

Southern California Edison

A.19-07-015 – TLRR IC

DATA REQUEST SET E D - S C E - 0 2 1

To: Energy Division
Prepared by: Kashif Siddiqi
Job Title: Project Engineer
Received Date: 1/13/2025

Response Date: 1/27/2025

Question 21-1.1-1.2:

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.

Response to Question 21-1.1-1.2:

Question 21-1.1 Response:

The anticipated amount of waste produced by the Project in cubic yards for the specified waste type is provided below:

$$\begin{aligned} 4,456 \text{ tons of metal} &= 1,003.12 \text{ cubic yards} \\ 114 \text{ tons of concrete} &= 56.30 \text{ cubic yards} \end{aligned}$$

NOTE: When developing the response to this data request, SCE identified a calculation error that impacted the expected quantities of metal and concrete that would be removed. The original quantities of 1,920 tons of metal and 37 tons of concrete have now been corrected to 4,456 tons of metal and 114 tons of concrete, as reflected in the response above.

Question 21-1.2 Response

SCE estimates that the Project would remove approximately 384 wood poles, each with an average weight of 800 lbs. None of the removed wood poles are expected to be reused or returned to a manufacturer. SCE anticipates sending all the removed wood poles to landfills, with an estimated volume of approximately 118.9 cubic yards.

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Question 21-2:

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.

Response to Question 21-2:

SCE expects that all existing conductor and lattice steel structures would be salvaged or recycled.

The approximate quantities of these materials are provided below:

1. Conductor: 2,637,392 lbs.
2. Lattice steel structures: 6,273,436 lbs.

SCE expects that all other materials, such as concrete and other debris, would be disposed of in landfills.

(Note: Materials such as steel or aluminum (e.g., conductors and lattice steel structures) are typically measured by weight rather than volume. Accordingly, the measurements for steel and aluminum in this response have been provided in pounds (lbs.) instead of cubic yards (cy)).

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Question 21-3:

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 to Question 21-3:

The IC Project design would use taller structures, double-circuit construction, and revised conductor arrangements (e.g., bringing phase conductors closer to each other compared to the existing arrangements) for Transmission Line Rating Remediation (TLRR) program purposes. While these design elements are necessary to meet the project objectives, they also provide EMF reduction benefits. Therefore, the EMF Field Management Plan describes these design options as “no-cost” EMF reduction measures. In other words, SCE is identifying the built-in, no-cost EMF reduction measures that are already incorporated into the project design.

The Project design would also implement the low-cost EMF reduction measure of optimally phasing the circuits across the full length of Segment 1 to achieve additional EMF reductions. Since other sections of Segment 1 have residential areas nearby (as indicated by other rows within Table 1 not shown in this data request), implementing this low-cost design option is recommended by the CPUC EMF Policy guidance.