

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 21, 2023

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

Re: Data Request #13 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 additional data (Data Request #13).

Background. The CPUC sent Data Request #1 on August 23, 2019, to request clarification regarding the Deteriorated Pole Replacement (DPR) Program and the number and type of poles that would be replaced before the I-C Project would be constructed. SCE responded in September 2019, explaining that the DPR program would replace existing single-circuit poles with similar single-circuit poles, and will not follow the preliminary TLRR design. SCE also explained that the pole replacements being installed in 2019 and 2020 were anticipated to be replaced again as part of the Full Rebuild of the I-C Project. However, we understand that Segments 3N, 3S, and 4 are no longer proposed to be "full rebuild."

In May 2020, during PEA Completeness Review, SCE stated that the DPR program was ongoing, and that deteriorated poles identified for replacement in Segments 3N and 3S were scheduled for replacement in 2020 and 2021.

In order to provide current information for our EIR and its cumulative impact analysis, please provide the following information regarding the status of the DPR program:

DR 13-1: Explain the current status of the DPR program. Provide a list of poles, by I-C segment, that have been replaced since 2019. Please specify whether poles have been replaced in I-C Segment 4 as well as in Segments 3N and 3S. Please also include the type of pole that was removed and the type of pole that was installed.

DR 13-2: Provide a list of all planned pole replacements, including the segment number and pole number where the replacement is planned. Please include the type of pole that is proposed to be removed and the type of pole that will be installed. Also, please provide a schedule for this future pole replacement work.

Please respond to this request 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