PUBLIC UTILITIES COMMISSION
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SAN FRANCISCO, CA 94102-3298

November 25, 2013

Ryan Stevenson
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G10O
Rosemead, CA 91770

Re: Application Completeness – West of Devers Upgrade Project Proponent's Environmental Assessment -- Application No. A.13-10-020

Dear Mr. Stevenson:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has conducted a completeness/deficiency review of the proposed West of Devers (WOD) Upgrade Proponent's Environmental Assessment (PEA) and Application (A.13-10-020) that was filed on October 25, 2013.

After completing our review of SCE's Application and PEA for the Project, the Energy Division concludes that the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that would prevent preparation of an adequate EIR/EIS in a timely manner. Many of these critical path items were defined in our comments on the Administrative Draft PEA.

The Energy Division used the CPUC's Information and Criteria List, as well as the requirements outlined in General Order (GO) 131-D and the PEA Checklist as its basis in evaluating the completeness of the PEA and determining whether or not sufficient information had been provided for the CPUC to complete its initial environmental assessment of the project as required by CEQA. Section 15100 of the California Environmental Quality Act (CEQA) Guidelines provides the lead agency 30 days to assess the completeness of the project proponent's application.

In June and August 2013, SCE submitted portions of the Administrative Draft PEA to the CPUC for preliminary review. The CPUC reviewed all documents received and provided detailed comments in a series of letters to SCE on July 10 and September 12, 2013. The Administrative Draft PEA comments focused primarily on the overall structure and format of the Project Description, adequate level of detail, and incorporation of information from past analyses of the project corridor.

The final PEA, submitted on October 25, 2013, incorporated many of the changes requested by the CPUC. However, certain critical information that was clearly presented to SCE as being required for completeness was not included in the PEA. The specific inadequacies of the PEA have been defined based on CPUC requirements and the information needed for analysis of the project in the EIR/EIS.

Attachment A to this letter identifies the specific additional information that is required to find the Application and PEA complete, and to support the preparation of the environmental analysis for this project. Without the information defined in this attachment, it would be difficult to prepare adequate analysis under CEQA and NEPA in the required timeframe.

The requested information should be filed as supplements to the October 25th Application and PEA. One set of responses should be sent to the Energy Division and one to our consultant Aspen

Environmental Group, in both hardcopy and electronic format. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

In addition to the essential completeness deficiencies identified herein, the EIR/EIS Team will also be identifying additional information needed from SCE in order to prepare a complete and adequate EIR/EIS. The CPUC Energy Division will submit these needs in the form of data requests to SCE during the course of the CEQA and NEPA processes. Data requests will include additional details about the project description, engineering design details for alternatives that may be developed by the EIR/EIS Team, and other resource information identified during EIR/EIS preparation.

At any point in this process, the CPUC reserves the right to ask for additional information in the form of data requests. Any questions on the completeness review should be directed to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

Billie C. Blanchard
PURA V
Project Manager for West of Devers Upgrade
Energy Division, CEQA Unit

Attachments (1)

cc: Tom Burhenn, Southern California Edison
Jessica Hecht, CPUC Administrative Law Judge
Molly Sterkel, CPUC Energy Division, Program Manager
Mary Jo Borak, CPUC Energy Division, CEQA Group Supervisor
Nicholas Sher, CPUC Legal Division
Holly Roberts, Bureau of Land Management
John Kalish, Bureau of Land Management
Susan Lee, Aspen Environmental Group
Hedy Koczwara, Aspen Environmental Group

Attachment A. Details of PEA Completeness Review

For each deficiency presented below, we first present the specific CPUC requirement upon which the deficiency is based.

1. Purpose and Need (PEA Chapter 1)

Required in: CPUC Information and Criteria List (ICL) Section V.10; GO 131-D Section IX. A. PEA Checklist (Chapter 2: Project Purpose and Need and Objectives; Chapter 3.3, Project Objectives; Chapter 3.4 Proposed Project)

Purpose/Need - Transfer Capacity. In order to understand the project and its purpose, which serves as the basis for developing alternatives, we need clarification of the initial and increased transfer capacity that would result from implementation of the project. Because CEQA requires that alternatives to the proposed project also meet most project objectives, it is important that we clearly understand the project's benefits to the electrical system.

The PEA contains some conflicting information on existing and future project transfer capacity:

a) PEA Chapters 1 and 2 (Sections 1.1.10 and 2.1.3.1) state that the proposed project would increase the system transfer capacity **from 1,600 MW** to 4,800 MW. However, the last paragraph of PEA Section 1.1.1 states that the existing temporary (upgraded) transfer capability is **1,050 MW**, not 1,600 MW.

b) Section 1.1.2 notes a requirement for **2,479.5 MW of new transfer capacity**. Using this data, the ultimate capacity requirement would be 3,530 MW, not 4,800 MW.

In order to support our project understanding and our ability to properly evaluate alternatives, please provide the following information:

1. Please reconcile the information presented in items (a) and (b) above.
2. Explain how the existing capacity increase between Devers and Valley Substations is calculated.
3. If the transfer capacity between Devers and the Vista and Mountain View Substations will increase by 2,800 MW, will there also be an increase in the capacity of other existing lines leaving those western substations?

2. Project Description: Future System Expansion

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.4, Proposed Project)

PEA Chapter 1 (p. 1-7) identifies that the proposed project would "maximize use of the existing corridor" – essentially making additional space available for future upgrades, if needed. However, the specifics of this possible future system expansion is not discussed further in the PEA. Due to the proposed location of the upgraded double-circuit 220 kV lines at the edge of the corridor, we expect that there may be public concern about moving the lines closer to residences rather than locating them in the center of the existing corridor. This question was also posed in the CPUC review of the Administrative Draft PEA (letter of July 10, 2013, on PEA page 1-7, Chapter 1).

In order to explain the rationale for the proposed location to the public and also to understand the Proposed Project and any reasonably foreseeable future phases (including any reasonably foreseeable consequences), as described in the PEA Checklist, we require the following information.

a. In order for future changes to be made to the corridor, the Morongo Band would have to agree (if they have not already) to future transmission upgrades beyond the proposed project as defined in the recent 50-year Agreement with SCE. Has SCE discussed the possible future use of the corridor with the Morongo, or has the Tribe already agreed to some future upgrades within or outside of the existing 50-year Agreement?

b. Discuss the status of a future transmission upgrades in enough detail that the CPUC can determine whether a future line in the ROW is remote and speculative (not requiring analysis under CEQA) or if it is reasonably foreseeable (thus requiring analysis as part of the whole of the project under CEQA).

c. If SCE considers the future expansion to be remote and speculative, please explain why the Proposed Project is not proposed to be located in the center of the existing ROW, which would maximize the distance from sensitive receptors located on both sides of the ROW.

3. GIS Data and Surveys

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.4, Proposed Project)

The PEA Checklist has as requirement to provide GIS (or equivalent) data layers for the Proposed Project preliminary engineering including estimated locations of all physical components of the Proposed Project as well as those related to construction.

1. The following information appears to be missing from the GIS files and is necessary to support our environmental review and analysis:

    a. All access and spur roads (see comments below on missing roads and inadequacy of disturbance areas)

    b. Pull and tension sites

    c. Guard pole and splice sites

    d. Approximate location of shoo-flies (also requested in CPUC comments on the Administrative Draft PEA)

    e. Grading and slope stabilization information is requested in the PEA Checklist under Staging Areas, Work Areas, Access and Spur Roads, and Erosion and Sediment Control and Pollution Prevention during Construction. As also requested in CPUC comments on the Administrative Draft PEA, please provide preliminary locations of all new retaining walls.

    f. Helicopter landing zones and pads

    g. Land use data (included in mapbook, but not GIS files)

    h. Existing and relocated distribution lines (66 kV subtransmission lines have been included)

    i. Tower types/Construction IDs (33 Existing structures do not have tower type or construction ID)

    j. Alternatives

2. In reviewing the GIS data, we have two specific requests:

    a. For cultural resources, it appears that approximately 5% of access roads have not been surveyed. In addition, there are some poles and lines that are listed to be removed and a small portion of the transmission line corridor that have not been surveyed.

    b. For biological resources, there are three areas on the map that are shown as not surveyed. These areas are from the WOD alignment to Maraschino Substation, from WOD to Banning Substation, and a triangular area east of Segment 1. Please verify and explain which of these areas have not been surveyed and why.

4. Structure Information

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.5.2, Poles and Towers; Chapter 3.5.3.1 Above-Ground Installation)

Included in the description of Proposed Project, mapbook and GIS files. However, the data included is inadequate and the following should also be provided:

a. A structure information table is needed and should include unique structure location identifier, specific design type keyed to structure design figure, height, and diameter (if appropriate).

b. Where applicable, route strip mapbook, kmz file, and plan and profile drawings need to clearly indicate the locations of sub-transmission structures with underbuild positions and the underbuild designs at those locations.

The PEA states (PEA Section 3.2.3.16) that some poles would be left in place because of other uses so other infrastructure may be collocated on the existing and proposed towers. Describe if other infrastructure would likely be collocated with the conductor; if so, provide conduit diameter of other infrastructure.

c. Plan and profile drawings (e.g., Figure 3.1-6) need to clearly indicate the locations of conductors, ground wire(s), and fiber optic cable, for each structure type.

5. Shoo-Flies

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.5.2, Poles and Towers; Chapter 3.5.3.1 Above-Ground Installation)

Approximate disturbance areas for each shoofly pole location are included in PEA Table 32-E3 and are estimated at 100-feet by 100-feet, which seems reasonable. However, the following additional information is needed in order to perform environmental review:

a. Estimated duration of installation/use of shoo-fly structures (see also comments under Construction Schedule);

b. Describe stringing methods proposed for shoo-fly construction/disassembly and indicate if helicopters would be used;

c. Provide a description of any FAA 7460 filings for shoo-fly structures/spans (see also comments under FAA Hazard Marking);

d. Provide detail on restoration proposed at shoo-fly locations/disturbed areas (see also comments under Restoration below).

e. In addition, shoo-fly locations should also be included in GIS data (see comments under GIS Data above).

6. Substations

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist, Chapter 3.5.4, Substations; Chapter 3.7.4 Substation Construction

Substations. The PEA Checklist requests that the PEA provide "typical" Plan and Profile views of the proposed modifications to existing substations. These were also requested in CPUC comments on the Administrative Draft PEA review and have not been provided. Therefore please provide the following:

a. Plan and Profile views of the proposed modifications to existing substations

b. Provide the approximate or "typical" dimensions (width and height) of new structures including engineering and design standards that apply.

7. Land Use Rights – Property Acquisition

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist, Chapter 3.6, ROW Requirements

PEA Section 3.3 states that properties may require acquisition along the 220 kV and 66 kV ROWs, but does not indicate locations along the ROW. Please provide a description of specific locations of any properties that may require acquisition.

8. Staging and Work Areas

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.1.1, Staging Areas; Chapter 3.7.1.2, Work Areas)

A mapbook and GIS files have been received from SCE, but grading and site preparation are not adequately shown.

a. Describe how would the work areas likely be accessed (e.g., construction vehicles, walk-in, helicopter, etc.)?

b. Yard restoration needs to be described in greater detail (see comments under Restoration below).

c. Provide a detailed description of the lighting to be used at construction sites and staging yards.

d. Describe how the staging area would be secured, would a fence be installed? If so, describe the type and extent of the fencing.

e. Describe how power to the site would be provided, if required (i.e., tap into existing distribution, use of diesel generators, etc.).

f. Splicing locations have been included on the mapbook, but GIS files have been requested in the GIS Data comment above. Additional information also is needed on whether the splicing

sites (or other sites) will be used for implosive sleeving. If yes, please describe the implosive sleeving technique including duration, work space required, locations proposed, and associated noise levels.

9. Helicopter Use

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.1.2, Work Areas; Chapter 3.7.1.4 Helicopter Access; Chapter 5.15, Transportation and Traffic)

The description of helicopter use and safety PEA Section 3.2.3.12 is minimal and additional information is needed to assess the location and extent of helicopter activities during both construction and operation. In accordance with the PEA Checklist and previous CPUC comments on the Administrative Draft PEA, please provide the following information:

a. Indicate which towers are proposed for helicopter installation.

b. PEA p. 3-95 states: "[t]he operations area of the helicopters would be limited to the Proposed Project area, including staging areas, ground locations in close proximity to conductor and/or OPGW pulling, tensioning, and splice sites, including locations in previously disturbed areas near construction sites. In addition, helicopters must be able to land within SCE ROWs, which could include landing on access or spur roads. All helicopter refueling in the staging areas, ROWs or access or spur roads, would be in accordance with the SWPPP." The last two sentences imply that SCE plans to land, do material picks, and refuel anywhere on the 160 miles of access and spur roads proposed for use. This is problematic if the exact locations are not known (e.g., nesting bird surveys would need to be conducted prior to helicopters landing along the ROW). Please provide additional clarification and specificity on locations where helicopters are proposed for use within the ROW and project area.

c. Helicopter landing zones (HLZs) or helicopter yards are not included on the maps provided. The locations of any anticipated helicopter landing platforms or pads must be shown on the route strip mapbook and GIS data (see also GIS Data comments). Locations of HLZs are necessary to assess impacts to sensitive receptors-wildlife (nesting birds), homes, schools, etc.

d. The PEA Checklist requests a description of any BMPs that would be employed to avoid impacts caused by use of helicopters. SCE's PEA mentions that helicopter fueling would be done consistent with the SWPPP, which is considered to be a BMP. However, the PEA does not address BMPs related to dust control and rotor downwash impacts to potentially adjacent environmentally sensitive habitat. These potential impacts would be especially relevant if SCE plans to land or do material picks anywhere on the access and spur roads proposed for project use. Please provide a description of proposed BMPs associated with helicopter use, including any addressing potential dust control and rotor downwash impacts.

e. Also, with respect to traffic control and the traffic management plan, Section 3.2.1.4 and the analysis of potential traffic hazards (p 4.16-27) should include use of traffic control for temporary road closures during helicopter external load overflights of frequently used roadways. Please provide additional information regarding traffic control for temporary closures of roadways due to helicopter use during construction and operation.

f. The air quality emission calculations assume helicopters would be used only for installing conductor wire, not for delivery of equipment and materials or structure placement. This means that the AQ Appendix E appears to be inconsistent with the Project Description (Section 3.2.3.12) and the description of helicopters used in the Noise section. Please provide details on when and for what specific activities SCE proposed helicopter use. Also please provide supporting helicopter emission calculations as part of the project-specific helicopter use plan that was previously requested by the CPUC, but has not been provided. The Plan prepared for the Devers-Palo Verde No. 2 Project may be used as an example.

10. Vegetation Restoration

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.1.2, Work Areas; Chapter 3.7.1.7, Cleanup and Post-Construction Restoration)

Specific details on vegetation restoration are not provided in the PEA, as requested for work areas in the PEA Checklist. The PEA project description states a Revegetation Plan will be prepared prior to the start of construction, will be finalized prior to completing construction activities, and that additional information is included in PEA Section 4.4, Biological Resources. However, the only mention of restoration is in APM BIO-1. APM-BIO-1 does not indicate whether SCE would revegetate areas where native vegetation is not dominant, and does not indicate "how cleanup and post-construction restoration…would be performed" (Section 3.7.17). There is insufficient detail to evaluate whether the Plan would effectively mitigate impacts to soils, water, air quality, visual, or biological resources.

1. Please revise language in the APM-BIO-1 or provide additional details in the Project Description to indicate which impacts would be mitigated by implementing the Plan, and affirm that the Plan will include the following components:

    a. **Statement of revegetation goals** (e.g., to mitigate project impacts to specific resources). If the goals will differ according to location, then specify goals in each segment of the route. For example, goals within MSHCP areas or other land use designations may differ from segments of the route outside those areas. Likewise, goals in areas supporting native vegetation may differ from other areas. Example of likely goals may include prevent or minimize further site degradation; stabilize soils; maximize the likelihood of vegetation recovery over time; replace degraded natural vegetation and habitat value; or minimize soil erosion, dust generation, and weed invasions.

    b. **Quantitative success criteria**. If restoration goals will differ according to location, then success criteria should be tailored appropriately to each segment of the route.

    c. **Implementation**. The Plan will describe SCE's proposed implementation measures, including: (a) soil preparation measures, including locations of recontouring, decompacting, imprinting, or other treatments; (b) details for top soil salvage and storage, as applicable; (c) plant material collection and acquisition guidelines, including guidelines obtaining plants or seed from vendors; (d) time of year that the planting or seeding will occur and the methodology of the planting and seeding; (e) a description of any proposed irrigation methods.

    d. **Maintenance**. The Plan will include a schedule and methodology for proposed maintenance activities such as weeding, trash removal, etc.

e. **Monitoring and Reporting**. The Restoration Plan will include a detailed monitoring and reporting program, commensurate with the goals and success criteria for each restoration site. The monitoring and reporting program will be designed to evaluate progress toward success criteria at appropriate milestones, provide an objective determination whether each site meets success criteria at the end of the monitoring period, and report this information to the relevant agencies.

f. **Contingency**. The Plan will include contingency measures for implementation if restoration efforts make insufficient progress toward success criteria at specified milestones.

2. SCE describes a large number of existing recreational areas that are within the existing ROW, see Table 4.15-1. For example, the Oak Valley Golf Club, a private facility, is identified as being located within the Proposed Project boundaries. Given the number of facilities within the ROW, please provide details regarding restoration of existing recreational facilities that may be disturbed by the construction.

11. Access and Spur Roads

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.1.3, Access Roads and/or Spur Roads)

SCE provided access and spur roads in the GIS data, however, access and spur roads are not shown or described in sufficient detail to assess ground disturbance impacts. For instance, some wreck-out towers indicated on maps have no defined access to them (see Tower T171 on Sheet 23).

a. The location of all vehicular access and spur roads (new and upgraded) need to be shown on the mapbook and GIS data.

b. SCE should provide roadway widths for temporary and permanent roadways.

c. SCE states that it will need additional acreage for access roads. Please state the exact amount of acreage needed to be acquired.

d. Describe any locations of tree removal.

12. Vegetation Clearance

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.1.5, Vegetation Clearance)

Vegetation types are included in the GIS files. However, additional details are required, as specified in the PEA Checklist, in order to perform biological and visual resources analyses:

a. Describe what types of vegetation clearing may be required (e.g., tree removal, brush removal, flammable fuels removal) and why (e.g., to provide access, etc.).

b. Describe how each type of vegetation removal would be accomplished.

c. For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.

d. Describe the types and approximate number and size of trees that may need to be removed.

e. Describe the type of equipment typically used.

13. 66 kV Subtransmission Line Trenching

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.3.1, Trenching)

Underground construction of the 66 kV subtransmission line is not provided in sufficient detail in the PEA to assess construction impacts. In accordance with the PEA Checklist, please provide the following:

a. Provide the total approximate cubic yardage of material to be removed from the trench, the amount to be used as backfill and the amount to subsequently be removed/disposed of off-site.

b. Provide off-site disposal location, if known, or describe possible option(s).

c. If engineered fill would be used as backfill, provide information as to the type of engineered backfill and the amount that would be typically used (e.g., the top two feet would be filled with thermal-select backfill).

d. Describe if dewatering would be anticipated, if so, how the trench would be dewatered, what are the anticipated flows of the water, would there be treatment, and how would the water be disposed.

e. Describe the process for testing excavated soil or groundwater for the presence of pre-existing environmental contaminants that could be exposed as a result of trenching operations.

f. If a pre-existing hazardous waste were encountered, describe the process of removal and disposal.

g. Describe any standard BMPs that would be implemented.

14. Operations and Maintenance (O&M)

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 3.8, Operations and Maintenance)

The PEA description of O&M activities is cursory and does not include all of the items requested in the PEA Checklist. Please describe the general maintenance program of the Proposed Project to include the following items:

a. Describe how the inspection would be implemented. Things to consider, who/how many crew members; how would they access the site (walk to site, vehicle, ATV); would new access be required; would restoration be required, etc.

b. PEA does not specify if additional full time staff would be required. Please state if any new staff would be required.

c. Describe what the time of the year would be for routing road maintenance, insulator washing, and tree trimming.

d. Describe how resource surveys will be employed during O&M activities. How will O&M crews be made aware of resources identified for construction activities (i.e., a cultural site or sensitive that do not move)?

e. See above comments regarding helicopter use during O&M activities.

15. Cultural Resources

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 5.5, Cultural Resources)

Background: The case of ***Madera Oversight Coalition v. County of Madera***,199 Cal.App.4th 48 (2011) involved an EIR that identified certain archaeological resources as historic resources, noted that the project would have a significant impact on said resources, and imposed a mitigation measure requiring, among others, further verification that those resources were indeed historic resources. The court overturned the EIR in this regard finding that this measure constituted an impermissible deferral of analysis since environmental decisions would be made outside an arena where public officials would be accountable. Along those lines, the court noted that "[n]either CEQA nor the Guidelines authorize any mechanism or procedure for undoing an EIR's conclusion that an archaeological site is an historical resource." The court also noted that the measure violated CEQA Guidelines § 15064.5(c)(1), which requires a lead agency to first determine whether a site is a historic resource when a project will impact an archaeological site.

The archaeological resources identified in the PEA and its confidential report were not evaluated for NRHP eligibility. Because of the ***Madera*** case and the fact that so much of the project is on private land (not BLM-administered land), CEQA adequacy in evaluating cultural resources is critical. We do not believe we can presume that all sites are eligible. For all sites where it appears that there may be impacts, a very definitive statement of eligibility is needed. In some cases, this determination may not require more fieldwork, but simply requires a clear analysis of why these sites are not eligible. For other sites, though, more information is needed to either dismiss site eligibility, or to design site-specific data recovery strategies for mitigation. In some cases, this may require subsurface shovel testing within the impact areas to confirm whether anything is present below the surface, to determine what types of materials are there, and to assess whether the impact areas contain deposits with integrity.

a. Due to the ***Madera*** case described above, the WOD Upgrade EIR/EIS will need to provide substantial evidence to support the EIR/EIS conclusions as to whether the proposed project would significantly impact cultural resources. The administrative record will need to document that standard and thorough investigations were carried out to determine whether there are any such eligible resources impacted. Please propose an approach and a schedule for providing this information. We would be happy to discuss this in a conference call/meeting that would include our legal and cultural resources team.

b. Section 4.5.4.1, CEQA Impact Assessment: Impacts that are less than 0.1 acre in extent, are shown in Tables 4.5-3 and 4.5-2 as 0.0*. While this value is qualified in a footnote, the tables must indicate the actual area of anticipated disturbance and the proportion of each resource that would be impacted. Many sites are smaller than 0.1 acre, and could be completely destroyed by a construction footprint of 4,000 sq ft or less. Please revise the tables to provide impact area as square feet and indicate what percentage of each resource would be affected.

16. FAA Hazard Marking (PEA Section 3.1.4, page 3-54)

CPUC ICL Section V.11; GO 131-D Section IX. A

SCE indicates that approximately 165 structures along the project route would require FAA notification. Appendix J of Application A.13-10-020 includes FAA Notifications that have been submitted for Segment 5 of the Proposed Project, indicating the locations for which SCE believes FAA determinations are required. However, locations of FAA hazard marker balls and lighting have not been identified for the remainder of the route. As defined in the CPUC July 2013 comment letter, the absence of this information from the initial CEQA and NEPA documents can cause substantial delays and the requirement for subsequent analysis. This was demonstrated in two of SCE's recent projects (DPV2 and TRTP), where the ultimate definition of the locations of FAA markers and lights resulted in the requirement for additional impact analysis under CEQA and NEPA. In order to avoid the requirement for filing of CPUC Petitions for Modification and subsequent CEQA and NEPA documents for the WOD Upgrade Project, we request the following:

a. In addition to Segment 5 near the Banning Airport, SCE should submit applications to the FAA by December 31, 2013, for all applicable 220 kV and 66 kV tower and span locations. Please provide a list/table of all towers and spans for which Form 7460 filings will be submitted (in a format similar to Application A.13-10-020, Appendix J: Letter Attachment FAA Filing Data). In addition, by March 15, 2014, SCE should provide copies of the FAA's hazard marking determinations/filing status to the CPUC.

b. Please clarify whether the FAA applications would apply to shoo-fly structures. If so, please provide a list/description of the proposed preliminary locations for which FAA Form 7460 filings will be submitted. Similar to (a) above, SCE should submit applicable shoo-fly applications to the FAA by December 31, 2013. In addition, by March 15, 2014, SCE should provide copies of the FAA's hazard marking determinations/filing status to the CPUC.

17. Operational Noise

CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 5.11, Noise)

The PEA does not include a complete set of estimates or description of operational noise for the upgraded transmission lines. The PEA in Table 4.12-6 only provides one estimate "typical" corona noise levels for a single transmission line. This is incomplete because each segment of the Proposed Project would contain four 220 kV circuits with bundled conductors. This means that four noise sources (circuits) would exist in all parts of the corridor, and each circuit would have the capability of generating greater-than-typical levels of noise by having bundled conductors. Additionally, the PEA noise level estimate (p.4.12-29) is incorrect because it assumed a distance to the ground of 110 feet, but this is the lower level of proposed tower heights. Conductors would sag between towers to levels closer than 110 feet above the ground.

Please provide corona effect modeling results for estimating the audible noise from the proposed bundles of conductors and multiple circuits in each segment of the project.

18. Construction Schedule (PEA Section 3.11)

GO 131-D Section IX. A; PEA Checklist (Chapter 3.7.6, Construction Schedule)

The CPUC's comments on the Administrative Draft PEA presented this request in July 2013:

> SCE notes that the construction of the Proposed Project would take "approximately 36 to 48 months." SCE further indicates that the construction of WOD will be complex due to the necessary outages for construction and the need to accommodate existing electric system operational requirements. SCE states, "[a]ny short or long term transmission line outages that would be needed to facilitate construction of any of the individual transmission lines for the Proposed Project would typically be scheduled through and subject to the approval of the CAISO."

We understand that detailed construction schedules may be difficult to prepare at this stage of a project. However, this issue is especially critical for this project because the construction activities and schedule have the potential to cause unusually lengthy and intense construction impacts. In order to explain the process to the public and to adequately analyze the impacts that will occur during construction, a preliminary schedule is essential. It will not be possible to prepare adequate impact analysis, or to consider potential alternatives that might reduce or avoid impacts, without a detailed schedule. Therefore, the following information is required.

a. Please explain the duration of construction that would be ongoing at each location along the corridor. Corridor segments may be developed and grouped, as long as the segment descriptions accurately portray the activities within each segment.

b. Explain the phasing/sequencing of activities related to construction of the new towers and removal of the existing line. This information should be provided for the project as a whole, and also for each segment.

c. Define specifically where shoo-flies be used, and what the expected duration of use of shoo-flies will be at each location.

d. In the schedule provided, please explain all constraints affecting the construction schedule, including planned outages and environmental requirements (e.g., nesting bird restrictions).

e. SCE describes a large number of existing recreational areas that are within the existing ROW (Table 4.15-1). For example, the Oak Valley Golf Club, a private facility, is identified as being located within the Proposed Project boundaries. In the description of construction phasing, include the estimated duration of closure of all recreational facilities.

19. Affected Property Owners

CPUC ICL Section V.15; PEA Checklist (Chapter 7: Other Process Related Data Needs)

Electronic Mailing List. Affected property owners within 300 feet of the project were included in SCE's Application A.13-10-020 in accordance with GO-131-D. However, the EIR/EIS team has not received a hard copy of SCE's Application, as requested. Additionally, the PEA Checklist specifies that an "Excel spreadsheet that includes all parcels within 300 feet of any project component with the following data: APN number, owner mailing address, and parcels physical address" should be submitted and this has not yet been received.

Please provide an electronic Excel spreadsheet of property owners so that the EIR/EIS team can develop the project mailing list prior to the start of scoping.