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

February 15, 2023

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

Re: Data Request #12 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. The PTC Application has not been determined to be complete by the CPUC because we are waiting for the revised report on cultural resource eligibility for the California Register of Historical Resources (CRHR).

To support our review of the project and potential alternatives, we are requesting the following additional data (Data Request#12):

DR 12-1:

Confirming my email of February 14, 2023, we are requesting completion of all surveys done for the Proposed Project alignment for the three LADWP alternative routes, including the (1) Fish Springs, (2) Manzanar, and (3) Fossil Falls alternative realignment segments.

DR 12-2:

Background. As described in PEA Section 3.5.1.1, in Segment 1 of the I-C Project, SCE proposes to remove all existing towers and poles and replace them with approximately 383 double-circuit tubular steel poles (TSPs), approximately 125 multipole TSP structures, and approximately 391 double-circuit lightweight steel (LWS) poles. PEA Section 3.5.1.2 states that Segment 2 of the I-C Project would require removal of all existing tower and poles; they would be replaced with approximately 342 double-circuited TSPs. Along both segments, most existing structures are lattice steel structures.

The following information is requested because the proposed TSPs and LWS poles would be more highly visible than lattice steel structures that exist in Segment 2 and parts of Segment 1.

- Please explain why TSPs and LWS poles are being proposed for Segments 1 and 2, rather than replacing the existing structures with lattice steel structures.
- Is there a difference in cost between lattice steel structures and TSPs or LWS poles? If so, what is the cost difference?
- Is there a difference in construction timeline, construction process, or ground disturbance between lattice steel structures and TSPs/LWS poles? If so, please describe.
- Would the replacement of some or all of the Segment 1 and 2 structures with lattice steel structures present any other concerns regarding feasibility or other issue? If so, please describe.

DR 12-3:

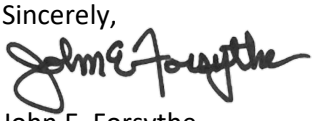
Background: The Ivanpah-Control Project has been addressed in SCE's Open Access Information Stakeholder Review Process (SRP) in a project status spreadsheet dated December 1, 2022. In order to ensure that we understand the project as currently proposed, please respond to the following requests.

- SCE SRP ID PB-23.01 indicates that the "Control-Haiwee-InyoKern No.1 TLRR Remediation" project is "Canceled." Please describe whether this information represents a material change in the project status or design for Segment 1 of the I-C Project presently undergoing environmental review.

- SRP ID SP-25 indicates that the "Ivanpah-Control TLRR Remediation" has a "Current Projected Total or Actual Final Cost" of approximately $692 million. Please describe whether this reflects a material change in the project status or design for the I-C Project, as shown in the Amended Application of April 2020 as having a cost of approximately $715 million in 2020 constant dollars.

Please respond to these requests within 2 weeks, with a copy to our CEQA consultant (Susan Lee at Slee@aspeneg.com). 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: David LeBlond, Southern California Edison (David.leblond@sce.com)
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