

CALIFORNIA
ENERGY
COMMISSION

***FORMS AND INSTRUCTIONS
FOR SUBMITTING ELECTRIC
TRANSMISSION-RELATED DATA***

COMMISSION REPORT

January 2007
CEC-700-2007-002-CMF



Arnold Schwarzenegger, Governor

CALIFORNIA ENERGY COMMISSION

Jackalyne Pfannenstiel
Chairman

James D. Boyd
Vice Chair

Commissioners:
Arthur H. Rosenfeld
John L. Geesman
Jeffrey Byron

B.B. Blevins
Executive Director

Mark Hesters
Principal Author

Robert Strand
Manager
ENGINEERING OFFICE

Terrence O'Brien
Deputy Director
**ENERGY FACILITIES SITING
DIVISION**

TABLE OF CONTENTS

Abstract	ii
Keywords	ii
Background	1
Filing Instructions	1
When to File	1
Who Must File	2
What Must be Filed	2
Where to File Completed Data Forms	2
How to Apply for Confidential Designation of Submitted Data	3
Instructions for Electric Transmission Forms	6
General Instructions	6
Specific Instructions	7
Appendix A: Application for Confidential Designation	9
Appendix B: Garamendi Principles	12

Abstract

The staff of the California Energy Commission's Engineering Office prepared draft forms and instructions to collect specific data from transmission-owning load-serving entities on their bulk transmission network and on specific projects identified in their transmission expansion plans, as well as on anticipated transmission corridor needs. The Energy Commission staff held a public workshop on the staff draft forms and instructions on January 16, 2007. This staff final report incorporates comments received at the workshop as well as further clarification and guidance on applications for confidential designation. A Commission final version of these instructions and forms will be issued following its adoption by the Energy Commission. Responses to this data request will be used to prepare analyses and recommendations for the *2007 Integrated Energy Policy Report* and the *2007 Strategic Transmission Investment Plan*.

Keywords

Electric transmission, transmission corridor, data request.

Background

The California Energy Commission is requesting that all transmission-owning load-serving entities (TLSEs) file specific data on their bulk transmission network and on specific projects identified in their transmission expansion plans, as well as on anticipated transmission corridor needs. These data will provide a foundation for the analyses and recommendations of the *2007 Integrated Energy Policy Report*, as well as the *2007 Strategic Transmission Investment Plan* required by Public Resources Code (PRC) Section 25324.

The Energy Commission is directed by PRC Section 25301 to conduct regular assessments of all aspects of energy demand and supply. These assessments serve as the foundation for analyses and policy recommendations to the Governor, Legislature, and other agencies. The broad strategic purposes of these policies are to conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety.

To carry out these regular assessments of expected and needed electricity supplies, "the Commission shall conduct... (an) assessment of the availability, reliability, and efficiency of the electricity and natural gas infrastructure and systems including, but not limited to,...western regional and California electricity and transmission system capacity and use." (PRC Section 25303[a][3])

In addition, the Energy Commission is directed by PRC Section 25324 to "adopt a strategic plan for the state's electric transmission grid using existing resources." Furthermore, when developing the strategic transmission plan, PRC Section 25333 directs the Energy Commission to "confer with cities and counties, federal agencies, and California Native American tribes to identify appropriate areas within their jurisdictions that may be suitable for a transmission corridor zone. The commission shall, to the extent feasible, coordinate efforts to identify long-term transmission needs of the state with the land use plans of cities, counties, federal agencies, and California Native American tribes."

If respondents have questions about the information being requested, or find a part of these instructions to be ambiguous, Energy Commission staff will work with the TLSE to clarify what information is being requested. General questions about the forms or instructions should be directed to Mark Hesters at mhesters@energy.state.ca.us or (916) 654-5049.

Filing Instructions

When to File

In adopting these *Forms and Instructions*, the Energy Commission requires that the TLSEs file the specified transmission-related data on or before March 31, 2007.

At a later date, the IEPR Committee, which comprises two Energy Commissioners, may direct additional data be filed to assess particular scenarios, topical issues, or policy proposals.

Who Must File

All TLSEs are required to file a general description of their transmission system and specific information on limits to importing electricity into their bulk transmission grid, and limitations on moving power within their bulk grid, transmission constraints that may limit their ability to meet state renewable energy procurement goals and transmission corridor needs. Agencies may submit data for their members. For example, the Transmission Agency of Northern California may file on behalf of several TLSEs. All TLSEs that are planning strategic bulk transmission project upgrades or are the lead agency for such projects are required to provide the project information requested on the transmission forms or report specifications.

Please note: Where the information is available through another forum, TLSEs are asked to identify a Web link and a contact person (name, phone number, and e-mail address).

What Must be Filed

For all filings, parties are requested to submit the following:

- A brief cover letter, addressed to the Energy Commission's Docket Office;
- A compact disc containing all required data; and
- One paper copy of all required data.

Where to File Completed Data Forms

Submit all requested data to:

California Energy Commission
Docket Office
Attention: **Docket 06-IEP-1F**
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Data that is submitted with an Application for Confidential Designation, however, must be sent to the Executive Director of the Energy Commission rather than to the Docket Office, as explained in the next section.

How to Apply for Confidential Designation of Submitted Data

The Executive Director of the Energy Commission has the overall responsibility for determining what information provided to the Energy Commission is confidential. This section outlines the application process.

The process for requesting a confidential designation for the data is described below. A more detailed description of this process is provided in Title 20 of the California Code of Regulations, Section 2501 et seq.¹

Parties must make a separate, written application to the Executive Director that specifies which data within the body of all submitted material warrants a confidential designation. A document or electronic file bearing a “confidential” stamp will not suffice. A formal application is necessary.

The following information items are needed by the Executive Director to make a confidentiality determination.

- 1) A printed cover letter bearing the following address:

B.B. Blevins, Executive Director
California Energy Commission
1516 Ninth Street, MS 39
Sacramento, California 95814-5504

- 2) The data. For this data request, the data must be submitted on a compact disc that bears the name of the TLSE and the following sub-docket number: **Docket #06-IEP-1F**.
- 3) A completed *Application for Confidential Designation* form, and
- 4) A signed and dated “penalty of perjury” certification printed on the TLSE’s letterhead containing the following paragraph, signature line, and signature:

“I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to make this application and certification on behalf of the applicant.”

Please note that the “penalty of perjury” certification is included in the *Application for Confidential Designation* form at the end of that form.

¹ Energy Commission regulations can be found at: <http://www.energy.ca.gov/2006publications/CEC-140-2006-001/CEC-140-2006-001.PDF>.

The four items listed above must be hand-delivered or mailed to the Executive Director's office in a sealed package (or envelope) marked "Confidential."

An *Application for Confidential Designation* form in portable document format (PDF) is provided within this publication as Appendix A. If, however, the applicant must create its own version of this form for any reason (for example, more space on the form is needed to provide a thorough response), then the applicant's version of the application must duplicate the Energy Commission's *Application* word for word.

The *Application* submitted to the Executive Director must contain the following information:

- 1) Identification of the information being submitted, including title, date, file size (for example, pages, sheets, MB), and sub-docket number;
- 2) Description of the data for which confidentiality is being requested;
- 3) Description of the length of time for which confidentiality is being sought, with an appropriate justification, for each confidential data category request;
- 4) Identification of applicable provisions of the California Public Records Act (Government Code Section 6250 *et seq.*), and/or other laws, for each confidential data category request;
- 5) A statement attesting either: (a) that the specific records to be withheld from public disclosure are exempt under provisions of the Government Code, or (b) that the public interest in non-disclosure of these particular facts clearly outweighs the public interest in disclosure; and
- 6) A statement that describes how each category of confidential data may be aggregated with other data for public disclosure.

Application packages deemed incomplete will not be reviewed by the Executive Director. Instead, incomplete application packages will be placed in a "suspense" file, and the filer will be notified by mail and by e-mail about the deficiencies in the application. The filer has 14 calendar days to correct the deficiencies and to deliver to the Executive Director replacement copies of the deficient cover letter, data (on compact disc and a printed copy), or complete *Application for Confidential Designation*, including the signed and dated "penalty of perjury" certification. If the Executive Director has not received the replacement copies after 14 calendar days from the date the letter was received, all information associated with the deficient application package will be deemed public information and docketed accordingly.

Once an application package is complete, the Executive Director of the Energy Commission has 30 days to decide on regarding the confidentiality request.

Confidentiality determination letters are signed by the Executive Director. If the letter states that the Executive Director has determined that the submitted data does not warrant confidential designation, then the applicant has 14 calendar days to appeal the Executive Director's decision.

More specific questions about confidentiality may be directed to Fernando DeLeon at fdeleon@energy.state.ca.us or (916) 654-4873.

Instructions for Electric Transmission Forms

General Instructions

The transmission filing requirements have been divided into four categories, and each TLSE (or its agent) is required to address each category. Since the majority of this information will be narrative text, TLSEs are asked to submit this information in Word or Adobe electronic format. For merchant transmission projects the interconnecting utility/utilities should file the required information. The following list includes, but is not limited to, some of the project information that TLSEs are required to file²:

Project	TLSE
Desert Southwest Transmission Project	Imperial Irrigation District
Green Path Project	Imperial Irrigation District and Los Angeles Department of Water & Power
Frontier Line Transmission Project	Southern California Edison, Pacific Gas & Electric, and San Diego Gas & Electric
Intermountain Power Plant DC Transmission Line Upgrade	Los Angeles Department of Water & Power
TransWest Express Project	Southern California Edison
Lake Elsinore Advanced Pumped Storage Project	Southern California Edison and San Diego Gas & Electric
Canada/Pacific Northwest to Northern California Project	Pacific Gas & Electric
Sea Breeze DC Cable Project	Pacific Gas & Electric
Northern Lights	Southern California Edison and Pacific Gas & Electric

Each TLSE is required to file its most recent transmission expansion plan. This plan should describe in detail all of the transmission facilities over 100 kV that the TLSE needs to meet applicable reliability and planning standards. This plan should include the identification of all proposed, approved, and planned transmission facilities. Where other transmission resources are planned to reduce congestion or for any other reasons, the projects and the reason they are needed should be described.

All TLSEs are required to file specific data on their bulk transmission network and on specific projects identified in their transmission plans. These data include descriptions of the transmission facilities or paths limiting power imports into their bulk transmission network, descriptions of the transmission facilities or paths limiting the transfer of power within their bulk transmission network, transmission limits that constrain the TLSE's

² Where a project interconnects to multiple TLSEs, the Commission encourages the TLSEs to coordinate their responses to avoid duplication of effort.

ability to meet legislated renewable resource procurement requirements and anticipated corridor needs.

Where the information is available through another forum, TLSEs are asked to identify a Web link and a contact person (name, phone number, and e-mail address).

Specific Instructions

Each TLSE shall submit a description of its bulk electric system and its latest transmission expansion plan. The electric system description and plan shall include:

1. A description of the transfer capabilities for transmission lines or transmission paths delivering electric power into the transmission owner's grid.
 - a. The description shall include the size (for example, megavolt ampere [MVA] or megawatt [MW]) and length of the lines or lines included in the path and the substations to which the line connects.
 - b. A description of any planned upgrades to the facilities that are used to import power into the transmission owner's grid that are expected to be operational between January 2007 and December 2016, including:
 - i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrades on transfer capabilities.
 - ii. Descriptions of the alternatives considered in developing the upgrades.
 - c. Any maintenance or construction that could impact transfer capabilities or the ability to move power over a path between January 2007 and December 2009.
 - d. A description of any planned transmission facilities that would create a new transmission path or transmission line to import electric power into the transmission owner's bulk electric network that are expected to be operational between January 2007 and December 2016, including:
 - i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities.
 - ii. Descriptions of the alternatives considered in developing the upgrades.
 - e. A general description of any planned upgrades to the facilities that import electric power into the transmission owner's bulk transmission grid that are expected to be operational after December 2016.
2. A description of the transfer capabilities for bulk transmission lines or bulk transmission paths limiting the delivery of electric power within the transmission owner's grid.
 - a. The description shall include the size (MVA, MW) and length of the lines or lines included in the path and the substations to which the line connects.
 - b. A description of any upgrades to the facilities that are used to import power into the transmission owner's grid that are expected to be operational between January 2007 and December 2016, including:
 - i. Descriptions of the upgrades including costs, benefits, maps, and the megawatt impact of the upgrade on transfer capabilities.
 - ii. Descriptions of the alternatives considered in developing the upgrades.

- c. Any maintenance or construction that could impact transfer capabilities within the transmission owner's bulk transmission grid between January 2007 and December 2009.
 - d. A description of any planned transmission facilities that would create a new means to transfer electric power within the transmission owners bulk transmission network that are expected to be operational between January 2007 and December 2016, including:
 - i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities
 - ii. Descriptions of the alternatives considered in developing the upgrades.
 - e. A general description of any planned upgrades to the facilities that transport electric power within the transmission owner's bulk transmission network that are expected to be operational after December 2016.
3. A description of the bulk transmission facilities needed to meet renewable energy requirements or other state mandated electricity policy goals, or to replace aging power plants that retire, or to eliminate or reduce local capacity requirements.
- a. The description shall include the size (MVA, MW) and length of the lines or lines included in the path and the substations to which the line connects.
 - b. A description of any upgrades to the facilities in the transmission owner's grid that are expected to be operating between January 2007 and December 2016, including:
 - i. Descriptions of the upgrades including costs, benefits, maps, and the MW impact of the upgrade on transfer capabilities
 - ii. Descriptions of the alternatives considered in developing the upgrades.
 - c. A general description of any planned upgrades expected to be operating after December 2016.
4. For those point-to-point electrical transfer needs identified in the sections (1-3) above, please discuss potential corridor needs in relation to the following:
- a. Opportunities to link with existing federally-designated corridors or potential federal corridors identified under Section 368 of the Energy Policy Act of 2005.
 - b. The potential to impact sensitive lands that may not be appropriate locations for energy corridors – including, but not limited to, state and national parks, state and national designated wilderness and wilderness study areas, state and national wildlife refuges and areas, critical inventoried roadless areas in national forests, habitat conservation plan areas, and special habitat mitigation areas.
 - c. Consideration of the Garamendi Principles (See Appendix B) as identified in Senate Bill (SB) 2431 (Chapter 1457, Statutes of 1988) and as noted in SB 1059, Section 1 (Chapter 638, Statutes of 2006), in the case of existing corridors.
 - d. Any work previously done with local agencies and any geographical areas of sensitivity that may have been identified.
 - e. Any other known major issues that have the potential to impact a future corridor designation.

Appendix A: Application for Confidential Designation

APPLICATION FOR CONFIDENTIAL DESIGNATION

(Title 20 Cal. Code. Regs., § 2505 et seq.)

TO: ENERGY COMMISSION EXECUTIVE DIRECTOR, MS-39

ENERGY COMMISSION CONTRACT/DOCKET NO. (IF APPLICABLE):

[Enter text here.]

APPLICANT: [Enter text here.]

ADDRESS: [Enter text here.]

- 1(a). Title, date, and description (including number of pages) of the information or data for which you request confidential designation. **Information or data seeking a designation of confidentiality must be included with this application.**

[Enter text here.]

- 1(b). Specify the part(s) of the information or data for which for which you request confidential designation.

[Enter text here.]

2. State and justify the length of time the Energy Commission should keep the information or data confidential.

[Enter text here.]

- 3(a). State the provision(s) of the Public Records Act (Gov. Code, § 6250 et seq.) or other law that allows the Energy Commission to keep the information or data confidential, and explain why the provision(s) apply to that material.

[Enter text here.]

- 3(b). Discuss the public interest in nondisclosure of the material submitted for a confidential designation. If the material contains trade secrets or its disclosure would otherwise cause loss of a competitive advantage, please state how it would be lost, the value of the information to the applicant and the ease or difficulty with which the information could be legitimately acquired or duplicated by others.

[Enter text here.]

4. State whether the information or data can be disclosed if it is aggregated with other information or masked to conceal certain portions (including but not limited to the identity of the applicant). State the degree of aggregation or masking required. If the data cannot be disclosed even if aggregated or masked, explain why.

[Enter text here.]

5. State how the material is kept confidential by the applicant and whether it has even been disclosed to a person other than an employee of the applicant. If it has, explain the circumstances under which disclosure occurred.

[Enter text here.]

I certify under penalty of perjury that the information contained in this application for confidential designation is true, correct, and complete to the best of my knowledge and that I am authorized to make the application and certification on behalf of the applicant.

Dated: _____

Signed: _____

Name (print or type): [Enter text here.] _____

Title: (print or type) [Enter text here.] _____

Representing: [Enter text here.] _____

Include additional signature blocks if there are multiple partners in the project with shared responsibilities for making the request.

Appendix B: Garamendi Principles

In 1988, recognizing both the growing importance of transmission with the interconnection of independent power producers and the escalating conflicts between transmission-owning and transmission-dependent utilities, the California Legislature passed Senate Bill (SB) 2431 (Stats. 1988, Ch. 1457), which contained the following findings concerning the role of transmission in California's future development:

(a) The Legislature finds and declares that establishing a high-voltage electricity transmission system capable of facilitating bulk power transactions for both firm and nonfirm energy demand, accommodating the development of alternative power supplies within the state, ensuring access to regions outside the state having surplus power available, and reliably and efficiently supplying existing and projected load growth, are vital to the future economic and social well being of California.

(b) The Legislature further finds and declares that the construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents, so that it is in the interests of the state, through existing licensing processes, to accomplish all of the following:

1. Encourage the use of existing rights-of-way by upgrading existing transmission facilities where technically and economically justifiable.
2. When construction of new transmission lines is required, encourage expansion of existing rights-of-way, when technically and economically feasible.
3. Provide for the creation of new rights-of-way when justified by environmental, technical, or economic reasons, as determined by the appropriate licensing agency.
4. Where there is a need to construct additional transmission, seek agreement among all interested utilities on the efficient use of that capacity.

In directing the Energy Commission to conduct an investigation and prepare a report outlining recommended policies and actions, SB 2431 plainly stated that the purpose of the report was to facilitate effective, long-term transmission line corridor planning.³ One of the major findings of the report was that utilities should take appropriate mitigation measures to reduce the environmental impacts of approved projects.⁴ The report also identified the absence of coordinated transmission and land-use planning as a major impediment to transmission development in California and called for a process to identify environmentally sensitive areas, acceptable areas, and areas where urban encroachment into transmission rights-of-way could pose problems.⁵ The basic principles and policies expressed in this effort formed a sound foundation for assessing and designating transmission corridors then and are still persuasive today, nearly 20 years after they were first articulated.

³ California Energy Commission, *Transmission System and Right of Way Planning for the 1990's and Beyond*, March 1992, Publication P700-91-005, p. 1.

⁴ *Id.* at p. 7.

⁵ *Id.* at p. 15.