

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 27, 2009

Donald Johnson
Project Manager
Southern California Edison
2131 Walnut Grove Ave.
Rosemead, C 911770

RE: SCE Antelope-Pardee 500 kV Transmission Project, Segment 1 – Variance Request #24

Dear Mr. Johnson,

On January 8, 2009, Southern Californian Edison (SCE) submitted a variance requesting the addition of a new underground fiber optic communication line located at Construct Tower 13 and the removal of the existing underground fiber optic communication cable which currently connects to Wreck-Out Tower 27-3. Additionally, SCE wishes to leave in place the current underground conduit after removal of the fiber optic line so as to minimize ground disturbance activities. The proposed work location is within an already approved disturbed area on Section 1, Segment 1 of the Tehachapi Renewable Transmission Project, in Santa Clarita, Los Angeles County. **This Variance Request is approved by CPUC for the proposed activities based on the following factors:**

SCE submitted the following information:

- As referenced in Notice to Proceed (NTP) #7 for Segment 1, work will include the removal of the existing 500 kV towers. As part of this work, an existing underground fiber optic line, which currently runs from Wreck-Out Tower 27-3 and provides communication between substations, will necessitate a new connection with new Construct Tower 13. The new line will run approximately 50 feet from Construction Tower 13 to an existing communication riser pole, and will be designed and installed in compliance with SCE's standards, and State and local codes and ordinances.
- The new underground fiber optic communications line will involve the installation of duct banks using open-cut trenching techniques. The duct bank will have a horizontal configuration of one cable per conduit. The typical trench dimensions for installation of a duct bank with a horizontal configuration will be a minimum of four feet deep and three feet wide, although depth may vary depending on soil stability and the presence of existing substructures.
- The trench will be widened and shored where necessary to meet Cal OSHA safety requirements. If trench water is encountered, trenches will be dewatered using a portable pump and disposed of in accordance with acquired permits. Trenching operations will be staged in intervals if necessary if a maximum trench length open at one time is deemed by permit requirements. A length of 50 feet of trench will generate approximately 23 cubic yards per day of excavated material. At any one time, open trench lengths will not exceed that required to facilitate the installation of the duct bank. Steel plating will be placed over the trenches to maintain vehicular traffic across areas that are not under active construction.
- Throughout trench excavation and installation of the duct bank, excavated materials will be hauled to a materials storage yard. Excavated materials will be tested and may be used as backfill if the

material is suitable as a clean backfill. The number of truck trips to haul excavated materials to storage yards will vary based on the rate of the trenching and the proximity of the storage yards to the right-of-way. The use of a rock hammer will be used sparingly to break up sections of rock material if encountered at this site. Other miscellaneous equipment would include excavators, dump trucks, flatbed with telescopic crane, and crew pick up trucks.

- As the trench for the underground fiber duct banks are completed, the Below Grade Electrical Contractor will install one (1) four inch PVC conduit and backfill around the conduit with concrete to a minimum of three inches above the conduit. The dimension of each duct bank will be approximately three feet wide by one foot in height, assuming that the concrete around the conduits is bank poured. The remaining backfill will be comprised of 1.5 sack slurry mix or native backfill. Native backfill material shall be compacted to 90 percent relative compaction, per SCE CD100 specification, and be free of contaminants and deleterious material. Upon completion of backfilling excavation, the existing disturbed area shall be restored in compliance with local permits and agency requirements.
- After installation of the conduit, SCE will install cables in the duct banks. Each cable segment will be pulled into the duct bank and terminated at the fiber box located on the outside of the leg of the lattice steel structure. Cables will be pulled to the existing riser with the use of a rope and a tugger. To reduce friction of the cable and the conduit when pulling, a lubricant will be applied to the cable as it enters the duct to decrease friction during pulling.
- As part of the final construction activities, vegetation will be restored as necessary and all construction materials removed from the project site.
- The proposed work location is within an already approved disturbed area and has been re-surveyed for biological resources. On December 10, 2008, a site visit was conducted by a BMcD Biologist. No sensitive resources were found in or around the existing disturbed site. The surrounding area is dominated by California buckwheat (*Eriogonum fasciculatum*), shortpod mustard (*Hirschfeldia incana*), and bromus grass (*Bromus sp.*). No significant impacts to biological resources are anticipated with the implementation of the conditions noted below.
- The proposed work location is within an already approved disturbed area and has been re-surveyed for cultural resources. Cogstone Resource Management conducted the cultural resource studies (Cogstone, December 2008). The record search revealed no recorded cultural resources within a 1-mile search radius of the project area. No paleontological localities have been previously discovered in the project vicinity, but the sediments (Saugus Formation) are known to be highly sensitive for paleontological resources. Cogstone conducted the survey of the proposed project area on December 23, 2008. The survey consisted of a one person walking the project areas while closely inspecting the ground surface. Transects were walked at 5 meter intervals. The survey area is located directly adjacent to existing electrical transmission lines. The area has brush and grasses on the north side of an existing dirt access road. Ground visibility was good. No historic or prehistoric artifacts were observed nor were fossils observed. Cogstone recommends full-time paleontological monitoring of earthmoving activities due to the highly sensitive paleontological sediments that are known throughout the proposed project area; therefore, no significant impacts to cultural resources are anticipated.

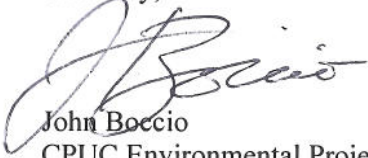
The conditions noted below shall be met by SCE and its contractors:

- All project mitigation measures, compliance plans, and permit conditions shall be implemented during construction activities. Some measures are on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Biological surveys shall be re-conducted and results submitted to the CPUC for review and approval prior to equipment and vehicles mobilizing to the project area. After complete surveys have been submitted and approved by the CPUC, site occupation can occur; however, if occupation does not occur within seven calendar days of survey submittals, biological clearance sweeps shall be conducted prior to site occupation, including nesting bird surveys.
- SCE has assigned Biological Monitors to the Project. They are responsible for ensuring that impacts to special-status species, native vegetation, wildlife habitat, or unique resources are minimized to the fullest extent possible. The Biological Monitor shall be on-site to monitor all work and shall conduct sweeps of the approved areas which will be impacted. If breeding birds with active nests are found, a biological monitor shall establish a 300-foot buffer around the nest and no activities will be allowed within the buffer until the young have fledged from the nest or the nest fails. The 300-foot buffer may be adjusted to reflect existing conditions including ambient noise and disturbance only with the approval of the CDFG and/or USFWS (Please note that the CPUC must be notified prior to the onset of construction). The biological monitor shall conduct regular monitoring of the nest to determine success/failure and to ensure that project activities are not conducted within the buffer until the nesting cycle is complete or the nest fails. If nesting birds move into the work area SCE will monitor the nest to ensure that their activities do not result in the loss or failure of the nest. A preliminary 300-foot buffer area around the nest will be established and SCE shall coordinate with the CPUC, CDFG and/or USFWS.
- Topsoil from trenching activities shall be preserved for restoration purposes.
- After use, all areas proposed under this Variance shall be completely restored to preexisting conditions following the construction activities.
- If construction debris or spills enter into environmentally sensitive areas, the jurisdictional agencies and CPUC EM shall be notified immediately.
- If not already provided, copies of all landowner agreements/lease agreements shall be submitted to the CPUC prior to use.
- Prior to the commencement of construction activities, all crew personnel including crane, haul truck and concrete truck drivers shall be appropriately WEAP trained on environmental issues including protocols for air quality, hazardous materials, biological resources, known and unanticipated cultural materials, as well as SWPPP BMPs. A log shall be maintained on-site with the names of all crew personnel trained.
- All work boundaries shall be flagged prior to construction. No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas.
- Storm Water Pollution Prevention Plan (SWPPP) will be implemented at all times during the use of the project area, as will Best Management Practices. Implementation of all necessary erosion control

devices will be properly installed and maintained throughout the duration of project area use. A copy of the SWPPP will be available on-site for reference.

- Per Cogstone's recommendations, full-time paleontological monitoring during earthmoving activities shall be implemented due to the highly sensitive paleontological sediments that are known throughout the proposed project area.
- Copies of all relevant permits, compliance plans, and this Variance shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in black ink, appearing to read "John Boccio". The signature is stylized and cursive.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen