

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 1, 2011

Ms. Suzan Benz
Environmental Project Manager
Devers-Palo Verde No. 2 Transmission Project
6 Point Drive, 1st Floor
Brea, CA 92821-6320

RE: SCE Devers-Palo Verde No. 2 Transmission Line Project – Variance Request #9

Dear Ms. Benz,

On August 23, 2011, Southern California Edison (SCE) submitted a variance request to the California Public Utilities Commission (CPUC) for the installation of for temporary power poles outside of the yard boundaries, required to power the trailers at the Desert Center #2 Yard for the Devers-Palo Verde No. 2 (DPV2) Transmission Project.

The CPUC voted on January 25, 2007 to approve the SCE DPV2 Transmission Line Project ([Decision D.07-01-040](#)). On May 14, 2008, SCE filed a Petition for Modification (PFM) of the existing Certificate for Public Convenience and Necessity (CPCN) approved per Decision D.07-01-040. SCE requested that the CPUC authorize SCE to construct DPV2 facilities in only the California portion of DPV2 and the Midpoint Substation (now called the Colorado River Substation) near Blythe, California. The CPUC approved SCE's PFM on November 20, 2009 in [Decision D.09-11-007](#).

After the CPUC's 2009 Decision regarding the PFM, several large solar power projects were proposed in the Blythe and Desert Center areas. SCE filed Permit to Construct applications addressing expansion of the Colorado River Substation and construction of a new Red Bluff Substation. These components were not covered in the original DPV2 Final EIR/EIS, because the solar power projects had not yet been proposed, and supplemental environmental review has been conducted. The Colorado River Substation Expansion and the Red Bluff Substation were both approved by the CPUC on July 14, 2011 in Decisions D.11-07-011 and D.11-07-020, respectively.

The BLM issued a Record of Decision approving the Project on July 19, 2011. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture Forest Service on the San Bernardino National Forest within an existing Forest Service-issued easement. The Forest Service will issue a revised easement signed by the Forest Supervisor. The area requested under this variance does not fall under BLM or Forest Service jurisdiction.

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the DPV2 Project during implementation. The MMCRP also acknowledges that temporary changes to the project are anticipated and common practice for construction efforts of this scale and that a Variance Request would be required for these activities. This letter documents the CPUC's thorough evaluation of all activities covered in this variance, and that no new impacts or increase in impact severity would result from the requested variance activities.

Variance #9, which approves the installation of for temporary power poles at the Desert Center #2 Yard is granted by CPUC for the proposed activities based on the factors described below.

SCE Variance Request. SCE has requested a variance for the Desert Center #2 Yard, authorized under Notice to Proceed #1, for the installation of temporary power poles outside of the yard boundaries, required to power the trailers. Excerpts from the SCE Variance Request, received August 24, 2011, are presented below (indented):

The Desert Center 2 Construction Yard Notice to Proceed (NTP) #1 dated June 23, 2011, identified construction activities and operation components including installation of temporary power and installation of office trailers. After reviewing potential scenarios for connecting the trailers to existing power sources, it was determined temporary power poles were required along Ragsdale Road, east of the yard boundary. The area along Ragsdale road, which will contain the temporary power poles and connection to the Desert Center 2 yard, is disturbed and has been surveyed by the archaeologist and Biologist and no resources will be impacted.

CPUC Evaluation of Variance Request

In accordance with the MMRP, the subject variance request was reviewed by CPUC to confirm that no new impacts or increase in impact severity would result from the requested variance activities. The following discussion summarizes this analysis for biological resources and other issue areas. A list of conditions is presented below to define additional information and clarifications regarding mitigation requirements. In some cases, these items exceed the requirements of the Mitigation Measures and Applicant Proposed Measures, and are based on specific site conditions and/or are proposed conditions by SCE.

Biological Resources. The CPUC Environmental Monitor (EM) performed a field check and reviewed the Variance Request regarding temporary power poles at the Desert Center #2 Construction Yard. Work under this variance would include the installation of eight wood poles, each with a one square foot area of disturbance and an additional 12' x 40' adjacent vehicle/equipment work area associated with each pole. Based on field verification and review of the biological resources surveys, no issues related to biological resources are anticipated as a result of this variance.

Cultural Resources. Based on background research, no known cultural resources were previously identified within the Desert Center #2 Construction Yard. However, an isolated cultural resource (hole-in-top can) was identified during the survey of the Desert Center #2 Yard distribution alignment corridor (DeCarlo and Eckhardt, 2011). Isolated finds do not qualify as significant resources under either California Register of Historical Resources or National Register of Historic Places criteria. Furthermore, the area is subject to the occasional dumping of residential refuse (DeCarlo and Eckhardt, 2011). Nonetheless, the area is potentially sensitive for historic-era resources. Therefore, in the absence of a Final Historic Properties Management Plan (HPMP) for the Devers-Palo Verde No. 2 Project, excavation for the temporary power poles outside of the Desert Center #2 yard boundaries should be monitored by a qualified professional archaeologist.

Other Issue Areas. No concerns noted under this variance.

Conditions of Variance Approval.

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

1. All applicable project mitigation measures, APMs, compliance plans, permit conditions and NTP conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.

2. Copies of all relevant permits, compliance plans, and this Variance approval shall be available on site for the duration of construction activities.
3. In the absence of a Final Historic Properties Management Plan (HPMP) for the Devers-Palo Verde No. 2 Project, excavation for the temporary power poles outside of the Desert Center #2 yard boundaries shall be monitored by a qualified professional archaeologist.
4. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
5. All crew members shall be Safe Worker and Environmental Awareness Program (SWEAP) trained prior to working on the project. A log shall be maintained on-site with the names of all crew personnel trained. For any crew members with limited English, a translator shall be on-site to ensure understanding of the training program. In place of a translator, the SWEAP training brochure can be provided in Spanish or other languages as appropriate. All participants will receive a hard-hat sticker for ease of compliance verification.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard
CPUC Environmental Project Manager
DPV2 Transmission Project

cc: Ryana Parker, Southern California Edison
Sheree James, Southern California Edison
Vida Strong, Aspen Environmental Group
Hedy Koczwarra, Aspen Environmental Group
Jamison Miner, Aspen Environmental Group
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