PUBLIC UTILITIES COMMISSION
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August 12, 2014 VIA MAIL AND EMAIL

Christine McLeod
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Southern California Edison
8631 Rush Street, General Office 4 - G10Q (Ground Floor)
Rosemead, CA 91770

SUBJECT: Data Request #2 for the Southern California Edison Moorpark-Newbury 66 kV Subtransmission Line Project

Dear Ms. McLeod:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review for Southern California Edison (SCE)'s Moorpark-Newbury 66 kV Subtransmission Line Project (Proposed Project), we have identified additional information required in order to adequately conduct the CEQA review. Please provide the information requested below (Data Request #2) by August 26, 2014. Please submit your response in hardcopy and electronic format to me and also directly to our environmental consultant, Environmental Science Associates (ESA), at the physical and e-mail addresses noted below. If you have any questions please direct them to me as soon as possible.

Sincerely,

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ESA
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Data Request #2
Moorpark-Newbury 66 kV Subtransmission Line Project

Project Description

1. PEA page 3-13 states that future activities remaining in Project Section 4 include installation of "approximately 0.5 mile of 954 SAC…" as well as installation of "an additional length of FRC."

    a. Please identify the location of the proposed 954 SAC installation along Section 4.

    b. Please identify the location and length of the proposed FRC installation.

2. PEA Table 3.5-1 (page 3-29) and Section 3.5.2.1 (page 3-27) indicate that lightweight steel (LWS) poles would be 60 to 80 feet above ground. However, PEA Figure 3.5-1 shows LWS poles ranging in height from 60 to 75 feet above the ground surface. Please confirm the maximum LWS pole above ground height.

3. PEA Table 3.5-1 (page 3-29) and Section 3.5.2.2 (page 3-28) indicate that tubular steel poles (TSPs) would be 70 to 135 feet above ground. However, PEA Figure 3.5-1 shows TSPs ranging in height from 70 to 130 feet. Please confirm the maximum TSP height.

4. PEA page 3-27 states: "LWS pole installation would require excavation of holes approximately 30-36 inches in diameter…" PEA Table 3.5.1 (page 3-29) shows the LWS pole approximate auger diameter to be 2-3 feet. Please confirm the minimum diameter of proposed LWS pole hole excavations.

5. PEA Section 3.5.2.1.1 (page 3-28) states that conductor used to electrically ground the LWS poles "is typically located 1 to 2 feet above the telecommunications facilities and 4 to 6 feet below the distribution facilities." However, PEA Figure 3.5-1 shows conductor used to electrically ground the LWS poles 3 feet above the telecommunications facilities, and a minimum of 6 feet below the distribution facilities. Please clarify which numbers are correct.

6. PEA Section 3.5.2.1 (page 3-28) states: "At the resumption of construction, the location of any additional guy wires and anchors for LWS poles would be determined on a case-by-case basis. No guying across a roadway would be required." Given that the Proposed Project would include construction of only two LWS poles:

    a. Please identify whether or not guys and/or guy poles would be required prior to construction based on the angle of the line at each of the poles.

    b. Please describe the type of pole and dimensions that would be used for the guy poles, if required.

7. PEA Section 3.5.3.1 (page 3-29) states: "Subtransmission conductor installed on LWS poles is planned to be at least 50 feet above ground as measured at the pole…" However, Figure PEA 3.5.1 shows that the subtransmission conductor would be installed at least 36 or 39 feet above ground. Please clarify which numbers are correct.

8. PEA Section 3.5.3.1 (page 3-30) states: "SCE is currently evaluating the proposed Project infrastructure with respect to FAA regulations regarding notification, and may file FAA Form 7460-1 as outlined in FAA Part

77. If applicable, SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. FAA recommendations would be implemented into the design of the Project to the extent practicable. Pursuant to FAA guidance, if a span requires three or fewer marker balls, then the marker balls on the span would all be aviation orange. If a span requires more than three marker balls, then the marker balls would alternate between aviation orange, white, and yellow. Marker balls would be 36 inches in diameter."

a. On the December 2013 site visit, SCE provided Environmental Science Associates with maps that show numerous marker ball spans, indicating that the FAA has already provided input. Please provide the CPUC with updated information, including any and all FAA recommendations and SCE notifications to FAA.

b. Project maps provided by SCE in the field indicate that marker balls would span from poles 25 to 28, between poles 32 and 33, and between poles 39 and 40. Please provide the estimated number of marker balls required for each of these spans, and the anticipated length between marker balls within a span.

c. Please clarify whether or not marker balls would be installed on all three conductors of the proposed new single circuit line and installed on all six conductors of the proposed new double-circuit line, where applicable. If not, please clarify which conductor(s) would be installed with marker balls.

9. PEA Section 3.1 (page 3-2) states: "The 66 kV subtransmission upgrade components of the Project would be built within existing rights-of-way (ROWs), existing easements, fee-owned property, and public ROWs; the substation components of the Project would be built on existing SCE fee-owned property." Please define "fee-owned property."

10. PEA Section 3.7.1.3 (page 3-49) states: "Prior to the restart of Project construction, some segments of the existing access and spur roads and work areas may be rehabilitated to facilitate the safe movement of construction vehicles and personnel. At present, future construction activities are projected to require only minor rehabilitation work to most existing access and spur roads; this work would be necessary due to the time elapsed between past and future construction activities." PEA Figures 3.7-1a and 3.7-1b identify areas of road rehabilitations. It is not clear if these areas describe the road rehabilitations associated with past work, or would be the road rehabilitation area proposed for future activities. If they describe the road rehabilitations associated with past work, please provide a figure that shows locations of the proposed future road rehabilitations, including locations that may require widening at curves, grading, and/or vegetation removal. Please also identify the associated mileage of such road improvements.

11. PEA Section 3.7.1.1 (page 3-44) states: "The two staging areas at Moorpark Substation are both 'L' shaped and have maximum dimensions of approximately 155 yards by 125 yards (Moorpark Substation #1) and approximately 100 yards by 80 yards (Moorpark Substation #2); these areas cover approximately 3.3 acres and 1.7 acres respectively." However, PEA Table 3.7-1 indicates that Moorpark Substation #1 is the smaller of the two staging areas. Please confirm the acreage of each of the two staging areas.

12. PEA Section 3.7.1.1 (page 3-44) states: "SCE may identify an additional or substitute staging area(s) prior to the start of future construction activities; additional staging areas would be identified and established as needed to optimize construction efficiency." To adequately assess the environmental impacts of proposed staging areas, all areas where Proposed Project staging may occur must be clearly identified. Please confirm that the staging areas identified in PEA Table 3.7-1 would provide adequate staging for construction of the Proposed Project, or identify the additional staging areas that would be necessary, and specify their location, pre-project condition, and approximate area.

13. PEA Section 3.7.1.1 (page 3-44) states that materials stored at the staging areas may include fuel. PEA Section 3.7.1.1.1 (page 3-45) states that "Normal maintenance and refueling of construction equipment and fuel storage by SCE personnel may occur at Thousand Oaks Service Center, Valencia Service Center or Ventura Service Center." Please clarify where refueling would occur, and where fuel would be stored.

14. PEA Section 3.7.1.4 (page 3-50) states: "During future construction activities, helicopters may, if necessary, be refueled at helicopter landing zones." Please describe the equipment and methods that would be used to refuel helicopters at the landing zones, including any spill prevention procedures that would be followed.

15. PEA Section 3.7.1.4 (page 3-50) states that helicopter landing zones would include "ground locations in close proximity to conductor pulling, tensioning, and splice sites; and in previously disturbed areas near construction sites." It also states that "helicopters must be able to land within or near SCE ROWs, which could include landing on access or spur roads." As written, these statements would allow SCE to land helicopters in any number of locations. To adequately assess the environmental impacts of proposed helicopter construction activities, all areas where helicopter landings may occur must be clearly identified. Please confirm that the helicopter landing zones identified in PEA Table 3.7-1 would provide adequate landing area for construction of the Proposed Project, or identify the additional helicopter landing zones that would be necessary, and specify their location, pre-project condition, and approximate area.

16. PEA Section 3.7.1.5 (page 3-56) states: "In Project Section 4, within the outer fenceline of the Newbury Substation, approximately 30 to 40 existing trees will require trimming or removal to facilitate construction. Most of the trees are ornamental species." Please list the species types of trees that would be removed, including the number and type of any oak trees.

17. PEA Section 3.7.2.2.1 (page 3-66) states that, in limited circumstances, helicopters may be used to dismantle lattice steel towers (LSTs). However, in the discussion of potential helicopter uses during Proposed Project construction (PEA Section 3.7.1.4, page 3-49 to 3-50), SCE only identifies the stringing of conductor and installation of marker balls as activities that would require the use of helicopters. Please confirm all construction activities that may require the use of helicopters.

18. Please provide the approximate height of temporary guard structures that would be used during construction of the Proposed Project.

19. In the discussion of conductor/cable installation, PEA Section 3.7.2.3 (page 3-70) states: "To ensure the safety of workers and the public, safety devices such as traveling grounds, guard structures or specifically-equipped boom trucks, radio-equipped public safety roving vehicles, and linemen would be in place prior to

the initiation of wire stringing activities." Please provide descriptions of traveling grounds and radio-equipped public safety roving vehicles of how these devices provide safety.

20. PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with rehabilitation of existing access/spur roads and construction work sites. However, the PEA Project Description includes language in numerous places that indicates that work would occur on existing access and spur roads and construction work sites; this work should be considered land disturbance. Below are examples of PEA language that indicate that land disturbance would occur.

    - As noted in footnote 1 in Table 3.7-41b, "light brushing" would occur within previously disturbed areas. PEA Section 3.7.1.5, Vegetation Clearance (page 3-55) defines "brushing" as removal of "shrubs and other low-lying vegetation within approximately 2-5 feet of the edge of access or spur roads…to prevent vegetation from intruding into the roadway."

    - PEA Section 3.7.1.5 (page 3-55) declares that "[b]lade-grading, mowing, or brushing may also occur during future construction activities in Project Sections 2, 3, and 4 depending upon the condition of the access roads, spur roads, and construction work sites; vegetation that has grown in these areas in the period between past construction activities and future construction activities would be trimmed and/or removed."

    - PEA Section 3.7.1.3 (page 3-49) states: "Prior to the restart of Project construction, some segments of the existing access and spur roads and work areas may be rehabilitated to facilitate the safe movement of construction vehicles and personnel. At present, future construction activities are projected to require only minor rehabilitation work to most existing access and spur roads; this work would be necessary due to the time elapsed between past and future construction activities."

    - PEA Table 3.7-2 (page 3-48) states that, for existing access roads that would have permanent improvements, "limited sections may require widening at curves or heavier grading."

    - Table 3.7-8b (page 3-83) shows that heavy equipment (e.g., grader, dozer, loader) would be required for ROW clearing, and road and landing work. All of these activities would result in temporary and/or permanent land disturbance.

        a. Please revise PEA Table 3.7-4b to include the estimated miles of road disturbance and the amount of sites disturbed, area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) based on worst-case estimates associated with the proposed construction activities described in the PEA (listed above).

        b. As requested in Data Request Item 10, please provide a figure that shows locations of future road rehabilitations, including locations that may require widening at curves, grading, and/or vegetation removal.

21. PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with installation of new TSPs, with a footnote that states: "22 new TSPs would be installed utilizing construction areas developed during past construction activities. Some TSP construction work sites overlap existing access and spur road

locations rehabilitated during past activities. All disturbances associated with TSP installation are captured on Table 3.7-4a." However, PEA Section 3.7.2.2.3 indicates that onsite grading could be necessary during site preparation (page 3-67), and that an equipment pad would be constructed within the construction work site if existing terrain around the TSP location is not suitable to support crane activities (page 3-69). In addition, the Proposed Project would include installation of 14 TSP foundations. All of these actions would result in land disturbance, as they would require grading, excavation, and/or removal of existing vegetation. Please revise Table 3.7-4b to accurately describe the area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) as a result of installation of the proposed new TSPs.

22. PEA Table 3.7-4b shows zero acres of land disturbance from 10 stringing sites, with a footnote that reads: "The ten stringing setup areas established during past construction activities may be used during future construction activities; these disturbance areas are accounted for on Table 3.7-4a. Additional stringing setup areas, if needed, would be established on existing access roads and in areas within the Moorpark-Ormond Beach 220 kV Transmission Line ROW" (page 3-60). Regardless of when the 10 stinging setup locations were established, please confirm that work at the sites would not require ground disturbance, such as light grading, brushing, or vegetation removal. Please update Table 3.7-4b accordingly.

23. PEA Table 3.7-4b shows zero acres of land disturbance associated with removal of existing LSTs, and 0.08 acre to be restored, with a footnote that reads: "The construction areas used for removing existing LSTs were established as part of past construction activities, and have been maintained since then; therefore, there would be no additional land disturbance for these activities during future construction activities. The area disturbed during past construction activities for removal of the LST between TSP locations 39 and 40 (0.08 acres) would be restored following final construction activities. This restoration is not associated with the HMRP discussed in Section 4.4" (page 3-60). However, PEA Section 3.7.2.2.1 (page 3-66) describes LST removal and states: "If previously disturbed areas adjacent to the structure are not available, an area would be cleared of vegetation and could be graded if the ground is not level. The crane could be positioned up to approximately 60 feet from the tower location to dismantle the tower." Please update the numbers in Table 3.7-4b to include consideration of these construction practices.

24. In the discussion on trenching, PEA Section 3.7.3.1 (page 3-37) states: "Excavated materials have been, and would be, disposed of at one of the following locations: Toland Road Landfill, Simi Valley Landfill, AG Reclamation, Bradley Landfill and Recycle, or Antelope Valley Landfill." This is inconsistent with PEA Section 4.17.1.1, which states: "The Simi Valley Landfill and Recycling Center, operated by Waste Management of California, Inc., would receive solid waste associated with the Project." Please clarify which solid waste facilities would be used.

25. Please describe all construction and operation activities that would require water use, and provide estimates of how much water would be required.

26. In discussing future operations and maintenance activities of overhead facilities, PEA Section 3.8 (page 3-92) states: "Existing conductors could require re-stringing to repair damages. Some pulling site locations could be in previously undisturbed areas and at times, conductors could be passed through existing vegetation on route to their destination." Please clarify whether or not these activities are considered routine maintenance, and

state under what circumstances would SCE not be required to obtain separate approval from the CPUC to conduct re-stringing activities?

27. In discussing future operations and maintenance activities that would be associated with the overhead facilities, PEA Section 3.8 (page 3-92 and 3-93) states that road maintenance would include moving and establishing berms. Please explain the circumstances under which berm movement and establishment would be necessary.