



*City of Arts & Innovation*

# City Council Memorandum

**TO: HONORABLE MAYOR AND CITY COUNCIL      DATE: MAY 10, 2022**  
**FROM: PUBLIC UTILITIES DEPARTMENT      WARDS: ALL**  
**SUBJECT: RIVERSIDE TRANSMISSION AND RELIABILITY PROJECT (RTRP)**

## **ISSUES:**

Receive a report on staff's research to questions posed at the April 5, 2022 City Council meeting regarding RTRP and consider certain actions regarding the project.

## **RECOMMENDATIONS:**

That the City Council:

1. Receive a report on the responses to questions and comments at the April 5, 2022 City Council meeting regarding RTRP.
2. Consider a City Council action for City of Riverside to conduct due diligence activities for purpose of determining the legal, financial and operational feasibility to consider potential project modifications to Southern California Edison's portion of the Riverside Transmission Reliability Project.

## **BACKGROUND:**

### **The Project**

The Southern California Edison (SCE) project as approved by the California Public Utilities Commission (CPUC), is the design, construction and operation of a high voltage transmission line to supply reliable electric service to the City of Riverside (Riverside) through a new second connection to the state bulk electric system grid. The Riverside Transmission and Reliability Project (RTRP) consists of construction of 10 miles of 230,000 volt (230kV) double circuit transmission line (approximately 4 miles underground, 6 miles above ground) and new 230kV substation and associated facilities needed by SCE to operate the facilities. All of the transmission lines originally proposed in the Environmental Impact Report (EIR) prepared and approved by Riverside were to be installed using above ground construction. The original project was redefined as the "revised project" to settle a legal challenge from property developers in Jurupa Valley along the proposed route. The revised project proposed to underground two miles of transmission line within the area of 68<sup>th</sup> Street heading north on Pats Ranch Road. No legal challenges or recommendations to modify the project design for the portion of the project south of the Santa Ana River in the City of Riverside were made at that time.

An “Alternative 1” project proposal was later developed in response to directives by the CPUC to consider further project alternatives and mitigate known significant environmental impacts. The result was the Alternative 1 project which proposed to underground an additional 2.1 miles of transmission lines in Jurupa Valley thus creating an underground transmission line from the point of interconnection (SCE Mira Loma Substation) to a location prior to extending across the Santa Ana River. Alternative 1 was deemed by CPUC as the environmentally superior alternative reducing “RTRP’s impacts on aesthetics and agricultural and forestry resources” in response to the project’s legal opponents.

#### Certificate of Public Convenience and Necessity

On March 18, 2020, the CPUC as the regulatory agency granted to SCE a Certificate of Public Convenience and Necessity (CPCN) for the Riverside Transmission and Reliability Project. The CPCN authorizes SCE to construct RTRP as currently designed, the CPUC determined the Subsequent Environmental Impact Report was completed in compliance with the California Environmental Quality Act (CEQA), that the total maximum project cost of the project not exceed \$521 million, and required any changes in project scope and schedule greater than a project refinement (inside the geographic boundary of the EIR study area, no new significant impact or substantial increase in the severity of a previously identified significant impact) be subject to a petition to modify application by SCE to the CPUC.

This 40-page document is extremely valuable to understand the CPUC’s reasoning to order the project to be constructed. It identifies the clear need that Riverside and its customers have for a second point of interconnection for bulk power transmission. It identifies Riverside as the only electric utility in California with a single point of connection to the state bulk transmission system that is served by transmission lines below 230,000 volts (230 kV) and recognized the significant outages at the SCE Vista Substation in 2005 and 2007. The CPUC weighed the environmental impacts of the project based on the testimony and documents submitted into the legal record and determined that Riverside’s needs “are overriding considerations that serve the public convenience and necessity and outweigh the project’s unavoidable impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its significant contribution to cumulative hydrology and water quality impacts.”

#### City Council Meeting – April 5, 2022

Discussion Calendar Item 15 titled *Riverside Transmission Reliability Project (RTRP) progress and project actions update presented by Southern California Edison representative* was presented. A team of SCE representatives presented details on the project’s progress toward engineering, permitting, procurement and what Riverside residents can expect once construction begins. After a Public Comment period, City Council members asked questions of SCE representative and the Riverside Public Utilities Department General Manager. The presentation and discussion can be viewed at:

[https://riversideca.granicus.com/player/clip/5052?view\\_id=2&redirect=true](https://riversideca.granicus.com/player/clip/5052?view_id=2&redirect=true).

The following questions required staff’s additional research and analysis and are included in the discussion of this presentation.

1. What was the extent of community outreach and communication about the project?
2. Why were Chino Hills and Jurupa Valley granted undergrounding for portions of projects through their communities and not Riverside?
3. What other project alternatives were considered?
4. What is the CPUC process to consider a request to modify the approved project including

- to underground the remainder of the project through the City of Riverside?
5. Is there consideration by SCE to underground, change or remove existing low voltage lines through Bradford Street?
  6. Are there health impacts of the approved electric transmission power lines?
  7. How were impacts on environment and disadvantage communities considered?
  8. What are the wildfire risks from the project and safety measures planned?

Mayor Lock-Dawson summarized the concerns of Councilmembers expressed during the presentation and discussion and supported staff and SCE return with information requested by Councilmembers.

## **DISCUSSION:**

The following discussion points correspond – sequentially by number – with each of the eight questions in the Background section above from the City Council meeting of April 5, 2022.

### **1. Community Outreach**

Beginning in 2006, an extensive public outreach effort was undertaken for the preparation of the first environmental review of the RTRP and the development of the alternatives for the project. Riverside Public Utilities and Southern California Edison coordinated the public outreach effort to evaluate 31 alternatives for the RTRP project that included a variety of route options, consideration of a no-wires option, a no project option, and consideration of undergrounding various portions of the transmission lines. Public participation, comments, and aspects of public involvement are outlined in both the Final RTRP Project Environmental Impact Report (2012 PEIR) certified by the City of Riverside in February 2013 and in the Final Subsequent Environmental Impact Report March 2020.

#### **a. RTRP Project EIR, October 2012**

The City of Riverside, in coordination with Southern California Edison, conducted the RTRP project outreach as the project initially developed beginning in January 2006. The Outreach methods for the 2012 PEIR included newsletters, media announcements, open houses, agency contacts, and agency and elected official briefings. As noted in the 2012 PEIR, Chapter 7: “The public involvement approach for the proposed RTRP [was] flexible and evolved with the Proposed Project based on level of public interest, types of public comments, issues identified, and stage of the planning process. In some instances, additional newsletters were published, public meetings were held, or agency presentations were conducted beyond originally identified efforts.”

Each EIR document includes sections that outline the details of the public outreach, comments received, and how comments were responded to.

- **Seven (7) newsletters** were distributed between March 2006 and September 2009. The mailing list size varied from 21,151 to 32,400 addresses. Newsletters discussed the project, alternatives and provided announcement of upcoming meetings.
- The RTRP environmental review scoping announcement was released November 2009 to 634 interested parties.

- **Display advertisements** were released in six publications. Newspapers included The Press-Enterprise, La Prensa, Hispanic News (Hispanos Unidos), Black Voice News and Riverside County Record. Depending on the publication dates for each newspaper, between four and seven announcements were included between March 2006 and November 2009.
- **Press releases** were distributed to seven newspapers: The Press-Enterprise, The San Bernardino Sun, Inland Empire Community Newspapers, Black Voice News, Los Angeles Times, Riverside County Record, and Inland Valley Bulletin.
- **A project website** was hosted on the RPU website in both English and Spanish. The website included all open house announcements, newsletters, display advertisements, and press released along with project details. In April 2007, the website added a public comment form allowing the public to provide comments on the project throughout the project development and environmental review process.
- **A project telephone information line** was established in January 2007. The line included information on the project, meeting dates, allowed callers to leave comments and be added to the mailing list. Callers could also request RPU staff to contact them.
- **Public open houses** were held throughout the environmental review process. As noted in the 2013 PEIR document, the open houses and other public meetings provided project updates, updates on studies, current routes being evaluated, and allowed the public to speak directly with the project team, ask questions, and provide comments. Meetings were informal using an open house format and were held in the evenings, after work hours. Community facilities located in the central part of the project area were primarily used for public open houses to facilitate participation. Two meetings were held in areas where public interest in the project was high. Additionally, a formal scoping meeting was held with the Riverside Planning Commission on December 3, 2009. The following table from the 2013 PEIR describes the location and attendance at the public meetings (see table 7.2-3, Public Meetings, PEIR October 2012 – page 7-4).

Date	Location	City	Attendance	Comment Forms Received at Meeting
April 5, 2006	Riverside Municipal Airport 6951 Flight Road	Riverside	6	0
April 6, 2006	Riverside Municipal Airport 6951 Flight Road	Riverside	8	3
January 25, 2007	Riverside Municipal Airport 6951 Flight Road	Riverside	29	2
April 25, 2007	Indian Hills Golf Club 5700 Club House Drive	Riverside	90	34
April 26, 2007	Riverside County Flood Control and Water Conservation District 1995 Market Street	Riverside	26	10
June 28, 2007	Riverside Municipal Airport 6951 Flight Road	Riverside	53	13
February 12, 2009	Jurupa Community Services District 11201 Harrel Street	Mira Loma	88	25
October 14, 2009	Patriot High School 4355 Camino Real	Riverside	47	2
October 15, 2009	Bryant Park Community Center 7950 Philbin Avenue	Riverside	25	1
December 3, 2009*	City Council Chambers, City Hall 3900 Main Street	Riverside	22	21

\* Formal scoping meeting; comments received were verbal comments transcribed by court reporter

- **Agency coordination** was conducted through the environmental review. This coordination involved agencies and organizations that had jurisdiction and/or specific project interest in the RTRP. RPU and SCE environmental staff coordinated with these agencies to provide RTRP project information, project status, availability of environmental documents, and to solicit input. Additionally, management level contacts were made with agencies as requested. **A Technical Advisory Committee (TAC)** was formed for those agencies or organizations that were considered to potentially have a significant role in permitting or project approvals. Agency coordination and TAC meetings began in January 2006 and continued through December 2009.
- **American Indian Tribes** were invited to and participated in project meetings. All Native American Tribes identified on the California Native American Heritage Commission mailing list were contacted with information on the proposed RTRP project. Meetings and site visits were conducted with three groups to identify potential areas of the project that were of special interest. The findings of the tribal coordination were included in the environmental planning process and were taken into consideration.
- **Official public scoping announcements and meetings** as required by the California Environmental Quality Act were also provided and/or held in 2009.
  - **Additional public announcements and comments during the public review of the Draft PEIR** were also made and taken. Official announcements per all CEQA requirements were made and public notices were posted in publications with area-wide circulation (The Press-Enterprise and The Riverside County Record). Project notifications were sent to about 16,000 residents, businesses and interested parties. The mailing list included agencies, elected officials, Native American Tribes, property owners (all properties within a one-mile buffer on either side of the project), and other interested individuals and organizations that had request notification.

- **An extended public review period** was provided. Comments were received by 21 agencies and 94 individuals.

b. RTRP Final Subsequent EIR – October 2018

The lead agency for the RTRP's 2018 subsequent environmental review was the California Public Utilities Commission (CPUC). Because the need for the subsequent environmental review was predicated on the need to address the change of conditions in Jurupa Valley and only considered the changes being considered on portions of the RTRP in Jurupa Valley, the public outreach was more limited in scope than the extensive efforts that were undertaken during the development and review of the 2012 PEIR.

The CPUC with SCE completed all required public noticing including distribution of announcements and review documents to numerous entities. Public notices were provided in English and Spanish. The full description of the required public notifications made by the CPUC can be found in Appendix M-2 of the Final Subsequent EIR. Additionally, the CPUC held public informational workshops in Jurupa Valley on April 24 and 25, 2018 to provide project information and accept public comment. During the comment period, the CPUC received 16 agency comments, 15 community group or organization comments, and 113 individual comments. In some cases, one agency, group, organization or individual may have submitted more than one comment letter. The CPUC also received comments from the applicant (SCE) as well as submissions from numerous individuals of two form letters and three petitions.

c. Additional Outreach and Public Discussion of the RTRP

Since the project approval, RPU has met with numerous community members, elected officials and City Council members. Additionally, a community meeting on December 10, 2020 was held to discuss community concerns.

2. Chino Hills and Jurupa Valley Granted Undergrounding

The Tehachapi Renewable Transmission Project (TRTP) is an approximate 173-mile high voltage transmission line project originating in southern Kern County and terminating at the SCE Mira Loma Substation in Ontario to transmit multiple renewable wind energy project resources into Southern California to support statewide renewable energy goals. This was an important project to support the region's renewable energy goals. It was not a project which primarily benefited the City of Chino Hills. After the EIR was approved and CPCN granted in December of 2009, the City of Chino Hills timely filed an Application for Rehearing in January 2010, which was not acted upon by the CPUC. Construction of the project began, then SCE filed a Petition to Modify the project to add marker ball in October 2011; shortly thereafter, also in October 2011, the City of Chino Hills filed a Petition to Modify CPUC Decision relating to Segment 8A of the project which crossed through the City of Chino Hills. In November 2011, the CPUC Administrative Law Judge issued a stay on the project until alternatives could be studied and considered. In its July 2013 Decision on the City of Chino Hills' Petition, after an Addendum to the EIR, public testimony, hearings and legal briefing, the CPUC ordered Segment 8A be constructed as an underground segment as the environmentally preferred route, noting that undergrounding only 3.5 miles of a 173-mile project would not substantially impact the entire project and determining that an addendum to the EIR met CEQA requirements.

The relation of Chino Hills to TRTP is similar in some ways to Jurupa Valley's relation to RTRP.

Similar to Chino Hills, Jurupa Valley is not benefiting directly from the project. No additional electricity is being delivered through RTRP to Jurupa Valley residents. Chino Hills residents similarly bore the burden of the overhead transmission lines through its community which benefited the entire region without a significant return of value for the cost incurred. The CPUC in both cases found that while the need for the project outweighed the unavoidable impacts on aesthetics and other environmental factors, approval for undergrounding specific segments of the project were granted to avoid and mitigate aesthetic and agricultural impacts.

### 3. Other Project Alternatives Considered

The City of Riverside studied project alternatives in both its original EIR and the CPUC required and prepared Subsequent EIR. The CPUC commissioned *Alternatives Screening Report* reviewed 30 project alternatives including the alternatives studied by Riverside (*RTRP Lower Voltage and Other Design Alternatives Report*) as a result of the August 15, 2017 directive from Administrative Law Judge Yacknin. The project alternatives included undergrounding, changes in route alignments in both Jurupa Valley and Riverside, battery storage solutions, expansion of existing SCE Vista Substation, expansion of existing Riverside peaker plants, distributed energy generation, utility scaled solar, energy efficiency/conservation programs, demand response programs and lower voltage transmission line options. Based on the CPUC evaluation of project alternatives, the following four project alternatives were selected for further consideration in the Subsequent EIR.

- Alternative 1 – Bellegrave-Pats Ranch Road 2.1-mile underground project
- Alternative 2 – Wineville-Limonite 2.2 mile underground project
- Alternative 3 – Relocation of Riser Poles from Limonite Ave to I-15 freeway location
- Alternative 4 – Wineville-Landon 0.8-mile underground project

Even though various route alternatives, including through Riverside, were included in the CPUC re-evaluation, no project modifications in Riverside were proposed by the CPUC. The findings resulted in a determination that the Alternative 1 project is the environmentally superior alternative to the Revised project which already included a 2-mile undergrounding component due the significant impacts on approved developments in the southern and western portions of Jurupa Valley.

Undergrounding portions and the entire project were considered and analyzed in Chapter 6.4.3: Project Alternatives of the certified 2013 RTRP EIR. The primary advantages identified in Chapter 6.4.3 of constructing the project with underground lines is the potential to reduce visual impacts, reduce land use and community impacts and reduce the Rights of Way width requirements. The disadvantages identified included increased land disturbances during construction, poor accessibility to maintain facilities after construction, increased use of hazardous materials in the cooling systems required, increased air quality and biological impacts during construction, increased potential to damage other existing utilities during operations and maintenance, increased time required to repair equipment resulting in longer outages to customers, and higher costs associated with installation and repair of the transmission lines. Undergrounding was determined to have greater environmental impacts than the overhead transmission line construction and operation. The CPUC in its Alternatives Screening Report assessment for the 2018 Subsequent EIR supported the findings of the certified 2013 RTRP EIR on this issue because of its greater environmental impacts than the Revised Project. In conclusion, the 2013 RTRP EIR recognizes that there are unavoidable and significant impacts in areas more than aesthetics in building the project. The CPUC weighed the environmental impacts of the project

based on the testimony and documents submitted into the legal record and determined that Riverside's needs "are overriding considerations that serve the public convenience and necessity and outweigh the project's unavoidable impacts on aesthetics, agricultural and forestry resources, noise and transportation and traffic, and its significant contribution to cumulative hydrology and water quality impacts."

#### 4. Process to consider changes to the approved project

Section 1708 of the Public Utilities Code authorizes the CPUC to "rescind, alter, or amend any order or decision made by it". It is characterized as an extraordinary remedy which must be exercised with care and the burden of proof is the responsibility of the petitioner.

There are two avenues for the CPUC to reconsider an approved project. Rule 16.1 of the CPUC's Rules of Practice and Procedure (California Code of Regulations, Title 10, Division 1, Chapter 1) outlines the process for the Application for Rehearing of a decision. This process is not available to the City because filing for a rehearing must occur within 30 days of the date that the decision is made. In this case, the decision for the RTRP CPNC was mailed on March 18, 2020 and the 30-day filing period has passed.

The second method to file for a reconsideration is under CPUC Rule 16.4, Petition for Modification (PFM). A PFM must follow specific rules and requirements in order to request changes to an issued decision, as follows:

- a. Must concisely state the justification for the requested relief
- b. Must propose specific wording to carry out all requested modifications to the decision
- c. Support factual allegations to specific citations in the record of the proceedings
- d. Support allegations of new or changed facts by appropriate declaration or affidavit
- e. Must be filed within one year of the effective date of the decision
- f. If PFM filed after one year, PFM must explain why petition could not have been presented within one year of the effective date of the decision
- g. PFM must be filed and served on all parties to the proceeding, and others as determined by the Administrative Law Judge if filed after one year
- h. Petitioner of the PFM that was not original party to the proceeding must state specifically how the petitioner is affected by the decision and why petitioner did not participate in the earlier proceeding
- i. Parties to the proceeding may take a position in support or opposition to the PFM
- j. Filing a PFM does not stay or excuse compliance with the approved order of the decision proposed to be modified
- k. The decision remains in effect until a decision modifying the decision is made

Based on the requirements of Rule 16.4, a PFM can be filed by anyone affected by the decision. The petitioner has the responsibility to provide the information in justification of the request. As a point of information, in the PFM filed by the City of Chino Hills, contributing factors identified were a Request for Rehearing that was not resolved for two years, new marker balls being placed on conductors for aircraft visibility which were not considered in the approved environmental analysis and actual size of transmission towers have significantly greater impact than represented in the record documentation. Each PFM must be specific to the facts and circumstances of the project.

In order for the City to pursue a PFM under Rule 16.4, the City Council would need to follow the process set forth in CPUC Rule 16.4. An adequate, proper, and thorough evaluation of the



undergrounding and/or alternate options for RTRP are paramount to support future City Council consideration of a Petition for Modification. Any procurement process for the selection of an independent consultant(s) could take up to 90 days or longer which is a factor for the City Council to consider. Topical areas for which independent consultants may be necessary in order to submit an effective Petition for Modification may include identification and documentation of omitted or erroneous information or changed conditions; undergrounding the currently above-ground portions; environmental impacts; and others. Timeline, scope and price for each type of each consulting service needed would be determined through the procurement process.

##### 5. Project mitigation measures – Bradford Street alternatives (SCE)

As of the publishing of this report, SCE continues to review the request by Riverside Public Utilities Department to analyze the possibility to underground, relocate or remove the existing SCE low voltage sub transmission line on Bradford Street or the entire line which originates on the west end of the Hidden Valley Wildlife Area and extends east through Bradford Street to Jurupa Avenue and north through a corridor between Peyton Road and Wilderness Road. This request would eliminate multiple sets of power lines intersecting the area.

##### 6. EIR Review – Impacts on health

Both the Riverside EIR approved in 2013 and the CPUC Subsequent EIR approved in 2018 addressed questions and issue relating to risks associated with exposure to Electromagnetic Fields (EMF) from high voltage transmission lines. The 2013 EIR references that the California Environmental Quality Act (CEQA) and the National Environmental Protection Agency (NEPA) do not require an evaluation of exposure to EMF due to the lack of consensus among scientists on the issue. Both 2013 and 2018 reports do, however, include discussion of the issue for the public benefit and transparency.

The reports reference national and international studies from 1999 – 2007. The CPUC reaffirmed in Decision 06-01-042 “that state and federal public health regulatory agencies have not established a direct link between exposure to EMF and human health effects.” California’s regulated utilities are bound, however as a precaution, to Decision 93-11-013 which requires “no-cost and low-cost” approaches for new project designs to reduce EMF exposure which were followed and accepted by the CPUC for RTRP. Design and construction elements such as utilizing double-circuit construction to reduce spacing between circuits and raising the height of the lowest conductor ground clearance are two methods used in RTRP to reduce EMF exposure.

Appendix C of the 2013 EIR (EMF Statement) can be found at

[https://riversideca.gov/utilities/sites/riversideca.gov.utilities/files/pdf/projects/rtrp/Appendix\\_C\\_EMF\\_Statement.pdf](https://riversideca.gov/utilities/sites/riversideca.gov.utilities/files/pdf/projects/rtrp/Appendix_C_EMF_Statement.pdf).

The CPUC Subsequent EIR contains further information at

[https://ia.cpuc.ca.gov/Environment/info/panoramaenv/RTRP/PDF/Final\\_SEIR/VOL2/Appendix\\_C.pdf](https://ia.cpuc.ca.gov/Environment/info/panoramaenv/RTRP/PDF/Final_SEIR/VOL2/Appendix_C.pdf).

Additionally, the CPUC Decision 20-03-01 noted that EMF is not considered in the context of CEQA for their final determinations on environmental impacts. However, the CPUC does

recognize the public concern and has established General Order (GO) 131 D, Section X.A which addresses measures projects over 50kV must take to minimize potential exposure to EMFs. The decision states the following (page 30):

*“With respect to the RTRP, the project will use double-circuit construction that reduces spacing between circuits compared to single-circuit construction; it will arrange conductors and cables in a manner designed to reduce magnetic fields; it will raise the lowest conductor ground clearance from SCE design standard by 10 feet near residential, commercial/industrial or recreational areas where feasible; and it will place new substation electrical equipment away from the substation property lines closest to populated areas. It is uncontested that this design complies with the Commission’s policies regarding incorporating no cost and low-cost EMF reduction measures into electric facilities project design.”*

## 7. EIR Review – Environmental Justice

Environmental justice was not considered as part of the CEQA processes for the RTRP. However, the CPUC’s Administrative Law Judge (ALJ) did address environmental and social justice considerations as part of the final decision (D. 20-03-001) for the project. The City of Jurupa Valley did pose several arguments against the revised project in its PFM. While the arguments against project feasibility posed were specific to the City of Jurupa Valley, the ALJ responses to many of the arguments reflected how environmental and social justice were considered in the overall project.

The ALJ noted that “[t]here is no evidence that the revised project or its overhead facilities placement are unfairly designed to be focused on Jurupa Valley’s or any other Disadvantaged Community. SCE and Riverside in their January 12, 2018 joint alternatives report, the EIR and the SEIR diligently analyzed potential line route alternatives [including undergrounding and no-wires alternatives] and consistently confirmed that the selected route is likely to pose fewer impacts than dozens of other routing concepts.” The ALJ goes on to state: “Jurupa Valley’s charge that the revised project violates environmental and social justice principles is without merit.”

The City of Jurupa Valley also argued that the RTRP project and process violated the CPUC’s Environmental and Social Justice Plan and its goals. In response to the arguments, the ALJ noted that equity issues were integrated into their efforts related to the project and that the documentation in the EIR and SEIR reflect that both Riverside’s and the CPUC’s CEQA review process furthered goals of integrating equity and access to CPUC regulatory activities. Additionally, the ALJ explained that the RTRP would not conflict with the goal to increase investment in clean energy resources to benefit environmental and social justice communities, especially to improve local air quality and public health. Access to clean energy within Riverside would be expanded because of RTRP and the project would decrease the City’s “reliance on gas-fired generation with its attendant pollutants in the area.”

## 8. EIR Review wildfire risks

The 2013 RTRP EIR was approved by Riverside City Council, certified by CPUC, subsequently litigated and upheld by the courts. This 2013 EIR is settled and in accordance with CEQA Guidelines. Fire Prevention as a mitigation measure to hazardous materials identified in Chapter 3 – Environmental Analysis was identified. Appendix G of the CEQA guidelines establishes a

CEQA Checklist for required mitigation in the event the project would “expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.” As a result, the mitigation measure for a mandatory fire prevention and management plan was identified to “ensure guidelines for prevention, control, and extinguishment of fires that could potentially occur during transmission line construction.”

In addition to the mitigation requirements in the 2013 EIR, SCE adheres to all regulatory requirements for a current and adopted 2022 Wildfire Mitigation Plan which guides and reports on its company-wide efforts mitigate the impacts and risks from wildfire. It outlines the company’s new strategies to employ technology in the design and operation of its electric transmission and distribution system. SCE’s 2022 Wildfire Mitigation Plan Update can be found online at [SCE 2022 WMP Update.pdf](#).

In Section M-3.3 of the 2018 Subsequent EIR prepared by the CPUC, a comprehensive answer was provided in response to a question from Endangered Habitats League regarding the consideration given to wildfire risk in the EIRs.

*The analysis of fire hazards is included in Chapter 3 of the certified 2013 RTRP EIR, which determined that the hazard of wildfire would be reduced to a less than significant level through conformance with CPUC General Order 95, Public Resources Code Section 4293, project Environmental Protection Elements, and mitigation. Mitigation Measure HAZ- 03 requires the preparation and implementation of a project- specific Fire Prevention and Management Plan, which will incorporate all applicable fire regulations. Vegetation conditions along the south side of the Santa Ana River have not substantially changed since the 2013 RTRP EIR was certified. The new CPUC fire regulations are incorporated into General Order 95, General Order 165, and General Order 166. As an investor- owned utility regulated by the CPUC, SCE is required to comply with these General Orders. The new fire regulations do not present new or increased impacts of the project and would strengthen fire safety within the area. The CPUC prepared the Initial Study Checklist to determine potentially new or increased impacts that would be addressed in the Subsequent EIR. The CPUC determined that no new or increased fire hazards would result from the Revised Project, nor had baseline conditions changed in the area such that fire hazards had increased. No additional analysis of fire hazards is required in the Subsequent EIR.*

Both the EIR and SEIR found that fire-related impacts from the RTRP would be less than significant.

## 9. Next Steps

The information provided in this report is intended to inform about the past considerations and actions on the project as it is currently approved and frame the process if changes are desired by the City Council. The City Council may consider taking no action and continue with the project as designed and approved. If, however, there is City Council direction to staff to research the legal, financial, and operational feasibility for project modification, the hiring of additional independent consultants in these areas will be necessary to fully explore, assess, and determine options moving forward (i.e. process, price, timeline). This consideration could take place at a future meeting in concurrence with City purchasing policies.

## **STRATEGIC PLAN ALIGNMENT:**

This item contributes to **Strategic Priority No. 6 - Infrastructure, Mobility & Connectivity** and **Goal 6.2.** - Maintain, protect and improve assets and infrastructure within the City's built environment to ensure and enhance reliability, resiliency, sustainability and facilitate connectivity.

This item aligns with each of the five Cross-Cutting Threads as follows:

1. **Community Trust** – Riverside is actively engaged with the Riverside Transmission Reliability Project (RTRP) and is providing timely and reliable information to inform policy makers on potential actions that may need to be taken to protect and serve the public interest.
2. **Equity** – Riverside is supportive of the City's racial, ethnic, religious, sexual orientation, identity, geographic, and other attributes of diversity and is committed to advancing the fairness of treatment, recognition of rights, and equitable distribution of services.
3. **Fiscal Responsibility** – RTRP as designed and approved has been found to be the most economic and fiscally responsible method for project delivery to Riverside customers.
4. **Innovation** – Riverside is keeping abreast of interconnection needs to the state electric transmission grid in order to respond to and prepare for any potential impacts to the community.
5. **Sustainability & Resiliency** – The need for RTRP was derived by the need for reliable supply of electricity. Riverside's lack of sufficient electric delivery capacity from the state electric grid created a risk to the resiliency of the City. RTRP addresses those needs.

## **FISCAL IMPACT:**

The portion of RTRP approved by the CPUC to be constructed by SCE has a maximum approved cost of \$521 million. Because SCE received approval from the Federal Energy Commission to include the costs of the project in the California Statewide Transmission Access Charges, the charge to Riverside is estimated to be 2.5% of project costs based on Riverside's proportionate share of statewide transmission system load for facilities rated greater than 200kV.

The published cost estimates for the changes in project scope to underground the 500kV lines in Chino Hills and the 230kV transmission lines in Jurupa Valley ranged between \$51.8 million to \$98.3 million per circuit mile construction based on data provided by CPUC in the March 12, 2020 Decision Granting CPCN. Because these cost estimates are not based on current competitively bid prices factoring current increases in engineering and construction costs, approved project plans for crossing the Santa Ana River and other project scope changes, a gross estimate is provided **for illustration purposes only** as requested by the City Council. For example, if a factor of \$75 million per circuit mile construction is used for the approximate 5 miles of potential project scope changes to underground the transmission lines in Riverside, the total estimated cost is \$375 million. This would increase the total cost of RTRP 72% from the approved Alternative 1 scope. If Riverside was forced or elected to pay for the cost of the changes to the project scope (assumed 30-year financing rate of 4%), the additional costs of approximately \$21.5 million would be added to the electric budget each year for 30 years and increase the utility's Reliability Charge

approximately \$16.25 per customer per month if costs were allocated on a straight-line basis. This is an increase between 100%-150% of the current rate. Increased Electric rates would have to be adjusted to establish the revenue capacity to fund the additional debt funding needs of this project as well as the other growing capital needs of the utility to maintain and improve its current infrastructure. If project grants were awarded, the project cost and total borrowing amount would be decreased proportionally.

Costs associated for Council-direct independent consulting services pertaining to a Petition for Modification would be determined through the procurement process (as would timeline and scope for each service).

Prepared by: Todd M. Corbin, Utilities General Manager  
Certified as to  
availability of funds: Edward Enriquez, Chief Financial Officer/City Treasurer  
Approved by: Al Zelinka, FAICP, City Manager  
Approved as to form: Phaedra Norton, City Attorney

Attachments:

1. Report
2. Presentation
3. 3/18/20 Certificate of Public Convenience and Necessity – RTRP
4. 10/31/11 Petition of the City of Chino Hills to Modify Decision 09-12-044 to Stay Construction of Transmission Facilities in Segment 8A
5. 10/31/14 City of Ontario's Petition for Modification to Order Undergrounding of Segment 8B
6. 10/2012 Environmental Impact Report – City of Riverside – Chapter 3 Environmental Analysis
7. 10/2012 Environmental Impact Report – City of Riverside – Chapter 6 Project Alternatives
8. 1/12/18 Lower Voltage and Other Design Alternatives Report – RTRP
9. 10/2018 Final Subsequent EIR – CPUC – Alternatives Screening Report
10. 04/27/22 Southern California Edison letter correspondence