

SBCRP – Deficiency Letter 2 Follow-up Questions

02/11/13

NO.	QUESTION FROM DEFICIENCY LETTER 2	RESPONSE
2.	<p>Upon review of the GIS data contained on the DVD received December 27, 2012, the Energy Division has determined that additional information is required to accurately describe and assess the proposed project. Specifically, the Energy Division previously requested details clarifying existing and replacement components. In particular, the Energy Division requested that details for transmission structures include specifics regarding the type of pole or tower (e.g., wood, steel, lattice steel, lightweight steel, etc.) and whether the structure would be single-circuit or double-circuit for both existing and proposed structures. Currently, the GIS data submitted by SCE does not contain the level of specificity required to assess project impacts, such as visual impacts and impacts related to acreage disturbance. In particular, the data should be clarified as follows:</p> <p>1) The data should more accurately identify the current configuration of subtransmission components in the project area, including the type of structures (e.g., wooden h-frame, lattice steel tower, etc.) and whether each structure is single-circuit or double-circuit. For example, the current data includes a layer called “eng_Structures_Points – STATUS Existing” that labels “Existing” (E) structures; however, the layers called “eng_Structures_Points – STATUS Proposed” and “eng_Structures_Points – STATUS New-REx” do not fully indicate which E structures would be rebuilt. Judging by the placement of some E structures, it is assumed that many of the E structures would be removed and replaced with new structures; however, this is not captured in the data.</p> <p>2) Clarification is required regarding A) which circuits are currently idle and/or would be de-energized and remain in place, B) which would be removed entirely, and C) which would be new construction. For example, near Tower M16-T3, there are four subtransmission circuits identified, including the following associated data:</p> <p>a. NEW SANTA CLARA-CASITAS-CARPINTERIA i. GlobalID: E9DF94DE-4A66-4979-8973-6FC8171008A9 ii. Status: Proposed iii. Segment_ID: Segment 4 iv. ExtraInfo1: New Line b. NEW SANTA CLARA-OJAI-SANTA BARBARA i. GlobalID: 57769C3F-5142-4892-A8F2-E1E7C302F111 ii. Status: On-line iii. Segment_ID: Segment 4 iv. ExtraInfo1: New Line c. EXISTING IDLE SANTA CLARA-SAN MARCOS i. GlobalID: F8DA7D47-C9FA-48C8-9BDD-E53D9EE5BB21 ii. Status: Idle iii. Segment_ID: Segment 4 iv. ExtraInfo1: Removed and Replaced d. SANTA CLARA-OJAI-SANTA BARBARA i. GlobalID: 409CA9B1-47B6-4182-B696-</p>	<p>SCE is providing a MPK file with a revised geodatabase. The enclosed revised geodatabase replaces in full the information previously provided on December 21, 2012. The data also contains an updated total of 17 previously topped poles to be removed (the PEA anticipated 15). In addition, the data shows that FRC in Segment 3A will be installed on wood and LWS poles, and the only TSP in this segment (the PEA anticipated installation on only LWS poles).</p> <p>Please note that for many SCE projects, such information is not always available at the PEA stage in light of the fact that final engineering typically remains to be done. However, given that much of the work on this project has been completed and therefore such information is currently available, SCE is providing this information in the geodatabase.</p> <p>Note, as offered on the January 29-30, 2013 site visit SCE will provide site visit field photos identifying specific line arrangements at Getty Tap and Segment 4 (north of Vedder Ranch) later this week in an email form to E&E and CPUC.</p> <p>Please also note that the enclosed MPK file contains protected Critical Energy Infrastructure Information (CEII).</p>

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ii. Status: On-line

iii. Segment_ID: Segment 11

iv. ExtralInfo1: Out of service when project completed

According to this data, it is difficult to determine how the lines would be configured upon completion without making assumptions about what is meant by combinations of terms such as a) Proposed/New Line, b) On-line/New Line, c) Idle/Removed and Replaced, and d) Online/Out of service when project completed. For example, the circuit labeled NEW SANTA CLARA-OJAI-SANTA BARBARA is a new circuit that does not currently exist; however, its status is labeled "On-line," which is assumed to be incorrect. Likewise, the circuit labeled SANTA CLARA-OJAI-SANTA BARBARA is also labeled "Online" but would be "Out of service when project completed." It is assumed that the former circuit is new and has not yet been constructed, and the latter circuit exists and would remain in place but would be idled upon completion of the new circuit. If these assumptions are correct, this would appear to result in two circuits, both of which would be called SANTA CLARA-OJAI-SANTA BARBARA.

Similarly, it is assumed that the circuit labeled NEW SANTA CLARA-CASITAS-CARPINTERIA does not currently exist and would be new construction, and the circuit labeled EXISTING IDLE SANTA CLARA-SAN MARCOS exists, but would be removed. Combined with the two SANTA CLARA-OJAI SANTA BARBARA circuits, the data implies that the end result would be three circuits where there are currently two.

3) There also appear to be inconsistencies related to tower naming conventions. For example, there are three towers labeled "Existing" near the M16-T3 Tower as follows (identified by the "Structure_ID"):

a. M16-T3 (southernmost tower)

i. GlobalID: 188E0B0A-EC42-4E89-BF01-7ADEE3ACD9BF

ii. Segment_ID: SEG_4

iii. ExtralInfo1: M16-T3

iv. Str_Type: Tower

b. M16-T1 (middle tower)

i. GlobalID: AFA3C2C9-4D24-4353-9E47-B2AC1A14FC31

ii. Segment_ID: SEG_4

iii. ExtralInfo1: CONSTR 92 M6T3

iv. Str_Type: Tower

c. M16-T1 (northernmost tower)

i. GlobalID: 9ED13047-9CB1-4BDB-AD44-AD5648C3B17A

ii. Segment_ID: SEG_4

iii. ExtralInfo1: M16-T1

iv. Str_Type: Tower

Note that although the M16-T1 Tower (northernmost tower) is labeled "SEG_4," it is clear when viewed against satellite imagery that this tower is part of the adjacent 220-kV line and is not part of the project. The middle tower, which is also labeled M16-T1, includes additional information in the field labeled ExtralInfo1, which states "CONSTR 92 M6T3," possibly indicating that the tower number is incorrect. The middle tower (M16-T1/CONSTR 92 M6T3) is assumed to be the tower that would be removed and replaced as part of the project. It is assumed that this tower would be replaced

	<p>with a tubular steel pole in order to support the two new circuits (the NEW SANTA CLARA-CASITAS-CARPINTERIA and NEW SANTA CLARA-OJAI-SANTA BARBARA circuits); however, this information is not captured in the data.</p> <p>The M16-T3 Tower, which is adjacent to the M16-T1/CONSTR 92 M6T3 Tower to the south, appears to parallel the two circuits labeled NEW SANTA CLARA-CASITAS-CARPINTERIA and NEW SANTA CLARA-OJAI-SANTA BARBARA; however, neither of these circuits has been constructed. Therefore, it is assumed that the existing M16-T3 Tower supports the existing SANTA CLARA-OJAI-SANTA BARBARA circuit and would remain in place to support the idled circuit.</p> <p>The information discussed above under 1, 2, and 3 are examples of the general inconsistencies uncovered in the data. The description of activities provided above is based on assumptions related to the number of circuits and the types of structures that currently exist or would be constructed. The Energy Division requests that SCE clarify whether these assumptions are accurate and provide a cleaner version of the data that contains additional details regarding the specific type of structures that currently exist and those that would be constructed, including whether they are single-circuit or double-circuit.</p>	
4.	<p>Due to the history of this project, the Energy Division requests that SCE provide written notice prior to performing work within the Electrical Needs Area, such as the work described in SCE's Item No. 4 response. In addition, the Energy Division requests that SCE submit any prior written communication in which SCE described the removal of the four towers identified as M6-T4 and requests that SCE describe the exemption under which this work was completed. The Energy Division also requests that SCE clarify the location of these towers as they are neither described in the PEA nor included in the GIS data received on December 27, 2012.</p>	<p>SCE notes and appreciates the concern expressed by the CPUC in this question. With respect to the October 2012 tower removal (referred to interchangeably by SCE in various contexts as "M6-T4", "Santa Clara San Marcos Tower Removal" and as a "slide area") on Segment 4 of the SBCRP, SCE regrets any misunderstanding or confusion that may have resulted between the CPUC, E&E and SCE. SCE has endeavored to clarify this activity on recent calls and with the CPUC and E&E, as well as on the January 29-30, 2013, site visit. SCE hopes the CPUC and E&E are now clear on the location, history and reason why the towers were removed, as well as SCE's previous reference to the potential tower removal on the September 27-28, 2012, site visit in the context of a "slide" area.</p> <p>SCE understands now per the discussions on the January 29-30, 2013, site visit that E&E may have misunderstood the location of the tower removal to be that which is identified in the PEA under Section 3.1.4 Other Major Work, which discusses 11 existing LSTs, two wood H-frame structures, and approximately 11,000 feet of conductor that would be removed elsewhere as part of the SBCRP project due to "... their location on unstable slopes." SCE realizes that based on what may have been a previous misunderstanding, the CPUC and E&E may have assumed that SCE performed work identified in SCE's PTC application (specifically the work discussed in PEA Section 3.1.4 Other Major Work) without appropriate CPUC authorization. SCE hopes it has now clarified that the tower removal that occurred in October 2012 is not included as part of, or located in the same location as, the tower removal proposed in Section 3.1.4 of the PEA.</p> <p>To reiterate, the tower removal work completed by SCE in October 2012, as discussed in SCE's response to CPUC Deficiency Letter #1, Question 4 and illustrated in the accompanying line arrangement figure, was performed due to concerns that an exposed tower footing on tower M6-T4 on the idle Santa Clara-San Marcos 66 kV Subtransmission Line could potentially result in the tower falling. As shown on the line arrangement figures provided with SCE's response to CPUC Deficiency Letter #1, Question 4, and as demonstrated on the recent site visit, SCE removed M6-T4 as well as the three towers west of M6-T4. The three towers were removed due to unstable ground, or the locations were unsuitable locations to terminate the conductor (see attached figure "M6-T4 Related Work"). One tower was within the Los Padres National Forest for which SCE notified the Forest of its construction activities, while the other three were located on private lands for which SCE coordinated with the landowner.</p> <p>With respect to the question's request to explain if prior written communication to the Energy Division had been provided about this tower removal, please note it occurred prior to SCE's filing of its PTC application on October 26, 2012. Work associated with the tower removal occurred between October 5 -23, 2012.</p> <p>Regarding the question's request to "describe the exemption under which this work was completed," SCE notes that GO 131-D typically applies to the construction of new, and the replacement/modification/ relocation of existing, facilities but does not discuss removal of existing facilities. In addition, CEQA Guidelines section 15061(b)(3) provides that CEQA does not apply to projects which have no potential for causing a significant effect on the environment. Work on M6-T4 did not cause any significant effect on the environment; any work was of short duration, did not affect habitat for sensitive species and resulted in fewer aesthetic impacts than the previous existing setting.</p>

		<p>With respect to the question's request to "clarify the location of these towers" in the context of the PEA and the originally submitted GIS data in response to the CPUC's Deficiency Letter #1, the revised GIS file SCE is providing as part of its response to CPUC Deficiency Letter #2, will clarify the location further. In addition, SCE is providing the attached figure (M6-T4 Related Work) to provide additional detail.</p> <p>Please also note that with respect to SCE's PEA the tower removal work was identified in SCE's PEA in Table 6.1-1 as a Cumulative Project "Santa Clara-San Marcos Tower Removal – Removal of up to five lattice steel towers and conductor – Unincorporated Ventura County – 2012/2013."</p> <p>Chapter 3, Project Description, of SCE's PEA does not contain a description of the removal of towers M6-T4, M7-T1, M7-T2, and M7-T3 and the conductor carried by those towers as this work was conducted separate from the SBCRP.</p> <p>Towers M6-T4, M7-T1, M7-T2, and M7-T3 and the conductor carried by those towers were originally slated for removal as part of the SBCRP. As shown in the accompanying line arrangement figure, SCE originally planned to remove the lower (most southerly) existing tower at each of these locations, and to install TSPs in approximately the same locations as the removed towers. With the emergent maintenance issue regarding removal of these four towers having been completed, as part of the Project SCE will realign its lines in this area, and will remove the remaining LSTs (on the Santa Clara-Ojai-Santa Barbara line) at the four locations and replace them with TSPs. The total number of towers to be removed, and total numbers of TSPs to be installed, is therefore unchanged, and thus there was no need to modify Chapter 3.</p>
6a.	According to Section 4.2, Agricultural and Forestry Resources, "Helicopters would be used to install telecommunications cable along Segments 1 and 2..." (page 4-68). If SCE intends to use helicopters as described in Section 4.2, then the Energy Division requests that SCE provide a more detailed description of helicopter construction.	During the bi-weekly call on 1/16/13 between SCE, CPUC and E&E, the difference between the term helicopter construction and the use of helicopters for wire stringing activities was clarified.
6b.	Provided that information regarding the remaining 29 spans referenced in response 6b is provided at a later date, for the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 6b to be adequate. Note that the Energy Division acknowledges SCE's statement that the FAA may require marker balls on the adjacent 220-kV line instead of the reconstructed 66-kV line; however, in order to conservatively assess visual and other impacts, FAA marker spans should be identified for the 66-kV line in lieu of the FAA's decision. Impacts associated with placement on the 220-kV span would likely not vary substantively from impacts associated with placement on the 66-kV span.	A figure titled "SBCRP 66 kV Spans for FAA Review Located Adjacent to Existing 220 kV Line" is attached as part of this response. The figure identifies 29 66 kV spans located adjacent to 220 kV spans that will require future FAA review for determining potential marker ball installation.
	<p>UNADDRESSED ITEM FROM DEFICIENCY LETTER NO. 1</p> <p>Applicant Proposed Measures Applicant Proposed Measure AQ-1 states, "Graded and/or excavated in active areas of the construction site shall be monitored by (<i>indicate by whom</i>) at least weekly for dust stabilization" (emphasis added). The Energy Division requests that SCE specify the responsible party.</p>	<p>Applicant Proposed Measure AQ-1 is taken verbatim, including the parenthetical remark "(indicate by whom)", from the Ventura County Air Quality Control District's <i>Ventura County Air Quality Assessment Guidelines</i>.</p> <p>SCE may, as appropriate during construction, take action to minimize wind erosion of soils. Such actions may include, among others, watering of graded and/or excavated areas. If implemented, the need for and frequency of such actions would be determined by an SCE monitor, and the actions would be monitored by an SCE monitor.</p>
	<p>NEW ITEMS FOR DEFICIENCY LETTER NO. 2</p> <p>Telecom Line Upon review of the GIS data contained on the DVD received December 27, 2012, the Energy Division identified a telecommunications line labeled "proposed," which runs parallel to Segment 3A from the Carpinteria Substation. The line then diverges from Segment 3A, travels east across Rincon Road, and roughly parallels Highway 101 through the Coastal Zone. The line then runs northeast, possibly along a microwave path, and then travels south along Highway 33. The line ends at 99 South Ventura Avenue in Ventura. The</p>	<p>SCE's Edison Carrier Solutions has an infrastructure project proposed for the Ventura and Santa Barbara county areas. It is a separate project from the SBCRP project and does not overlap the SBCRP project structures, but nonetheless SCE realizes it should have been included in Table 6.1-1 of the Chapter 6, Other CEQA Considerations section of SCE's PEA. Note, however, this project is being captured in the updates to cumulative projects list that would be provided as part of a supplemental response to Deficiency Letter #2.</p> <p>This project which is called the Carpinteria-Ventura FOC (Fiber Optic Cable) project is necessary to improve the reliability for the SCE telecommunications network between Ventura and Santa Barbara. Currently there is only one micro-wave system linking the Goleta and Santa Barbara areas to the rest of the SCE Network. This cable route would serve as a redundant path and increase reliability in addition to the existing micro-wave system.</p> <p>The Carpinteria-Ventura FOC project will involve installing new fiber optic cable primarily on existing distribution facilities. In a few locations where existing distribution poles are not available cable will be placed in existing or new underground conduit. Undergrounding would</p>

	<p>Energy Division requires additional information on this component as it is not depicted on Figure 3.1-8 in the PEA or described in Chapter 3.</p>	<p>occur primarily in franchise locations (e.g., public ROW). An attached figure "Carpinteria-Ventura FOC" shows the entire line route from Ventura Substation to Carpinteria Substation. In addition, SCE has attached a figure showing the SBCRP project route vs. the Carpinteria-Ventura FOC project route ("SBCRP Project Route vs. Carpinteria-Ventura FOC Project Route").</p> <p>SCE's internal environmental reviews have been completed and we are in the process of determining the applicable permitting required. Local jurisdictions will be consulted in the near future.</p> <p>Pending any necessary permits, the cable project is anticipated to be operational by 7/31/13 and is currently in the pre-bid stage of development.</p>
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