



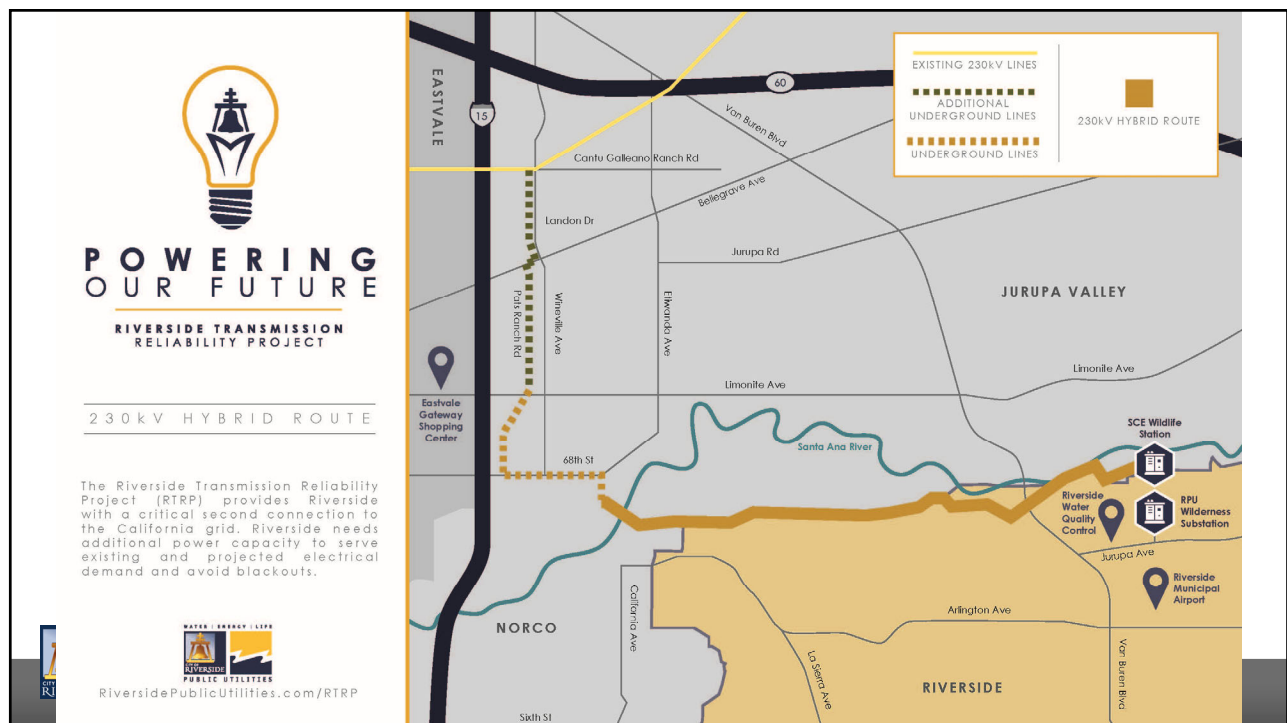
RIVERSIDE TRANSMISSION AND RELIABILITY PROJECT (RTRP)

Public Utilities Department

City Council
May 10, 2022

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1



2

SCE's Portion - Elements of Approved Alternative



Approximately **5.9 miles** of new **overhead 230-kV** transmission line



Approximately **4.1 miles** of new **underground 230-kV** transmission line



Telecommunication facilities between the existing Mira Loma and Vista Substations, and the proposed Wildlife Substation



Modifications of existing overhead distribution lines



Modifications at existing substations



New 230-kV Wildlife Substation



3

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3

WHY WAS RTRP PLANNED

Increase electricity capacity and improve electricity reliability in the City of Riverside

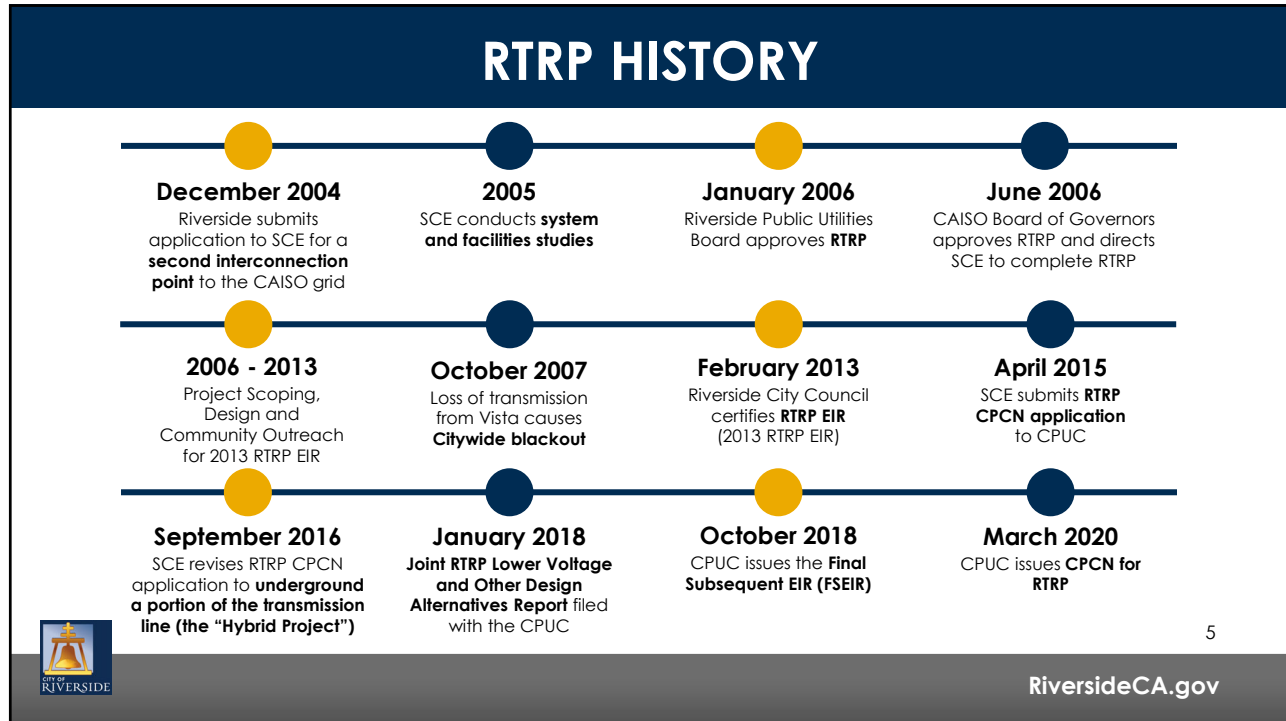
1. City experienced complete blackout in 2007
2. RTRP provides a second connection to the State's grid
3. California Independent System Operator (CAISO) ordered RTRP be built in 2009 for the benefit of Riverside



4

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4



5

APRIL 5, 2022 CITY COUNCIL QUESTIONS

1. What was the extent of community outreach and communication about the project?
2. Why was 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 process to consider a request to modify the approved project at the CPUC including 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?

 6

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6

1. COMMUNITY OUTREACH

2006 through 2013: Project scoping, project design and EIR by RPU and Riverside.

1. Project newsletters mailed to 20,000 to 30,000 recipients
2. Display advertisements in multiple news publications in English and Spanish language
3. Press releases
4. Project website in English and Spanish
5. Telephone hotline
6. Public Open Houses located near the project area
7. Coordination with multiple agencies, cities, and organizations
8. Coordination with American Indian Tribes including project walks
9. Extended public review of all project and environmental projects



7

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7

1. COMMUNITY OUTREACH (CONT.)

1. **2013 through 2018:** SCE and RPU Prepared a Lower Voltage and Alternatives Study and the CPUC prepared the Subsequent EIR
 - a. Informational workshops
 - b. Mailed notifications and project website were in English and Spanish
2. **2015 through 2020:** The CPUC conducted and completed their review of the SCE application for the Certificate of Public Convenience and Necessity (CPCN) through a public process
3. **Ongoing:** RPU and the City have continued to meet with community members, held a workshop on December 12, 2020, and conducted tours of the RTRP route



8

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8

2. UNDERGROUNDING IN CHINO HILLS AND JURUPA VALLEY

1. CPUC ordered undergrounding for portions of SCE Transmission Projects
 - a. Chino Hills – Tehachapi Renewable Transmission Project (TRTP)
 - b. Jurupa Valley – RTRP
2. Key points
 - a. Both cities filed timely challenges during the CPCN processes
 - b. Both cities bore significant direct impacts without direct benefit
 - c. Both cities justified their challenges with thorough analysis and documentation of impacts to their communities
3. CPUC Findings
 - a. The need for the overall project outweighed the unavoidable impacts on aesthetics and other environmental factors
 - b. Undergrounding specific segments of the project was granted to reduce aesthetic (visual) impacts and avoid impacts to agricultural and forest resources in Jurupa Valley



9

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9

3. 30 PROJECT ALTERNATIVES REVIEWED BY CPUC

RTRP Lower Voltage and Other Design Alternatives Study (Completed in 2018)

1. Undergrounding
2. Changes in the route alignments in Jurupa Valley and Riverside
3. Battery storage solutions
4. Expansion of the existing SCE Vista Substation
5. Expansion of existing Riverside peaker plants
6. Distributed energy generation
7. Utility scaled solar
8. Energy efficiency/conservation programs
9. Demand response programs
10. Lower voltage transmission line options



10

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10

3. ALTERNATIVES SELECTED FOR CPUC EIR REVIEW

1. Four alternatives in Jurupa Valley selected for detailed review in the Subsequent EIR
 - a. Alternative 1 deemed as the environmentally superior alternative
 - b. Included undergrounding portions in Jurupa Valley
2. Even though alternatives for the section of the project in Riverside were considered in the Lower Voltage report, no project modifications in Riverside were proposed by the CPUC



11

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11

3. UNDERGROUNDING ALTERNATIVE

1. Partial and full undergrounding analyzed
2. Determined to have greater environmental impacts than the overhead transmission line construction and operation
3. CPUC concurred with these findings in 2018

Advantages

1. Reduce visual impacts, including in open-space
2. Reduce land use and community impacts
3. Reduce the Rights-of-Way width requirements
4. Reduce wildfire risk

Disadvantages

1. Increase land disturbances during construction
2. Poor accessibility to maintain facilities after construction
3. Increased use of hazardous materials in the cooling systems required
4. Increased air quality and biological impacts during construction
5. Increased potential to damage other existing utilities during operations and maintenance
6. Increase time required to repair equipment resulting in longer outages to customers
7. Higher costs associated with installation and repair of the transmission lines



12

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12

4. PROCESS AND FEASIBILITY OF CHANGES

1. CPUC Rule 16.4, Petition for Modification (PFM), governs the rules and requirements for changes to an issued decision
2. A PFM can be filed by anyone affected by the decision
3. The petitioner has the responsibility to provide the information in justification for the request



Required Contents for a Petition for Modification (PFM)

- 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

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13

4. PROCESS AND FEASIBILITY OF CHANGES

1. To pursue a PFM, City Council would need to determine new findings of omitted or erroneous information, or changed conditions exist which render the certified environmental analysis incomplete for the RTRP and support it to be modified.
2. 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 PFM.
3. Procurement process for selection of an independent consultant(s) could take 90 days or longer to complete
4. 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.
5. Timeline, scope and price for each type of each consulting service needed would be determined through the procurement process.



14

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14

5. PROJECT MITIGATION MEASURES

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 Rd. and Wilderness Rd.



15

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15

6. EIR REVIEW OF HEALTH IMPACTS

1. Possible exposure to Electromagnetic Fields (EMF) from high voltage transmission lines evaluated or addressed in both environmental reviews
 - a. CPUC does not consider EMFs in CEQA review
2. CPUC General Order 131 D, Section X.A places requirements on all facilities over 50 kV
3. RTRP as approved complies with the General Order

Design Features of RTRP to Reduce EMF

1. **Double-circuit construction** that reduces spacing between circuits compared to single-circuit construction;
2. Conductors and cables arranged in a manner **designed to reduce magnetic fields**;
3. Lowest **conductor ground clearance raised** from SCE design standard by 10 feet near residential, commercial/industrial or recreational areas where feasible
4. New substation electrical **equipment placed away from the substation property lines** closest to populated areas



16

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16

7. ENVIRONMENTAL & SOCIAL JUSTICE

1. Jurupa Valley challenged the feasibility of Alternative 1 in the SEIR on the basis of environmental and social justice
2. CPUC determined that the project and Alternative 1 were consistent with the CPUC's Environmental and Social Justice Plan and its goals as well as State law
 - a. SCE and Riverside in the 2018 Joint Alternatives report, EIR and SEIR diligently analyzed potential line route alternatives [including undergrounding options]
 - b. "There 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." (D. 20-03-001, page 20)
 - c. Process by Riverside and CPUC was open and inclusive to all potentially impacted communities
 - d. Would expand Riverside's access to clean renewable energy and decrease reliance on internal gas-fired generation
 - e. Unavoidable visual impacts were outweighed by the need for the project
 - f. Consistently confirmed that the selected route is likely to pose fewer environmental impacts than dozens of other routing concepts



17

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17

8. WILDFIRE RISKS

1. Both the EIR and SEIR evaluated wildfire risks
2. CPUC evaluated the analysis of the wildfire risks when making its decision in 2020
3. Fire related impacts from the RTRP were determined in both documents to be less than significant
4. SCE will comply with its Wildfire Mitigation Plan



18

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18

9. TRANSMISSION ACCESS CHARGE

1. SCE's maximum approved project cost for the RTRP is \$521 million
2. The Federal Energy Commission approved the project costs as part of the Statewide Transmission Access Charge (TAC)
3. Riverside's share of the TAC is 1.759%
4. Estimated maximum cost to Riverside ratepayers is \$9.2 million



19

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19

9. ILLUSTRATIVE COST OF UNDERGROUNDING

Ungrounding
Total Cost
\$375 million

Increase
Reliability Charge
~\$16.25 / month

1. Undergrounding costs for lines in Chino Hills and Jurupa Valley ranged from \$51.8 M to \$98.3 M per circuit mile
2. Gross estimate for undergrounding in Riverside
 - a. \$75 M per circuit mile x 5 miles = \$375 M
 - b. Increases the cost of the RTRP by 72%
3. If all cost is responsibility of Riverside assuming a 30-year financing rate of 4%
 - a. Annual costs added to electric budget for 30 years = \$21.5 M
 - b. Reliability Charge increase = \$16.25 per month per customer (assuming costs on a straight-line basis)
 - c. Represents a 100-150% increase in the reliability charge
 - d. Electric rates would also need to be adjusted to establish the revenue capacity to fund the additional debt and other growing capital needs of the utility
4. If City receives grants or other funding, it could reduce the potential cost of the project to Riverside

20



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20

10. NEXT STEPS

1. The City Council may consider taking no action and continue with the project as designed and approved.

-or-

2. The City Council may direct staff to research the legal, financial, and operational feasibility for project modification.

This will require:

- a. Hiring additional independent consultants will be necessary to fully explore, assess, and determine options moving forward. (i.e. process, price, timeline).
- b. This consideration could take place at a future meeting in concurrence with City purchasing policies.



21

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21

STRATEGIC PLAN ALIGNMENT

Strategic Priority No. 6 - Infrastructure, Mobility & Connectivity

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

Cross-Cutting Threads



Community Trust



Fiscal Responsibility



Sustainability & Resiliency



Equity



Innovation



22

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22

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.



23

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