

**Southern California Edison – Informal Data Request Response**

**Re: Valley-Ivyglen 115 kV Subtransmission Line Project & Fogarty Substation Project (A.07-01-031/A.07-04-028)**

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Between mid-September and early October 2008, SCE worked closely with the CPUC Energy Division's consultants, Ecology and Environment Inc., ("E&E"), specifically Mr. Paul VanKerkhove of E&E, to address the air quality analysis for the Valley-Ivyglen and Fogarty projects. E&E provided input to SCE's air quality impact calculations and then prepared an estimated impact evaluation which appeared to SCE to be very detailed and appropriate for the projects. However, SCE did have issues with two of the assumptions used by E&E in its analysis, (1) regarding the assumption used for the Local Significance Threshold (LST) evaluation of the 115 kV subtransmission line, and (2) regarding the assumption that a 100 kW generator would be needed for part of the substation construction. SCE (specifically A.L. Wilson of SCE), provided feedback to Mr. VanKerkhove on both of these issues.

Regarding the LST assumption, it is SCE's understanding that the E&E analysis assumed all of the equipment needed for a particular construction activity would impact a sensitive receptor during one day. However, SCE believes that only a fraction of the construction equipment would impact a receptor during one day, thus the E&E assumption would result an estimated impact that is higher than should be the case. In addition, upon further review of the LST assumptions, SCE recognized that it did not include one dump truck needed to haul away soil, in the equipment list provided to E&E.

Regarding the need for a 100 kW generator as part of the construction of the Fogarty substation, it is SCE's understanding that the E&E analysis assumes a 100 kW generator is needed for one of the construction activities (i.e., the 100 kW generator is added to the equipment list and included in the emissions impact analysis. SCE recognizes that the addition of this generator would add to the emissions significantly, but believes that this addition does not change the general conclusions of significance compared to the thresholds.

In light of the above discussion, SCE recommends the following:

- Adjust the equipment usage as discussed in the attached document (LST Comments for Ivyglen 115kV).
- Include a dump truck (10 cubic yard capacity, 350 hp diesel engine), operating 2 to 4 hours per day, in the Valley-Ivyglen LST analysis.
- Remove the 100 kW generator from the Fogarty Substation LST analysis.
- Accept all other air quality calculations and analyses provided by Paul VanKerkhove to date.