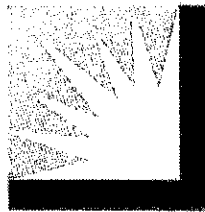




Facilities Study

September 14, 2012



SOUTHERN CALIFORNIA
EDISON

An *EDISON INTERNATIONAL*™ Company

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Southern California Edison

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I. Executive Summary

[REDACTED] applied to Southern California Edison ("SCE") for distribution service under the terms of SCE's Wholesale Distribution Access Tariff ("WDAT"). [REDACTED] will own and operate a 20 MW photovoltaic solar power project, [REDACTED] Project, to be constructed by [REDACTED]. The [REDACTED] power plant is to be located in Mojave, CA, with the project site located [REDACTED] of SCE's Windhub 66 kV Substation. [REDACTED] proposes to interconnect to the Windhub 66 kV Substation. The requested in-service date for the project is [REDACTED].

A System Impact Study (SIS) dated February 3, 2012 was prepared to address the impacts of the new generation to the SCE Subtransmission System. A Subtransmission System Technical Assessment report dated August 6, 2012, and a revised report dated August 21, 2012 were subsequently prepared due to withdrawals of projects ahead of [REDACTED] Project in queue.

FOR ADDITIONAL DETAIL REFER TO THE FOLLOWING EXHIBITS:

- EXHIBIT A: SYSTEM IMPACT STUDY EXECUTIVE SUMMARY
- EXHIBIT B: SUBTRANSMISSION SYSTEM TECHNICAL ASSESSMENT

II. System Impact Study Results

Power Flow – [REDACTED] Project did not trigger new base overloads requiring distribution or transmission level mitigations. However, it is important to note that the project directly queued ahead of [REDACTED] was identified to trigger the need for a third 220/66 kV transformer bank at Windhub Substation which cost responsibility may shift to [REDACTED] if the queued ahead project withdraws.

Post-Transient Analysis – [REDACTED] Project did not trigger any new Post-Transient voltage criteria violations.

Transient Stability Analysis – [REDACTED] Project would not trigger and transient stability criteria violations on the SCE system.

Short Circuit Duty – More detailed analysis will be required as a part of the Facilities Study.

Delivery Assessment – No assessment was performed.

III. Subtransmission System Technical Assessment Results

Power Flow – As a result of both project withdrawals and use of an operating procedure identified for a queued ahead project, the [REDACTED] Project now triggers the need for the third 220/66 kV transformer bank at Windhub Substation.

IV. Facilities Study Assumptions

- A. [REDACTED] Project is [REDACTED] of Windhub Substation.
- B. Any required upgrades at facilities not owned by SCE are not included in the Facilities Study.
- C. The schedule for the Environmental Impact Statement and/or Environmental

Impact Report and all other regulatory filings required for the Project are not included in the Facilities Study.

V. Facilities Study Scope and Cost Estimate

V – A Facilities Study Scope

Pursuant to FERC's orders 2006-A (Small Generators) and 2003-A (Large Generators) all Facilities Studies are required to provide the customer with its "maximum possible funding exposure", which shall include the costs of upgrades that are reasonably allocable to the Interconnection Customer at the time the estimate is made, and the costs of any upgrades not yet constructed that were assumed in the interconnection studies for the Interconnection Customer but are, at the time of the estimate, an obligation of an entity other than the Interconnection Customer."

To comply with the FERC orders, the Scope of Work and Cost Estimate for all elements required for the interconnection are presented for the following two cases:

CASE A: All facilities required exclusively by the Project

And

CASE B: All additional facilities that may be required by the Project

The facilities included on Case B are those additional facilities required to remedy situations caused by earlier projects, placed ahead in the Application Queue, and are expected to be implemented by them.

However, in the event that any of these earlier projects withdraws or modifies their application in accordance with applicable tariff allowances, [REDACTED] may become responsible for any or all of these additional facilities.

SCE will own, operate, construct, and maintain a new 66 kV position and third transformer bank at Windhub Substation to interconnect the [REDACTED] Project.

A SCD analysis was performed and found no circuit breaker upgrades are required to interconnect this project.

CASE A:

Substation:

Windhub Substation

- Equip a 66 kV position
 - Two circuit breakers
 - Four sets of disconnect switches
 - Protection relays
- 220/66 kV transformer bank
 - One 220/66 kV transformer bank
 - One set of disconnect switches
 - Protection relays
- 220 kV transformer bank position
 - Two circuit breakers

- Four sets of disconnect switches
- Protection relays
- 66 kV transformer bank position
 - Two circuit breakers
 - Four sets of disconnect switches
 - Protection relays

Sub-Transmission:

Install one engineered steel pole, one 66 kV remote controlled switch, and two spans of conductor from the SCE dead end structure to the customer's owned structure outside of Windhub Substation property.

Telecommunication:

Install 1,200' of fiber optic cable, lightwave, channel, and associated equipment supporting protection and SCADA for the interconnection.

Corporate Environmental Services and Real Properties:

Provide mapping, survey, title work, land acquisition labor, licensing, and other activities related to Windhub Substation, gen-tie, and telecommunication requirements.

Power Systems Control:

Install one Remote Terminal Unit (RTU) at the customer's facility to monitor generation data, weather data, and relay protection status alarms.

Add point to the Substation Automation System equipment at Windhub Substation to monitor the new tie line data and associated circuit breakers, and relay protection status alarms.

Metering Services Organization:

Install a SCE retail meter in tandem with the customer's ISO meter.

CASE B:

There are no Case B elements for this project.

V – B Facilities Study Cost Estimate

CASE A Identifies the cost of all facilities that are required exclusively by the Project.

CASE B Identifies the cost of all upgrades required that were triggered by earlier Applicants placed ahead of the Project in the Application Queue.

In the event that any Applicant, presently placed ahead of the Project in the Application Queue, withdraws its Application, the system would need to be re-evaluated. The new evaluation may conclude that the Project would now trigger any of these upgrades and would then become responsible for some or all of the upgrades identified on Case B.

[REDACTED]
[REDACTED]
FACILITIES STUDY

The total estimated cost of all elements of the interconnection as identified above in the Facilities Study Scope is as follows:

CASE A:	\$ 22,345,686
CASE B:	\$ 0
TOTAL MAXIMUM COST EXPOSURE:	\$ 22,345,686

SEE EXHIBIT C: COST SUMMARY

VI. Conclusions

- A. The estimated cost for the Interconnection is approximately \$22,345,686 for Case A with the potential additional cost of \$0 for Case B for a total Maximum Cost Exposure of \$22,345,686.
- B. The time required to complete the proposed project will be 24 months after receiving project authorization and funding. This time includes engineering, material procurement and construction. This timeframe is subject to final verification by SCE of available resources at the time of the Project. The 24 month period does not include the time required for the preparation of the Environmental Impact Statement and/or Environmental Impact Report as required per CEQA and NEPA, if required, as well as any other approvals and permits to be provided by the CPUC or other regulatory agencies.
A detailed Project Schedule will be provided during the Engineering and Design Phase of the Project.
- C. The costs indicated in the attached tables are shown 2012 Dollars and are not firm. These are only preliminary estimates based on conceptual engineering and system unit costs, and are subject to change based on the final design and actual material costs. This Facilities Study and cost estimates as presented are valid for a period of 90 days.
- D. The estimated Project Cost will be reconciled to actual costs upon closure of the subject work orders. The necessary billing adjustments will be made at that time.
- E. Study results may be affected by changes in other projects ahead of the queue in the area. A re-study may be required if there are changes in the project queue or the scope of projects ahead in the queue.
- F. Although study results reflect no adverse impact on the high-voltage CAISO controlled transmission system with the addition of the WDG project, the Interconnection Customer will still be required to adhere to all applicable WECC policies including, but not limited to, the WECC Generating Unit Model Validation Policy. For example, the Interconnecting Customer will be required to provide validated dynamic models for the proposed project within the timelines identified in the WECC policy. The latest policy is available on the WECC website at www.wecc.biz.

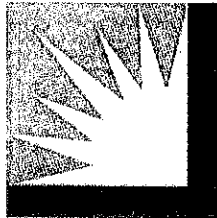
EXHIBIT A

**SYSTEM IMPACT STUDY
EXECUTIVE SUMMARY**



GENERATION INTERCONNECTION
SYSTEM IMPACT STUDY

February 3, 2012



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Southern California Edison Company

Jorge Chacon
Manager, Generation
Interconnection Planning

EXECUTIVE SUMMARY

Southern California Edison Company ("SCE") received an interconnection request from [REDACTED] for the interconnection of its 20 MW Project to SCE's Windhub 66 kV Substation, pursuant to the Small Generator Interconnection Procedures ("SGIP") under the Wholesale Distribution Access Tariff ("WDAT"). The [REDACTED] photovoltaic solar power plant is to be located in Mojave, CA, with the project site located [REDACTED] of SCE's Windhub Substation. The requested in-service date is [REDACTED].

In accordance with the SCE's WDAT SGIP, SCE performed an interconnection System Impact Study ("SIS") to determine the adequacy of SCE's electrical system, including both the SCE distribution system and the CAISO controlled grid, to accommodate the Project. The Study was performed for two system conditions: a 2014 heavy summer with a one-in-ten load forecast and a 2014 light spring load forecast (65% of the heavy summer load). These conditions reflect the most critical expected loading condition for the transmission system in SCE's area.

The study included all active generation applications in the study area, regardless of in-service dates, that were submitted prior to the Project application. This includes several higher queued serial projects active in either the CAISO SGIP or the SCE Wholesale Distribution Access Tariff ("SCE WDAT") SGIP. This also includes numerous CAISO Large Generator Interconnection Procedures ("LGIP") and SCE WDAT Clustering Large Generation Interconnection Procedures ("CLGIP") queued generation projects.

The study included the modeling of the East Kern Wind Resource Area ("EKWRA") 66 kV reconfiguration project. This project was proposed by SCE in the CAISO 2010 Transmission Plan as a reliability project to address numerous reliability criteria violations in the existing Antelope-Bailey 66 kV network. This project was presented and recommended for approval by CAISO at the February 16, 2010 CAISO transmission plan stakeholder meeting. The EKWRA project has a proposed in-service date of December 2013.

The study accuracy and results for the assessment of the system adequacy are contingent on the accuracy of the technical data provided by [REDACTED]. Any changes from the data provided could void the study results. The Study report provides detailed Study assumptions and conditions of the system in which the Study was conducted.

CONCLUSIONS

Power Flow

With all queued ahead generation projects and all corresponding facility upgrades modeled, and with the system reconfigurations proposed as part of EKWRA, the power flow study found that the Project did not trigger new base case overloads requiring distribution or transmission level mitigations. However, it is important to note that the project queued directly ahead of [REDACTED] was identified to trigger the need for a third 220/66 kV transformer bank (mostly distribution upgrade) at Windhub Substation. As such, withdrawals of higher queued projects in the Windhub 66 kV area may shift triggering cost responsibility of this distribution upgrade to the [REDACTED].

Project. Additionally, the study found that a previously triggered Windhub 500/220 kV transformer bank overload under loss of one 500/220 kV transformer bank is aggravated by the inclusion of the [REDACTED] Project. However, the study found that a proposed SPS for the triggering higher queued project will be sufficient to mitigate the incremental impacts of the Project without any additional upgrades.

Post-Transient Analysis

The post transient study focused on identifying NERC/WECC/CAISO voltage criteria violations. The study found that the Project did not trigger any new Post Transient voltage criteria violations.

Previous studies for higher queued projects have identified the need to maintain "South of Vincent" power flows at or below approximately 8,500 MW if no upgrades South of Vincent beyond TRTP are assumed. This study concluded that the Project will not impact the existing system's South of Vincent area export capability. However, depending on dispatch, the addition of the Project can increase South of Vincent area export. Due to the fact that the amount of existing and higher queued generation is already sufficient to exceed 8,500 MW South of Vincent flows, operational mitigation measures to manage South of Vincent flow levels is required to accommodate higher queued projects. The dispatch of this Project will also need to be subject to the same operational limitations as all higher queued projects with regard to South of Vincent area export capability.

Transient Stability Analysis

Using the latest revision of the GE PSLF models for higher queued projects, several higher queued projects were found to exhibit characteristics of sympathetic tripping under normally cleared fault conditions. With modified parameters to eliminate the sympathetic tripping of the higher queued projects in simulations, the transient stability study concluded that the addition of the Project would not trigger any transient stability criteria violations on the SCE system.

Short Circuit Duty

A Short Circuit Duty analysis was performed for the [REDACTED]. This analysis used the best short circuit duty case available at this time which includes the latest information available to date regarding all active higher queued generation projects in the area with studies already completed.

These limited results showed that the [REDACTED] Project may increase SCD by at least 0.1 kA at one location (Windhub 66 kV Substation). This indicates that the SCD impact of the Project is not negligible, and that a more detailed SCD analysis, including the latest available details for all higher LGIP and SGIP queued projects, will be required as part of the Facilities Study.

Deliverability Assessment

The [SEPV7] Project is pursuing interconnection under the SCE WDAT SGIP Tariff. In terms of deliverability status, all small generation projects (including those under the SCE WDAT SGIP) are considered as "Energy Only" projects by CAISO and therefore no deliverability assessment is performed.

Distribution and Interconnection Facilities

The System Impact Study identified the direct assignment Distribution and Interconnection Facilities required to interconnect the Project. The estimated cost for the interconnection facilities including corporate real estate, licensing, environmental permitting, and telecommunication facilities cost is approximately \$6,500,000. It is important to note that the project directly queued ahead of [REDACTED] triggered the need for a new third 220/66 kV transformer bank at Windhub Substation with an estimated distribution cost of \$17,400,000. This cost may shift to [REDACTED] if higher queued projects requesting interconnection in the Windhub 66 kV area ultimately withdraw.

Transmission Network Upgrades

The System Impact Study found that the addition of the Project did not trigger the need for any new transmission network upgrades.

Facilities Study

A Facilities Study ("FAC") will be required after the SIS, to address facility upgrades required for the Project. If necessary, further review of the Project's SCD impact may be performed as part of the Facilities Study.

Project Schedule

The estimated time to engineer, procure equipment and construct the interconnection facilities and upgrades for the Project is 24 months from the time SCE receives an Authorization to Proceed. This schedule does not include corporate real estate, licensing/permitting or environmental schedules needed to support the project. If permitting is needed for the interconnection facilities the estimated time to complete the Project could take up to 60 months.

The IC has requested an in-service date of November 14, 2014 for the Project. The ability to meet the requested in-service date of the Project may be impacted by EKWRA construction activities. Coordination between EKWRA construction activities and construction of facilities needed to interconnect this project will need to be fully vetted once additional projects specific details are provided, such as actual gen-tie routing.

EXHIBIT B

**SUBTRANSMISSION SYSTEM
TECHNICAL ASSESSMENT**



REVISED
**Subtransmission System
Technical Assessment**

Evaluation Based on Historical Load

August 21, 2012



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Prepared by

Lionel Olivares

Southern California Edison Company

WDT435 - [REDACTED]
Revised Subtransmission System Technical Assessment
8/21/2012

On February 3, 2012 Southern California Edison ("SCE") submitted to [REDACTED] a System Impact Study ("SIS") report which described the impact of adding the 20 MW [REDACTED] Project ("Project") to the Northern Antelope-Bailey Distribution and Transmission systems. The SIS determined that there were constraints on the subtransmission system that must be mitigated prior to the interconnection of the Project. The Transmission Assessment conclusions are summarized below.

SIS Transmission Assessment Power Flow Conclusions

With all queued ahead generation projects and all corresponding facility upgrades modeled, and with the system reconfigurations proposed as part of EKWRA, the power flow study identified that the addition of the Project did not trigger any new transmission level problems but rather aggravated previously triggered base case overloads. The System Impact Study identified the direct assignment Facilities required to interconnect the Project and estimated the cost for these interconnection facilities including corporate real estate, licensing, environmental permitting, and telecommunication facilities costs at approximately \$6,500,000.

Additionally, the study found that a previously triggered Windhub 500/220 kV transformer bank overload under loss of one 500/220 kV transformer bank is aggravated by the inclusion of the [REDACTED] Project. However, the study found that a Special Protection System would be implemented for the triggering project which would mitigate the overload.

Overloads with [REDACTED] Project

Overloaded Facility <i>*Without higher queued upgrade</i>	Rating	Heavy Summer		Heavy Spring	
		Pre	Post	Pre	Post
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

While the study determined that the project did not trigger any new transmission level impacts, it is important to note that the project queued directly ahead of [REDACTED] was identified to trigger the need for a third 220/66 kV transformer bank (mostly distribution upgrades) at Windhub Substation. As such, the study identified that any withdrawals of higher queued projects in the Windhub 66 kV area may shift triggering cost responsibility of the third Windhub 220/66 kV transformer to the [REDACTED] Project. The estimated cost that may shift to the [REDACTED] project was identified to be \$17,400,000.

Technical Assessment Study Results

Since the IC received the SIS Transmission Assessment, a few queued ahead projects initially included in the base case, have withdrawn their interconnection application from queue. Table 1 provides the list of projects which have withdrawn since the IC received the SIS Transmission Assessment. This technical assessment revised the local area loads to reflect historical data. A correction to the MW capacity of a queued ahead generation project was also made.

Table 2 below provides the load comparison between the revised to reflect historical load data and the load data that was used in the original SIS base case. Table 3 below shows the correction made to the queued ahead generation project.

Table 1: Queued Ahead Projects that withdrew after the IC received a SIS

CAISO Queue Position	Type	Size (MW)
CAISO Queue #41	Combustion Turbine	159
CAISO Queue #409	New Wind Project	150
CAISO Queue #483	Solar	10
	Total	319

Table 2: Load Data Comparison (MVA)

	Original Base Case	Revised Base Case	Difference
Summer	110.7	95.9	14.8
Spring	71.9	57.6	14.3

Table 3: Queued Ahead Project Modeled Capacity (MW)

Adjusted Queued Ahead Project	Original Base Case	Revised Base Case	Comment
CAISO Queue #86 B	27	16	Original Case modeled units that were to be repowered as part of the expansion. New case subtracts these units as they are already included as existing generation.

Note that the load used in the original SIS base case was 14 MW larger when compared to historical load performance. Due to the reduction in size of the queued ahead project, very similar system conditions to the initial SIS were defined given the total net difference of approximately 3 MW (14 MW load reduction coupled with 11 MW project withdrawal). However, the technical assessment for a queued ahead project has identified a new mitigation which would alleviate the overload and eliminate the need for the third A-Bank transformer to accommodate the queued ahead project. The new mitigation involves rolling an existing 10 MW generating facility currently connected at SCE's Borel Substation to be served from the Vestal 66 kV subtransmission system via a normally open circuit breaker. The mitigation requires the development of an operating procedure which would transfer the Borel generator from the Windhub system to the Vestal system. This operating procedure does not provide sufficient relief to enable the interconnection of [REDACTED]. As such, [REDACTED] triggers the need for the third Windhub 220/66 kV transformer bank as summarized below in Table 4.

Table 4: Thermal Overloads due to the Project Found in Technical Assessment

Overloaded Facility	Rating	Heavy Summer		Heavy Spring	
		Pre	Post	Pre	Post
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED] stands for loading in excess of line capability.

The cost responsibility will be directly assigned to [REDACTED]. The cost, scope, and schedule estimate for this upgrade has been previously provided in the original SIS and will not be reevaluated as a part of this technical assessment. These estimates will be reevaluated in the Facilities Study. Table 5 below indicates the projects ahead in queue that must be complete for the transformer addition to be required.

Table 5: Active Queued Ahead Northern Antelope-Bailey Area Subtransmission and Distribution Level Projects

CAISO Queue Position	Type	Size (MW)	Status
CAISO Queue #79	New Wind Project	51	In-Service
CAISO Queue #86 B	New Wind Project (Partial Repower)	34	Old units from Partial Repower In-Service
CAISO Queue #91	New Wind Project	51	In-Service
CAISO Queue #348	New Solar Project	40	GIA Pending
CAISO Queue #349	New Solar Project	100	GIA Pending
SCE WDAT #368	New Solar Project	5	GIA Pending
SCE WDAT #402	New Solar Project	10	GIA Pending
	Total	291	

Technical Assessment Conclusion

Results of the Technical Assessment which incorporate both project withdrawals and use of Operating Procedure identified for queued ahead project have determined that [REDACTED] triggers the need for the third A-bank transformer at Windhub. The operating procedure for the queued ahead project did not provide sufficient capability for this project.

EXHIBIT C

COST SUMMARY

WDT 435 [REDACTED] Project

Cost Estimate Summary (2012 Dollars)

Scope: Interconnection of 20 MW of generation to Windhub Substation.

No.	Element	Interconnection Facilities (Subject to ITCC)	Distribution Upgrades (Subject to ITCC)	Reliability Network Upgrades (Not Subject to ITCC)	ITCC** (35%)	Total
Sub-Transmission						
1	Gen-fee	\$ 308,815	\$ -	\$ -	\$ 108,085	\$ 416,900
Subtotal						
Substation						
1	Equip a 66 kV position - interconnection	\$ 330,859	\$ -	\$ -	\$ 115,801	\$ 446,660
2	Equip a 66 kV position - Distribution	\$ -	\$ 1,001,920	\$ -	\$ 350,672	\$ 1,352,592
3	Install third 220/66kV transformer bank, Network Upgrades	\$ -	\$ -	\$ 2,860,352	\$ -	\$ 2,860,352
4	Install third 220/66kV transformer bank, Distribution Upgrades	\$ -	\$ 11,539,099	\$ -	\$ 4,038,685	\$ 15,577,784
Subtotal						
Telecommunication						
1	Install lightning, channel, and associated equipment	\$ 343,055	\$ -	\$ -	\$ 120,089	\$ 463,144
2	Install fiber optic cable	\$ 99,716	\$ -	\$ -	\$ 24,401	\$ 124,117
Subtotal						
Corporate Environmental Services						
1	Activities related to equipping the 66 kV position	\$ -	\$ 57,748	\$ -	\$ 20,212	\$ 77,960
2	Activities related to the gen-fee	\$ 428,003	\$ -	\$ -	\$ 149,801	\$ 577,804
3	Activities related to the telecom requirements	\$ 43,143	\$ -	\$ -	\$ 15,100	\$ 58,243
4	Activities to support the new third 220/66kV transformer bank	\$ -	\$ 57,748	\$ -	\$ 20,212	\$ 77,960
Subtotal						
Licensing						
1	Activities to support project - N/A	\$ -	\$ -	\$ -	\$ -	\$ -
Real Properties						
1	Activities to support project	\$ 96,437	\$ -	\$ -	\$ 33,758	\$ 130,195
Subtotal						
Metering Services						
1	Requirements for the interconnection	\$ 29,598	\$ -	\$ -	\$ 10,359	\$ 39,957
Power System Controls						
1	RTU at the customer's facilities	\$ 93,327	\$ -	\$ -	\$ 32,664	\$ 125,991
2	Point additions to RTU at Windhub Substation	\$ -	\$ 34,113	\$ -	\$ 11,940	\$ 46,053
Subtotal						
Total		\$ 1,742,953	\$ 12,690,628	\$ 2,960,352	\$ 5,051,753	\$ 22,345,686

* Pursuant to FERC Order 2003A, ITCC is not collected on Reliability Upgrades and One Time Costs.

** ITCC cost may be offset with a letter of credit in accordance with the tax provisions of the LGIA.

*** The ITCC included in this cost estimate was computed using a 35% rate. Because of recent enactment of H.R. 4653, the Tax Relief, Unemployment Insurance Reauthorization and Job Creation Act of 2010, and upon formal acceptance by the CPUC of SCE's advice letter (filed on December 27, 2010), this rate may change for electric CIGAR recorded or received after September 8, 2010 through December 31, 2011.

Cost estimate is only an estimate based on 2011 constant dollars and actual cost is subject to change depending on project construction date, and inflation.

**** SCE's Phase II cost estimating is done in "constant" dollars 2011 and then escalated to the estimated O.D. year. For the Phase II study, the estimated O.D. is derived by assuming the duration of the work element will begin approximately in January 2012, which is roughly the CAISO tariff scheduled completion date of the Phase II study plus 90 days for the LGIA signing period. For instance, if a work element is estimated to take a total of 24 months (permitting, design, procurement, and construction), then the estimated O.D. would be January 2014. If an IC's requested O.D. (in service) is beyond the estimated O.D. of a work element, the IC's requested O.D. is used. Does not include ITCC.