

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 27, 2020

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

**Re: Data Request #3 [revised] for the SCE Ivanpah-Control (I-C) Project (A.19-07-015)**

Dear Ms. Charpentier:

Southern California Edison Company (SCE) submitted its Permit to Construct (PTC) application and Proponent's Environmental Assessment (PEA) on July 17, 2019. The California Public Utilities Commission's (CPUC) Energy Division provided a PEA deficiency letter to SCE on August 15, 2019 and SCE is currently preparing a revised PEA. Prior to SCE's submittal of the revised PEA, we request the information listed below related to SCE's rights-of-way (ROW) for the I-C Project. We need this information in order to fully understand the location of the proposed project components and to explain this to the public in our EIR.

SCE has provided the CPUC with copies of its easement agreements as follows:

- LADWP easements (provided August 8, 2019)
- BLM and Inyo National Forest right of way grants and special use permits (provided January 24, 2020, in response to a BLM data request).

However, the easement agreements do not include any electronic data, or information on changes to rights-of-way that SCE needs. Therefore, we also require the following information for all of SCE's rights for the I-C Project (including the LADWP and BLM agreements):

1. Please provide GIS data defining the ROW widths and boundaries of all existing rights-of-way (ROWS) for the I-C Project.
2. For proposed ROWs for the proposed (re-built) I-C Project facilities: Where different from existing rights, please provide GIS data defining the ROW widths and boundaries.
3. Provide copies of all existing ROW agreements that have not already been provided (as defined above).
4. Identify the easements whose boundaries would remain the same under the proposed I-C Project and which easements would not need to be modified for the proposed I-C Project.

5. Explain the general terms SCE's rights within the existing ROWs. For example, do all agreements allow SCE to complete natural and cultural resources surveys within the easement boundaries?
6. For areas where SCE will require expanded ROWs (either wider than current ROWs or relocated ROWs):
  - a. Please confirm that SCE's natural resources surveys (biology, cultural, paleontology) included all areas of potential direct effect, even where they are located outside of existing ROWs.
  - b. Please describe how SCE obtained permission to survey these lands that are not within existing rights-of-way.
  - c. Have the expanded ROW agreements already been obtained, or would this occur after project approval by the CPUC?
7. In cases where the proposed project ROW will be wider or different from the existing ROW, did SCE's PTC Mailing List (the 300-foot property owner list) submitted with the July 2019 PTC Application include only the properties within 300 feet of SCE's existing ROWs, or did it include all the properties that would be affected within 300 feet of the proposed/wider ROW?

Additional data requests may be necessary to address other issues as we move forward with scoping and EIR preparation. Please provide a copy of the response to me and one to Susan Lee at Aspen Environmental Group in San Francisco, in electronic format only. Any questions on this data request should be directed to me at (415) 703-2837 or by email at [billie.blanchard@cpuc.ca.gov](mailto:billie.blanchard@cpuc.ca.gov).

Sincerely,

*Billie Blanchard*

Billie Blanchard  
Project Manager for I-C Project  
Energy Division CEQA Unit

cc: Rosalie Barcinas, Southern California Edison  
Joan Petrovsky, Project Manager, BLM  
Scott Whitesides, Project Manager, BLM  
Susan Lee, Sandra Alarcon-Lopez, Aspen Environmental Group  
Susanne Heim, Panorama Environmental