February 23, 2024 VIA EMAIL

Lori Charpentier
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770

SUBJECT: Cal City Substation 115 kV Upgrade Project – Data Request 3

Dear Ms. Charpentier,

As the California Public Utilities Commission (CPUC) proceeds with the environmental review for SCE's Cal City Substation 115 kV Upgrade Project (Project), we have identified additional information that is needed to adequately conduct the California Environmental Quality Act (CEQA) review. Please provide the information requested below (Data Request 3) by March 7, 2024, and submit your response in electronic format to the CPUC and to our consultant, Environmental Science Associates (ESA).

Please do not hesitate to call me at (408) 705-6030 if you have any questions.

Sincerely,

Boris Sanchez
Energy Division Project Manager

cc: Roxanne Henriquez, CPUC Energy Division Supervisor
Tammy Jones, Senior Attorney, SCE
Matthew Fagundes, ESA
Maria Hensel, ESA
Michael Manka, ESA

Data Request 3
Cal City 115 kV Substation Upgrade Project CEQA Evaluation

Proponent's Environmental Assessment (PEA) Chapter 3, Project Description

1. Follow-up regarding SCE's response to CPUC Data Request 1, Question 1: The schematic provided appears to show five 12 kV distribution getaways, but PEA Section 3.3.4.1.4 (and other locations in the PEA) states there would be 14 new 12 kV distribution getaways. Please clarify.
2. Follow-up regarding SCE's response to CPUC Data Request 1, Question 1: The schematic provided shows vaults along three of the five 12 kV distribution getaways; however, would each distribution getaway require a vault?
3. Follow-up regarding SCE's response to CPUC Data Request 2, Question 18: SCE's response states that the Project includes steel monopole 115 kV structures with a cross arm-less design of horizontal post insulators to reduce opportunities for desert tortoise predators. However, PEA Section 3.5.5.1.2 includes discussion of cross arms relative to both TSPs and LWS poles/H-frames and Figures 3-5a and 3-5b include illustrations of several pole designs that include cross arms for both the subtransmission and distribution circuits. Please clarify what types of poles (e.g., for example, only LWS poles with no distribution underbuild, and not TSPs or H-frames) would be cross arm-less.
4. Follow-up regarding SCE's response to CPUC Data Request 2, Question 22: SCE's response indicates that lightweight steel (LWS) poles would have a polyurethane or approved equivalent barrier coating to protect the steel from corrosion and that a geotechnical study will be performed that will include analysis of corrosive soils for tubular steel pole (TSP) sites. Please explain the specific potential issue of corrective soils at proposed TSP sites. Is it related to the potential breakdown of TSP foundations? If so, would the solution for corrosive soils be to use the direct-bury approach similar to LWS pole installation versus foundations for those TSPs?
5. PEA Sections 3.3.4.1.1, 3.3.4.2.1, and 3.3.4.4 include discussion of guy stub tubular steel poles (TSPs); however, Figure 3-5b illustrates a LWS pole guy stub. Please clarify what type of guy stub would be required.
6. PEA Figures 3-5a and 3-5b describe TSP and LWS pole heights that are different than described in Table 3-3. Please clarify the correct height range for TSPs and LWS poles.
7. PEA Figures 3-5a and 3-5b describe LWS pole/H-frames depths in units of inches that are different than described in Table 3-3. Please clarify the correct depth range for LWS poles/H-frames.
8. PEA Section 3.3.3.2.1 states that six wood poles along SCE's existing Edwards-Holgate-Southbase 115 kV Subtransmission Line adjacent to Holgate Switchyard may be removed to accommodate the new lines connecting into the facility. Clarify whether the new TSP poles would be double-circuit configurated to support the Edwards-Holgate-Southbase and proposed Cal City-Edwards-Holgate 115 kV subtransmission lines.
9. The last sentence of PEA Section 3.3.3.1 indicates that removal or modification to H-frames is not proposed, but the first sentence of Section 3.5.5.1.1 indicates wood H-frames would be removed with a crane. Is the reference to wood H-frames removal relative to the six wood subtransmission poles discussed in Table 3-1, footnote 1?
10. PEA footnote 5 on page 3-7 states that the planned maximum operating limit at Cal City Substation from 2022 to 2030 is 31.6 MVA. Should this instead be described as the planned maximum operating limit for each transformer at Cal City Substation?

11. Please provide the dimensions of the proposed new Mechanical Electric Equipment Room for Cal City Substation.

12. The second to last sentence in the first paragraph of PEA Section 3.3.4.1.4 indicates distribution circuitry is proposed. Please clarify if distribution circuits from Cal City Substation are considered part of the Project and whether SCE has any updates regarding the direction and/or alignments of those distribution circuits.

13. PEA Section 3.5 does not include a "distribution" construction discussion. Please provide.

14. Regarding PEA Section 3.5.3.1.1, what is the distinction between a helicopter landing zone and a helicopter touchdown area?

15. PEA Section 3.5.4.6.2 text includes conflicting information about whether grading volumes for construction work areas and access roads have been accounted for and quantified. Please clarify. Also, how are the cut and fill volumes referenced in text (i.e., 175,000 cy and 225,000 cy) distinguishable from each other and from the volumes provided in Table 3-8? Are the volumes identified in Table 3-8 included in the volumes identified in the text?

16. PEA Section 3.5.5.1.2, under the *Existing Pole Modification* discussion. Modification of existing double-circuit or single circuit TSPs is not addressed elsewhere in the PEA. Please clarify if the modifications would be to existing single-circuit or double-circuit TSPs, and which 115 kV subtransmission lines would be associated with the existing TSPs, and which specific TSPs would be modified.

17. PEA Section 3.5.5.1.3 states each TSP would require 15 to 154 cubic yards of concrete; however, Section 3.3.4.5.2 states each TSP would require 15 to 39 cubic yards of concrete (as also noted in Table 3-3). Please clarify which is correct.

18. PEA Section 3.5.7.1.1, under the *Cal City Substation Improvements* discussion. Please provide the approximate depth, area, and volume of concrete needed for foundations for the Cal City substation upgrades and the other substation modifications.

19. PEA Section 3.5.7.1.7: Would there be installations at the existing MEERs at Kramer and Edwards Substations and Holgate Switchyard AND within the proposed MEER at Cal City Substation?

20. The Project Description construction sections do not include a distribution pole removal activity heading or discussion. Would those distribution wood pole removal and topping activities generally be same as described for the Transmission Line Construction in Sections 3.5.5.1.1 and 3.5.5.1.5?

21. The PEA Project Description construction sections do not include a distribution getaway heading or discussion for the underground conduit, duct banks, vaults, etc. Please provide those discussions and associated figures like PEA Figures 3-6 and 3-7 for the telecommunications facilities.

22. PEA Figure 3-7 is an illustration of a telecommunication manhole but there is no text description of the manhole. For example, where would these be installed, what are they installed for, etc. Please provide a text description for telecommunication manholes.

23. PEA Section 3.5.14.2.3: For the liquid waste estimate, what is the justification for assuming 70 workers when there would be an average of 97 workers on-site?

24. Confirm whether PEA Tables 3-10 and 3-11 includes activities and equipment descriptions associated with the distribution and telecommunication components of the Project. If not, please provide a supplement for those components.

25. The PEA Project Description includes best management practices (BMPs) that SCE "may" implement. For purposes of the CEQA analysis, please confirm whether implementation of the identified BMPs is proposed and considered part of the Project.