

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 27, 2013

Thomas Diaz  
SCE -- Regulatory Affairs  
Southern California Edison Company  
2244 Walnut Grove Avenue – G10R/G04  
Rosemead, CA 91770

**RE: Review of Southern California Edison (SCE) Company's Application (A. 13-08-023) for a Certificate of Public Convenience and Necessity for the Coolwater-Lugo Transmission Project**

Dear Mr. Diaz:

The Energy Division of the California Public Utilities Commission has completed its first review of SCE's project application for the Coolwater-Lugo Transmission Project (A. 13-08-023). Staff from both the Generation and Transmission (G&T) section and the Infrastructure Permitting and CEQA section (IP&C) are reviewing the application. The attached list contains deficiencies identified by both sections.

Section 15100 of the California Environmental Quality Act 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 the Commission's Proponent's Environmental Assessment (PEA) Checklist (Working Draft), among other resources, as the basic guide for determining the adequacy of the project application. A copy of this document was forwarded to SCE on August 10, 2012, and again on June 26, 2013, for use in preparing the PEA.

After performing its review of SCE's application and PEA for the Coolwater-Lugo Transmission Project (CLTP), the Energy Division finds that the information contained in the environmental assessment is currently incomplete. Attached is a list of items and issue areas of the PEA that were found to be deficient. Additional information submitted in accordance with this letter should be filed as supplements to the above application. We request that responses to these items be provided to us as soon as possible.

Upon receipt of the supplemental information, the Energy Division will perform a second review to assess the adequacy of the data submitted, and a determination of the adequacy of the application will once again be issued.

The Energy Division reserves the right to request additional information on either the application or the PEA at any point in the process. Questions relating to the CLTP PEA should be directed to me at (415) 703-3221 or [bca@cpuc.ca.gov](mailto:bca@cpuc.ca.gov); questions relating to the CLTP application in chief should be directed to Bill Deitrich at [William.Dietrich@cpuc.ca.gov](mailto:William.Dietrich@cpuc.ca.gov).

Sincerely,



Andrew Barnsdale  
Energy Division  
California Public Utilities Commission

cc: (via e-mail)  
Jack Mulligan, CPUC Legal  
Elizabeth Dorman, CPUC Legal  
Molly Sterkel, ED Program Manager  
Mary Jo Borak, CEQA Supervisor  
William Deitrich, ED G&T  
Jason Coontz, ED CEQA  
Jon Davidson, Aspen  
Lisa Blewitt, Aspen  
Jose Najjar, BLM – CDD  
Hon. Irene Moosen, ALJ

Attachment: Deficiency List

**Deficiencies in A.13-08-023: SCE CLTP Application**

In general, the PEA appears to contain the necessary information in the appropriate topical areas; however, the PEA was not organized according to the CPUC's PEA Checklist of August 2012. Energy Division staff were aware that SCE would file the PEA in a non-standard format; the staff request that SCE assist in efforts to "de-code" the PEA. We would expect to accomplish some of this via workshops between technical staff, but would appreciate some tools from SCE to "bridge" the gap between formats.

The Energy Division would like to see more detail and explanation about the project. For example, the PEA is deficient with respect to detailed, mapped information about project features. The PEA states that Segment 5 would largely consist of double-circuit LST structures, but also indicates that there would be 18 single-circuit H-frame TSPs, 5 single-circuit TSPs, and 6 double-circuit TSPs in this segment. Questions arise as to why SCE would use different tower types and where these different types of towers would be located. Another example is that SCE provides a table of potential staging yards but does not show the locations and boundaries of these yards on a map. Again, the PEA indicates that additional ROW will need to be acquired, but provides little information on how much or where. The Energy Division will require this information in order to understand the project and be able to verify the assumptions used (such as land disturbance assumptions).

The mapping of project features in the PEA is not very detailed or at a scale that allows CPUC to understand anything other than the general alignment of the transmission line and the general location of the Desert View Substation. The PEA checklist requires the submission of GIS data for project components, but no GIS data has been provided.

We expect to gain a better understanding of the specifics of the project during our working meetings with SCE; however, the staff will need a more formal explanation of some project components and some of this information needs to be provided on maps. For other projects with the CPUC, SCE has provided a "road story" (map book) for each segment that showed a lot of useful detail (tower locations, wire setup sites, spur roads, staging areas). This type of tool is very useful in understanding all of the various project components.



The Energy Division staff has the following specific comments on the CLTP PEA:

1. GO-131D, Article IX, section A.1.d., requires the utility to include in a CPCN application, "[a] detailed statement of the estimated cost of the facilities." SCE's discussion of cost in the application, along with the two-page table in Appendix H, is insufficient detail for this large of a project. Please provide the G&T section of the Energy Division with a more detailed analysis of the cost for the CLTP.
2. It does not appear that the PEA included with SCE's CLTP application conforms to the format required for submittals to the CPUC Energy Division. Please provide the Energy Division IP&C section with tools that will allow the staff to bridge the gap between SCE's format and the required CPUC format.
3. 3.1 Project Location: Specific information about property acquisition not provided.
4. 3.2 Existing System: Little specific information on existing transmission infrastructure provided.
5. 3.2 Existing System: No schematic diagram and map provided.
6. 3.4 Proposed Project: Desert View Substation is described in two scenarios – "initial build out" and "full build out". The timing and need for full build out are not clear.
7. 3.4 Proposed Project: GIS data not provided, including unique ID number for poles/towers to match GIS database information.
8. 3.4 Proposed Project: locations of replacement poles/towers not provided.
9. 3.5.4 Substations: Profile views not provided.
10. 3.6 Right-of-Way Requirements: description of new ROW (length, width, current use/locations) not provided.
11. 3.6 Right-of-Way Requirements: list of properties likely to require acquisition not provided.
12. 3.7.1.2 Work Areas: approximate locations of known work areas in GIS database not provided.
13. 3.7.1.3 Access Roads and/or Spur Roads: approximate locations of known access roads in GIS database not provided.
14. 3.7.2.2 Pole Installation and Removal: summary of typical pole/tower installation metrics not provided.

15. 3.7.4 Substation Construction: Conceptual landscape plan in consultation with local municipality – not provided.
16. 5.4 Biological Resources: GIS data not provided.
17. 5.4 Biological Resources: GIS data not provided.
18. 5.5 Cultural Resources: Cultural Resources Report documenting cultural resources investigation of the CLTP, including a literature search, pedestrian survey, and Native American Consultation – not provided.
19. 5.5 Cultural Resources: Copies of all letters and documentation of Native American consultation – not provided.
20. 5.6 Geology, Soils, and Seismic Potential: Geotechnical investigation report, including known geologic hazards, not provided.
21. 5.7 Hazards and Hazardous Materials:
  - a. Environmental Data Resources report -- completed but not provided
  - b. Hazardous Substance Control and Emergency Response Plan -- not provided
  - c. Health and Safety Plan -- not provided
  - d. Worker Environmental Awareness Program (WEAP) -- not provided
22. 5.9 Land Use and Planning: GIS data of all parcels within 300' of the Proposed Project with the following data: APN number, mailing address, and parcel's physical address – not provided.
23. 6.2 Description of Project Alternatives and Impact Analysis: A description of a "No Project Alternative" was not included.