DATA REQUEST #1 FROM FRONTLINES TO SCE

QUESTION 1:

Page 66 of the "2010 Final CTPG Study Report - Phase 3" dated September 10, 2010 states "At the request of TNHC additional studies were performed using the updated modeling information presented above. In these studies it was assumed that the new Lake 500-kV station would not be built and that the line to the LEAPS Substation would be interconnected at SCE's Alberhill Substation."

[See http://www.ctpg.us/public/images/stories/downloads/2010-09-10 final phase3 study report.pdf]

- A) Please confirm that SCE is a member of the CTPG.
- B) Please clarify whether SCE objects to, or supports the CPTG's assumptions which eliminate the proposed 500 kV Lake substation and interconnect LEAPS to SCE's Alberhill substation and Please explain why.
- C) Please provide FRONTLINES with all documents and/or studies prepared by SCE or in the possession of SCE which provide transmission line routing information and other information pertinent to the interconnection of the LEAPS substation with SCE's Alberhill substation.

QUESTION 2:

Please provide FRONTLINES with copies of all written and electronic correspondence, documents, and/or studies that have been prepared or submitted by SCE as a member of the CTPG which pertain in any way to either the TEVS project or the LEAPS project or the combined TEVS/LEAPS projects. Additionally, please provide FRONTLINES with all electronic correspondence, documents, and/or studies in the possession of SCE that have been prepared or issued by the CTPG or by members of the CTPG which pertain in any way to either the TEVS project or the LEAPS project or the combined LEAPS/TEVS projects. Additionally, please provide FRONTLINES with copies of all future written and electronic correspondence between SCE and the CTPG or CTPG members which pertain to either the TEVS project, the LEAPS project, or the combined LEAPS/TEVS projects until CPUC proceeding A.10-07-001 is formally concluded.

QUESTION 3:

In addition to the documentation requested in Question 2, please provide FRONTLINES with the results of all analytical studies and power flow results that SCE has developed pertaining to the TEVS project, the LEAPS project, or the combined TEVS/LEAPS projects including all conclusions related to criteria violations and mitigation plans.

QUESTION 4:

SCE has issued the following notices:

11/16/2007

On Friday, November 16, 2007, the following non-public transmission information was improperly disclosed to employees of SCE's internal marketing group, Energy Supply & Management. There is coordination between the Alberhill 500/115 kV project and the Lake Elsinore Advanced Storage (LEAPS) project. The location of LEAPS's Lee Lake substation was of concern because of the size of the proposed parcel by LEAPS. The interconnection of LEAPS into Alberhill 500/115 kV project would consist of the addition of one position to the Alberhill switch rack.

The system needs associated with Nevada Hydro's 500 kV transmission line were not studied. SCE's Interconnection System Impact Study for LEAPS evaluated the following scenarios: Telega – Escondido/ Valley – Serrano (TE/VS) transmission line only (natural flow); 500 MW into SCE's System; 500 MW into SDG&E's system; 600 MW of load into SCE's system; and 600 MW of load into SDG&E's system

The system reliability and need for Nevada Hydro was not studied.

SCE's Transmission and Interconnection Planning group has proceeded with its annual Expansion Plan study with out the TE/VS and/or LEAPS project and has taken the necessary steps to assure reliable service to the Lake Elsinore / San Jacinto region with its proposed Alberhill 500/115 kV project. Method of service for the Alberhill 500/115 kV substation does not consider the TE/VS and/or LEAPS project.

The Alberhill 500/115 kV project details:

- Up to 7-500 kV positions
- 4 –560 MVA 500/115 kV Transformer banks
- Up to 9 115 kV positions

Proposed to pick-up approximately 288 MW.

10/16/2007

On Tuesday, October 16, 2007, the following non-public transmission information was improperly disclosed to several employees of SCE's internal marketing group, Energy Supply & Management. Nevada Hydro submitted an interconnection application with the California ISO to interconnect the 500 MW Lake Elsinore Advance Pump Storage ("LEAPS") project to SCE's Valley-Serrano 500 kV line and the San Diego Gas & Electric Company near Camp Pendleton.

A new interconnection substation is needed so that the LEAPS project can interconnect to SCE's electrical system, whereby the Valley-Serrano 500 kV line will be looped into the new substation. Also, several facility upgrades on SCE's system are required to accommodate the LEAPS project. The substation and upgrades must be included in the Nevada Hydro Environmental Impact Report (EIR). The new substation will basically be SCE's proposed Alberhill substation and may be relocated to the proposed Nevada Hydro 500 kV substation site.

- 1) Please provide FRONTLINES with copies of all correspondence between SCE and Nevada Hydro and/or others regarding the coordination effort that is referred to in the first paragraph above.
- 2) Please provide FRONTLINES with a copy of the draft and final System Impact Study Documents referenced above and prepared by SCE in accordance with the CAISO Tariff.
- 3) Please provide FRONTLINES with a copy of the draft and final Facilities Study documents prepared for the LEAPS project prepared in accordance with the CAISO Tariff.
- 4) Please identify any modifications or additions to the Alberhill 500/115 kV substation project that have been recommended or implemented by SCE to accommodate either the LEAPS or the TEVS project since November, 2007.
- 5) Please provide FRONTLINES with all documents and study results developed by, or in the possession of, SCE which pertains to the facility upgrades required on SCE's system that are referred to in the last paragraph above.