

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 21, 2014

Ryan Stevenson
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G100
Rosemead, CA 91770

Re: Data Request #1 for the SCE West of Devers Upgrade Project - Application No. A.13-10-020

Dear Mr. Stevenson:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that PG&E has provided, including the Application and Proponent's Environmental Assessment (PEA; dated October 25, 2013) and the PEA deficiency response items submitted in late 2013 and early 2014. During the analysis of the aforementioned materials, we have identified additional information items needed from SCE. Attached please find Data Request No. 1, which defines the additional questions we have at this time. Additional data requests may be necessary to address other CEQA or NEPA topics as we move forward with EIR/EIS preparation.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current schedule. We request that responses be provided to us within two weeks (by March 7, 2014). We understand that some of these requests may require more time; however, we request that information be provided to us as soon as each response is available, along with an estimated response date for any information that can't be provided within two weeks.

Please submit one set of responses to me and one to Susan Lee at Aspen Environmental Group in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager for West of Devers Upgrade Project
Energy Division CEQA Unit

Attachment

cc: Mary Jo Borak, CPUC Supervisor CEQA Unit
Brian Paul, Bureau of Land Management
Holly Roberts, Bureau of Land Management
Lynette Elser, Bureau of Land Management
Susan Lee & Hedy Koczwar, Aspen Environmental Group
Nicholas Sher, CPUC Legal Division

SCE West of Devers Upgrade Project

Data Request No. 1

West of Devers Upgrade Project Data Request No. 1, includes requests related to the following issue areas:

- Project Description
- Aesthetics
- Agriculture and Forestry
- Cultural and Paleontological Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Mineral Resources
- Public Utilities and Service Systems
- Wildland Fire

Project Description

- PD-1** The mapbook indicates SCE tax parcels along the proposed route. However, in order to clarify land rights and ownership, please describe SCE's current land rights and who owns the remaining SCE transmission line ROW not in SCE fee ownership.
- PD-2** East of the San Bernardino Substation, a relocated 66 kV subtransmission line is proposed, running east-west on the north side of W San Bernardino Avenue. Please describe the specific location of this new line with respect to the existing line and the two rows of trees between the warehouses and the street. Can this new line be constructed and operated without affecting the two rows of trees that are present along the north side of this roadway?
- PD-3** East of the San Bernardino Substation, a proposed telecommunication line is shown running east-west on the north side of W San Bernardino Avenue. Is this line to be placed as an underbuild on the existing double circuit 66 kV subtransmission line in this area? If not how would this line be supported?
- PD-4** Six single-phase Tubular Steel Poles (TSP) are proposed to be installed inside the San Bernardino Substation. Please provide dimensions in terms of height and diameter for these six TSP.
- PD-5** In SCE's preliminary design mapbook, it appears that an additional 220 kV double circuit structure (EC-SB 0) is added within the substation boundary.
- a. Please explain why this proposed structure is needed.
 - b. Would this structure be a LST or TSP?
- PD-6** In Segment 1, between San Bernardino Junction and the area of Barton Road, the proposed 220 kV towers have spans that are roughly one-half of the length of the existing spans, resulting in a doubling of the number of structures in this area. What predicated the use of additional structures? Please explain whether this is an operational or a construction-based design decision.
- PD-7** In Segment 4 (City of Banning), the preliminary design shows that the proposed new tower alignment shifts from the north edge of the right-of-way to the south edge of the

right-of way near structures D-EC 59 and D-V164 (sheet 29) and then later shifts back to the north edge of the right-of-way near structures D-EC 9 and D-V 116 (sheet 40). What predicated this shift to the south? Conversely, what issues would need to be addressed if the alignment were to continue along the north edge of the right-of-way in this line segment?

PD-8 In Response to Completeness Item #9a, SCE stated that it is not proposing to use helicopters to erect towers. Will helicopters be used for conductor or tower removal?

PD-9 Response to Completeness Question #14d states that: “SCE conducts an environmental review for all operations and maintenance activities that involve *ground disturbance*” (emphasis added).

a. Is any environmental review conducted for non-ground disturbing activities such as helicopter inspections, insulator washing, or tree trimming which could impact nesting birds?

b. Provide examples for each of the three risk categories defined as part of SCE’s environmental analysis.

PD-10 PEA Figure 3.1-6 shows the conductor and ground wire positions vertically for subtransmission structures. Please provide information on horizontal distances for the conductor and ground wire relative to the center of the structures.

PD-11 PEA Table 3.1-B shows zero (0) double-circuit TSP for Segment 1. However, the Response to Completeness Item #4a spreadsheet shows one (1) for Structure Number EC-SB 0. Table 3.1-B does show six (6) single-phase TSP, but these appear to be proposed within the San Bernardino Substation. Please explain the apparent discrepancies between the two tables.

PD-12 PEA Table 3.1-B shows 35 double-circuit Lattice Steel Tower (LST) for Segment 2. The Response to Completeness Item #4a spreadsheet shows 33 and 1 unknown structure type. Please explain the apparent inconsistency between the two tables.

PD-13 As explained in our meeting with SCE on February 19, 2014, SCE is currently undergoing a “data refresh” of the structure locations and other components of the Proposed Project. SCE stated that engineering for the entire route is not expected to be completed until the end of June 2014, but it was stated in the February 19 meeting, that site surveys of several segments have been completed and tower locations and tower types have changed. In order to allow our ongoing EIR/EIS analysis to be done using most accurate and current data, please provide updated GIS data immediately for completed segments, and provide future segment data to us at the time each project segment is completed.

PD-14 Please provide updated mapbooks with all available new information incorporated at least 5 days prior to the first scoping meeting, which we currently expect to occur in early to mid-April.

Aesthetics

V-1 Please provide the location and a detailed description of new and replacement lighting at the various substations. The plan needs to be provided in site plan form, and should

include narrative describing the requirements. The description must include the type of lighting to be installed and measures to be taken to: (1) prevent the visibility of bulbs and reflectors from public viewing areas, (2) avoid the occurrence of reflected glare, and (3) minimize the illumination of project facilities, vicinity, and nighttime sky.

Agriculture and Forestry

AG-1 Please provide GIS files used in assessments of Important Farmland, Williamson Act land, and agricultural zoning.

Cultural and Paleontological Resources

C-1 In PEA Appendix D (Agency Consultation), SCE has provided copies of requests to the Native American Heritage Commission for searches of their Sacred Lands Files. SCE also provided letters from four tribes acknowledging that they had been contacted by SCE about the proposed Project. Please provide copies of any letters that were sent to the tribes to elicit information or concerns.

C-2 In reviewing the GIS data for Paleontological Resources (PEA Section 4.5.5), it was noted that fossil locality points or shapes, as well as survey areas were not included in the GIS data. Please provide this information.

Geology and Soils

G-1 Based on our meeting on February 19, 2014, SCE indicated that a geotechnical report is currently underway based on 146 borings that were performed in fall 2013. Please provide the geotechnical report when it is available (estimated in April 2014 in the meeting).

G-2 Please provide the specific timing of planned fault trenching at the three locations of fault traces (2 Segment 5 and 1 in Segment 6) so the EIR/EIS team geologist can view the trenches. Also, please provide the report of trenching after it is completed (estimated at the end of April 2014).

G-3 PEA Section 4.6.1.5 provides a summary of the principal active faults crossing the study area, however no reference citations for the data provided about the faults is included in the section. Please provide reference citations for the fault information provided in this section.

G-3 PEA Section 4.6.1.6, subsection Seismic Ground Shaking presents peak ground acceleration (PGA) data for the project alignment segments and substations, however the text and tables present the PGA data as 10 percent probability of exceedence in 50 years (corresponding to a return interval of 475 years for a maximum considered earthquake) for the project alignment segments and 2 percent probability of exceedence in 50 years (which corresponds to a return interval of 2,475 years and for a maximum considered earthquake) for the substations. The 10% in 50 and the 2% in 50 probabilities vary considerably for the same site and cannot be used together (mixed) in the same comparison of groundshaking severity. Please be consistent in the data type used and provide an update to the text and table. Additionally it should be noted that

the current California Building Code uses the 2% probability of exceedence in 50 years for design calculations.

Hazards and Hazardous Substances

HAZ-1 Appendix H of the PEA includes the following document used for analyses of hazardous materials in the EIR section - "Hazardous Materials Assessment, Southern California Edison, West Of Devers Upgrade Project, Riverside and San Bernardino Counties, California" by Ninyo & Moore dated September 5, 2013.

This document refers to "Aerial photographs of the project area were provided by EDR taken in 1968, 1975, 1989, 1994, and 2002" and "historical topographic maps from EDR, for the years 1942, 1954, 1956, 1957, 1967, 1972, 1973, 1975, 1979, 1980, 1988, and 1996. USGS 7.5 Minute Series maps for Banning, Beaumont, Cabazon, Desert Hot Springs, El Casco, Elsinore, Palm Springs, San Bernardino, Sunnymead, Redlands, San Jacinto, and Whitewater" which are not listed in the reference section of the document, but were reviewed by Ninyo & Moore as part of their analyses. Please provide copies of these EDR historic reports.

Mineral Resources

MIN-1 The PEA presents no data that was obtained from federal sources such as the BLM or the USGS Mineral Resource Data System. The Proposed Project crosses federal lands that are not subject to oversight by State and county agencies regarding mining and mining claims. Please provide current and historical mining data obtained from federal sources for these areas.

Public Utilities and Service Systems

PU-1 Based on the discussion in the February 19, 2014 at the CPUC, please provide the results of potholing and ground penetrating radar of existing underground utilities once work is completed.

PU-2 Please provide information regarding the amount of water anticipated to be needed for construction of the Proposed Project and the where water required for construction would be obtained for each project segment.

Wildland Fire

F-1 The project traverses populated landscapes with significant histories of catastrophic wildfire incidence. The PEA Section 4.8 "Environmental Setting" recognizes wildland fire as a hazard but the section does not document the actual fire history associated with the transmission corridor and substations included in the WOD-UP project. To support the required analysis for this project in the EIR/EIS:

- a. Please identify all past fire incidences in the project area where fires were ignited by SCE's electrical equipment or lines.
- b. Describe whether the WOD-UP project would increase or decrease fire risk related to presence of the transmission lines in the existing corridor, and why.

- c. Describe any conflicts that exist between the presence of transmission lines and fire suppression efforts (e.g., relationship between presence of energized lines and ground and aerial suppression and crew safety.)
- d. Describe SCE's protocol for identifying and managing fuel load risks.

F-2 PEA Table 4.8-3 lists county & city land use regulations identified for fire suppression and coordination.

Please describe how SCE coordinates with county and city jurisdictions to meet their goals in terms of fire risk management and how or whether this may change with installation of higher voltage lines.

F-3 PEA Section 4.8 mentions "protocols" and SCE's participation with the Red Flag Fire Prevention Program in the discussion of fire risk impact evaluations.

- e. What, specifically, are the "standard protocols" mentioned in this section and who is responsible for their implementation?
- f. How is fire safety addressed in training in both the construction and maintenance phases of the project?
- g. What is SCE's performance history in meeting these protocols of those that are currently in place?
- h. Please provide specific information of what the Red Flag Fire Prevention Program entails and how SCE implements it, its standard procedures, who is responsible for implementation, and what training is required. The discussion should include SCE's fire incident history for all lines associated with the project, lessons learned, and enacted procedures for risk reduction and risk mitigation.

F-4 Please list any community groups (i.e., Fire Safe Council) and government agency outreach and fire risk reduction programs that SCE participates in.