

DATA REQUEST #1 FROM FRONTLINES TO SCE

QUESTION 1:

The “2010 Final CTPG Study Report - Phase 3” dated September 10, 2010 indicates that the CTPG (which consists of CAISO and various IOUs) has recently studied the TEVS interconnection project.

A) Please confirm that SDGE is a member of the CTPG.

B) Please provide FRONTLINES with copies of all written and electronic correspondence, documents, and/or studies that have been prepared or submitted by SDGE 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 SDGE 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 SDGE 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 2:

Please provide FRONTLINES with the results of all analytical studies and power flow results that SDGE has developed independent from the CTPG and subsequent to the Commission’s approval of Sunrise which pertain to the TEVS project, the LEAPS project, or the combined TEVS/LEAPS projects. Please include all conclusions related to criteria violations and mitigation plans.

QUESTION 3:

An essential argument of SDGE’s protest to TNHC’s CPCN application is that it fails to properly account for the Commission-approved Sunrise project, and that benefits which TNHC claims TEVS will provide are essentially addressed with the Commission’s approval of Sunrise. FRONTLINES seeks to reconcile SDGE’s arguments presented in their protest with SDGE’s testimony filed in the Sunrise Proceeding. SDGE testified in 2005 (see SD-2) that the “full-loop” alternative to Sunrise provides the highest economic and CAISO ratepayer benefit. SDGE also testified that the “full loop” alternative “is consistent with the transmission additions that have been proposed in association with the LEAPS project”. In 2008, SDGE testified that the proposed Sunrise project is “better situated to connect future transmission lines to SCE’s system” via the “full loop” interconnection (see Ch 7 of SDGE Rebuttal testimony). The “northern-route” proposed by SDGE for Sunrise was not approved by the Commission, rather a “southern route” was approved that excluded SDGE’s proposed “central substation” and precluded construction of the “full loop” alternative envisioned by SDGE.

In light of the “southern route” approved for Sunrise, Does SDGE still consider the “full loop” configuration to be capable of providing economic benefits and CAISO ratepayer benefits? Please explain why.