

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Southern California Edison Company)

Docket No. EL10-1-000

**MOTION TO INTERVENE AND COMMENTS OF
THE LARGE-SCALE SOLAR ASSOCIATION**

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Date: November 2, 2009

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Pursuant to Rules 212 and 214 of the Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214 (2009), and the Commission’s Notice of Filing dated October 7, 2009, the Large-scale Solar Association (“LSA”) hereby respectfully moves to intervene and submit comments in support of Southern California Edison Company’s (“SCE”) request for rate incentives in connection with its proposed Eldorado-Ivanpah Transmission Project (“EITP”) and the treatment of the EITP facilities as network facilities.

In support here of, LSA states as follows:

I. BACKGROUND

On October 1, 2009, SCE filed a petition for declaratory order and requests the Commission to grant certain rate incentives, as described in the petition, in connection with SCE’s proposed EITP. SCE further requests the Commission to declare that the EITP facilities will be network facilities and, as such, eligible for rolled-in rate treatment. SCE explains that it is seeking narrowly-tailored incentive-based transmission rate treatments for its proposed EITP which has been identified through the California Independent System Operator Corporation’s (“CAISO”) generation interconnection process.

SCE states, and we agree, that the EITP “will increase the ability of proposed renewable generation projects to connect to the CAISO-controlled grid, a critical element to achieving

compliance with California’s Renewable Portfolio Standard and California legislations requiring substantial reductions in greenhouse gas emissions.” Petition at 3 (citing Congressional testimony of Chairman Jon Wellinohoff before the Committee on Environment and Public Works). As SCE explains, “[o]ne of the most significant regional benefits of the EITP will be its role in advancing the Commission’s interest in fostering development of renewable energy resources.” Petition at 6.

The EITP will provide customers in California with access to the substantial renewable energy potential of the Ivanpah region, which includes both solar and wind resources, and will facilitate meeting California’s ambitious RPS requirements. SCE has agreed to provide upfront financing for the EITP on the condition it receives an order from the Commission accepting SCE’s request for transmission rate incentives.

II. INTERVENTION

The Large-scale Solar Association (“LSA”) represents eleven of the nation’s largest developers and providers of utility-scale solar generating resources. Collectively, LSA’s members, whose technologies and models span both photovoltaic and solar thermal applications, have contracted to provide over 6 gigawatts (“GW”) of clean, sustainable solar power to utilities in the Western United States, including SCE. LSA members are engaged in the development, construction and/or operation of renewable generation plants in the Ivanpah region. As such, LSA and its members may be directly affected by the outcome of this proceeding. The interests of LSA are not adequately represented by any other party. This timely motion of LSA to intervene in this proceeding is in the public interest. Accordingly, LSA requests that it be made a party to this proceeding with all rights attendant to such status.

All communications regarding this matter, including all pleadings, filings and orders should be served on the following persons:

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III. COMMENTS

LSA supports SCE's petition for an order granting the requested transmission rate incentives for the EITP. The availability and timing of SCE's proposed EITP is a critical element to provide renewable projects in the Ivanpah region, including those being developed as well as projects proposed to be developed, much needed transmission access the Southern California market.

The EITP transmission facilities are appropriately sized to meet both near- and mid-term renewable energy needs consistent with California's Renewable Energy Transmission Initiative and reasonable expectations from interconnection requests filed with the California Independent System Operator Corporation ("CAISO"), making them prudent from both economic and environmental perspectives. SCE's approach to upfront financing for these facilities protects ratepayer interests by tying this financing to progress on renewable energy development milestones, simultaneously ensuring that the facilities will not only be used and useful, but that they will receive the most cost-effective, timely and readily feasible financial support available.

Although SCE has committed to providing upfront financing for the EITP, it has done so on condition that it receives an order from the Commission accepting its request for certain transmission rate incentives related to the construction of the EITP. As SCE explains in its petition, the EITP satisfies the Commission's requirements for obtaining the required transmission rate incentives.¹ Moreover, approval of transmission rate incentives for the EITP, which will facilitate delivery of economic renewable generation to the Southern California market, is consistent with the Commission's policy to encourage the development and delivery of renewable power.

IV. CONCLUSION

Timely Commission approval of SCE's petition is critical to provide certainty to both renewable energy developers and to SCE on the development of, and financing responsibility for, transmission interconnection facilities necessary to deliver renewable generation from an important solar and wind resource area to the California market, where it is needed to achieve California's Renewables Portfolio Standard ("RPS"). The Commission's determination in this matter, recognizing SCE's forward-thinking and responsible approach to development and financing of these transmission facilities, is important to the support and achievement of both federal and state clean energy goals. As such, LSA respectfully requests the Commission to approve SCE's petition for transmission rate incentives related to the construction of the EITP. Accordingly, LSA requests the Commission to find that EITP satisfies the requirements of Order No. 679 and to grant SCE's request for transmission rate incentives for its EITP.

¹ The CAISO is reviewing the impacts of the EITP upgrades through its Large Generator Interconnection Procedures. Therefore, the EITP qualifies for incentives under Order No. 679.

WHEREFORE, for the foregoing reasons, LSA respectfully moves for leave to intervene in the above-captioned proceeding and encourage the Commission to approve expeditiously SCE's petition as requested.

Date: November 2, 2009

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list of EL10-1-000 in this proceeding and in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure.

Dated at Sacramento, California, this 2nd day of November 2009.



Deric J. Wittenborn
Deric J. Wittenborn

EL10-1-000
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November 2, 2009

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