

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 22, 2008

Milissa Marona
Southern California Edison
Regulatory Policy & Affairs Dept.
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, 388L
Rosemead, CA 91770

RE: Review of Southern California Edison's Application (A. 08-11-019) for a Certificate of Public Convenience and Necessity for the Triton Substation Project.

The Energy Division of the California Public Utilities Commission has completed its first review of Southern California Edison's project application (A. 08-11-019).

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 SCE's application for the Triton Substation project, the Energy Division finds that the information contained in the environmental assessment is currently incomplete. Attached is the report that identifies the issue areas of the application that were found to be deficient. Additional information submitted in accordance with the Energy Division's report should be filed as supplements to the above application. We request that responses to these items be provided to us within two weeks (no later than January 5 2009).

Upon receipt of the supplemental information, the Energy Division will perform a second 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 request additional information at any point in the process. Questions relating to the project should be directed to Iain Fisher (415) 355-5580.

Sincerely,

A handwritten signature in black ink, appearing to read "Iain Fisher".

Iain Fisher
Energy Division
California Public Utilities Commission

Deficiencies in Triton PEA

A) The PEA does not have enough information on greenhouse gases to analyze the environmental effects in accordance with the requirements of CEQA. The PEA discussion of greenhouse gases is too general and needs to be supported by specific emission estimates for construction and operation. The discussion should address all greenhouse gases and not just SF₆. A discussion relating to current CARB best practice should be referenced and related to this project, this should address CARB's draft proposal for determining significance thresholds. The PEA gives particular attention to the potential for release of SF₆. However, some quantitative estimate of fugitive release and annual leakage rate of such a critical gas is necessary to determine significance.

A discussion relating to current CARB proposals, specifically the CARB draft staff proposal issued in October 2008 would aid the significance determination. But focus should be given to quantitative estimates of CO₂ release for a) project construction and b) annual release of CO₂E from non-transportation sources.

B) The System Alternative 2 would substantially meet the project objectives. The PEA does not adequately justify the rationale for not having carried this alternative through for full analysis. Based on SCE's current forecast, System Alternative 2 would meet the projected need through mid-2015; however, changes in the economy and growth in the area may alter this assessment. On similar projects in the region, public comments have called for additional needs assessment on the grounds that the economy has slowed the demand for new projects.

C) More detailed information needs to be provided regarding other foreseeable projects that could contribute to cumulative impacts. The information should include descriptions of the type and size of the other projects as well as their location and expected timing in relation to the proposed project. For most resource areas, the cumulative analysis discussions are too general. Conclusory statements that no significant cumulative impacts are expected must be substantiated. In addition, potential cumulative effects on the burrowing owl need to be addressed.

D) Some information in the project description and many of the project design features (PDFs) are not specific enough to draw conclusions about their ability to provide adequate mitigation for potential impacts. Phrases used such as "to the extent feasible," "to the fullest extent possible," and "are recommended," leave in question what is being proposed. These statements need to be clarified or corrected. Some examples are the following:

- PDF BIO-7 states that pre-construction burrowing owl surveys "are recommended" but does not confirm if they will be conducted.
- Similarly, PDF BIO-6 states that planned vegetation clearing will take place during the non-breeding season "to the extent feasible," but it does not describe conditions that would make this infeasible.
- Page 3-3 states that SCE would conform to the street setback requirements of the City of Temecula "to the extent feasible." The city's setback requirements should be stated, and there should be an explanation of conditions that would make meeting them infeasible.

• The statements on pages 4.4-14 and 4.4-15 that direct and indirect impact analyses are subject to final project design need to be clarified or corrected. The project design must be determined sufficiently such that project impacts can be analyzed in accordance with the requirements of CEQA.

E) The description of the perimeter wall and security for the substation in Section 3.3.1.1.6 is inconsistent with the photo simulations provided and should be clarified or corrected. For example, pages 3-4 and 3-5 state that the band of barbed wire that would be affixed near the top of the perimeter wall inside the substation would not be visible from the outside; however, the top of the inside of the northern perimeter wall is clearly visible in the view shown in Figure 4.1-3. Similarly, Figure 4.1-3 does not show a simulation of the proposed security gate across the driveway.

F) The description of the proposed substation should include an elevation drawing that shows the height of all physical components of the project and expected landscaping.

G) Section 3.6 should include the volume of waste materials to be removed during construction.

H) Page 3-4 says lighting would only be turned on at night in emergencies. An estimate of the expected frequency and duration of nighttime emergency work or an average from other similar stations is needed.

I) The aerial dimensions for the proposed substation site are described inconsistently in the PEA. For example, pages 3-2 and 3-12 of the PEA state that approximately 1.5 acres and 2.5 acres, respectively, of land immediately outside the substation perimeter wall to the north, east, and south would be used for distribution duct banks, buffers, and landscaping. A plot plan (GIS or equivalent data layers) should be provided showing the estimated locations of all physical components of the project and those related to construction. It should show the footprint of the structures and facilities both inside and outside the fence line and in relation to roads, including new poles and poles to be removed. It should also identify the areas where grading is expected to occur, and the areas proposed for grading should be consistent with photo simulations.