

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

March 13, 2020



Lori Charpentier
Project Manager
Major Environmental Projects
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA, 91770

RE: Valley South Subtransmission Project: Minor Project Change #7

Dear Ms. Charpentier,

On February 26, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) Request #7 to the California Public Utilities Commission (CPUC) for the change from overhead to underground distribution work and additional associated work space in Segment 1. The request was submitted after the work had occurred. Additional information from SCE was requested on February 27. A revised MPC was submitted on March 6.

SCE's Valley South Subtransmission Project was evaluated in accordance with the California Environmental Quality Act (CEQA). The mitigation measures described in the Final Environmental Impact Report (FEIR) were adopted by the CPUC as conditions of project approvals. The CPUC voted on December 1, 2016 to approve SCE's Valley South Subtransmission Project (Decision 16-12-001) and a Notice of Determination was submitted to the State Clearinghouse (SCH# 2015051012). The CPUC is working with SCE to develop a Mitigation Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Valley South Subtransmission Project during implementation.

MPCs are reviewed for consistency with CEQA requirements and are located within the geographic boundary of the project study area. MPCs do not create new or substantially more severe significant impacts, or conflict with any mitigation measure or applicable law or policy. Also, they do not trigger other permit requirements unless the appropriate agency has approved the change, and clearly and strictly comply with the intent of the mitigation measure or applicable law or policy.

This letter documents the CPUC's thorough evaluation of all activities covered in this MPC, including the mitigation measure requirements. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the MPC are implemented, as required in the CPUC's Decision.

MPC #7 for the use of the change from overhead to underground distribution work and additional associated work space in Segment 1 is granted by CPUC based on the factors described below.

SCE Minor Project Change Request. Excerpts from the revised SCE MPC #7 request, received March 06, 2020, are presented below (indented):

SCE is requesting the change from overhead to underground distribution work and additional associated work space in Segment 1.

Original Condition: Additional work area for the underground distribution requested is within SCE existing Right-of-Way easement, within a disturbed developed area.

Justification for Change: The engineering at this location designed the distribution to be placed on the newly installed structures for VSSP. Subsequently, engineering was revised at this location to accommodate and join with SCE non-project underground distribution work along Leon road. The new distribution trench is approximately 180-feet long, 3-feet wide, and 5-feet deep. The associated work area required is between UNK 44 and UNK 45 and measures 35-feet by 75-feet.

Other Potential Impacts: Impacts associated with the change from overhead to underground distribution work and additional associated work space are equal to or less than those already associated with the Segment 1 work areas and access roads. All applicable avoidance/minimization measures identified in FEIR Appendix 6 Mitigation Monitoring Plan will be followed.

CPUC Evaluation of Minor Project Change Request

In accordance with the draft MMCRP, the request for MPC #7 was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested MPC activities. Impacts associated with the change from overhead to underground distribution work and additional associated work space are equal to or less than those previously identified. The following discussion summarizes the supplemental analysis for biological and cultural resources conducted for the MPC request. The proposed MPC request did not result in any changes to impacts or required mitigation for other issue areas, including aesthetics, agriculture, air quality, land use, noise, traffic/transportation, and water resources.

Biological Resources: Biological resources assessments were conducted and were included in the Notice to Proceed Request 2 dated December 21, 2018; in the Notice to Proceed Request 3 dated May 9, 2019; and in the preconstruction surveys dated July 30 and September 10. MSHCP riparian riverine resources and smooth tarplant were recorded in the survey area during historical surveys. However, the work area for the undergrounding of the distribution was conducted in a previously, disturbed area. No additional impacts to biological resources occurred.

Cultural and Paleontological Resources: SCE provided a Resource Summary Table which indicated that no cultural resources are present within the underground distribution work area. High sensitivity paleontological formations are mapped in the area of the underground distribution trench line. Monitoring for paleontological resources during underground distribution trenching was consistent with the approved Paleontological Resources Mitigation and Monitoring Plan (PRMMP) and no resources were found.

Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors:

- SCE to update the mapping data to show the new work areas and new underground components.
- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented post-construction where applicable.

Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen