

Wednesday, April 27, 2022

Dear Mr. Corbin,

Southern California Edison (SCE) continues to build the grid of the future in support of safe, clean, reliable and affordable energy, and to protect against the impacts of extreme weather.

As part of this effort, SCE and Riverside Public Utilities (RPU) have partnered to build the Riverside Transmission Reliability Project (the Project), which, once completed will enable RPU to:

- Bring the City and its customers adequate transmission capacity to serve existing and projected electrical demand.
- Provide long-term system capacity for load growth, including growth from renewable energy projects, electric vehicle charging stations, and building electrification.
- Make Riverside's grid more resilient in the face of catastrophic events such as earthquakes, windstorms, wildfire, and more.

RPU is generally responsible for the construction of project elements within the City of Riverside's jurisdiction, including the proposed 220/66 kV Wilderness Substation, certain interconnection and telecommunication facilities, and 66 kV subtransmission lines.

The following is SCE's response to a collection of questions recently received regarding the Project. We hope this document is helpful to the City of Riverside, its elected officials, and its residents as the project is developed.

### **Project status**

The project was approved and licensed by the California Public Utilities Commission (CPUC) in March of 2020, after a lengthy and complex environmental and regulatory review process, which began in 2006. We expect construction to begin this summer.

### **Undergrounding**

Members of Riverside's City Council have shown an interest in taking a closer look at the risks and rewards of undergrounding the project within city limits. While SCE respects the Council's desire for more information as it relates to undergrounding, SCE will continue to support the project as it was approved and licensed by the CPUC, with all project infrastructure placed above ground in Riverside. This will ensure that the project is completed on time and with limited rate impacts.

Underground infrastructure presents certain maintenance challenges typically not faced by above-ground infrastructure, including:

- Buried lines can take longer to repair when damaged, leading to longer outage times.

- Buried powerlines do not prevent outages caused by damage to transmission lines or towers.

**Financial/rate impacts of undergrounding**

SCE rates are set through a transparent process with the CPUC, the body that regulates SCE and other investor-owned electric utilities in the state. It includes public input and participation, and all investor-owned utilities use this same process. Rates for high voltage transmission, such as the RTRP are approved by the Federal Energy Regulatory Commission (FERC) through an annual process where FERC and interested stakeholders review SCE's costs to determine whether SCE acted prudently.

Keeping rates as low as possible is a top priority of SCE, which is why we build most of our system above ground. Underground infrastructure is far more costly and has a greater impact on customer rates. For this reason, we support the CPUC's decision to build RTRP above ground in Riverside.

For information on how undergrounding would impact RPU rates, please contact the City of Riverside.

**Timeline impacts if an additional project review were to happen**

While it is difficult to estimate how the project timeline would be impacted by additional environmental reviews, which the City of Riverside and its utility would initiate with the CPUC, it is reasonable to suggest such a review would delay construction by several months or even years.

**Wildfire risks**

Evolving climate conditions throughout California have made wildfires a year-round concern to many communities. With about a quarter of SCE's service territory in high-risk fire areas, addressing the prevention and mitigation of wildfires is another of our top priorities. SCE has invested in a variety of improvements and innovations to help prevent wildfires and act quickly when they occur.

Our Wildfire Mitigation Plan (available at [SCE.com](http://SCE.com)) is an actionable, measurable, and adaptive plan to reduce the risk of potential wildfire-causing ignitions associated with SCE's electrical infrastructure in high fire risk areas to protect public safety. We have implemented wildfire mitigation activities and continue to build on the progress we've made by expanding existing programs, incorporating lessons learned, and testing new technologies. These efforts complement the state's enhanced wildfire efforts, which include providing support for forest management and firefighting resources.

There are no wildlands near the Revised Project alignment and the fire risk within landscaped vegetation is minimal. The fire risk will be reduced by ongoing vegetation management practices throughout the operation of the project.

Furthermore, transmission lines rarely spark wildfires due to how they are constructed and where they are typically placed. Transmission line conductors are spaced far apart, which reduces the likelihood of vegetation or debris encountering the lines. Also, not only are transmission systems designed to detect faults and rapidly shutoff power flow to avoid hazards, they are typically mounted on very tall structures and are built a safe distance from vegetation.

### **Health impacts**

With projects like RTRP, public concerns occasionally arise around electromagnetic frequencies (EMF).

Based on the findings of the project's Environmental Impact Report (EIR), and the EMF reduction measures planned for the project, the CPUC determined that EMF-related health risks associated with this project are negligible. The following comes from the EIR:

Electric and magnetic fields are separate phenomena and occur both naturally and as a result of human activity across a broad electrical spectrum. Naturally occurring EMF are caused by the weather and the Earth's geomagnetic field. The fields caused by human activity result from technological application of the electromagnetic spectrum for uses such as communications, appliances, and the generation, transmission, and local distribution of electricity.

The CPUC does not consider EMF to be an environmental issue in the context of CEQA [California Environmental Quality Act] because there is no consensus among scientists that EMF creates a health risk, and because CEQA does not define or adopt standards for defining any potential risk from EMF. Appendix C of the Subsequent EIR provides supplemental information regarding EMF associated with electric utility facilities and the potential EMF resulting from the Proposed Project.

To learn more about EMF and the mitigation measures planned for the project, please review Appendix C of the EIR.

### **Aesthetic impacts**

Another area of concern for some residents involves the aesthetic impacts presented by RTRP. Based on the findings of the project EIR, the CPUC determined that any aesthetic impacts associated with RTRP did not warrant undergrounding in Riverside and do not negate the need for the project. The following comes from the EIR:

The Revised Project would not impact scenic vistas, scenic highways, or designated scenic roadways because no scenic vistas or designated scenic highways or roadways are located in proximity to the Revised Project. The Revised Project would therefore not contribute to cumulative impacts on scenic vistas or designated scenic highways or roadways.

To learn more about the project's aesthetics impacts and mitigation measures, please review Appendix F of the EIR.

### **Public outreach**

Working closely with RPU, SCE has relied on a variety of methods to inform the public about RTRP. These include mailers sent to residents along the project route, open houses, informational handouts, a project website ([sce.com/rtrp](http://sce.com/rtrp)), a project hotline (1-866-785-7057), and dedicated project staff who manage stakeholder outreach. SCE will continue to provide important project updates to its customers along the project route, whereas RPU customers should seek project updates from RPU.

To contact Riverside Public Utilities, please visit [riversidepublicutilities.com](http://riversidepublicutilities.com) or call (951) 826-5311.

For assistance from the CPUC, please contact the Public Advisor in San Francisco at (415) 703-2074 ([public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov)) or toll free at (866) 849-8391.

**Conclusion**

SCE, in partnership with Riverside Public Utilities and the City of Riverside, our contractors and the community, is ready to begin the construction phase of the Project and bring safe, reliable, affordable and clean power to Riverside and its residents.

For more information or to leave us a comment, please call our project hotline at (866) 785-7057 or visit [sce.com/rtrp](http://sce.com/rtrp).

Thank you,

Mark Cloud, Southern California Edison  
Government Relations Manager  
Local Public Affairs