACTED]

2. Written comments provided by IC three (3) Business Days following the Results Meeting.
  - a. None