

Stakeholder Comments 2019 Final TMCR Report

Submitted by	Entity	Date Submitted
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Northern California Power Agency (NCPA) appreciates the opportunity to submit the following comments in response to SCE’s 2019 final Transmission Maintenance and Compliance Review (TMCR) Report:

1. Excluding projects from years 1 and 2 and asking stakeholders to search for the data in current rate cases does not provide a comprehensive five-year plan. NCPA would like to restate, while SCE provides a methodology for determining which assets require maintenance/replacement, SCE only provides limited information to show how the methodology is utilized to determine the specific maintenance/replacement projects. Without the following minimum data:
 - a. Project description
 - b. Justification
 - c. Age of the asset
 - d. Estimated cost
 - e. Start and End dates
 - f. Cost Benefit Analysis or NPV Analysis
 - g. Alternatives considered
 - h. Types of field analysis/inspections performed including results
 - i. CPUC fire threat zone
 - j. ISO planning area

A meaningful stakeholder process will not be possible.

2. SCE’s final report does not allow for NCPA to be able to evaluate whether the projects are consistent with SCE’s methodology, what alternative have been considered to take the best course of action, and whether the cost estimates are reasonable.
3. NCPA feels the information included in the final report does not provide a transparent and open stakeholder process. SCE is not allowing for stakeholder feedback and suggestions by simply stating stakeholder comments are beyond the scope of SCE’s Tariff Appendix XI. NCPA is hopeful and suggest the scope of the TMCR be expanded to be more transparent, allow for stakeholder discovery, and at the very least; provide the ten (10) items listed in comment 1 above.