

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 22, 2009

Mr. Stephen E. Pickett
Ms. Beth Gaylord
Ms. Laura Renger
Southern California Edison Company
2244 Walnut Grove Avenue
Rosemead, CA 91770

RE: Southern California Edison Company's Application (A. 09-09-022) to construct the Alberhill System Project

The Energy Division of the California Public Utilities Commission has reviewed Southern California Edison Company's Application (A. 09-09-022) to construct the Alberhill Substation Project.

Section 15100 of the California Environmental Quality Act requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses the Commission's Information and Criteria List as the basic guide for determining the adequacy of project applications.

After performing its review of A. 09-09-022, the Energy Division finds that the information contained in the environmental assessment is currently incomplete. The attached review the areas of the application that were found to be deficient. Responses should be submitted to Jensen Uchida of Energy Division and Karen Ladd of Ecology & Environment in electronic as well as printed form. Please submit the information no later than November 5, 2009.

Upon receipt of the responses, the Energy Division will perform a subsequent review to assess the adequacy of the data submitted--a determination of the adequacy of the application will once again be issued. The Energy Division reserves the right to submit subsequent requests for information at any point in the process.

Sincerely,

A handwritten signature in blue ink that reads "Jensen Uchida".

Jensen Uchida
CPUC CEQA Project Manager
Energy Division
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Ecology & Environment
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#	Resource Area / Topic	Location in PEA or Other Document	Data Gap Question
1	Project Description	Page 1-5	Explain the definitions of "installed" and "removed," as used in the fifth bullet point on page 1-5 of the PEA, which states that 4,719 meters were installed and 1,061 removed. Are the "installed" meters new ones that were physically installed, or are they meters that were turned on after being switched off? Are the "removed" meter boxes physically removed or just turned off?
2	Project Description	Page 3-11 and Figures 2.3 and 3.3	<p>The description of the existing system in the PEA assumes that the Valley-Ivyglen Subtransmission Line and Fogarty Substation project has been approved and its construction complete. However, that project has not been approved or constructed. Provide a description of the system as it currently exists. Include a revision of Figures 2.3 and 3.3.</p> <p>Provide a map or schematic diagram that shows the current configuration of the Valley North 115 kV System and the 10 distribution substations associated with it. Provide a map or schematic diagram that shows the current configuration of the Valley South 115 kV System and the 11 distribution substations associated with it. Provide a map or schematic diagram that shows the proposed configuration of the Valley South 115 kV System and the six distribution substations that would be associated with it if the Alberhill System project is constructed.</p>
3	Project Description	Pages 2-2, 3-1, 2-11, Figures 2.4 and 3.1	Provide a detailed description of the proposed substation. Page 2-2 of the PEA states that the property is approximately 124 acres. Specify the area within this property that would be used for the enclosed substation. Provide a map showing the boundary of the entire property, and show the boundary of the proposed substation enclosure within it. Estimate the acreage of proposed ground disturbance due to site grading and show this area on the map. Identify the locations and areas of proposed staging areas; indicate if they would be paved. Indicate how and where the transmission lines would connect with the substation. Indicate how and where the substation would connect with the 115 kV subtransmission line.
4	Project Description	Pages 2-2, 2-7, Figure 2.2	Provide a detailed description of the proposed and alternative transmission line routes. Maps provided are not sufficiently detailed to determine environmental effects. Provide maps of suitable scale of the proposed and alternative transmission line routes. Show details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within 1 mile of the proposed routes and substation. Indicate how and where the transmission lines would connect with the substation. Indicate how and where the transmission lines would connect with the existing Serrano-Valley transmission line. Discuss the changes to the existing Serrano-Valley transmission line that would be required.
5	Project Description	Pages 2-7 through 2-11, Figure 2.4	Provide a detailed description of the proposed subtransmission line routes. Maps provided are not sufficiently detailed to determine environmental effects. Provide maps of suitable scale of the proposed and alternative subtransmission line routes. Show details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within 1 mile of the proposed routes and substation. Indicate how and where the 115 kV subtransmission lines would connect with each other and with the proposed substation.
6	Project Description	Page 3-1	Discuss Southern California Edison Company's expectation of when the Alberhill System, if constructed as proposed, would be expanded to its ultimate design build-out capability of 1,680 megavolt amperes.

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7	Project Description	Page 3-4	Provide a detailed description and map showing the location of the existing agricultural water line that crosses the proposed substation and its proposed new location.
8	Project Description	Page 3-4	Discuss the activities that would be required for demolition and removal of the existing structures on the proposed substation property. Discuss the types and quantities of materials that would be removed, and specify where and how they would be disposed of. Discuss the procedures that would be used for identification, removal, and fill of the existing septic system. Discuss the procedures that would be used, if any, for testing for hazardous materials, and discuss the procedures that would be implemented if hazardous materials are found.
9	Project Description and Biological Resources	Page 3-22	Discuss the circumstances that would require construction at night. Include a description of the locations and durations where night construction work may be needed. Discuss if work at night using helicopters would be required. Discuss specific measures that would be used to avoid or reduce impacts on wildlife species if night construction work is required.
10	Project Description	Page 3-21	Page 3-21 states that environmental review would be deferred for evaluation of marshalling yards and material staging yards that would be used for the project. Adequate CEQA analysis of the significant environmental effects of the project requires the lead agency to consider the whole of an action, not simply its constituent parts. Provide a complete description of the marshalling yards and material staging yards that would be used for the project.
11	Alternatives	Section 2.0	<p>The CPUC expects to prepare an EIR for the Alberhill System project. CEQA Section 15126.6 requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.</p> <p>The PEA does not provide sufficient information for the CPUC to prepare an EIR that could describe a range of reasonable alternatives to the project or to the location of the project:</p> <ul style="list-style-type: none"> • While the PEA introduces several system and substation location alternative concepts, it dismisses them from analysis and does not include a full description because they would not feasibly attain most of the basic objectives of the project. • The PEA states that alternative routes to the proposed transmission lines are feasible, but it does not provide substantive information for comparison of these routes to the proposed routes. • The PEA presents an alternative 115 kV subtransmission line segment between the Newcomb Substation and the Skylark Substation. <p>These minor routing variations do not represent an adequate range of reasonable alternatives to the project or to the location of the project.</p> <p>Provide information on a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project. Focus on alternatives that would avoid or substantially lessen any of the significant effects of the project, including potential effects on air quality and biological resources. Ensure that the information is sufficient to evaluate the comparative merits of the alternatives to the proposed project.</p>

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12	Alternatives	Section 2.0	Discuss whether placing the transmission lines on a single double-circuit line was considered as opposed to two single-circuit lines. If so, discuss the reasons for not proposing and analyzing in detail a single double-circuit transmission line as an alternative to the proposed project.
13	Agricultural and Biological Resources	Pages 3-37, 4-55, 4-63, 4-66, 4-67, 4-94	Discuss the potential for the project to affect trees (e.g., oak trees) and agricultural groves or orchards, both directly and indirectly. Specify if tree removal would be required as part of the project. If so, indicate the type, number, and location of trees that would need to be removed. Identify also the potential need for tree removal at alternative substation locations and along alternative transmission and subtransmission routes.
14	Biological Resources	Section 3.8 and Section 4.4	Clarify what is meant by the term "focused," as used in the PEA in reference to the various biological surveys that were performed. For each species for which the PEA states that "focused" surveys were performed, specify whether reconnaissance-level and/or protocol-level surveys were employed and for which species, and describe the survey methodology that was used.
15	Biological Resources	Pages 4-61, 4-62	<p>Provide the reports referred to in Section 4.4.4.2 for the biological resources surveys that have been conducted at the proposed and alternative substation locations and along the proposed and alternative transmission and subtransmission line routes.</p> <p>Provide copies of the reports listed under "Section 4.4.4.1 Literature Review." To the extent that they are different from those listed in Section 4.4.4.1, provide copies of the reports from AMEC Earth and Environmental and AECOM Technical Services that are listed as references to Section 4.4 Biological Resources section.</p> <p>Provide copies of the following references to Section 4.4 Biological Resources section: Chung 2009, Dudek 2009, iCubed 2009, and Lichvar and Ericsson 2004.</p>
16	Biological Resources	Page 4-85	<p>Discuss Southern California Edison Company's status relative to the Alberhill System project and the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). If Southern California Edison Company is a Participating Special Entity in the MSHCP for the Alberhill System project, as stated on page 4-185 of the PEA, provide a copy of the Take Authorization issued by the Western Riverside County Regional Conservation Authority.</p> <p>Whether or not Southern California Edison Company has or intends to apply for Take Authorization pursuant to Section 11.8 of the MSHCP Implementing Agreement, describe the measures that would be taken to ensure the project would be consistent with the MSHCP.</p>
17	Biological Resources	Page 4-93	Provide descriptive and visual information (i.e., maps of suitable scale) on all drainages (named and unnamed), water bodies, ponded areas, and wetlands (including vernal pools) within the project area (including but not limited to the proposed and alternative substation locations and along the proposed and alternative transmission and subtransmission lines) as well as those outside the project area but within the potential influence of disturbance from construction and operation. Describe locations where aquatic features would be crossed or filled. Provide preliminary or formal wetland delineation reports. Provide acreage of.
18	Biological Resources	Pages 4-62 through 4-67	Explain the apparent discrepancy in the number of individual plant communities were found during biological surveys for the project. Page 4-62 states that 17

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			individual plant communities were found, while pages 4-62 through 4-67 describe only 16. Provide a map that identifies the locations where these individual plant communities were found. Discuss the quality of the habitats identified.
19	Cultural Resources	Pages 4-119 through 4-125	Provide the reports for the cultural resources surveys that have been conducted at the proposed and alternative substation locations and along the proposed and alternative transmission and subtransmission line routes.
20	Cultural Resources	Appendix J	The letter to the Native American Heritage Commission requesting a review of the Sacred Lands File identifies only the proposed and alternative substation locations but does not identify areas where ground would be disturbed for construction of the transmission and subtransmission lines. Verify that a brief position statement was requested from the Native American Heritage Commission regarding all areas of the project where ground disturbance may occur, including the transmission and subtransmission lines. Provide the written responses from the Native American Heritage Commission and any Native American tribes contacted, or provide a statement of Southern California Edison Company's understanding of their positions.
21	Hazards and Hazardous Materials	Page 4-153	Provide a Phase I site assessment (ASTM E1527 or other equivalent assessment method) for the proposed linear appurtenances to determine whether there are any environmental concerns. If the Phase I identifies conditions, concerns, or data gaps requiring additional site assessment to adequately characterize these areas, then additional site assessment work (i.e., Phase 2) may also be required.
22	Hydrology and Water Quality	Page 3-4	Describe plans for grading that would be conducted at the proposed substation site. If a final grading plan has not yet been prepared, describe the criteria that would be used in its development. Describe methods that would be used for drainage, erosion, and sediment control at the proposed substation site and along the proposed transmission and subtransmission line alignments during both construction and operation.
23	Hydrology and Water Quality	Page 3-3	Discuss the adequacy of the capacity for water sources to serve project demands for project construction and operational needs.
24	Land Use	Appendix J	Provide a copy of the Information Sheet that was included in the letters to Riverside County and the Cities of Lake Elsinore, Menifee, Wildomar, Canyon Lake requesting a brief position statement on the project. Provide the written responses from these agencies, or provide a statement of Southern California Edison Company's understanding of these agencies' positions.