

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



February 11, 2021

Ms. Lori Charpentier
Licensing/Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave.
Rosemead, CA 91770

Re: Data Request #10 for the SCE Ivanpah-Control (I-C) Project (A.19-07-015)

Dear Ms. Charpentier:

Southern California Edison Company (SCE) submitted its Amended Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on April 13, 2020. This data request asks for information to supplement the PEA's contents.

CPUC Energy Division staff has noted in prior reviews of the PTC Application and PEA that the CPUC's EIR must analyze a "No Project Alternative" that includes a description of "... *what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services*" [CEQA Guidelines §15126.6(e)(2)].

CEQA defines the purpose of the No Project Alternative as to "... *allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project*" [CEQA Guidelines §15126.6(e)(1)]. Therefore, we need to understand what actions SCE could take towards satisfying SCE's first Project Objective: *Ensure compliance with standards contained in CPUC General Order 95 and NERC Facility Ratings*, as defined in Section 1.3 of the April 2020 PEA.

SCE has partially addressed our prior questions about the No Project Alternative as follows:

- After our 2019 Completeness Review, SCE replied in part that: "... if the Project were not approved, continued discrepancies compared to current GO95 standards would be reasonably expected to occur in the foreseeable future."
- The April 2020 PEA (Section 5.2.2.8, No Project Alternative) similarly provides one brief paragraph that concludes with: "... *the No Project Alternative is not feasible as it could not be accomplished considering SCE's need to comply with CPUC GO 95.*"

These prior responses did not provide the information that we need to define the specific actions (and evaluate environmental effects of the actions) that SCE would need to take if the project were not approved.

Therefore, we request a detailed description of the actions SCE could feasibly take to improve and modify the existing facilities in the absence of the CPUC approving the Proposed Project. We ask that SCE elaborate on the types of actions it could undertake to remove physical clearance discrepancies for the existing I-C facilities in the event that the CPUC does not issue a Permit to Construct for the project that SCE has defined. The response to this data request must provide the following:

1. Describe the actions SCE might generally undertake that are exempt from the need for CPUC Authorization under CPUC General Order 131-D, Section III.B.1 and that would ensure a long-term

likelihood of SCE's bulk electric system facilities operating in compliance with applicable CPUC General Order 95 standards.

2. Explain whether and to what extent the following actions could be implemented by SCE for the existing I-C facilities as "reasonable efforts" to remediate physical clearance discrepancies for its bulk electric system facilities. The response should itemize the following information for each segment of the Proposed Project and the specific actions SCE could undertake towards bringing the existing I-C facilities into compliance. Please itemize:
 - a. What types of actions that are exempt from the CPUC's requirement to file an application requesting authority to construct could be undertaken to physically modify existing I-C facilities, such as routine maintenance, repair, replacements, or minor relocations?
 - b. Where would these physical modifications most likely occur within each segment of I-C facilities?
 - c. What is the timetable in which the I-C facilities could be modified in the absence of CPUC approving the Proposed Project?
 - d. Within this response, SCE may consider options such as selective structure replacement with equivalent structures (similar to SCE's "deteriorated pole replacement program"), use of additional interset structures to reduce sag, relocations of structures within the existing franchise easement or public utility easement, and/or replacement of existing conductors for certain segments.
 - e. What environmental protections would be implemented during such actions? Would SCE complete cultural and biological resources surveys? Would field monitors be present during construction?

Please provide this information within 2 weeks, by February 25, 2021. Please provide a copy of the response to me and one to Susan Lee at Aspen Environmental Group, in electronic format only.

Additional data requests may be necessary to address other issues as we move forward with EIR preparation. Any questions on this data request should be directed to me at (916) 217-5073 or by email at john.forsythe@cpuc.ca.gov.

Sincerely,



John E. Forsythe
Project Manager for the I-C Project
Energy Division CEQA Unit

cc: Rosalie Barcenas, Southern California Edison
Christine Root, CPUC Energy Division, CEQA Group Supervisor
Joan Patrovsky, Project Manager, BLM
Susan Lee, Sandra Alarcón-Lopez, and Beth Bagwell, Aspen Environmental Group
Susanne Heim, Panorama Environmental
Peter Rocco, Jo Render, Galileo
Jace Fahnestock and Kelly Green, Northwind
Paul Callahan, Burns and McDonnell