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

September 9, 2024

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

Re: Data Request #16 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 was deemed complete on May 31, 2023. This data request defines additional information required for completion of the Draft EIR that we are preparing.

16-1: Project Description Updates for Removal of Segment 4

We have removed references to Segment 4 from the Project Description that SCE reviewed in late 2023. However, much of the data presented in the PD (taken from the 2020 PEA's Chapter 3) is presented for the project as a whole and not by segment. For example, calculations about water use, access road widening, guard structures, excavation materials, waste materials, and ground disturbance are presented for the project as a whole (including Segment 4). In addition, construction equipment and workforce data is presented for the project as a whole.

Please review all of the data provided in **Attachment 1** to this letter, and provide tracked changes in the Word file showing the corrected data with Segment 4 removed. The data to be reviewed is highlighted.

16-2: Marker Balls

The PEA states that marker ball locations cannot be defined until consultation with the FAA is complete; see text below. However, SCE's preliminary design includes structure heights and spans, which are used in the FAA determination, so a preliminary determination of marker ball locations can be calculated.

Please provide SCE's preliminary estimates of the locations of marker balls based on the FAA criteria defined below (from the PEA). We understand that these may change after FAA consultation.

> SCE will consult with the FAA and consider recommendations, to the extent feasible. Typical recommendations include, but are not limited to, the following: installation of marker balls on the proposed OPGW between structures), and/or installation of lighting on structures. Generally, marking or lighting is recommended by the FAA for those spans or structures that exceed 200 feet in height above ground level (AGL); however, marking or lighting may be recommended for spans and structures that are less than 200 feet AGL, but located within close proximity to an airport or other high-density aviation environment. FAA recommendations of guidelines and standards for marking and lighting are included in Advisory Circular AC 70/7460-1L.

16-2: PEA Table 3.5-1, Typical Subtransmission Structure Dimensions

The first data column of this table shows "Number of Structures, IC Project." For Segment 1, 905 structures are listed in this column. For Segment 2, 452 structures are listed, but 110 of these are shown as "Temporary." None of the Segment 1 structures are characterized as "Temporary." Please verify that there are no temporary structures planned in Segment 1. If changes are required, please submit an updated Table 3.5-1.

If no changes are required to the Segment 1 description, please explain why no temporary structures are required in Segment 1 while 110 temporary structures are required for Segment 2.

16-4: Cumulative Projects and Deteriorated Pole Program

In SCE's November 2023 review of the Administrative Draft of the Project Description, SCE suggested that the description of the Deteriorated Pole (DP) Program be moved to the Cumulative Projects section. We have made that change and we have removed the Segment 4 data. However, given the time that has passed since the analysis of this project began, this data requires updating. Please see **Attachment 2** to this letter.

- The table in Attachment 2 shows "Planned Installation" of 42 replacement poles occurring in 2023 and 2024. Please provide an updated table that shows 2023 and 2024 replacements as "installed" and not "planned," and update the anticipated status for 2025 and 2026, as needed.
- The table shows that over 500 structures will have been replaced in Segments 3N and 3S before the end of 2025. Please verify that the GIS data that we have been provided accurately defines structures that will be replaced as part of the I-C Project (separate from those that will have been replaced as part of the DP Program).
- Please confirm whether the 21 poles that have been replaced under the DP Program in Segments 1 and 2 (where all existing poles are defined as requiring replacement as part of the I-C Project) will be replaced again as part of the I-C Project.

16-5: Conductor Type and EMF Plan

SCE's comments on the Administrative Draft of the Project Description (late 2023) removed reference to ACCC as the conductor type, stating that the conductor type has not yet been determined. However, the PTC Application, Appendix F (April 2020 Field Management Plan [FMP]) appears to have been developed with the assumption that ACCC conductor would be used in Segments 1, 2, 3N, and 3S. The text (Magnetic Field Assumptions, page F-29) states the following:

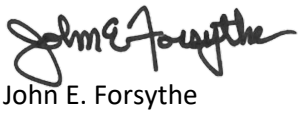
- The current conductor type, ACSR, sags much more than the proposed conductor type, ACCC, resulting in lower EMF values. This generally leads to lower EMF results for the ACCC conductors.

Please confirm the conductor type that was used in preparation of the April 2020 FMP. Explain whether (and why) the FMP data is still valid if another type of conductor is used.

Response

Please respond to this request within 2 weeks with a proposed approach and provide 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

Attachment 1: Project Description Review Required for Segment 4 Removal
Attachment 2: Deteriorated Pole Program Data

cc: David LeBlond, Southern California Edison (David.leblond@sce.com)
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