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

January 13, 2025

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

Re: Data Request #21 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.

21-1: Landfill Capacity

PEA: 3.7.1.9 Reusable, Recyclable, and Waste Material Management

The PEA states the following:

Approximately 1,920 tons [updated from 2,054 in the 2020 PEA] of metal (consisting of steel from existing towers and metals from existing conductor) would be removed as part of the Proposed Project, as would approximately 37 tons of concrete from the foundations of existing towers.

The existing wood poles removed under the IC Project would be returned to a material yard, and either reused by SCE, returned to the manufacturer, disposed of in a Class I hazardous waste landfill, and/or disposed of in the lined portion of a Regional Water Quality Control Board (RWQCB)-certified landfill. Approximately 384 poles would be removed and disposed under the IC Project.

- **Request 21-1.1:** The remaining capacity at landfills is quantified in cubic yards. Please quantify the amount of waste produced by the Project in cubic yards rather than in tons, as was done in the PEA.
- **Request 21-1.2:** Please estimate the number of wood poles that would be disposed of, and the number of poles that would be reused or returned to a manufacturer. Please also quantify the volume in cubic yards of the removed wood poles that would be sent to landfills.

21-2: Recycling

PEA: 3.7.1.9 Reusable, Recyclable, and Waste Material Management

The PEA states the following:

Material from existing infrastructure that would be removed as part of the IC Project such as conductor, steel, concrete, and debris, would be temporarily stored in one or more material yards as the material awaits salvage, recycling, and/or disposal [underlining added].

- **Request 21-2.1:** Please quantify the volume of the removed material would be salvaged or recycled, versus the volume that would be disposed of in a landfill.

21-3: EMF Low Cost and No Cost Options

The EMF Field Management Plan included as Appendix F of the 2020 PEA presents a table entitled "Low Cost and No Cost Options Adopted by SCE." Please explain the following (rows excerpted from Appendix F, Table 1, attached to this letter):

Segment	Start Structure	End Structure	EMF Reduction Design Options	Estimated Cost	Structures in Residential Area
Segment 1	Structure 214	Structure 683	■ Conductor Arrangement ■ Double Circuit Construction ■ Structure Heights ■ Phasing Circuits	■ No cost ■ No cost ■ No cost ■ Low cost	N/A
Segment 2	Randsburg Substation	Inyokern Substation	■ Conductor Arrangement ■ Structure Heights	■ No cost ■ No cost	N/A

- The Segment 1 row above includes a segment approximately 53 miles long (from structure 214 to 683) but says simply "N/A" in the last column, so it does not identify structures in residential areas. Please explain what land use factors are driving the no cost and low cost options proposed.
- The Segment 2 row above also states "N/A" in the last column. Please explain the rationale for implementing no cost options.

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)
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Susan Lee, Aspen Environmental Group Slee@aspeneg.com
Susanne Heim, Panorama Environmental susanne.heim@panoramaenv.com

Attachment 1 – Table 1 From EMF Field Management Plan

Table 1 – "Low Cost and No Cost" Options Considered & Adopted for Project

Segment & Section	Start Structure	End Structure	EMF Reduction Design Options	Estimated Cost	Structures in Residential Area
IC Segment 1 Section 1	Control Substation	Structure 214	Conductor Arrangement Double Circuit Construction Structure Heights Phasing Circuits	No cost No cost No cost Low cost	35-37, 53-56, 137-138
IC Segment 1 Section 2 - 3	Structure 214	Structure 683	Conductor Arrangement Double Circuit Construction Structure Heights Phasing Circuits	No cost No cost No cost Low cost	N/A
IC Segment 1 Section 4	Structure 683	Structure 912	Conductor Arrangement Double Circuit Construction Structure Heights Phasing Circuits	No cost No cost No cost Low cost	706-708
IC Segment 1 Section 5	Structure 912	Inyokern	Conductor Arrangement Double Circuit Construction Structure Heights Phasing Circuits	No cost No cost No cost Low cost	1042-1050
IC Segment 2 Section 1 - 2	Kramer Substation	Randsburg Substation	Conductor Arrangement Structure Heights	No cost No cost	121165- 121166
IC Segment 2 Section 3 - 4	Randsburg Substation	Inyokern Substation	Conductor Arrangement Structure Heights	No cost No cost	N/A
IC Segment 3N	Kramer Substation	Coolwater Substation	Structure Heights	No cost	1546399E_ 1546400E - W1546395E_ E1546396E
IC Segment 3S Section 1	Kramer Substation	Tortilla Substation	Structure Heights	No cost	NA560118AE_ SA560118BE - NA560117AE_ SA560117BE, NA560194AE_ SA560194BE - NA560193AE_ SA560193BE
IC Segment 3S Section 2	Tortilla Substation	Coolwater Substation	Structure Heights	No cost	N/A
IC Segment 4 Sections 1 - 7	Coolwater Substation	Dunn Siding Substation	Conductor Arrangement Structure Heights	No cost No cost	128571- 128572 & 128608- 128609
IC Segment 4 Section 8 - 14	Dunn Siding Substation	Baker Substation	Conductor Arrangement Structure Heights	No cost No cost	N/A
IC Segment 4 Section 15 - 25	Baker Substation	Structure Ivanpah	Conductor Arrangement Structure Heights	No cost No cost	N/A