

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 29, 2022

Anthony Barranda, Senior Advisor - Infrastructure Licensing
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, California 91770

Re: Completeness Review of the SCE TLRR Gorman-Kern River 66 kV Project (A.22-02-014) Proponent's Environmental Assessment and Permit to Construct Application

Dear Mr. Barranda:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of Southern California Edison's (SCE) Application (A.22-02-014) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the Gorman-Kern River 66 kV Project. Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses *CPUC's Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (November 2019) as the guide for determining the adequacy of project applications.

After review of SCE's application for the Gorman-Kern River 66 kV Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate EIR in a timely manner. The attached report identifies the portions of the application found to be deficient. Information provided by SCE in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.22-02-014.

One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. in electronic format. We request that SCE respond to this report no later than April 27, 2022. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and application as complete. We are available to meet with you at your convenience to discuss these items. The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's PTC be approved.

Please direct questions related to this application to me at Eric.Chiang@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Eric Chiang".

Eric Chiang
Project Manager, Energy Division

Attachment A: Detailed PEA Comments

cc: Blanca Solares, Southern California Edison
Lauren P. Goschke, Southern California Edison
Case Administration, Southern California Edison
Susanne Heim and Jessica Koteen, Panorama

Report Overview

The California Public Utilities Commission (CPUC) has identified deficiencies in Southern California Edison's (SCE) Application (A.22-02-014) and Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the SCE TLRR Gorman-Kern River 66 kV Project. Deficiencies were identified using the CPUC Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments (November 2019) (PEA Checklist). Deficiencies are presented in Table 1.

Proponent's Environmental Assessment Review Form



Submittal

Document Title: Proponent's Environmental Assessment for Southern California Edison Company's TLRR Gorman-Kern River 66 kV Project

Review Form No. No. 1

Description: **PEA Review**

From: Panorama Environmental Inc.


To: Southern California Edison

Date Submitted: March 29, 2022

Determination

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

PEA Deficiencies

PEA Section or Page #	Comment Code	Deficiency
Section 3: Project Description		
3.3 Project Components 3.4.3.4 New Rights-of-Way or Easements: Development Restrictions 3.5 Construction Pages 3-3 and 3-18	DD3.1	<p>Issue: According to the GIS data layers "Subtransmission Structures" and "Subtransmission Alignment", nearly the entire length of Segment 1 would be permanently realigned approximately 15 feet east of the current alignment, except for the northernmost 0.6 mile from structure W4683791E_ E4683792E to Kern River 1 Substation. New structures would be installed alongside the existing alignment but offset in a new alignment immediately east or southeast (see screenshot below). No explanation of this alignment shift or its purpose was identified in the project description. More information is needed about the proposed subtransmission realignments or shifts, and impacts on trees and vegetation associated with maintaining clearances in the new alignment.</p>  <p>How to Address:</p> <ol style="list-style-type: none"> Please provide a detailed description of the purpose and need of the subtransmission line realignment in Segment 1 and explain why

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PEA Section or Page #	Comment Code	Deficiency
		<p>the structure replacement is not proposed within the same alignment as it is on the other project segments.</p> <ol style="list-style-type: none"> Please verify the alignment shift distances (i.e., 15 feet east-southeast) in Segment 1 and verify that such shifts only occur within Segment 1. Please verify that the subtransmission line realignments would not result in any clearance conflicts with existing structures in the proposed corridor, or alternatively identify each potential conflict and described how it would be addressed. It is noted that Section 3.4.3.4 states "No commercial or residential properties or structures would be relocated or demolished as part of the GKR Project." Please identify any areas along the proposed new subtransmission line clearance corridors, where realigned, that would require the clearance of existing vegetation or tree trimming where it is not currently cleared for the existing subtransmission corridor. If no existing vegetation is expected to be cleared or trimmed within the adjusted corridor limits, please state this.
<p>3.3.4.2 Description of Facilities by Segment Page 3-9</p> <p>3.3.5.1.2 Aviation Lighting and/or Marking Page 3-14</p>	DD3.2	<p>Issue: Section 3.3.4.2 states for each marker balls for each segment will be installed on overhead wire if and where determined to be appropriate. Section 3.3.5.1.2 states "The FAA has not made a determination regarding the lighting or marking of any component of the GKR Project."</p> <p>How to Address: No draft FAA notice and criteria tool results were included with the PEA materials. Please complete the preliminary structure screening for the maximum potential structure heights and span heights for the project and provide the preliminary results for the purposes of the CEQA analysis. Identify segments where marker balls may be required by FAA based on FAA criteria.</p>
<p>3.3.4.4 Different Facilities Page 3-12</p>	DD3.3	<p>Issue: Section 3.3.4.4 includes the following description about guys: "Guys are typically used when LWS poles or LWS H-frames are located on angles, corners, and dead-ends to provide support to the poles. Guys may also be used on tangent/suspension poles as field conditions dictate. Guying consists of a guy wire (down guy) that is fastened to a pole and attached to a buried anchor, or when there is not adequate space for the required down guy, a shorter guy pole (stub pole) is typically placed with a down guy and buried anchor in a location that has sufficient room for these facilities. The need for and location of guy wires and anchors for LWS poles and LWS pole H-frames would be determined during final engineering and construction on a case-by-case basis. Guying across a roadway would be avoided where feasible."</p> <p>How to Address: More information is needed about the potential for guying across roadways. Please evaluate the project alignment and identify any potential locations where guying across roadways could be required based on the angle changes and adjacent road locations, etc. Alternatively, please clarify if guying across roadways is not anticipated, and in the event that such guying would be required to ensure the stability of the line, then provide a statement about how the guying</p>

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PEA Section or Page #	Comment Code	Deficiency
		would be established to ensure existing roadway access would not be impeded.
Section 5: Environmental Analysis		
5.3 Air Quality and 5.6 Greenhouse Gases		
Appendix B - Air Quality Emissions Modeling	DD5.1	<p>Issue: Emissions from ground construction activities were estimated using CalEEMod v2016.3.2. However, in June of 2021 CalEEMod 2020.4.0 was released.</p> <p>How to Address: Update Appendix B of the PEA to account for the updated CALEEMod version and the issues noted in the deficiencies below.</p>
Appendix B - Annual Emissions	DD5.2	<p>Issue: The equipment type, equipment horsepower, number of pieces of equipment, load factor, hours per day of operation, and number of days of usage (start/end dates) were inconsistent between CalEEMod (Appendix B Annual Emissions) and Table 3.6-1 of the PEA for each of the construction activity tasks except for the following instances:</p> <ul style="list-style-type: none"> For Task 2: Staging Areas, Table 3.6-1 contains 10 hours of daily use for the generator while CALEEMOD contains 6 hours. For Task 4: Install TSP Foundations, Table 3.6-1 contains 1 piece of equipment for the backhoe/front loader while CALEEMOD has 2 pieces. For Task 7: TSP Erection: Table 3.6-1 should denote gasoline for the ¾-ton truck. For Task 8: Install TSP H-frame Foundation, Table 3.6-1 contains 10 hours of daily use for the backhoe/front loader while CALEEMOD contains 8 hours. For Task 11: TSP H-frame Erection, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the compressor trailer while CALEEMOD has 2 pieces. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 2 pieces of equipment for the backhoe/front loader while CALEEMOD has 4 pieces. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the excavator while CALEEMOD has 2 pieces. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the R/T crane (M) while CALEEMOD has 2 pieces. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 1 piece of equipment for the R/T crane (L) while CALEEMOD has 2 pieces. For Task 13: Existing Lattice Structures/TSP Removal, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD.

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PEA Section or Page #	Comment Code	Deficiency
		<ul style="list-style-type: none"> For Task 16: Install L-WS Pole, Table 3.6-1 contains 6 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the sock line puller while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the bull wheel puller while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the hydraulic rewind puller while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the backhoe/front loader while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the conductor splicing rig while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 1 piece of equipment for the fiber splicing lab while CALEEMOD has 2 pieces. For Task 20: Install/Remove Conductor/OPGW/OHGW, Table 3.6-1 contains 7 hours of daily use for the helicopter support truck while Appendix L: Vehicle Miles Traveled Calculations contains 4 hours. The corresponding calculated VMT is then used in CALEEMOD. <p>How to Address: Update Appendix B to account for the noted issues above.</p>
Appendix B - Annual Emissions	DD5.3	<p>Issue: The estimated construction workforce, number of worker trips, number of vendor trips, and number of hauling trips (within Appendix L: Vehicle Miles Traveled Calculations) compares correctly with the information within CalEEMod (Appendix B Annual Emissions) and Table 3.6-1 of the PEA except for the following instances:</p> <ul style="list-style-type: none"> Appendix L: Vehicle Miles Traveled Calculations uses an employee vehicle travel distance of 25 miles and CALEEMOD uses 30 miles. Table 3.6-1 contains estimated schedule in days for each construction task. Appendix L: Vehicle Miles Traveled Calculations specifies total schedule (days) and total duration (days), for most construction tasks these values are the same. However, for Tasks 3: Existing Lattice Structures/TSP Removal, Task 4: Install TSP Foundations, Task 13B: Existing Lattice Structures/TSP Removal, and Task 20: Install/Remove Conductor/OPGW/OHGW, these values are different with the total duration being half of the total schedule. CALEEMOD appears to use the total duration to estimate air emissions from trucks and employee vehicles. However, it is unclear why the construction duration for Tasks 3, 4, 13, and 20 are about half the total schedule. For example, for Task 3A, the total schedule is 179 days but the total duration is 90 days. The calculations are based on the duration and not the total schedule.

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PEA Section or Page #	Comment Code	Deficiency
		<ul style="list-style-type: none"> Appendix L: Vehicle Miles Traveled Calculations does not appear to include vender trips while CALEEMOD does include vender trips. Appendix L: Vehicle Miles Traveled Calculations uses a variety of truck trip distances within each construction task. For example, Task 2: Staging Areas has 1-Ton Truck, 4x4 (50 miles per trip and 4 trucks), Boom/Crane Truck (10 miles per trip and 4 truck), Water Truck (10 miles per trip and 8 trucks), and Truck, Semi-Tractor (30 miles per day and 4 pieces. Task 2 occurs for 599 days. The result is a weighted average of 22 miles per truck trip and 11,980 trips or 263,560 miles. However, CALEEMOD has 9,584 trips and 15 miles per truck trip or 143,760 miles. During review this situation was found in many of the construction tasks. Therefore, the CALEEMOD analysis may be incorrectly estimating truck emissions and be inconsistent with Appendix L. The errors may be in the value of truck trips and/or miles per trip within CALEEMOD. Notably, the data within appendix L is consistent with the information within Appendix B Equipment list. <p>How to Address: Update Appendix B to account for the noted issues above.</p>
Appendix B - Annual Emissions	DD5.4	<p>Issue: The PEA does not include the electronic copy of the CalEEMod input files (in Excel format).</p> <p>How to Address: Include the electronic copy of the CalEEMod input files (in Excel format) and any information with Appendix B and L revised as a result of this review.</p>
Appendix B - Helicopter Emissions	DD5.5	<p>Issue: Landing and take-off cycle (LTO) emissions incorrectly equal the LTO emission factors for all three helicopter types and do not accurately account for daily hours of LTO or number of LTO. That is, the LTO emissions only accounts for one LTO per day for each helicopter. However, the Project Description does not provide a clear indication of the number of LTOs per day per helicopter.</p> <p>For Skycrane (heavy duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations includes 6 daily hours of use for the Task 7A: TSP Erection and 6 daily hours of use for the Task 11: TSP H-frame Erection while Appendix B (and Table 3.6-1) uses 1 total hour. It appears the daily hours should be 12 (6 hours per task). The daily number of LTOs would be at least two (one for each task).</p> <p>For Kmax (medium duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations (and Table 3.6-1) includes 6 daily hours of use for the Task 13 Existing Lattice Structure/TSP Removal and 6 daily hours of use for the Task 16 Install LWS Pole while Appendix B uses 4 total hour. It appears the daily hours should be 12 (6 hours per task). The daily number of LTOs should be at least two (one for each task).</p> <p>For Hughes (light duty) helicopter, Appendix L: Vehicle Miles Traveled Calculations (and Table 3.6-1) includes 7 hours of use for the Task 20 Install/Remove Conductor and Install OHGW while Appendix B uses 5 total hour. Appendix L: Vehicle Miles Traveled Calculations also shows two helicopters per day. It appears the daily hours should be 14 (7 hours</p>

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PEA Section or Page #	Comment Code	Deficiency
		<p>per task times two helicopters). The daily number of LTOs would be at least two (one for each task and helicopter).</p> <p>Therefore, there is some inconsistency between helicopter use within Table 3.6-1, Appendix B, and Appendix L and it appears the helicopter emissions are underestimated.</p> <p>How to Address: Update Appendix B to account for the noted issues above.</p>
Appendix B - Helicopter Emissions	DD5.6	<p>Issue: Table 3.6-1 of the PEA indicates one light-duty helicopter would be used for 109 days for 7 hours per day. The light-duty helicopter emissions (Hughes) only assumed 55 working days, but then multiply the emissions by two noting there would be two helicopters. However, the emissions are only multiplied by two in the summary tab for daily emissions (lbs/day). Annual emissions in the summary tab and daily and annual emissions in the Hughes tab underestimate the emissions by 50%.</p> <p>How to Address: Update Appendix B to account for the noted issues above.</p>
Appendix B Helicopter Emissions Calculations SCAQMD	DD5.7	<p>Issue: Landing and take-off cycle (LTO) emissions equal the LTO emission factors for all three helicopter types and do not accurately account for daily hours and number of LTO. That is, accounts for only one LTO per day. See 20220228 TLRR GKR PEA 7-of-15 (Appendix B Helicopter Emissions) above.</p> <p>How to Address: Update Appendix B to account for the noted issues.</p>
5.5 Cultural Resources		
Archaeological Report		
Throughout Report	DD5.8	<p>Issue: Access roads and other project support areas such as pull sites located beyond the 300-foot project corridor were not inventoried and were therefore not evaluated for CRHR eligibility.</p> <p>How to Address: Access roads and other project support areas that are outside of the transmission corridor are part of the project impact area and need to be inventoried to allow the CPUC the ability to 1) define CRHR listed or eligible resources in the project area and 2) evaluate project impacts on those resources. All archaeological sites within the project area also need to then be evaluated for CRHR eligibility. Resource evaluation is necessary in order for the CPUC to comply with CEQA. The maps in the Appendices also need to indicate all access roads and support areas outside the corridor as being within the project area (APE/API).</p>
Archaeological Report – Section 2.3.2 Page 33	DD5.9	<p>Issue: There is a potential for Tribal Cultural Resources within the APE/API, but this is not addressed in the report.</p> <p>How to Address: Due to the potential for Tribal Cultural Resources within the APE/API, please include a theme for sacred sites or ritualistic sites. Archaeological sites can also have other eligibility beyond NRHP/CRHR criterion D/4 and many of these sites could also be Tribal Cultural Resources. In order to support the CPUC's impact evaluation, be sure to consider archaeological sites within the direct APE/API for consideration under NRHP/CRHR criteria A/1 and C/3.</p>

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PEA Section or Page #	Comment Code	Deficiency
Archaeological Report – Section 2.3.3 Page 37	DD5.10	Issue: Is Kern River No. 1/ Kern River 1 Hydroelectric Substation listed on CRHR or NRHP? How to Address: Discuss whether the Kern River No. 1/ Kern River 1 Hydroelectric Substation is listed on the CRHR and/or NRHP. This applies to all archaeological sites within the direct APE/API. If the Project has the potential to impact archaeological sites within the indirect APE/API, include the NRHP/CRHR eligibility. NRHP/CRHR eligibility is necessary to make CEQA impact determinations.
Archaeological Report – Section 3.2.1 Page 40	DD5.11	Issue: The report did not include a discussion regarding the treatment of isolates. How to Address: The treatment of isolates needs to be included here. The isolates should be recorded on DPR forms with primary and location maps and be submitted to the Information Center to have a Primary number assigned. Isolates are generally considered to have very little data potential, but they are not <i>de facto</i> ineligible for the NRHP/CRHR. They need to be documented and discussed in the report.
Archaeological Report – Section 4.3 Page 47	DD5.12	Issue: Management summary states that 7 previously recorded resources could not be recorded, section 4.3 states 6 previously recorded resources could not be relocated. How to Address: Inconsistencies such as this need to be corrected throughout the report in order for the CPUC to make valid CEQA findings.
Archaeological Report - Section 4.3 Page 55	DD5.13	Issue: According to Appendix E, sites P-15-020126, TLRR-KR-005, P-15-020129, P-15-020127, P-15-001540, P-15-001643, P-15-020125, P-15-008780, TLRR-KR-008, lie within a work area. These resources were not evaluated for eligibility and it is unclear how these sites could be avoided. How to Address: The report needs to clearly indicate how sites that are within work areas will be avoided or they will need to be evaluated for eligibility on the CRHR/NRHP. All archaeological resources within the direct APE/API, including archaeological isolates need to be evaluated for eligibility on the CRHR. This may require archaeological testing/excavation (Phase II). If a site is considered a unique archaeological resource or eligible for the CRHR, attempts to avoid or mitigate the site will be necessary and need to be documented.
Archaeological Report - Appendix E, Page 89	DD5.14	Issue: Boundaries of site P-15-007761 are unclear. This resource is not included in the body of the report. All resources in the maps should be in the report and vice versa. How to Address: Please be sure that a thorough QA/QC check is made within the report and all Appendices so that all resources within the project area are properly documented.
Archaeological Report - Appendix E, Page 402	DD5.15	Issue: Segment 5 appears to continue off this page, How to Address: There needs to be a map showing the termination of segment 5.
5.7 Geology, Soils, and Paleontological Resources		
Section 5.7.4.2 Page 5-200	DD5.16	Issue: The PEA Appendices do not include the geotechnical report. The geotechnical report is discussed in the PEA and should be provided. How to Address: Provide the geotechnical report.

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PEA Section or Page #	Comment Code	Deficiency
Paleontological Report		
Paleontological Report - Executive Summary Section 4.2 and 6.0 Pages 21 and 37	DD5.17	<p>Issue: Report does not specify the areas that were covered by the paleontological survey.</p> <p>How to Address: Clarify areas that were covered by the paleontological field survey covered (i.e.: 300-foot buffer around the transmission line?). Provide a map and GIS data with the field survey area.</p>
Paleontological Report Section 5.2 Page 32	DD5.18	<p>Issue: The report does not define records search limits.</p> <p>How to Address: Define the paleontological record search limits.</p>
5.4 Biology and 5.11 Land Use and Planning		
Section 5.11.1.2.1.5 Page 5-238	DD5.19	<p>Issue: The PEA states: "Portions of Segment 2, 3, and 4 are located on lands identified as 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement". Additionally on page 5-7 it states, "The GKR Project alignment continues southeast, crossing largely undeveloped open grassland and seasonal wetland within Castaic Valley, a part of the Tejon Ranch Conservancy, before traversing an area of unpaved trails and near the summit of the east-west trending spine of the western Tehachapi Mountains and entering Los Angeles County". However, the document does not address how the Project would impact lands and habitats within the Tejon Ranch Conservancy and 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement.</p> <p>How to Address: Update the PEA to include analysis on how the Project would impact lands and habitats within the Tejon Ranch Conservancy and 'Conservation Areas' in the Tejon Ranch Conservation and Land Use Agreement. Provide GIS data or a map showing the conservation areas within the Project alignment and work areas.</p>
5.13 Noise		
Section 5.13.4.2.1 Table 5.13-3 Page 5-257	DD5.20	<p>Issue: The footnote for Table 5.13-3 states that "there are no established noise level standards applicable to Project-related construction activities in unincorporate Kern County, the City of Arvin, or the City of Bakersfield; therefore, work in these jurisdictions would not generate noise in excess of established standards and work in these areas is not addressed in this Table." Although these jurisdictions do not have specific decibel thresholds for construction noise, they do restrict hours of construction.</p> <p>How to Address: Include estimated noise levels for construction occurring outside of Los Angeles County (City of Arvin, City of Bakersfield, and Kern County) to Table 5.13-3.</p>
5.18 Tribal Cultural Resources		
Section 5.18.1.2.2.2	DD5.21	<p>Issue: The PEA is unclear on the number of villages in the APE and where they are located.</p>

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PEA Section or Page #	Comment Code	Deficiency
Page 5-294 and Page 5-295		How to Address: Clarify how many "a few" villages are and where (if location is known). If location is not known since consultation with the tribes has not yet occurred, then only use the known village sites.
Section 5.18.1.2.2.3 Page 5-294	DD5.22	Issue: The location of the Kitanemuk village is not defined How to Address: Elaborate where the one Kitanemuk village is on the transmission line. Provide a citation to the publication that gives the village location.
Section 5.18.1.2 Page 5-293	DD5.23	Issue: The PEA does not include any maps showing the locations of ethnographic resources. How to Address: Provide a map and GIS data if available with the locations of ethnographic resources. Provide descriptions of each resource.

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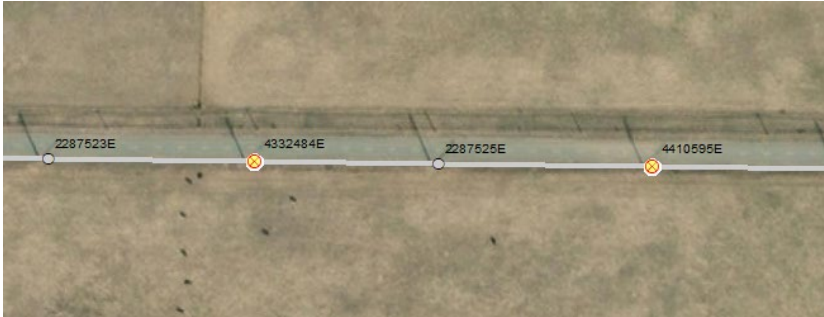
PEA Data Needs

PEA Section or Page #	Comment Code	Data Need
Section 3: Project Description		
Section 3.3.3.1.1 Page 3-6 and Appendix J, Figures 4a and 4b	DN3.1	<p>Issue: Table 3.3-1 indicates the difference in height between existing and proposed structures. In Segment 2 the existing LST/TSP poles are indicated to be 47 feet high and will be replaced with poles approximately 100 feet high, roughly double the height. If that were correct it would appear that the simulations for KOP #6 may present a height that is not accurate. However, structure-specific height as shown in the GIS files show the new poles seen in Figures 4b to be 70 feet high, more in line with the simulation.</p> <p>How to Address: Revise Table 3.3-1 to show the range of new structure heights in each segment.</p>
3.3.14.3 Below-Ground Telecommunication Line Page 3-16	DN3.2	<p>Issue: 3.3.14.3 states "Fiber optic cable would be installed below-ground within and immediately adjacent to the existing Banducci, Gorman, and Kern River 1 Hydroelectric substations. Fiber optic cable would be routed belowground from the control building or MEER at these substations to a getaway structure, and then would transition to an above-ground configuration." Figureset 3.5-3: Telecommunications Underground Routes roughly identifies the general routes of the underground telecom routes; however, portions are not shown and the maps are not detailed. Further the PDF files for Figureset 3.5-3 appear to be corrupted and are not displaying properly like the other figures in the file. The GIS data layer for "Telecom Alignment" includes only overhead portions of the telecom features or the underground portions are not distinguished.</p> <p>How to Address: Please provide GIS data for the underground portions of the telecommunication line. Please provide GIS data for the approximate locations of the vaults and pull boxes on the underground sections of the telecom lines.</p>
3.3.2.2.3 Substations Page 3-5	DN3.3	<p>Issue: Section 3.3.2.2.3 includes the following description with the work described for substations; however, this paragraph and the prior paragraph appear to describe O&M for the entire project.</p> <p>"There are two phases associated with the GKR Project: the construction phase and the operations and maintenance (O&M) phase. This PEA addresses the construction phase and its potential impacts. Construction of the GKR Project will not be phased; construction of any one component or all components could be performed at any one time.</p> <p>At present, SCE is performing O&M activities along the existing subtransmission lines included in the GKR Project, and any past and potential future impacts associated with these O&M activities are considered part of the existing environment. Therefore, the potential impacts that may result during the O&M phase are not addressed unless such potential future impacts differ from the potential future impacts that may result from performing O&M activities along the existing subtransmission lines included in the GKR Project."</p> <p>How to Address: Please clarify if a heading is missing and if this statement about O&M is intended to apply to the entire project beyond substation activities.</p>
Figure 1.1-1a and	DN3.4	<p>Issue: While Figure 1.1-1a indicates the general photograph viewpoint locations of KOPs, it is unclear where the photographs of</p>

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PEA Section or Page #	Comment Code	Data Need
Figures 1.1-1a through 5.1-7b		<p>existing conditions and simulations are exactly located which makes it difficult to verify. For example, Figures 4a and 4b simply state "Towerline Road near Arvin".</p> <p>How to Address: Update the PEA to provide original photography of KOPs with EXIF and GPS information or provide a table listing GPS coordinates of KOP imagery.</p>
<p>Table 3.3-1. Approximate Number of Existing Structures to be Removed or Modified 3.3.3.1.2 Structures to be Modified Page 3-6</p> <p>3.3.4.2.1.5 Segment 5 Page 3-10</p> <p>GIS Data Layer: "Subtransmission Structures"</p>	DN3.5	<p>Issue: Section 3.3.3.1.2, Structures to be Modified, states: "...In Segment 5, insulators would be replaced on existing structures and the distribution circuit underbuild would be modified on one other existing structure." In Table 3.3-1 for Segment 5, it appears 4 structures would be modified.</p> <p>How to Address: Please clarify if these four structures are the only structures where insulators would be replaced in Segment 5 or identify any other structures where such activities would occur.</p> <p>Issue: The GIS data for "Subtransmission Structures" does not include any structures in the "Modify" class in Segment 5. Besides the numerous existing and new structures, the other feature class is for "New-R-EX".</p> <p>How to Address: Please clarify which structures would be modified and their names/locations per the Project Description.</p> <p>Issue: In addition, Section 3.3.4.2.1.5 states the existing distribution underbuild in Segment 5 would be modified.</p> <p>How to Address: Please specify the portion of Segment 5 length and structures where underbuild would be modified. Please clarify if the distribution modification would involve anything other than transfer, per the statement in Section 3.3.2.2.2, Distribution.</p>
<p>3.3.4.6 Permanent and Temporary Facilities Page 3-13</p>	DN3.6	<p>Issue: Section 3.3.4.6 states "Approximately two temporary wood poles would be installed and then removed at the junction of Segments 2 and 3 to facilitate construction..."</p> <p>How to Address: Please explain the purpose of these temporary wood poles. It is assumed that these temporary poles would be located within the identified construction workspaces. Please confirm.</p>
<p>3.5.5.2.1.1 Segment 1 Page 3-36</p>	DN3.7	<p>Issue: Clarification is needed regarding the processed based construction description for Segment 1, based on DD3.1 above regarding the proposed realignment of the segment by approximately 15 feet east-southeast.</p> <p>How to Address: Would the new structures and conductor be entirely constructed alongside the existing alignment while the existing line remains energized, or would the energized conductor be transferred over to the new structures periodically as they are installed? Please explain the phasing of the realignment in Segment 1.</p>
<p>3.5.10.4 Livestock Page 3-47</p>	DN3.8	<p>Issue: Section 3.5.10.4 states: "No livestock fencing or guards will be installed as part of the GKR Project to prevent livestock from entering project areas."</p> <p>How to Address: Please describe SCE's construction work practices that will be followed, if any, within areas where livestock maybe</p>

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		present, such as general procedures for securely covering and/or fencing excavations, etc.
GIS Layer: "Subtransmission Structures"	DN3.9	<p>Issue: The GIS layer for "Subtransmission Structures" includes two structures with the STATUS attribute "New-R-EX." These proposed new structures are located in Segment 5 (structures 4332484E and 4410595E) on either side of 2287525E) in an area where no other structure replacement is identified.</p> <p>How to Address: Please clarify the purpose of these new structure installations.</p> <p>Issue: Looking at aerial imagery, two existing structures at these locations are visible; however, the existing structures are not included in the "Existing" structure GIS features (see screenshot below).</p> <p>How to Address: Are the proposed activities at these locations similar to existing structure modification? Please clarify.</p> 
GIS Layer: "Subtransmission Structures"	DN3.10	<p>Issue: The GIS layer for "Subtransmission Structures" includes a data column attribute called CONST_MTHD for Construction Method. All structures are assigned "Conventional" regardless of status. Based on the Project Description, Section 3.5.5.1.3 Foundation Installation, it appears conventional construction methods may be referring to either of the three foundation options: (1) drilled, poured-in-place, concrete foundation, (2) installed on drilled micro-piles, or (3) direct-buried.</p> <p>How to Address: Please clarify if the above assumptions are correct. Please identify the anticipated preliminary foundation methods for each project structure, or alternatively it may be assumed that each structure will involve the most impactful activities and greatest number of trips associated with there construction (i.e., concrete pier foundations). If specific foundation methods cannot be provided, please provide an estimated percentage of the anticipated foundation method use.</p>
GIS Data Layer: "Right of Way"	DN3.11	<p>Issue: The GIS data layer "Right of Way" (ROW) does not distinguish between existing and new ROW areas for the subtransmission lines.</p> <p>How to Address: Please explain how to interpret the GIS data that was provided. Figure 3.4-1, New Easements Required, identifies portions of the subtransmission line alignment where new easements are needed. Please provide GIS data that identifies existing vs. the new targeted easements corridors. If these areas are already included in GIS data that was provided, please revised the data to</p>

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		<p>include an attribute that distinguishes between existing and proposed ROW areas.</p> <p>Issue: A ROW area is shown around a single access road in Segment 1.</p> <p>How to Address: Please explain this ROW corridor and why other access roads or easement roads to access the line are not shown. Please identify any additional access road corridors where ROW easements to the subtransmission line are required for construction and operation.</p> <p>Issue: There are areas of the ROW GIS layer that do not appear to align with the linear Subtransmission Alignment features where the project aligns are not within an identified ROW.</p> <p>How to Address: Please clarify the locations where these discrepancies were observed below. Please provide a revised layer as applicable.</p> <ul style="list-style-type: none"> - Segment 2 between existing structures 2175040E and NO 5 - Segment 2 between existing structures M44-T1 and M46-T6 - Segment 3 between existing structures 4410456E 4410457E and M48-T9 - Segment 3 between existing structures M50-T10 and Gorman Sub Segment 5 between existing structures X7655E and Banducci Sub
Appendix O: 300' and 1,000' Lists GIS Data Layer: "Right of Way"	DN3.12	<p>Issue: An excel file with the 300' and 1000' lists was provided (Appendix O¹). The CPUC does not currently poses the parcel GIS data necessary to verify the spatial methodology for compiling this list and also prepare subsequent mailing lists that may be necessary during the CEQA process. The data layer for "Right of Way" does not include APN numbers that could be used to join the tabular information with the spatial information.</p> <p>How to Address: Please provide a copy of the APN GIS data that was used to compile the lists included in Appendix O.</p>
Section 5: Environmental Analysis		
5.3 Air Quality and Noise		
Section 5.3.1.3, Page 5-34 Figure 5.13-1a-d Sensitive Receptors	DN5.1	<p>Issue: Section 5.3.1.3 directs the reader to Figure set 5.13.1 in Section 5.13, Noise, for detailed descriptions of the locations of residential areas and other sensitive receptors in the vicinity of the GKR Project. However, Figure set 5.13.1 does not differentiate between the different types of sensitive receptors. Per the <i>Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments</i> (2019 CPUC Guidelines), the air quality section should "identify the location and types of each sensitive receptor locations within 1,000 feet of the project area." Therefore, Figure set 5.13.1 should be updated to differentiate the</p>

¹ Note the PEA Table of Contents identifies this list as Appendix N, but the digital file is titled Appendix O.

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		<p>different types of sensitive receptors (i.e., residences, schools, day care centers, etc.).</p> <p>How to Address: A separate column should be added to Table 5.13-1 that identifies the type of sensitive receptors. Update Figure 5.13-1 to differentiate the different types of sensitive receptors (i.e., residences, schools, day care centers, etc.).</p>
5.5 Cultural Resources		
Archaeological Report		
Archaeological Report - Appendix G	DN5.2	<p>Issue: Many of the photos are of poor quality and the detail is blurry. Pictures need to be of higher quality. As part of our review we need to be able to better understand the conditions and items discovered at the sites. Clear pictures are critical to completing this analysis.</p> <p>How to Address: Please provide .Jpegs of all photos</p>
5.6 Energy		
Section 5.6.4.3.1 Table 3.5-5 vs. Table 5.6-1 Pages 3-49 and 5-175	DN5.3	<p>Issue: Fuel consumption estimates presented in Table 5.6-1 are inconsistent with the fuel consumption estimates presented in Table 3.5-5. The diesel volume in Table 5.6-1 is higher and inconsistent with the diesel volumes anticipated to be stored on site, as reported in Table 3.5-5. For example, Table 5.6-1 reports total diesel consumption as 386,506 gallons, whereas Table 3.5-5 reports a total diesel storage volume of 386,486 gallons during construction. It is also anticipated that gasoline consumption volumes could be higher than the volumes planned to be stored onsite. For example, passenger vehicles are not expected to refuel at onsite storage locations. Confirmation of consistency between Table 5.6-1 diesel consumption volumes and volumes used in the air quality calculations could not be performed because technical report was not available.</p> <p>How to Address: Correct the PEA so the diesel volumes in Table 5.6-1 are consistent with the diesel volumes in Table 3.5-5 AND Update Appendix B to account for the issue noted above</p>
5.9 Hazards, Hazardous Materials, and Public Safety		
Section 5.9.1.3 Table 5.9-2 Page 5-208	DN5.4	<p>Issue: The SRA, LRA, and FRA columns in Table 5.9-2 do not indicate the units of measurement so it is unclear what the numbers indicate.</p> <p>How to Address: Update Table 5.9-2 to include the appropriate units for the SRA, LRA, and FRA columns in Table 5.9-2</p>
5.13 Noise		
Section 5.13.4.2.1 Table 5.13-3 Page 5-257	DN5.5	<p>Issue: There are several inconsistencies between the construction noise levels depicted in Table 5.13-3 and the primary equipment descriptions in Table 3.6-1. The following inconsistencies were found: Table 3.6-1 included several primary equipment descriptions (with a detailed list of equipment) that was not listed in Table 5.13.3 including Install TSP H-frame Foundation, TSP H-frame Haul, TSP H-frame Assembly, TSP H-frame Erection, LWS H-frame Haul, LWS H-frame Assembly, Install LWS H-frame and Telecommunications Underground Infrastructure Installation</p>

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		<p>For equipment required for the Staging Area, Table 5.13-3 did not list a Generator (as listed in Table 3.6-1). Table 5.13-3 listed a Jet A Fuel Truck that was not listed in Table 3.6-1</p> <p>For equipment required for the TSP Erection, Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1).</p> <p>For equipment required for the Install LWS Pole, Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1).</p> <p>For equipment required for the Existing Lattice Structure/TSP Removal, Table 5.13-3 did not list a Jet A Fuel Truck or a Helicopter Support Truck (as listed in Table 3.6-1).</p> <p>For equipment required for Remove Conductor and OHGW and Install Conductor and OPGW/OHGW, Table 5.13-3 did not list Boom/Crane Truck, Lowboy Truck/Trailer and Jet A Fuel Truck (as listed in Table 3.6-1). Table 3.6-1 did not list Sleeving truck, R/T Crane, Flatbed Trailer, Bucket Truck, 22-Ton Manitex and Sag Cat with 2 winches (as listed in Table 5.13-3).</p> <p>How to Address: Include the missing items in Table 5.13-3 or update the Table 3.6-1 to provide consistency between the Noise Chapter and the Project Description.</p>
5.14 Population and Housing		
Section 5.14.1.3.1, Page 5-266	DN5.6	<p>Issue: The PEA is missing information on housing developments within 1 mile of the proposed project. The following information is not provided for the Grapevine Specific and Community Plan:</p> <ul style="list-style-type: none"> Estimated population increase Contact information for the developer (provided in the public outreach appendix) <p>How to Address: Include the information listed above.</p>
Section 5.14.1.3.2, Page 5-266	DN5.7	<p>Issue: The PEA is missing information on housing developments within 1 mile of the proposed project. The following information is not provided for the Centennial Specific Plan:</p> <ul style="list-style-type: none"> Location of the project Number of units and estimated population increase Contact information for the developer (provided in the public outreach appendix) <p>How to Address: Include the information listed above.</p>
5.19 Utilities and Service Systems		
Section 5.19.4.1.6.1 Page 5-310	DN5.8	<p>Issue: The PEA does not substantiate why construction would not increase the rate of corrosion of adjacent utility lines as a result of alternating current impacts.</p> <p>How to address: Update the PEA to support the claim that construction would not increase the rate of corrosion of adjacent utility lines.</p>
5.19.4.5.2 Separation	DN5.9	<p>Issue: Data missing for the unconnected utilities and other infrastructure</p>

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Distance and Length of Collocation		How to Address: Please provide the GIS data for the "Unconnected Utilities and Other Infrastructure" identified on Figure 5.19-1 and described in Section 5.19.4.5.2.