

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 20, 2024

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

Re: Data Request #20 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.

20-1: Air Quality Modeling

In the 2020 PEA, SCE used the California Emissions Estimator Model (CalEEMod) for air emissions estimates. These calculations are complex, and after our team's review, we have planned to use them as the basis of the EIR impact analysis rather than re-running the model ourselves. However, because the PEA is now 4.5 years old, new versions of CalEEMod have been released, with the most recent version being Version 2022.1. In addition, the model is now run in an online platform (rather than the older desktop application) and the old model files cannot be uploaded and edited in the new online version of the model. As a result, we are not able to make changes to the PEA calculations in order to get data reflective of the Segment 4 elimination. In addition, the consultant legal team is suggesting that using older version of the model may not be acceptable. As a result, we request that SCE revise the calculations using the newest version of CalEEMod (Version 2022.1) and the new project parameters.

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

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

Michelle Wilson, Supervisor CEQA & Energy Permitting Group, CPUC

michelle.wilson@cpuc.ca.gov

Joan Patrovsky, Project Manager, BLM jpatrovs@blm.gov

Regan Watt, NEPA Coordinator, BLM rwatt@blm.gov

Susan Lee, Aspen Environmental Group Slee@aspeneg.com

Susanne Heim, Panorama Environmental susanne.heim@panoramaenv.com

