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

February 27, 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 #25

Dear Ms. Benz,

On February 10, 2012, Southern California Edison (SCE) submitted a variance request to the California Public Utilities Commission (CPUC) for additional parking/temporary staging vehicles along the existing Devers-Palo Verde No. 1 (DPV1) access and spur/stub roads 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 DPV2 Project on July 19, 2011. Subsequently, the BLM issued a Record of Decision approving the Red Bluff Substation as part of the Desert Sunlight Solar Farm Project on August 10, 2011. BLM approved exclusionary fencing activities on August 23, 2011 and issued Notices to Proceed for the Red Bluff Substation and overhead transmission line construction on BLM lands on September 19, 2011. The DPV2 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 #25, which approves additional parking along existing DPV1 access and spur/stub roads, is granted by CPUC based on the factors described below.

SCE Variance Request. SCE has requested a variance for activities identified in Notices to Proceed #7, #8, #9, and #10 for parking locations along the Colorado River to Devers and Devers to Valley transmission line route. Excerpts from the SCE Variance Request, received February 10, 2012, are presented below (indented):

> The construction activities identified in NTP #s 7, 8, 9, and 10 include parking and staging. Because of the terrain, size of disturbance area, type of soil and safety concerns for parking near moving construction equipment, parking along the existing access roads and existing DPV1 spur/stub roads is required. These additional parking areas are needed to safely facilitate the movement of large construction equipment and vehicles necessary for work proposed along the transmission line. All proposed parking areas will utilize previously disturbed areas/roads.
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> Parking on the previously disturbed, and regularly used DPV1 access road and tower spur roads would have no direct effect on the biological resources in the area. Biological preconstruction surveys conducted prior to construction use of the access road and development of the DPV2 tower sites, cover all of the area that could be indirectly affected by parking on the adjacent access road or spur road. These surveys, which were previously submitted for the access roads and tower sites, adequately address the biological resources that could be affected by granting this parking request.
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> The archaeologist has determined that there will be no cultural or paleontological impacts from parking along DPV1 stub/spur roads and the existing access road. A memo summarizing this is attached.
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> As construction moves along the transmission line, construction crews may determine additional areas needed for parking. If a road or other area is needed for parking which has not been previously surveyed, a biological preconstruction survey will be conducted. The survey will include each proposed parking area and 100-foot survey buffer around each site.

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, noise/sensitive receptors, and other issue areas. A list of conditions is presented below to define additional information and clarifications regarding mitigation requirements.

Biological, Cultural and Paleontological Resources. Additional parking areas along the existing DPV1 access and spur/stub roads are needed to safely facilitate the movement of large construction equipment and vehicles necessary for work proposed along the DPV2 transmission line. As it is unknown at this time which access and/or spur roads will be utilized, the following biological, paleontological and cultural mitigation and MMCRP compliance requirements have been incorporated in this variance:

- Maps of proposed parking areas along the existing DPV1 access and spur/stub roads shall be provided as they are identified by SCE.
- Maps shall be accompanied by biological and cultural survey reports that demonstrate no sensitive biological or cultural resources are present within the parking/turnaround sites or adjacent areas ("adjacent" being those buffers identified by project mitigation measures and/or plans).
- Maps and survey reports shall be provided at the same time to avoid confusion.
- The CPUC EMs shall validate the areas prior to their use.

- Sweeps shall be conducted immediately prior to use of a requested area and monitoring shall be conducted throughout its use.

All mitigation measures, APMs, and conditions of the Biological Opinion (BO) shall be implemented at the parking areas. This includes, but is not limited to, providing a qualified USFWS, CPUC, and BLM approved tortoise biologist and maintaining speed limits. In the event of an unanticipated discovery of cultural materials along the access route, the find shall be managed in compliance with the procedures set forth in the draft Historic Properties Management Plan (HPMP).

Noise/Sensitive Receptors. Parking and staging under this variance would occur along the existing DPV1 access road which is already being used for construction equipment ingress/egress activities. The level of noise related to construction activities would not change as a result of this variance.

Other Issue Areas. No concerns noted under this variance.

Conditions of Variance Approval

The mitigation and MMCRP compliance requirements 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. This includes, but is not limited to, providing a qualified USFWS, CPUC, and BLM approved tortoise biologist, pre-construction clearance sweeps prior to any use of access roads, and maintaining speed limits.
2. Copies of all relevant permits, compliance plans, and this Variance approval shall be available on site for the duration of construction activities.
3. Maps of proposed parking areas shall be provided as they are identified by SCE. Maps shall be accompanied by both biological and cultural survey reports that demonstrate no sensitive biological or cultural resources are present within the parking/turnaround sites or adjacent areas (“adjacent” being those buffers identified by project mitigation measures and/or plans).
4. The CPUC EMs shall validate the additional parking areas prior to their use.
5. Sweeps shall be conducted immediately prior to use of a requested area and monitoring shall be conducted throughout its use.
6. In the event of an unanticipated discovery of cultural materials along the access route, the find shall be managed in compliance with the procedures set forth in the draft Historic Properties Management Plan (HPMP).
7. The CPUC EM shall be notified immediately of any unanticipated cultural, paleontological, or biological resource discoveries.
8. 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
Sheree James, Southern California Edison
Patty Nevins, Southern California Edison
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