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**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

December 12, 2023

Thomas Diaz  
Infrastructure Projects & Programs  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, California 91770**Re: Data Request #3 for the SCE EPL TLRR Project (A.23-04-009)**

Dear Mr. Diaz:

Southern California Edison Company (SCE) submitted its Certificate of Public Convenience and Necessity (CPCN) and Proponent's Environmental Assessment (PEA) on April 26, 2023. The California Public Utilities Commission (CPUC) Energy Division provided PEA deficiency letters to SCE on May 19 and June 27, 2023 and SCE is currently completing additional analysis.

As we prepare for the environmental analysis for the CEQA compliance document, we have identified additional information needed from SCE. Attached please find Data Request No. 3, which defines the additional questions we have at this time. We would appreciate your prompt responses to our data requests.

One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. in electronic format. Any questions on this data request should be directed to me by email at [eric.chiang@cpuc.ca.gov](mailto:eric.chiang@cpuc.ca.gov).

Sincerely,

Handwritten signature of Eric Chiang in cursive.

Eric Chiang  
Project Manager, Energy Division

cc:

Case Administration, Southern California Edison  
Susanne Heim and Jessica Koteen, Panorama Environmental

## Submittal

**Document Title:** Proponent's Environmental Assessment for Southern California Edison Company's TLRR EPL Project

**Data Request Form No.** No. 3

**Description:** Data Request #3

**From:** Panorama Environmental Inc.

**To:** Southern California Edison

**Date Submitted:** December 12, 2023

## Determination

- Meets CPUC Requirements, No Additional Information Needed
- Does not Meet CPUC Requirements (see Deficiencies below)
- Additional Data Needed (see Data Requests below)

## Data Request

| PEA Section or Page #  | Comment Code | Data Request  |
|--|--------------|---|
| <b>Chapter 5: Environmental Analysis</b>                             |              |   |
| <b>5.3 Air Quality/5.8 Greenhouse Gas - Health Risk Assessment</b>   |              |   |
| Revised Health Risk Assessment – Table 3 (dated December 1, 2023)    | <b>DR3-2</b> | <p><b>Issue:</b> Within the revised Health Risk Assessment memo, Tables 1 and 2 and supporting text changes have been updated correctly. However, the updates to Table 3 (values associated with Lugo 1) seem to be incorrect. The provided AERSCREEN files for Lugo 1 (entitled ED-SCE-EPL-002-HRA-Lugo 1 AERSCREEN Results v2.xls) reported a maximum modeled 1-hour concentration at 120 meters of 1,950 µg/m<sup>3</sup> (which equates to a maximum modeled annual concentration of 195 µg/m<sup>3</sup> and an annual DPM concentration at the maximally exposed individual receptor of 0.00480 µg/m<sup>3</sup> instead of 0.00523 µg/m<sup>3</sup>). Therefore, the values in Table 3 for Lugo 1 would be 1.67 and 0.0297 for MICR for sensitive and worker receptors, respectively, and 0.000959 for chronic impacts.</p> <p><b>How to Address:</b> Provide update to Table 3 results for Lugo 1 or an explanation why a different value from the AERSCREEN files for Lugo 1 was used.</p> |
| Revised Health Risk Assessment (dated December 1, 2023) – Appendix B | <b>DR3-3</b> | <p><b>Issue:</b> The information provided in Appendix B of the revised Health Risk Assessment memo does not correspond to the values in Table 3. Table 3 is correct (except as noted previously for Lugo 1) and the information within Appendix B needs to be properly updated and correspond to Table 3. For example, Table 3 reports a MICR for sensitive and worker receptors of 1.29 and 0.023, respectively, and 0.000724 for chronic impacts for Bear Valley. However, Appendix B displays a MICR for sensitive and worker receptors of 0.660 and 0.00918, respectively, and 0.000724 for chronic impacts for Bear Valley.</p> <p>Attached are verification calculations for comparison. An older version of Appendix B may have been included within the revised Health Risk Assessment memo.</p> <p><b>How to Address:</b> Provide update to Appendix B with calculated values which correspond to Table 3.</p>   |

**Staging Area Located at SR-18 and Joshua Road (Bear Valley Staging Area)**

**Health Risk Assessment Assumptions**

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 350 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Bear Valley  
 Receptor: Residence

| Age Range       | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|-----------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| Third Trimester | 1.28E+06              | 0.00371                          | 0.25              | 361                              | 10.0            | 1.00                     | 0.05        | 7.42E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant? |
| 0 to <2 yrs     | 3.88E+06              | 0.00371                          | 1                 | 1,090                            | 10.0            | 1.00                     | 0.61        |   |
| 0 to <2 yrs     | 3.88E+06              | 0.00371                          | 1                 | 1,090                            | 10.0            | 1.00                     | 0.61        |   |
| 2 to <16 yrs    | 2.03E+06              | 0.00371                          | 0.25              | 572                              | 3.00            | 1.00                     | 0.02        | 1.29 Cancer Risk<br>10 Significance Threshold<br>No Significant?              |

**Health Risk Assessment Assumptions**

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 250 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Bear Valley  
 Receptor: Worker

| Age Range     | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|---------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| 16 to <70 yrs | 5.84E+05              | 0.00371                          | 2.5               | 230                              | 1.0             | 1.00                     | 0.023       | 7.42E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant?<br><br>2.30E-02 Cancer Risk<br>10 Significance Threshold<br>No Significant? |

**Lugo 1 Staging Area**

**Health Risk Assessment Assumptions**

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 350 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Lugo 1  
 Receptor: Residence

| Age Range       | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|-----------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| Third Trimester | 1.66E+06              | 0.00480                          | 0.25              | 361                              | 10.0            | 1.00                     | 0.07        | 9.59E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant? |
| 0 to <2 yrs     | 5.01E+06              | 0.00480                          | 1                 | 1,090                            | 10.0            | 1.00                     | 0.79        |   |
| 0 to <2 yrs     | 5.01E+06              | 0.00480                          | 1                 | 1,090                            | 10.00           | 1.00                     | 0.79        |   |
| 2 to <16 yrs    | 2.63E+06              | 0.00480                          | 0.25              | 572                              | 3.00            | 1.00                     | 0.03        |   |

**Health Risk Assessment Assumptions**

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 250 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Lugo 1  
 Receptor: Worker

| Age Range     | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|---------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| 16 to <70 yrs | 7.56E+05              | 0.00480                          | 2.5               | 230                              | 1.0             | 1.00                     | 0.030       | 9.59E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant? |
|               |                       |                                  |                   |                                  |                 |                          |             | 2.97E-02 Cancer Risk<br>10 Significance Threshold<br>No Significant?          |

Lugo 2 Staging Area

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 350 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Lugo 2  
 Receptor: Residence

| Age Range       | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|-----------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| Third Trimester | 4.29E+05              | 0.00124                          | 0.25              | 361                              | 10.0            | 1.00                     | 0.02        | 2.48E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant? |
| 0 to <2 yrs     | 1.30E+06              | 0.00124                          | 1                 | 1,090                            | 10.0            | 1.00                     | 0.20        |   |
| 0 to <2 yrs     | 1.30E+06              | 0.00124                          | 1                 | 1,090                            | 10.00           | 1.00                     | 0.20        |   |
| 2 to <16 yrs    | 6.80E+05              | 0.00124                          | 0.25              | 572                              | 3.00            | 1.00                     | 0.01        |   |

Health Risk Assessment Assumptions

5 Chronic Reference Exposure Level (ug/m3) for DPM  
 1.1 Cancer Potency Slope Factor (cancer risk per mg/kg-day) for DPM  
 250 days per year  
 25,550 days per lifetime

Project: SCE Eldorado-Pisgah-Lugo 220-kV TLRR Project  
 Date: December 4, 2023  
 Staging Area: Lugo 2  
 Receptor: Worker

| Age Range     | Daily inhalation Dose | Annual DPM Concentration (ug/m3) | Exposure Duration | Daily Breathing Rates (L/kg-day) | Exposure Factor | fraction of time at home | Cancer Risk |   |
|---------------|-----------------------|----------------------------------|-------------------|----------------------------------|-----------------|--------------------------|-------------|---|
| 16 to <70 yrs | 1.95E+05              | 0.00124                          | 2.5               | 230                              | 1.0             | 1.00                     | 0.0077      | 2.48E-04 Chronic Hazard Impact<br>1 Significance Threshold<br>No Significant? |
|               |                       |                                  |                   |                                  |                 |                          |             |   |