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CITY OF MORENO VALLEY
Planning Division

Raymond Hicks
Region Manager

April 3, 2013

Attn: Mark Gross, AICP
Senior Planner
City of Moreno Valley
Community and Economic Development Department
14177 Frederick Street
Moreno Valley, CA 92553

Re: World Logistics Center Project Draft EIR (SCH# 2012021045)

Southern California Edison (SCE) appreciates the opportunity to provide comment on the above referenced project.

Electrical Capacity

Please note, Moreno Valley Utilities (MVU) will need to file an interconnect application with SCE, in accordance with the applicable filed Federal Energy Regulatory Commission (FERC) tariffs, for any increased substation capacity connected to SCE's system, whether it is from MVU's existing Moreno Valley substation or another potential location, as proposed in the Draft EIR. Following receipt of MVU's application SCE will initiate and complete a system impact study analysis at MVU expense to determine: 1) the method of service necessary to serve the additional MVU load, whether from the existing Moreno Valley substation, or another method of service as determined by SCE, or the interconnection as proposed in the Draft EIR; 2) what, if any, system upgrades may be required to provide such service capacity; and 3) if the proposed interconnect location is acceptable to SCE. This analysis will include, but not be limited to, SCE system conditions, existing generation and queued ahead proposed market generation, SCE and MVU electrical load at that time and the load forecasts of both utilities. A facilities study analysis will also be required, at MVU's expense, to identify the specific facilities required for interconnection and system upgrades as well as the cost. Once completed, an interconnection agreement will also be required between the parties. It will outline the interconnection and operating responsibilities between the parties. SCE will perform the work required

and MVU will pay SCE for the work required.

Existing Facilities

Relocation, rearrangement, or undergrounding of SCE overhead lines at developer expense may be required as part of the development. The extent of such work can be determined when street improvement plans are prepared. The preliminary information in the current Draft EIR does not provide enough clarity to make this assessment.

Please note that SCE's rights-of-ways and fee-owned properties are purchased for the exclusive use of SCE to operate and maintain its present and future facilities. Any proposed use will be reviewed on a case-by-case basis by SCE's Operating Department. Approvals or denials will be in writing based upon review of the maps provided by the developer and compatibility with SCE right-of-way constraints and rights. In the event the project proposes to impact SCE facilities or its land related rights, please forward five (5) sets of project plans, and a PDF copy of the same, depicting SCE's facilities and its associated land rights to the following location for review as noted above:

Real Properties Department
Southern California Edison Company
2131 Walnut Grove Avenue
G.O.3 – Second Floor
Rosemead, CA 91770

General Order 131-D Requirements

Please be advised if development plans result in the need to build new or relocate existing SCE electrical facilities that operate at or above 50 kilovolt (kV), the SCE construction may have environmental impacts subject to California Environmental Quality Act (CEQA) review as required by the California Public Utilities Commission (CPUC). If those environmental impacts are identified and addressed by the Lead Agency in the CEQA process for the larger project, SCE may not be required to pursue a later, separate, mandatory CEQA review through the CPUC's General Order 131-D (GO 131-D) process. If, however, the SCE facilities are not adequately addressed in the CEQA review for the larger project, and/or the new facilities could result in significant environmental impacts, the required additional CEQA review at the CPUC could delay approval of the SCE power line portion of the project for several years and thus impact the schedule for the larger project.

Unfortunately, SCE is not able to provide specific comments on the Draft EIR due to the fact SCE has not yet received the applicable requests from MVU and the project applicant and pursuant to the requirements specified in this letter to determine impacts to SCE's facilities.

Once again, we appreciate the opportunity to comment on the project. If you have any questions regarding this letter, do not hesitate to contact me at (951) 928-8238.

Sincerely,

A handwritten signature in blue ink that reads "Raymond Hicks". The signature is written in a cursive style with a large initial "R" and a stylized "H".

Raymond Hicks
Local Public Affairs Region Manager
Southern California Edison Company