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

January 7, 2021

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

Re: Data Request #9 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. This request asks for clarification on the extent of ground disturbance at existing structures (not proposed for replacement) in Segments 3N and 3S.

Background: The PEA (Chapter 3) describes construction activities for Segments 3N and 3S as including the removal of existing conductor and installation of ACCC conductor along the entire length of these segments. At each structure location, the PEA describes that this reconductoring process would require the actions listed in Attachment 1. As shown in Attachment 2, the GIS data for Segments 3N and 3S shows a 75-foot square around each existing structure that would require only reconductoring.

SCE's response to this request will allow the EIR team to clarify the following issues:

- The cultural resources team's need for geoarchaeological information along Segments 3N/3S (which supports our assessment of the potential for buried resources).
- The cultural resources team's identification of the resources that may be subject to direct impacts from construction and the evaluation of those resources for California Register eligibility.
- The likely acreage of habitat loss associated with Segment 3N/3S construction.

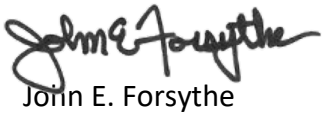
Requests:

1. Please define the specific activities and types of disturbance that would occur in these 75-foot square areas identified at existing structures in Segments 3N and 3S.
2. Explain whether these 75x75 foot areas (~5,625 square feet) are, or should be, included in the ground disturbance calculations. We note that they do not appear to be included in PEA Table 3.7-2 (*Approximate Laydown/Work Area Dimension*) or Table 3.7-4 (*Subtransmission Land Disturbance Table*).

Please provide this information within 1 week, by January 14, 2021. Please provide a copy of the response to me and one to Susan Lee at Aspen Environmental Group, in electronic format only.

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 I-C Project
Energy Division CEQA Unit

cc: Rosalie Barcinas, Southern California Edison
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

Attachment 1: Excerpts from April 2020 Amended PTC Application and PEA

Section 3.7.2.2.1

- **4. Conductor removal** – Upon placement of wire pulling equipment, the existing subtransmission conductor would be pulled out with a pulling rope and/or cable attached to the trailing end of the conductor; guard structures or the equivalent might be used during the removal process. The old conductor would be transported to a material yard where it would be prepared for recycling.
- **7. Conductor installation** – Replacement conductor would be installed as described in Section 3.7.2.3.

Section 3.7.2.3 Conductor/Cable Installation

- **Step 2 – Sock Line Threading, Ground Access:** A bucket truck is typically used to install a lightweight sock line from structure to structure. The sock line would be threaded through the wire rollers in order to engage a camlock device that would secure the pulling sock in the roller. This threading process would continue between all structures through the rollers of a particular set of spans selected for a conductor pull.
- **Step 2 – Sock Line Threading, Helicopter Access**: In areas where a bucket truck is unable to install a lightweight sock line, a helicopter would fly the lightweight sock line from structure to structure. The sock line would be threaded through the wire rollers in order to engage a camlock device that would secure the pulling sock in the roller. This threading process would continue between all structures through the roller of a particular set of spans selected for a conductor pull.
- **Step 3 – Pulling**: The sock line would be used to pull in the conductor pulling rope and/or cable. The pulling rope or cable would be attached to the conductor using a special swivel joint to prevent damage to the wire and to allow the wire to rotate freely to prevent complications from twisting as the conductor unwinds off the reel.
- **Step 4 – Splicing, Sagging, and Dead-Ending**: Once the conductor is pulled in, if necessary, all mid-span splicing would be performed. Once the splicing has been completed, the conductor would be sagged to proper tension and dead-ended to structures.
- **Step 5 – Clipping-In**: After the conductor is dead-ended, the conductors would be secured to all tangent structures in a process called clipping-in.

Attachment 2: Examples of Structure Work Areas

Structure Illustrations. GIS Data provided in early December 2020 includes a 75-foot square "Structure Work Area" around each structure in Segment 3N/3S that is not being replaced. A few examples are presented below, showing the varying proximity of structures to access roads and the varying extent of existing disturbance within the 75-foot square.