

July 14, 2008

Solar Energy PEIS Scoping  
Argonne National Laboratory  
9700 S. Cass Avenue, EVS/900  
Argonne, IL 60439

Subject: Bureau of Land Management Solar Energy Notice of Intent;  
Comments of Southern California Edison Company

Dear Bureau of Land Management/Argonne National Laboratory:

Southern California Edison (SCE) is submitting its comments regarding the May 29, 2008 Notice of Intent (NOI) by the Bureau of Land Management (BLM) to prepare a Programmatic Environmental Impact Statement (PEIS) to Evaluate Solar Energy Development.

The western United States is widely recognized as possessing a high potential for world-class developable renewable resources; including wind, solar, and geothermal resources. Many western states, including California, have been at the forefront in leading efforts to reduce dependence on fossil fuels and lower greenhouse gas emissions from electricity generation. California's Renewable Portfolio Standard (RPS) legislation, codified at Public Utilities Code Section 399.11. et seq., requires utilities such as SCE to increase their generation and/or procurement from eligible resources so that 20 percent of their load is served by such resources by 2010. In addition to the RPS legislation, the Governor of California has directed the State's agencies to review the feasibility of reaching 33 percent renewables by 2020.

In accordance with California's goals, SCE is aggressively pursuing the procurement of renewable resources. However, most of the bids received in SCE's RPS solicitations are increasingly for development of projects that require significant upgrades to SCE's existing transmission system or would require the addition of new transmission facilities to deliver the energy from these renewable resources. Although major efforts are underway to provide transmission access to transmit energy from certain areas – most significantly the Techachapi Wind Resource Area – these efforts alone may not be sufficient to deliver the volume of energy necessary for the State to meet its RPS goals. Therefore, SCE supports the BLM solar PEIS as a means to streamline the approval of solar energy project applications, and the necessary transmission system infrastructure associated with such solar applications, to facilitate environmentally responsible utility-scale solar energy development in a timely fashion.

In addition, SCE understands that solar generation developers have responded vigorously to fill the market opportunity created by the RPS, and have submitted record numbers of right-of-way requests to the BLM requesting use of federal lands for generation projects. The BLM has initiated its PEIS to deal with the influx of applications. In parallel, the California Independent System Operator (CAISO), which administers the generation interconnection process for the state's high-voltage

transmission system, has seen record numbers of interconnection requests in recent years from renewable energy developers. We suspect that some of these interconnection requests may be for project applications being submitted with the BLM. The large number and magnitude of new interconnection requests, combined with the lack of available existing transmission capacity in the remote regions where much of the renewable generation is proposed, has led to a severely log-jammed interconnection approval process. Subsequently, the CAISO has initiated its Generation Interconnection Process Reform initiative (GIPR) to address the log jam. These efforts, both by the BLM and CAISO, should help process the record number of applications that are being submitted.

SCE believes a top-down programmatic approach makes logical sense as the BLM deals with the large volume of applications. The BLM PEIS and the CAISO GIPR have resulted from the same contributing factors; therefore, SCE believes the BLM's process could be informed by many of the same principles being used by the CAISO in its process. For example, the CAISO's GIPR takes a holistic approach to evaluating the impacts of generation requests that share attributes such as geographic region or electrical connectedness. By grouping requests and studying the collective impact of the generation as a whole, the CAISO is streamlining the study process (versus studying each request individually in sequence) and by so doing is better able to design cost-effective transmission solutions that integrate the groups into the larger network. SCE recommends the BLM adopt a similar top-down approach in reviewing the collective impacts of solar projects in its PEIS.

In the NOI, the BLM advised that it was temporarily suspending acceptance of new solar applications pending completion of the PEIS, while the agency processed the 125 applications previously received. In response to public comment, on July 2, 2008, the BLM announced that it will now accept additional applications for solar projects and process them with the 125 already submitted applications. SCE supports this response of the BLM to public comment. It is important that while the solar PEIS moves forward through 2010 that it does not hinder current and future solar development.

The BLM NOI acknowledged the role of other transmission planning efforts currently underway in the Western US, including the Western Governors' Association Renewable Energy Zone project, and the California Renewable Energy Transmission Initiative (RETI). SCE encourages BLM, as a participant in the RETI stakeholder steering committee, to both provide input to RETI on areas of BLM concern, as well as utilize the findings of RETI to inform and support the PEIS effort so that high-ranking competitive renewable energy zones (CREZs) proceed towards development with minimal delays.

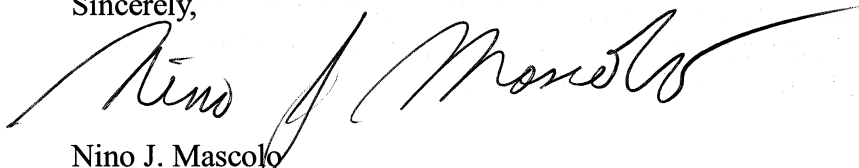
SCE believes that RETI is intended to assess all competitive renewable energy zones in California, and possibly also in neighboring states, that can provide significant electricity to California consumers by the year 2020. RETI also should identify those zones that can be developed in the most cost effective and environmentally benign manner and will prepare detailed transmission plans for those zones identified for development. SCE understands that results from the RETI process will be available before the solar PEIS is finalized; therefore, the RETI results should be used to inform the solar PEIS process.

The NOI recognizes the interrelationship between the solar generation development and the need for transmission infrastructure to deliver the solar energy, mostly proposed for largely remote areas, to utility load centers. SCE believes that the BLM PEIS should coordinate the evaluation of potential solar generation on BLM land along with the necessary transmission infrastructure such that a comprehensive analysis is contained in the PEIS. The BLM should take into account that transmission planning to support additional generation is performed on a regional basis and is not related to just one solar project, as is occurring in the RETI process. SCE has significant expertise in transmission infrastructure planning and we would be pleased to meet with the BLM to discuss our planning process. As a result, SCE encourages the BLM to continue its collaboration with the DOE's Section 386 corridor development as stated in the NOI, as well as work closely with utilities and other Federal agencies and regional transmission planning efforts to designate additional electricity transmission corridors on BLM-administered lands to facilitate utility-scale solar energy development.

The NOI states that the BLM is considering whether to establish a Bureau-Wide solar energy development program to supplement or replace existing BLM solar development policy, and to amend land use plans in the six-state study area to adopt the new program. SCE supports such a program as it should make transmission line approvals more efficient and timely.

SCE would like to thank the BLM for considering SCE comments in this PEIS public scoping process.

Sincerely,

A handwritten signature in black ink, appearing to read "Nino J. Mascolo". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Nino J. Mascolo  
Manager, Land Assets