

PUBLIC UTILITIES COMMISSION

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April 21, 2015

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

RE: SCE Antelope Transmission Project (Antelope-Tehachapi 500kV and 220kV Transmission Line), Segment 3B: Final Engineering Concurrence for the Segment 3B Installation of Ground Rods

Dear Ms. Nelson,

On April 7, 2015, Southern California Edison (SCE) submitted a request for Final Engineering Concurrence for installation of five ground rods to provide additional gas pipeline protection on Segment 3B Transmission Line (T/L) of the Antelope Transmission Project (ATP) in unincorporated Kern County, California. **This Concurrence to Final Engineering is approved by the CPUC for the proposed activities based on the following factors:**

- SCE submitted the following information:

SCE requests Final Engineering Concurrence for installation of five ground rods to provide additional gas pipeline protection on Segment 3B T/L of the ATP in unincorporated Kern County, California. Subsequent to approval of Segment 3B T/L NTPR (NTP #32 dated March 20, 2012), and the addendum for gas pipeline protection facilities (dated March 14, 2012) by the CPUC, final design was completed, resulting in the need for five additional ground rods emplaced at the ends of exposed pipe sections. These newly proposed electrodes are needed to contain pipe touch potentials to nominally safe levels in the regions where the pipe is exposed.

The following changes are proposed for Segment 3B T/L (note that all measurements are approximate):

1. One ground rod (PGE-A_GR13) located 300 feet east of Construct 3B-43, installed to a depth of approximately 404 feet. A temporary work area measuring 0.147 acre will be required for construction (of this, 0.0 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.
2. One ground rod (PGE-A_GR14) located 120 feet northeast of Construct 3B-44, installed to a depth of approximately 404 feet. A temporary work area measuring 0.147 acre will be required for construction (of this, 0.0 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.
3. One ground rod (PGE-A_GR15) located 160 feet northwest of Construct 3B-45, installed to a depth of approximately 404 feet. A temporary work area measuring 0.147 acre will be required for construction (of this, 0.073 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.
4. One ground rod (PGE-A_GR16) located 20 feet east of PG&E A Valve Station, installed to a depth of approximately 278 feet. A temporary work area measuring 0.147 acre will be required

for construction (of this, 0.138 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.

5. One ground rod (PGE-A_GR17) located 250 feet southeast of Construct 3B-61, installed to a depth of approximately 341 feet. A temporary work area measuring 0.147 acre will be required for construction (of this, 0.113 acre is new disturbance area not previously approved in NTP #32 or the gas pipeline protection facilities addendum). A previously approved access road would be used to reach the site.

- **Biological Resources:** SCE submitted a biological survey report titled *Biological Survey Report for the Installation of Ground Rods Request for Final Engineering Concurrence 3B-#12, Segment 3B Transmission Line, Antelope Transmission Project, Kern County, California* dated March 30, 2015. The report documents the biological conditions for Segment 3B Final Engineering Concurrence 3B-#12 (Project Component). The Project Component plus the 500-foot buffer are referred to as the Biological Study Area (BSA). Biological resources within and adjacent to the Project Component were evaluated during several focused surveys, including 2010 and 2011 rare plant surveys (LSA 2010e, ICF 2011gt, ICF and ECORP 2012a); 2008 and 2010, and 2011 Swainson's hawk surveys (LSA 2008b, 2010c; ICF and Bloom 2011d, 2012); 2007, 2008 through 2011, and 2013 desert tortoise surveys (LSA 2007, 2008a, 2009b, 2010a; ICF and ECORP 2011b, 2012b; CH2M Hill 2014); 2008, 2010, and 2011 Mohave ground squirrel surveys (Vanherweg 2008, LSA 2010b, ICF and ECORP 2011c, ICF and ECORP 2012c); and burrowing owl and American badger burrow surveys in 2010 (LSA 2010d). The biological resources within and adjacent to the Project Component and BSA were also evaluated during preconstruction surveys for general biological resources (P30) and burrowing owl (Owl30) for the Segment 3B Transmission Line.

Vegetation communities within the Project Component include Mojave mixed woody scrub, Mojavean juniper woodland and scrub, and disturbed/developed. Vegetation communities within the 500 foot buffer include bunchgrass grassland, California annual grassland, Joshua tree woodland, Mojave desert wash scrub, Mojave mixed woody scrub, Mojavean juniper woodland and scrub, rabbitbrush scrub, southern willow scrub, and disturbed/developed. No special-status plant species were identified within the Project Component. One special-status plant species, Bakersfield cactus (*Opuntia basilaris* var. *treleasei*), was identified within the BSA during focused rare plant surveys in 2012. In addition, beavertail cactus (*Opuntia basilaris*) hybrid was also identified within the BSA.

Previous focused burrowing owl (*Athene cunicularia*) surveys in 2010 for Segment 3B were negative for burrowing owls, sign of the species, and potential burrowing owl features within the Project Component. However, sign of the species and potential burrowing owl burrows were identified within the 500-foot buffer (LSA 2010d). New potential burrows were identified within the 500-foot buffer during 2011 desert tortoise (*Gopherus agassizii*) focused surveys, preconstruction surveys, and burrowing owl preconstruction surveys for the Segment 3B transmission line and the Wilderness Line Relocation. Additional potential burrowing owl burrows were documented within the Project Component during general preconstruction and focused preconstruction surveys in 2012 (ICF and ECORP 2012a). Additional potential burrows were also identified within the 500-foot buffer during 2012 Segment 3B desert tortoise focused surveys (ICF and ECORP 2012b). No new potential burrows were found during 2014 focused surveys (CH2M Hill).

Focused surveys conducted for desert tortoise, Mohave ground squirrel (*Xerospemophilus mohavensis*), and Swainson's hawk (*Buteo swainsoni*) in 2010, 2011, 2012, and 2014 were negative for the species within the Project Component and BSA. However, Swainson's hawk were observed in flight over the BSA during the general preconstruction survey in 2012. No desert tortoise sign was observed within the Project Component and BSA during the Segment 3B focused survey for desert tortoise. No special-status wildlife species were identified within the Project Component. Additionally, an occupied American badger den (*Taxidea taxus*), potential desert kit fox (*Vulpes macrotis arsipus*) dens, desert woodrat (*Neotoma lepida*

intermedia) middens, a loggerhead shrike (*Lanius ludovicianus*), and LeConte's thrasher (*Toxostoma lecontei*) nest were observed within the 500-foot buffer.

Jurisdictional resources within the Project Component were evaluated during the 2011 jurisdictional delineation for Segment 3B (LSA 2011) and a separate field visit on May 16, 2012, to evaluate potential jurisdictional features for additional areas that were not included in the 2011 jurisdictional delineation. Jurisdictional features do occur within the 500-foot buffer, but not the Project Component. All features were marked as ESAs.

Impacts associated with this Final Engineering Concurrence includes: 0.324 acre of temporary impacts. Per **Mitigation Measure B-1a**, SCE shall provide restoration/compensation for impacts to native vegetation communities and shall include the area covered under this Final Engineering Concurrence in the TRTP Work Package 1 (Segments 4/5/10) Habitat Mitigation and Monitoring Plan which as reported by SCE will include Antelope Segment 3B.

No additional impacts to biological resources are anticipated.

- **Cultural Resources:** SCE submitted a memorandum titled *Southern California Edison Tehachapi Renewable Transmission Project Cultural and Paleontological Resources Assessment – RFEC #12 Installation of Ground Rods PGE-A_GR13, GR14, GR15, GR16, and GR17* dated April 3, 2015. The areas addressed in this RFEC were included in previous cultural resources surveys in support of Segment 3B and cultural resources were identified in the vicinity or within the boundaries of one of the proposed locations (Ahmet et al. 2006; Armstrong et al. 2011; Holm 2011; Pacific Legacy 2011, 2012, 2014); therefore, an archaeological monitor is required during all ground disturbing activities at PGE-A_GR15.

Previous paleontological assessments for Segment 3B define the geology at the proposed locations as Quaternary recent alluvium (Qa) and Quaternary older alluvium (Qoa) (Gust and Scott 2008). Based on the Potential Fossil Yield Classification (PFYC) system, Quaternary recent alluvium has a low potential for containing paleontological resources. Quaternary older alluvium is considered to have a moderate sensitivity for yielding significant paleontological resources. During the construction of the Segment 3B Transmission Line, Highwind Substation, and installation of previous ground rods in support of AC Mitigation Activities, all ground disturbing activities were monitored for paleontological resources between 2012 and 2013 (Aron and Kelly 2014; Aron et al. 2014a, 2014b). In addition, the adjacent areas were also monitored for paleontological resources for SCE's East Kern Wind Resource Area – EKWRA – project during 2014. No paleontological resources were observed, thus, field observations indicate that Qoa at the proposed ground rod locations have a very low-to-none potential for harboring paleontological resources. As a result and based on previous field observations, a paleontological monitor is not necessary to support the proposed activities in RFEC #12.

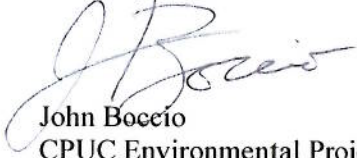
No additional impacts to cultural or paleontological resources are anticipated.

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

- Per Mitigation Measure B-1a, SCE shall provide restoration/compensation for impacts to native vegetation communities and shall include the area covered under this Final Engineering Concurrence in the TRTP Work Package 1 (Segments 4/5/10) Habitat Mitigation and Monitoring Plan which as reported by SCE will include Antelope Segment 3B.
- Archaeological monitoring shall be conducted during all ground disturbing activities at PGE-A_GR15.
- All conditions required by Notice to Proceed (NTP) #32 shall apply to the subject area and activities.

- Copies of all relevant permits, compliance plans, NTP #32, and this Concurrence of Final Engineering shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Boccio", is written over the printed name.

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen