



Stephen D. Lee

T 213.626.8484  
F 213.626.0078  
E [slee@rwglaw.com](mailto:slee@rwglaw.com)

355 South Grand Avenue  
40th Floor  
Los Angeles, CA 90071-3101  
[rwglaw.com](http://rwglaw.com)

April 23, 2018

VIA ELECTRONIC MAIL & U. S. CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Riverside County Regional Park and Open-Space District  
C/O Darrin Gilbert  
POWER Engineers  
731 East Ball Road  
Anaheim, California 92805  
[RTRP-LWCF@powereng.com](mailto:RTRP-LWCF@powereng.com)

Riverside County Regional Park and Open-Space District  
Attn: Scott Bangles, Park Director/General Manager  
4600 Crestmore Road  
Jurupa Valley, California 92509

Re: ***The City of Jurupa Valley's Comments in Response to Riverside County Regional Park and Open-Space District's March 23, 2018 Request for Public Comment re: Hidden Valley Wildlife Boundary Change***

---

Dear Mr. Gilbert and Mr. Bangles:

The City of Jurupa Valley (the "City") has reviewed and submits the below comments in response to the Riverside County Regional Park and Open-Space District's ("District") March 23, 2018 Request for Public Comment on the proposed conversion, replacement, and boundary changes to the Hidden Valley Wildlife Area ("HVWA") in conjunction with the Riverside Transmission Reliability Project ("RTRP").<sup>1</sup>

The RTRP would affect approximately 10.8 acres of HVWA land funded by the Land and Water Conservation Fund ("LWCF"). The LWCF was established by Congress with the specific goal of safeguarding natural areas, water resources, cultural heritage, and recreational opportunities. The RTRP, however, seeks to construct massive 230 kV transmission lines and

---

<sup>1</sup> The District's proposal to alter the boundaries of and convert lands within the HVWA is referred to as the "Project."

facilities, including steel lattice and pole structures up to 170-feet in height, that will traverse the HVWA.

Consequently, the RTRP and the Project seek to place massive, above-ground electric utility structures on land that has been specifically acquired and designated for open space and recreational uses. For the reasons demonstrated below, the District should fully and independently analyze the impacts of and alternatives to the Project to address the Project's numerous deficiencies and the public's significant concerns:

- The District must independently analyze undergrounding the RTRP in the HVWA and cannot rely on the obsolete 2011 Draft Environmental Impact Report ("EIR") and 2013 Final EIR because those documents incorrectly presume that undergrounding is infeasible when, in fact, the California Public Utilities Commission and the RTRP applicant have conceded undergrounding is both feasible and the environmentally superior alternative for the RTRP.
- The District must fully and independently analyze the contemplated replacement of LWCF lands prior to making a decision on the Project to ensure that the lost LWCF land is adequately compensated by and replaced with land that is comparable in use, value, and location.
- The LWCF Program specifically authorizes and provides funding for undergrounding options that the District must explore and analyze.
- The District has not demonstrated that it has complied with the requirements of the LWCF Act, specifically the requirements under 36 CFR § 59.3, for approval of the Project.
- The Project is inconsistent with state and federal land use policies.
- The District must comply with the scoping requirements for the Project's Environmental Screening Form by meaningfully engaging the public and local government, in the scoping process.
- The District cannot abdicate the District's independent review and decision-making obligations to the RTRP applicant through its consultant, POWER Engineers.

**I. The District Cannot Ignore Its Legally-Required Duties of Fully Analyzing the Project By Relying on the Outdated 2011 Draft EIR and 2013 Final EIR.**

The District cannot rely on the 2011 Draft EIR and 2013 Final EIR for an analysis of the Project's impacts on LWCF lands because those environmental reports are obsolete and do not

analyze impacts of the Project and the RTRP, including feasible alternatives, according to the drastically-altered baseline conditions and presumptions that are now presented.

**A. The District Must Independently Analyze the Feasibility, Impacts, and Alternatives of Undergrounding All or a Portion of the RTRP in the HVWA.**

Because the analysis of and conclusions on the viability of undergrounding in the 2011 and 2013 EIRs have been contradicted by and superseded in the 2018 Subsequent Draft EIR, the District must independently analyze the feasibility, impacts, and alternatives of undergrounding for the HVWA. Indeed, the RTRP applicant and the Subsequent Draft EIR now both concede, contrary to the 2011 and 2013 EIRs, that undergrounding significant portions of the RTRP is not only feasible but also the preferred and environmentally superior option among all other alternatives for the RTRP. This constitutes a major change in the baseline presumptions and conditions for the RTRP and the Project. Thus, the District cannot now rely on the outdated analysis and conclusions of the 2011 and 2013 EIRs and must independently review the impacts, feasibility, and alternatives of undergrounding the RTRP alignment that traverses through the HVWA.

The California Environmental Quality Act ("CEQA") requires subsequent environmental review, including a subsequent EIR, when new information shows that mitigation measures previously found to be infeasible would in fact be feasible and would substantially reduce one or more significant impacts:

"New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete . . . shows any of the following: . . . (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project."

(Cal. Code Regs., tit. 14, § 15162(3).) Likewise, a public agency cannot use an EIR from an earlier project for a later project if the EIR would not adequately describe alternatives and mitigation measures related to each significant effect. (CEQA Guidelines § 15153.)

Here, new information of substantial importance -- the feasibility of, official preference for, and environmental superiority of undergrounding portions of the RTRP line -- has been presented, requiring that the District analyze undergrounding for the HVWA. Specifically, the 2018 Subsequent Draft EIR confirms that undergrounding portions of the 230 kV transmission line is both feasible and the preferred alternative because undergrounding "would avoid significant aesthetic impacts from riser poles and overhead transmission lines between Cantu Galleano Ranch Road and Limonite Avenue." (Draft Subsequent EIR ES-12, ES-13, ES-20.) This new information starkly contrasts with the outdated conclusions and analysis in the 2011 and

2013 EIRs, which rejected undergrounding even limited portions of the RTRP line as infeasible: “In all, then, undergrounding even a limited portion of the Project as a means of potential mitigation is both infeasible and environmentally more damaging than the currently proposed Project’s overhead lines.” (Draft EIR 3-54; Final EIR 3-41 [Volume II Revised Draft EIR].) Indeed, the Final EIR specifically and incorrectly concluded that “undergrounding even limited sections of the Project’s 230 kV transmission line as a means of potential mitigation is infeasible.” (FEIR 3-322 [Volume II Revised Draft EIR].) Because the Subsequent Draft EIR confirms that undergrounding portions of the RTRP’s 230 kV transmission line is feasible and the environmentally superior alternative, new information has been presented regarding the viability of undergrounding that the District must now analyze for the HVWA. Indeed, because the 2011 and 2013 EIRs incorrectly rejected undergrounding even a portion of the RTRP as infeasible, the District cannot rely on the obsolete 2011 and 2013 EIRs in evaluating undergrounding for the HVWA.

The District must analyze undergrounding for the HVWA and the Project because undergrounding is now not only feasible and environmentally superior but also would reduce significant aesthetic impacts that would otherwise be immitigable. The 2011 Draft EIR confirms that the visual impacts of massive overhead 230 kV transmission lines would be greatest in the HVWA and LWCF areas: “where visual impacts of the overhead line are greatest (the Santa Ana River corridor, including the Santa Ana River Trail and Hidden Valley Wildlife/LWCF areas).” (DEIR 6-30.) The Draft EIR concluded that the significant aesthetic impacts of overhead transmission lines in the HVWA would be immitigable: “[the] Hidden Valley Wildlife area to the west . . . impacts on views from this area would be potentially significant and immitigable, as they would degrade the visual character and quality of the interface of residential, recreational, and the Santa Ana River’s trails and open space uses.” (Draft EIR 3-54.) Likewise, the Final EIR confirms that “[s]ome visual impacts are significant, unavoidable and immitigable” regarding the HVWA. (Final EIR 2-201.) Undergrounding, however, has been demonstrated to be a viable mitigation measure and would provide the greatest aesthetic benefit, reducing what were significant and previously thought-to-be immitigable impacts, by removing overhead utility lines: “**The aesthetic appeal to a vista without the interruption of utility lines is the most recurring benefit** stated regarding underground transmission lines.” (DEIR 6-30 [emphasis added].) Because undergrounding portions of the RTRP in the HVWA would drastically reduce significant aesthetic impacts of the RTRP and the Project, the District must analyze the impacts, feasibility, and alternatives for undergrounding in the HVWA. To accurately depict the aesthetics analysis of undergrounding, the District also must include detailed view simulations regarding undergrounding and its alternatives in the HVWA.

In addition to the requirements for complying with CEQA, the District also must analyze the impacts and feasibility of undergrounding pursuant to the District’s National Environmental Policy Act (“NEPA”) obligations. Specifically, in order to obtain Project approval from the National Park Service (“NPS”), the District must submit a Project Description-Environmental

Screening Form and appropriate NEPA review as required by the NPS as part of the Conversion Area and Replacement proposal review process. Indeed, under 42 U.S.C.A § 4332, NEPA requires that the District must provide a detailed statement the environmental impact of the proposed action; any adverse environmental effects which cannot be avoided should the proposal be implemented; alternatives to the proposed action; and any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented. To fully analyze the Project's impacts, unavoidable adverse environmental effects, and alternatives under the District's NEPA obligations, the District must include an analysis of the impacts, feasibility, and alternatives for undergrounding in the HVWA.

**B. The District Must Fully and Independently Analyze the Contemplated Replacement of LWCF Lands Prior to Making a Decision on the Project.**

Because neither the 2011 Draft EIR nor the 2013 Final EIR analyzes the contemplated replacement of LWCF lands, the District must analyze the impacts of and alternatives for any loss and replacement of LWCF lands. Specifically, the District proposes to substitute a "similarly sized contiguous portion of a parcel (#153240030-6) . . . to compensate for the loss of recreational function within the park." (District's Request for Public Comment.) The 2011 Draft EIR and 2013 Final EIR, however, do not present any analysis of this proposed land exchange. Neither environmental document analyzes the specific characteristics, use, or value of the LWCF land that will be lost with the specific characteristics, use, and value of the contemplated parcel with which the LWCF land will be replaced. Without such an analysis and comparison, including detailed view simulations and use comparisons, the District cannot demonstrate and the public cannot be assured that the loss of any LWCF land will be adequately compensated with the land from parcel #153240030-6. Indeed, merely accepting the District's proposal at this stage threatens to exchange beautiful open space and recreation land for pennies on the dollar. Furthermore, the District has not analyzed any of the alternatives to replacing LWCF lands with parcel #153240030-6. Without such an analysis, the District cannot demonstrate and the public cannot be assured that other parcels of land are more viable alternatives than parcel #153240030-6 for replacing LWCF land.

**II. The LWCF Program Specifically Authorizes Undergrounding Options that the District Must Explore and Analyze.**

The LWCF State Assistance Program Manual specifically supports and facilitates the undergrounding of utilities in LWCF lands. Specifically, "[t]he State may allow underground utility easements within a Section 6(f)(3) area as long as the easement site is restored to its pre-existing condition to ensure the continuation of public outdoor recreational use of the easement area." (LWCF State Assistance Program Manual 8-12; see also DEIR 3-309, 3-310; FEIR 3-322 [Volume II].) Significantly, LWCF financial assistance is available for the specific purpose of undergrounding transmission lines: "

“LWCF financial assistance may be available for most types of facilities needed for the use and enjoyment of outdoor recreation areas. . . . The beautification of an outdoor recreation area is eligible provided it is not part of a regular maintenance program and the site's condition is not due to inadequate maintenance. This includes: landscaping to provide a more attractive environment; the clearing or restoration of areas that have been damaged by natural disasters; **the screening, removal, relocation or burial of overhead power lines**; and the dredging and restoration of publicly owned recreation lakes or boat basins and measures necessary to mitigate negative environmental impacts.”

(LWCF State Assistance Program Manual 3-7 through 3-14 [emphasis added].) Because the LWCF program specifically authorizes and sets aside financial assistance for undergrounding utility lines, the District must fully and independently analyze undergrounding, including its impacts and alternatives, in the HVWA.

**III. The District Has Not Demonstrated That It Has Satisfied the Requirements of the LWCF Act for Approval of the Project.**

Under the LWCF Act, the Project must comply with the requirements of 36 CFR § 59.3, which specifies several “Prerequisites for Conversion Approval.” Based on the current record, however, the District has not demonstrated and cannot begin to demonstrate such compliance without first undertaking further, independent review of the Project.

The LWCF Act states that the NPS will consider conversion requests only if the following nine prerequisites have been met:

- “(1) All practical alternatives to the proposed conversion have been evaluated.
- (2) The fair market value of the property to be converted has been established and the property proposed for substitution is of at least equal fair market value as established by an approved appraisal . . .
- (3) The property proposed for replacement is of reasonably equivalent usefulness and location as that being converted. . . .
- (4) The property proposed for substitution meets the eligibility requirements for L&WCF assisted acquisition. The replacement property must constitute or be part of a viable recreation area. . . .
- (5) In the case of assisted sites which are partially rather than wholly converted, the impact of the converted portion on the remainder shall be considered. If

such a conversion is approved, the unconverted area must remain recreationally viable or be replaced as well.

(6) All necessary coordination with other Federal agencies has been satisfactorily accomplished including, for example, compliance with section 4(f) of the Department of Transportation Act of 1966.

(7) The guidelines for environmental evaluation have been satisfactorily completed and considered by NPS during its review of the proposed 6(f)(3) action. . . .

(8) State intergovernmental clearinghouse review procedures have been adhered to if the proposed conversion and substitution constitute significant changes to the original Land and Water Conservation Fund project.

(9) The proposed conversion and substitution are in accord with the Statewide Comprehensive Outdoor Recreation Plan (SCORP) and/or equivalent recreation plans.”

(36 C.F.R. § 59.3(b)(1)-(9).)

Here, the District has not demonstrated compliance with the foregoing requirements of the LWCF Act. Contrary to the requirements of subsection (b)(1) and as also demonstrated above, the District has not evaluated all practical alternatives. The District has not analyzed the impacts, viability, and alternatives for undergrounding all or a portion of the RTRP that will run through the HVWA in light of the new information confirming the viability and environmental superiority of undergrounding. Likewise, the District has not analyzed alternatives to replacing existing LWCF lands, such as a change in the RTRP’s route that would avoid the HVWA altogether or substantially reduce the RTRP’s intrusion into the HVWA. Finally, the District has not evaluated alternatives to replacing LWCF land with parcel #153240030-6 as opposed to using any other parcels to replace the LWCF land. Accordingly, the District has not demonstrated that the proposed land conversion is equitable and the most preferred route in terms of the replacement and lost land’s value, use, aesthetics, location, and other characteristics.

Second, contrary to the requirements of subsection (b)(2), the District has not evaluated the fair market value of the LWCF land it proposes to convert and has not evaluated the fair market value of parcel #153240030-6. The District has not set forth any appraisals or studies regarding the fair market value of these lands. Accordingly, the District cannot demonstrate the conversion satisfies the fair market value requirements of the LWCF Act.

Third, the District has not demonstrated that the proposed replacement property is of reasonably equivalent usefulness and location as the LWCF land that is being converted. The

District has not demonstrated that parcel #153240030-6 has a reasonably equivalent usefulness and location as the proposed LWCF land to be converted. Indeed, such an equivalence demonstration may be difficult, if not impossible, because the LWCF land that the District proposes to convert spans seven portions of the HVWA, and the loss of this large tract of the HVWA, its usefulness, and its particular location cannot be adequately offset by the land in parcel #153240030-6 or any other land. Indeed, the City doubts that the loss of open space and recreation land in the HVWA can be adequately offset by the replacement land. The HVWA provides trails and scenic vistas as part of its primary recreational function: “[the] Hidden Valley Wildlife Area...has access to 25 miles of hiking and equestrian trails. Visitors can get away from the noise and lights of the city and enjoy the beautiful views of the river or the bluff overlooking the Santa Ana River bottom.” Replacing a massive tract of the HVWA’s recreational functions with a parcel that is located in a small portion of the southwestern portion of the overall Hidden Valley Wildlife Area does not replace the value of land lost for the use of trails offering views of scenic vistas (primarily the Santa Ana River that is a linear scenic feature). The District has failed to make any showing that the proposed Project meets the equivalent usefulness and location criteria, and in fact, the District cannot.

Fourth, there is no indication that the District has met the eligibility requirements for converting parcel #153240030-6. Because the District proposes to acquire parcel #153240030-6 -- land that is currently in public ownership -- from the City of Riverside and Riverside County, the District must demonstrate that: (1) the land was not acquired by the sponsor or selling agency for recreation; (2) the land has not been dedicated or managed for recreational purposes while in public ownership; (3) no federal assistance was provided in the original acquisition; and (4) required payments for the land have been made. The District has not made any of the foregoing findings and cannot proceed with the Project absent such a showing.

Fifth, the LWCF Act requires that the District consider the impact of the converted portion of LWCF land on the remaining areas of the HVWA; the District has not made and cannot make such findings because the impacts from placing massive overhead transmission lines and facilities will be significant and irreparable to the entire HVWA. The RTRP and the Project seek to place massive overhead utility lines and structures -- up to 170-feet in height -- throughout areas in the HVWA that have been specifically designated for open space and recreation use. These massive structures will not only prevent the specific areas they are located in from being used for open space or recreation but also will negatively impact the open space and recreational uses of the entire HVWA as these facilities will be incredibly obtrusive and visually jarring from throughout the HVWA. The District must fully evaluate the Project’s and the RTRP’s impacts on the rest of the HVWA and do so by using visual impact analyses, visual simulations of the proposed height and location of transmission facilities in the HVWA, and visual simulations of the viewpoints from the rest of the HVWA according to how they would be altered by the proposed Project and RTRP.



Finally, the District has not demonstrated that the Project satisfies all necessary coordination requirements with other federal agencies, such as compliance with section 4(f) of the Department of Transportation Act of 1966; that the guidelines for environmental evaluation have been satisfactorily completed and considered; that state intergovernmental clearinghouse review procedures have been adhered to; and that the proposed conversion and substitution are in accord with the Statewide Comprehensive Outdoor Recreation Plan and/or equivalent recreation plans.

#### **IV. The Proposed Project Is Inconsistent with State and Federal Land Use Policies.**

The Project does not comply with state and federal land use policies because it eliminates designated open space and recreational land uses, while imposing severe and widespread aesthetic impacts that impair the public's scenic and recreational resources.

California's Recreation Policy 4, (2005) requires that recreation areas be planned and managed to avoid damage to natural resources while providing recreational opportunities: "Recreation areas should be planned and carefully managed to provide optimum recreation opportunities without damaging significant natural or cultural resources. Management actions should strive to correct problems that have the potential to damage sensitive areas and degrade resources." Likewise, the LWCF program requires that LWCF lands serve a variety of public outdoor recreation activities, including walking and sightseeing: "Areas acquired may serve a wide variety of public outdoor recreation activities including but not limited to: walking and driving for pleasure, sightseeing, swimming and other water sports, fishing, picnicking, nature study, boating, hunting and shooting, camping, horseback riding, bicycling, snowmobiling, skiing, and other outdoor sports and activities." (LWCF Manual 3-4).

In contravention of these policies, the District's support of the RTRP and the proposed Project creates significant, negative visual impacts from the placement of massive, above-ground power transmission lines throughout the HVWA, irreparably damaging scenic resources and preventing significant portions of the HVWA from being used for their intended and designated recreational and open space purposes. This is contrary to the HVWA's stated mission of protecting such resources. Indeed, even the Draft EIR and Final EIR note that the placement of massive transmission lines in the HVWA conflicts with the LWCF program:

"The Proposed Project (230 kV transmission line) traverses lands . . . which have received federal funding through the LWCF program. These lands include the Hidden Valley Wildlife Area . . . . Placement of 230 kV transmission line components on these lands would constitute a conflict with the LWCF, according to the California State Parks, Office of Grants and Local Services, which is the Agency that oversees the LWCF program in California."

(DEIR 3-304, 3-305; FEIR 3-317 [Volume II].)

**V. The District Must Comply With the Scoping Requirements for the Project's Environmental Screening Form ("ESF").**

Contrary to the requirements of the LWCF program, the District has not engaged the City and the rest of the affected public to scope the proposal for the Project. The LWCF State Assistance Program Manual requires that the District invite public agencies, like the City, to provide input early in the planning and scoping process to "yield information for use in defining the scope of the LWCF proposal and possible associated environmental impacts." (LWCF Manual 4-4 and 4-5). Indeed, the ESF "is designed for use as a tool during project scoping, planning, and proposal development to document environmental information and consider the LWCF proposal's possible environmental impacts." (LWCF Manual 4-5). Under step 6 of the ESF, a site inspection of the affected area must be conducted by individuals who are familiar with the type of affected resources, possess the ability to identify potential resource impacts, and to know when to seek additional data when needed. In contrast with these public and local government participation requirements, the District's Request for Public Comment fails to meet the requirements for meaningfully engaging the City and other stakeholders in the preparation of the Project proposal and the ESF. The City strongly urges that the District meet and confer with the City and interested stakeholders before preparing the ESF, especially in light of the District's premature development of the Project proposal without any public input.

**VI. The District Cannot Abdicate the District's Independent Review and Decision-Making Obligations to the RTRP Applicant.**

The District cannot abdicate its independent review and decision-making functions to the RTRP applicant -- POWER Engineers, Southern California Edison's and Riverside's consultant on the RTRP. Instead, the District must conduct an independent environmental review and objectively evaluate the Project and the RTRP. Delegating these functions to POWER Engineers, as the District has done in the Request for Public Comment, is a complete conflict of interest and violates well-established standards for environmental review.

Significantly, the Court of Appeal has noted that the interests of a lead agency conducting environmental review of a project are at odds with and divergent from the interests of the project applicant, here the RTRP: "**when environmental review is in progress, the interests of the lead agency and a project applicant are fundamentally divergent.** While the applicant seeks the agency's approval on the most favorable, least burdensome terms possible, the agency is dutybound to analyze the project's environmental impacts objectively." (*Citizens for Ceres v. Superior Court* (2013) 217 Cal.App.4th 889, 898 [emphasis added].) Indeed, "[t]he lead agency must independently participate, review, analyze and discuss the alternatives in good faith." (*Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1352.)

Here, the District incorrectly relies upon POWER Engineers to receive and evaluate the public comments in response to the District's March 23, 2018 Request for Public Comment.

Such an abdication of the District's independent environmental review obligations is anathema to the objective and fair environmental review and decision-making that the law requires of the District, especially as the RTRP applicant has divergent interests that are at odds with the District's environmental protection and open space preservation goals. The City requests that the District independently conduct its environmental review and analysis of the Project and that the District require that all public comments and correspondence for the Project be directed to the District rather than POWER Engineers.

## VII. Conclusion

The District's mandate is to preserve open space and recreational lands within the HVWA. As demonstrated above, placing massive, overhead transmission lines in the HVWA is in direct conflict with the District's goals. While the District evaluates the Project, the City urges the District to comply with its legal duties of conducting a full and fair environmental review of the Project; finally, for the reasons stated above, the City strongly recommends that the District reject the current proposal for overhead transmission lines in the HVWA.

Very truly yours,



Stephen D. Lee

cc: Gregory P. Priamos, Esq.  
Riverside County Counsel  
3960 Orange Street, Suite 500  
Riverside, California 92501

George Johnson, Riverside County CEO  
4080 Lemon Street, 5th Floor  
Riverside, California 92501

Supervisor Kevin Jeffries  
4080 Lemon Street, 5th Floor  
Riverside, California 92501

Supervisor John Tavaglione  
4080 Lemon Street, 5th Floor  
Riverside, California 92501

Supervisor Chuck Washington  
4080 Lemon Street, 5th Floor  
Riverside, California 92501

Supervisor V. Manuel Perez  
4080 Lemon Street, 5th Floor  
Riverside, California 92501

Supervisor Marion Ashley  
4080 Main Street, 5th Floor  
Riverside, California 92501

Center for Biological Diversity  
660 S. Figueroa St., Suite 1000  
Los Angeles, California 90017

Endangered Habitats League  
c/o Dan Silver, Executive Director  
8424 Santa Monica Blvd., Suite A 592  
Los Angeles, California 90069-4267

Sierra Club, San Gorgonio Chapter  
PO Box 5425  
Riverside, California 92517

Center for Community Action and Environmental Justice  
7701 Mission Boulevard  
Jurupa Valley, California 92509

Interested Parties registered In the Matter of the Application of SOUTHERN CALIFORNIA  
EDISON COMPANY (U 338-E)  
for a Certificate of Public Convenience and Necessity for the  
RTRP Transmission Project, CPUC Case No. A.15-04-013