PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



May 8, 2013

Susan J. Nelson Southern California Edison Regulatory Affairs 2244 Walnut Grove Avenue, Quad 3D, GO1 Rosemead, California 91770

Re: Completeness Review #3, Banducci Substation Project Proponent's Environmental Assessment

Dear Ms. Nelson,

The California Public Utilities Commission (CPUC) has reviewed Southern California Edison's (SCE) Banducci Substation Project Proponent's Environmental Assessment (PEA) and supplemental information, and has determined that the PEA requires further supplementation including full resubmission and review prior to being considered complete. The complete PEA document resubmittal should incorporate all supplemental information and data compiled in response to this letter and that has previously been provided by SCE on February 5 and April 19, 2013.

Since August 8, 2012, the CPUC has formally requested numerous times that all PEAs must be submitted in an approved format. Furthermore, the CPUC's first PEA incompleteness determination letter for the Banducci Substation Project (dated December 17, 2012) stated that a complete resubmission and supplementation of the PEA was necessary. However, again on April 19, 2013, SCE submitted its response to the CPUC's second PEA Completeness Review letter (dated February 25, 2013) in a simple "response to data requests" format. Therefore, as described above, SCE must re-file a fully revised and supplemented PEA with the Docket Office in response to today's incompleteness determination. The electronic version of the re-filed, complete PEA should be provided in smaller data file pieces (20 MB or less) rather than in a single 200 MB file as was provided for the December 15, 2012 PEA submittal.

In addition to re-filing the PEA in its entirety, pursuant to the CPUC's PEA Checklist for Transmission Line Projects (2008), please also include the following supplemental information, which has been previously requested but not adequately provided.

- 1. The CPUC previously requested a description of the existing ROW location, ownership, and width, and a list of any properties likely to require acquisition. SCE stated that it plans to provide this information in mid-May 2013. Please include this information with the full PEA resubmittal.
- 2. The CPUC previously requested GIS data showing soil types within the proposed project study area. SCE has provided GIS data for most of the project study area, except the proposed staging area at the Tehachapi Service Center appears to be missing. Please include GIS data showing soil types within the proposed staging area at the Tehachapi Service Center with the PEA resubmittal.
- 3. The CPUC previously requested clarification on whether potential staging areas have been surveyed and mapped for vegetation type. Vegetation was mapped for the project study area, except for the proposed staging area at the Tehachapi Service Center appears to be missing. Please include GIS vegetation data for the proposed staging area at the Tehachapi Service Center with SCE's PEA resubmittal.

Banducci Substation PEA Review May 2013 Page 2

4. The CPUC previously requested survey and evaluation of cultural resources within the proposed staging areas. The cultural resources assessment report sent to Applied Earthworks, Inc., on April 19, 2013, addresses the Banducci Substation staging area. However, comparable information has not been included for the Tehachapi Service Center staging area or the Highwind Substation staging area. Please provide a description of cultural resources surveys and results for the Tehachapi Service Center staging area and the Highwind Substation staging area.

I look forward to reviewing SCE's resubmittal of the PEA for the Banducci Substation Project. Please contact me if you have any questions.

Sincerely,

/s/

Amy Baker Infrastructure Permitting & CEQA California Public Utilities Commission 415.703.1691 amy.baker@cpuc.ca.gov

cc: Hedy Koczwara, Aspen Environmental Group Heather Blair, Aspen Environmental Group