

Southern California Edison
A.09-09-022 – ASP

DATA REQUEST SET CPUC - Supplemental Data Request - 019

To: CPUC
Prepared by: Rey Gonzales
Job Title: Sr. Environmental Project Manager
Received Date: 9/29/2023

Response Date: 10/11/2023

Question DG-MISC-91:

Resource Areas/Topic: Air Quality

SCE Data Submittal Item/Page:

SCE Third Amended Application and PEA - Revised Environmental Impact Analysis, Section 4.3.5

Data Gap Question:

Unable to confirm emissions shown in Table 4.3-12 to validate reducing 'significant with mitigation' to 'less than significant'. For example, maximum daily onsite controlled emissions for PM10 for 500 kV transmission line construction is shown as 14 lbs/day. This value does not appear in Appendix P so unable to confirm which emissions were summed to arrive at the value shown in the table.

Provide the appropriate reference to where the detailed information is in the Third Amended PEA to confirm emissions in Table 4.3-12 or provide the appropriate summary tables based on the information provided in the Third Amended PEA Appendix P: Revised Air Quality and GHG Calculations.

Response to Question DG-MISC-91:

The data depicted in Table 4.3-12 of the Third Amended PEA are correct. However, SCE identified an error in Tables 3, 4, 5 provided in Appendix P of the Third Amended PEA. Tables 3, 4 and 5 have been corrected and the corrected version of Appendix P has been attached to this data request response. In summary, the 500 kV transmission line construction values presented in Table 4.3-12 have confirmed that on-site emissions will be below applicable localized significance thresholds, and impacts under this criterion will be less than significant.

Appendix P: Revised Air Quality and GHG Calculations presents detailed calculations for the following four construction scenarios:

- Soil Import Option 1
- Soil Import Option 1, with the application of Project Commitment J
- Soil Import Option 2
- Soil Import Option 2, with the application of Project Commitment J

Each construction scenario contains Table 3: Construction Emissions Summary – On-site Daily Criteria Pollutant Emissions by Construction Phase. This table calculates the anticipated daily on-

site emissions in accordance with the South Coast Air Quality Management District's ("SCAQMD") localized significance threshold ("LST") methodology. An equation in these tables mistakenly presented the sum of the total daily on-site and off-site emissions for the Tower Foundations Installation phase of 500 kV Transmission Line Construction. Because the SCAQMD's LST methodology is intended to evaluate on-site emissions only, the emissions in Table 3: Construction Emissions Summary – On-site Daily Criteria Pollutant Emissions by Construction Phase were overstated for the Tower Foundations Installation phase of 500 kV Transmission Line Construction. These erroneous values were also carried into Table 4: Construction Emissions Summary – Total Daily Onsite Criteria Pollutant Emissions for Overlapping Construction Phases, and Table 5: Construction Emissions – Localized Significance Threshold Analysis. Table A: Revised On-Site Daily Emissions, below, presents both the incorrect values from Appendix P: Revised Air Quality and GHG Emissions from the Third Amendment to the PEA (Original Values), and the Corrected Values.

Table A: Revised On-Site Daily Emissions

Tower Foundations Phase of 500 kV Transmission Line Construction	On-Site Emissions (pounds per day)					
	VOC	CO	NOX	SOX	PM10	PM2.5
Without Project Commitment J						
Original Values (From Appendix P of the Third Amendment to PEA)	2.01	15.93	6.66	0.06	107.57	10.97
Corrected Values	1.73	13.83	6.02	0.05	0.43	0.26
With Project Commitment J						
Original Values (From Appendix P of the Third Amendment to PEA)	2.01	15.93	6.66	0.06	48.92	5.11
Corrected Values	1.73	13.83	6.02	0.05	0.43	0.26

Note: VOC = volatile organic compounds, CO = carbon monoxide, NOX = nitrous oxides, SOX = sulfur oxides, PM10 = particulate matter less than 10 microns in diameter, PM25 = particulate matter less than 2.5 microns in diameter

A revised version of Appendix P: Revised Air Quality and GHG Calculations has been attached to this response with the correct values presented.

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Question DG-MISC-92:

Resource Areas/Topic: Air Quality

SCE Data Submittal Item/Page:

SCE Third Amended Application and PEA - Revised Environmental Impact Analysis, Section 4.3.5

Data Gap Question:

The text on page O-42 of the ASP third amended PEA for MM AQ-3 indicates that emissions of PM₁₀ and PM_{2.5} during construction of the 500-kV transmission lines would remain significant after mitigation (see excerpted text below). However, Table 4.3-12 shows controlled emissions do not exceed threshold for PM₁₀ and PM_{2.5}. Explain the discrepancy.

MM AQ-3 would reduce some emissions of fugitive PM₁₀ and PM_{2.5}, but these reductions would not reduce emissions to levels below localized significance thresholds. Emissions ~~of PM_{2.5} from combustion engines during construction of 500-kV transmission lines using the conventional method of construction and emissions~~ of PM₁₀ during construction of 500-kV transmission lines ~~using helicopter construction~~ therefore would remain significant after mitigation.

Response to Question DG-MISC-92:

The original text on Page O-42 is inconsistent with the values presented in Table 4.3-12. The text on Page O-42 should be revised, as shown below, to ensure consistency with the values and analysis presented in Table 4.3-12. Text deletions are shown in ~~strikeout~~ format, and text additions are shown in underline format, all in **red** font:

MM AQ-3 would also reduce ~~some~~ emissions of fugitive PM₁₀ and PM_{2.5}, ~~but these reductions would not reduce emissions to levels below localized significance thresholds.~~ As shown in Table 4.3-12, controlled Emissions ~~of PM_{2.5} from combustion engines during construction of 500-kV transmission lines using the conventional method of construction and emissions~~ of PM₁₀ during construction of 500-kV transmission lines using helicopter construction therefore would be below the applicable localized significance thresholds and impacts would be less than ~~remain~~ significant after mitigation.

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Question DG-MISC-93:

Resource Areas/Topic: Transportation and Traffic

SCE Data Submittal Item/Page:

SCE Third Amended Application and PEA - Revised Environmental Impact Analysis, Section 4.15.5

Data Gap Question:

The Third Amended PEA Appendix P: Revised Air Quality and GHG Calculations indicates additional motor vehicle usage. However, Table 4.15-14 does not show any changes to the Construction Trip Generation. Explain the discrepancy and confirm the maximum number of construction workers on a peak day of construction remains 200 workers.

Response to Question DG-MISC-93:

The total maximum daily worker commutes were calculated to estimate the maximum number of potential construction workers, using the same construction phasing which was used to calculate peak daily emission in Appendix P: Revised Air Quality and GHG Calculations. These calculations, summarized in the table that follows, indicate a theoretical potential peak construction crew size of 332.

The construction plan that was used to calculate the air quality and greenhouse gas emissions was intentionally conservative and allowed for many construction phases to occur simultaneously. During construction, each crew member will likely be responsible for more than one construction activity; therefore, the potential peak of 332 crew members is a substantial overestimate of the anticipated real-world staffing levels. The peak daily construction crew size of 200 workers from Section 4.15 of the Final Environmental Impact Report is a more realistic estimate of the planned staffing levels and is consistent with historical staffing levels on SCE projects of similar scope.

Proposed Project Component/Activity	Approximate Crew Size
Substation Construction	
Survey	4
Grading	10
Fencing, Control Building, Electrical, Wiring, Transformers, Maintenance Crew Equipment Check, Testing, Asphaltting	67
Civil	15
Landscaping	10
Maximum	67
500 kV Transmission Line Construction	
Survey	4
Marshalling Yard, Road and Landing Work, Install Helicopter Platforms	20
Marshalling Yard, Tower Removal, Tower Foundations Installation, Install Micropile Foundations, Tower Steel Haul, Tower Steel Assembly, Tower Erection, Tower Erection (Helicopter) Ground Support, Tower Helicopter Operations	73
Marshalling Yard, Foundation Removal	8
Marshalling Yard, Wire Stringing	59
Restoration	7
Maximum	73
115 kV Subtransmission Line Construction	
Survey	4
Marshalling Yard, Roads and Landing Work, Guard Structure Installation, Remove Existing Wood H-Frames and Poles, Remove Existing Tubular Steel/Light Weight Steel Poles, Install Tubular Steel Pole Foundations, Steel Pole Haul, Steel Pole Assembly, Steel Pole Erection, Wire Stringing, Guard Structure Removal, Vault Installation, Duct Bank Installation, Install Underground Cable	142
Restoration	7
Maximum	142
Telecommunications Construction	
Tower Foundation	4
Tower Construction	4
Dish Installation, Control Building, Overhead Communications Installation, Substation Telecommunications Equipment Installation	12
Santiago Peak Communication Site	4
Maximum	12
Additional Substation Construction	
Civil, Electrical, Wiring, Testing, Civil - Demo	38
Maximum	38
PEAK DAILY	332