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

January 31, 2012

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 #21

Dear Ms. Benz,

On January 20, 2012, Southern California Edison (SCE) submitted a variance request to the California Public Utilities Commission (CPUC) for use of a water source, including three stand-tanks, at the Lake Tamarisk Desert Resort for transmission line construction needs along the Colorado River-Devers segment of 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 and approved exclusionary fencing activities on August 23, 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 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 #21, which approves the subject transmission line water source, is granted by CPUC for the proposed activities based on the factors described below.

SCE Variance Request. SCE has requested a variance under NTPs #8 and #9 for a water location at the Lake Tamarisk Desert Resort along the Colorado River-Devers segment. Excerpts from the SCE Variance Request, received January 20, 2012, are presented below (indented):

> Southern California Edison (SCE) requests a variance for the CRS to Red Bluff and Red Bluff to Devers Transmission Line, identified in NTPs #8 and #9 for use of offsite water locations identified by the contractors needed for dust suppression.
>
> The table below lists the locations of proposed fire hydrant, to be equipped with a water meter, and stand-tanks (three) to be utilized as the primary location for water on the Devers-Colorado River section of DPV2. The three stand-tanks will be hooked-up directly to the hydrant to provide a continuous water resource for tanker truck refilling.

Water Source Locations

Site Location	City	Water District	Latitude	Longitude
Hydrant Locations				
26251 Parkview Dr	Chuckwalla	Riverside County Service Area 51	N33.73716	W115.39359
Stand-Tank Locations				
26251 Parkview Dr	Chuckwalla	Riverside County Service Area 51	N33.73676	W115.39377
26251 Parkview Dr	Chuckwalla	Riverside County Service Area 51	N33.73654	W115.39389
26251 Parkview Dr	Chuckwalla	Riverside County Service Area 51	N33.73648	W115.39417

> Potential activities to occur on stand-tank sites include:
>
> - Parking and storage of a 10,000 gallon stand-tank (9ft wide by 35ft long)
> - Driving of water trucks, as long as 60 feet to fill stand-tanks
> - Parking of additional support vehicles and equipment during project hours
>
> The water truck refilling area under the stand-tanks will be rocked for erosion control purposes and to prevent potential track-out issues. Aerial maps of the hydrant and stand-tank locations are provided.

CPUC Evaluation of Variance Request

In accordance with the MMCRP, 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, cultural resources, paleontological resources, noise/sensitive receptors, water 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 water sources have been reviewed in the field. The subject hydrants are located in disturbed areas immediately adjacent to public streets (compacted dirt). Three stand-tanks will be hooked-up directly to the hydrant to provide a continuous water resource for tanker truck refilling and would be located in this same disturbed area. Therefore, there are no biological resources concerns associated with this variance.

All mitigation measures, APMs, and conditions of the Biological Opinion (BO) should be implemented along the water haul routes. This includes, but is not limited to, providing a qualified USFWS, CPUC, and BLM approved tortoise biologist, pre-construction clearance sweeps, and maintaining speed limits.

Cultural Resources. Based on background research and a site visit, there is no potential to encounter cultural resources at the existing hydrant and proposed three stand-tanks identified for dust suppression. In addition, both the hydrant and stand-tanks are located within a formerly graded area and adjacent to an existing road and will be accessed via truck. All trucks will remain on existing roads. Therefore, there are no specific cultural resources conditions applicable to this variance.

Paleontological Resources. Based on the Paleontological Monitoring and Treatment Plan, submitted to the California Public Utilities Commission on April 20, 2011, the potential to encounter paleontological resources within the identified offsite water source is low. In addition, no subsurface ground disturbing activities will be required. Therefore, there are no specific paleontological resources conditions applicable to this variance.

Noise/Sensitive Receptors. The hydrant and stand tank area is located northwest of the intersection of Oasis Drive and Parkview Drive in the City of Chuckwalla. Lake Tamarisk Desert Golf Resort to the north and west which is composed of manicured landscaping with date palm trees, paved roads, and small buildings to the south and east. Use of the two water sources would have similar noise-generating activities to those that will occur for use at the construction yards and transmission line work areas. Appropriate noise and land use mitigation measures would apply. Specifically, unnecessary idling time would be minimized in the parking area with implementation of Mitigation Measure N-1a (Implement best management practices for construction noise) and AQ-1c (Restrict engine idling). In addition, the contractors would be accessing existing fire hydrants and the overall scope and duration of construction activities has not changed as a result of the variance.

Water Resources. Under this variance, SCE would utilize an existing fire hydrant with a metering device and overall water usage would not change. The hydrants would be equipped with a meter and water would be obtained from Riverside County Service Area 51. No additional groundwater would be utilized. Therefore, there are no specific water resources conditions applicable to this variance.

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, conditions of the Biological Opinion, 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. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
4. 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

Billie Blanchard
CPUC Environmental Project Manager
DPV2 Transmission Project

cc: Ryana Parker, Southern California Edison
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