

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2018

Mr. Thomas Diaz
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave – 235G/GO4
Rosemead, CA 91770

**Re: Application Completeness – West of Eldorado-Lugo-Mohave Series Capacitor Project --
Application No. A.18-05-007**

Dear Mr. Diaz:

Based on information provided by Southern California Edison (SCE) as part of its Application and SCE's responses to questions from the California Public Utilities Commission (CPUC), the CPUC deems Application A.18-05-007 complete for purposes of review under the California Environmental Quality Act (CEQA).

Background. On May 2, 2018, SCE submitted its Application for Permit to Construct (PTC) and the Proponent's Environmental Assessment (PEA) for the proposed project. The Energy Division used the CPUC's Information and Criteria List, as well as the requirements outlined in General Order (GO) 131-D and the PEA Checklist as its basis for evaluating the completeness of the PEA and determining whether sufficient information had been provided for the CPUC to complete its initial environmental assessment of the project as required by CEQA. Section 15100 of the CEQA Guidelines provides the lead agency 30 days to assess the completeness of a project proponent's application. On June 1, 2018, the California CPUC's Energy Division sent a deficiency letter to SCE that identified specific information required before the Application could be deemed complete. CPUC reviewed SCE's responses to the June deficiency letter and in a subsequent letter on August 27, 2018, the CPUC identified additional information that needed to be submitted. The letters identified information need or requested clarifications. For purposes of tracking, individual questions/requests were identified as Q.1 through Q.73.

Outstanding Completeness Items. During June through October 2018, SCE submitted information in response to the two deficiency letters in several parts. Two deficiency items were not addressed, as follows. For Q.66, regarding Table 9, it was mutually agreed by CPUC and SCE that the request was sufficiently addressed by information provided with the PEA. For Q.69, regarding Burrowing owl surveys, SCE identified that it would require additional time to satisfy the request and requested that this and be considered a Data Request rather than a deficiency. SCE has stated that it will provide the required Burrowing owl data before the end of 2018, but with intention of making it available sooner. The CPUC has agreed that this information can be treated as a response to a data request rather than a deficiency. The CPUC notes that this is information that is critical to completing the MND and may affect the overall schedule.

MND Schedule. Based on an assumption that all responses to requested information would be provide by September 21, 2018, the CPUC established a tentative schedule that called for publication of the Draft MND on or about January 14, 2019. The tentative schedule will be revised to reflect the current status.

While SCE was assembling the information required to deem the application complete for preparation of a complete and adequate Draft MND, the Energy Division moved forward with the following items:

- Coordination with BLM, which is preparing a separate NEPA document with regard to impacts on BLM and NPS lands.
- Participation in bi-weekly conference calls with SCE regarding the proposed project and meetings with SCE to review specific issues.
- Identification of Native American Tribes for formal and informal consultation.
- Preparation of a draft project description and graphics based on information provide in the PEA and in subsequent responses to requests from CPUC
- Preparation of templates to facilitate preparation of MND sections.

Conclusion Regarding Application Completeness. As described above, the Energy Division reviewed SCE's project information as it was submitted, between June and October 2018. Based on this review of SCE's responses, the CPUC Energy Division concludes that the PEA/Application is now complete.

Data requests to SCE may be made from time to time during the course of the CEQA processes should additional information needs be identified, or clarifications required.

Should you have any questions, please call me at (916) 823-4799 or email at billie.blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie C. Blanchard
CPUC Project Manager for ELM Series Capacitor Project
Energy Division, CEQA Unit

cc: Rosalie Barcinas, Southern California Edison
Molly Sterkel, CPUC Energy Division, Program Manager
Lonn Maier, CPUC Energy Division, CEQA Group Supervisor
Jason Jungreis, Administrative Law Judge
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David Peck, Commissioner Picker's Advisor