## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 01:**

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.

#### **Response to Question 01:**

SCE confirms there will be 14 new 12 kV distribution getaways. The blue 12 kV getaways<sup>1</sup> that were provided in the schematic reflect underground distribution duct banks that can accommodate several 12 kV circuits per each duct bank. Please see attachment *A. 23-03-005\_ED-SCE-003\_Q1.PDF*, which provides a sample cross section of a duct bank.

<sup>&</sup>lt;sup>1</sup> See attachment *REVISED\_01\_A. 23-03-005 ED-SCE-01 Q. 1\_Cal City Distribution Getaways.pdf* to Data Request ED-SCE-01, Question 1.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

### **Question 02:**

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?

### **Response to Question 02:**

The schematic provided<sup>1</sup> was based on preliminary design and the vaults are shown where there are anticipated bends in the distribution getaways. Vaults are typically installed to prevent damage when pulling cable. Pulling and tensioning calculations will be performed during final engineering and will ultimately determine number of vaults and the location where vaults will be installed.

<sup>&</sup>lt;sup>1</sup> See attachment *REVISED\_01\_A. 23-03-005 ED-SCE-01 Q. 1\_Cal City Distribution Getaways.pdf* to Data Request ED-SCE-01, Question 1.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Chad Packard Job Title: Planning Advisor Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 03:**

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.

### **Response to Question 03:**

Lightweight steel (LWS) poles and single- circuit tubular steel poles (TSP) without distribution underbuild would not include cross arms.

LWS poles and TSPs replacing existing distribution poles would include cross arms for the newly underbuilt distribution lines.<sup>1</sup>

Dead-ended LWS poles without distribution underbuild, which would be located approximately every 3,500 feet along the alignment, would include cross arms to accommodate the necessary guying.

All H-frames and double circuit TSPs would include cross arms.

<sup>&</sup>lt;sup>1</sup> Existing distribution poles on the project alignment currently include cross arms. Distribution underbuild on new subtransmission poles will include cross arms, consistent with the existing distribution poles.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Gennady Tsarev Job Title: Geotechnical Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 04:**

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?

#### **Response to Question 04:**

The potential issue of corrosive soils would be a long-term deterioration of the TSP concrete foundation due to a high concentration of sulfate in the soil. TSPs cannot be installed using a directbury approach, unlike LWS poles, therefore a barrier coating would not be feasible. To reduce long-term deterioration of the TSP concrete foundations from potential corrosive soils SCE would design the TSP foundation concrete mix per ACI 318, Section 19.3.1 requirements<sup>1</sup> to resist corrosive soil.

<sup>&</sup>lt;sup>1</sup> American Concrete Institute Code 318: Building Code Requirements for Structural Concrete.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 05:**

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.

#### **Response to Question 05:**

SCE typically installs lightweight steel (LWS) pole guy stubs where space is available. However, if there is no available room for down guys and anchors, SCE would install TSP stub poles. Please note that structure selection would be finalized during final engineering.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 06:**

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.

#### **Response to Question 06:**

Table 3-3, Section 3.3.4.5.2, and Figures 3-5a and 3-5b show incorrect values. See the updated Table 3-3 Structures to be Installed, Section 3.3.4.5.2 below, and Attachment *A. 23-03-005\_ED-SCE-003\_Q6.PDF* Figures 3-5a and 3-5b (note that updated information is provided in <u>underline</u>). Please note that all dimensions are based on preliminary engineering and are subject to change during final engineering.

Structure Type	Proposed Approximate Number of Structures	Approximate Height Above Ground (Feet)	Approximate Pole Diameter (Feet)	Approximate Burial Depth (LWS poles) and Foundation Depth (TSPs) (Feet)	Approximate Auger Width (LWS pole) and Foundation Diameter (TSPs) (Feet)	Approximate Concrete Volume (Cubic Yards)		
New Kramer-Cal City 115 kV Subtransmission Line								
LWS Poles	681	<u>34</u> -109	1.5-3	6-14	2-3	N/A		
TSP <sup>1</sup>	4	<u>42</u> -132	2-6	20-50	5	15- <u>154</u>		
New Cal City-Edwards-Holgate 115 kV Subtransmission Line								
LWS Poles	437	<u>34</u> -109	1.5-3	6-14	2-3	N/A		
LWS H-Frame Poles <sup>2</sup>	10	<u>56-74</u>	1.5-3	9-11	2-3	N/A		
TSP <sup>1,3</sup>	16	<u>42</u> -100	2-6	20-50	5	15- <u>154</u>		

#### Table 3-3 Structures to be Installed

<sup>1</sup> Some structures may be guy stub TSPs, which range in height from approximately  $\underline{42}$  to 52 feet.

<sup>2</sup>H-Frames consist of two poles each. Number of H-Frames provided reflects total number of poles (10 poles) associated with H-Frames (five H-Frame structures).

<sup>3</sup> Includes seven TSPs entering Cal City Substation from the north that would be shared by both proposed 115 kV subtransmission lines.

#### 3.3.4.5.2 Foundations

TSPs, or equivalent structures, would generally be attached to a concrete drilled pier foundation or installed on an engineered micro-pile foundation. TSP concrete drilled pier foundations would be approximately 5 feet in diameter and would extend underground approximately 20 to 50 feet with approximately 1 to 3 feet of concrete visible above ground. Each TSP would use approximately 15 to <u>154</u> cubic yards of concrete. The size of foundations associated with the TSPs is presented in

Table 3-3.

Where necessary, micro-pile foundations may be used. Installation of micro-piles would require the drilling of several smaller diameter holes (approximately 3-10, 8-inch holes) for each foundation. An anchor rod would be placed within each hole and the holes would be filled with cement grout (approximately 0.5 to 2 cubic yards). The micro-piles would then be tied together to form a single, reinforced concrete cap upon which the TSP would be installed.

The foundations necessary to support new equipment at substations and the switchyard are addressed in Section 3.5.7.1.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 07:**

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.

## **Response to Question 07:**

Figures 3-5a and 3-5b should identify embedment depth in feet instead of inches. Please see SCE's response to Question 06 of this Data Set for the corrections to Figures 3-5a and 3-5b, and Table 3-3 Structures to be Installed.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 08:**

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.

#### **Response to Question 08:**

Correct, the TSPs would be double-circuit configured to support the Edwards-Holgate-Southbase and proposed Cal City-Edwards-Holgate 115 kV Subtransmission Lines.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 09:**

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?

#### **Response to Question 09:**

The project does not include modification or removal of any H-frame structures, therefore, the first sentence of PEA Section 3.5.5.1.1. should state "Wood poles would generally be removed utilizing a crane."

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Sheridan Mascarenhas Job Title: Senior Advisor – Reliability Project Development Received Date: 2/23/2024

#### Response Date: 3/22/2024

#### **Question 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?

#### **Response to Question 10:**

The PEA footnote 5 on page 3-7 incorrectly stated that "the planned maximum operating limit at Cal City Substation from 2022 to 2030 is 31.6 MVA." The planned maximum operating limit should have been identified as 36.4 MVA, as stated in Table 2-2 Projected Electrical Needs Area Substation Capacity and Peak Demand, in Chapter 2, Introduction.

The forecasted planned maximum operating limit for Cal City Substation from 2022 to 2030, the ten-year forecast available when the PEA was written, was 36.4 MVA. It was not identified as the planned maximum operating limit for each transformer.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 11:**

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

#### **Response to Question 11:**

The proposed new Mechanical Electrical Equipment Room for Cal City Substation will be approximately 35-feet by 16-feet.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Ryan C Jones Job Title: Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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.

#### **Response to Question 12:**

Distribution circuits from Cal City Substation are not considered part of the project, because as stated in PEA Section 3.3.1.4., the direction of distribution circuitry is unknown at this time and would be designed to respond to customer need and location. SCE does not have any updates regarding the direction and/or alignments of future distribution circuits.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Pablo Ibarra Job Title: Advisor, Distribution Engineering Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 13:**

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

### **Response to Question 13:**

The Proposed Project includes construction of distribution getaways, described in PEA Section 3.3.4.1.4, and the transfer of existing distribution lines to an underbuild configuration along portions of the proposed new subtransmission alignments. Construction of the getaways, and transfer and underbuild of the existing distribution lines is described below.

The distribution getaway construction would involve the excavation, installation of conduits, concrete encasements, and backfill and restoration of surfaces, if required. The civil crew would trench, install, and backfill small distances at a time up to the substation fence line.

At locations where an underbuild circuit is installed on transmission poles, a new transmission/ distribution combination structure would be set in the general area of the existing distribution structure. Existing distribution conductors and equipment (underbuild) would be transferred to the new transmission structure and upgraded to current specifications, if necessary. The existing distribution structure would be removed whenever possible. Construction crews may require temporary access to adjacent structures during the underbuild transfer. Minor construction activities related to distribution switching may be required.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Alexander Podruski Job Title: Advisor, Project Construction Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 14:**

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

#### **Response to Question 14:**

Please see PEA Section 3.6.5.2.1 Helicopter Landing Zones and Touchdown Areas for descriptions of helicopter landing zones and touchdown area uses and durations. Helicopter landing zones are located within staging areas and would be utilized for activities such as re-fueling and picking up supplies. Helicopter touchdown areas are located within a wire pull area and would be utilized for touching down during conductor/cable installation activities.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Ruben Mazzei Job Title: Senior Civil Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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?

### **Response to Question 15:**

PEA Section 3.5.4.6.2 and Table 3-8, Detailed Grading Volumes, show incorrect values for earthwork quantities. Please see the updated Table 3-8, Earthwork Volumes, and revised PEA Section 3.5.4.6.2 text below,<sup>1</sup> which correctly identify proposed earthwork quantities and reflects earthwork volumes for construction work areas and access roads. The corrections shown below in the updated Table 3-8 and revised text resolve all of the identified conflicting information.

## 3.5.4.6.2 Estimated Volumes of Grading

Table 3-8 summarizes the estimated detailed grading earthwork volumes associated with the Proposed Project based on current design and engineering. Cut and fill volumes have been provided for Proposed Project components for which detailed grading earthwork estimates have been prepared, including grading, blading and removing/ recompacting of new/existing access roads and permanent O&M structure pads. Most excess eut material is anticipated to be balanced within the Proposed Project site; organic material removed during clearing and grubbing activities may be hauled off site as needed. Detailed Grading quantities for construction work areas and blading of new and existing access roads have not been prepared at this time, as all soil from such activities is anticipated to be balanced on-site. It is anticipated that approximately 175,000 ey of material will be moved (cut and fill) during blading operations. Approximately 225,000 592,000 cy of material is anticipated to be moved (cut and fill during blading and detail grading earthwork operations). Import/export of elean fill material is not anticipated at this time but may be necessary pending final engineering or if recommended by a geotechnical engineer due to site-specific soil conditions.

<sup>&</sup>lt;sup>1</sup> New text underlined, removed text is stricken through.

## Table 3-8 Earthwork Detailed Grading Volumes

	Estimated Cut	Estimated Fill	Estimated Import/Export				
Project Component	(cubic yards)	(cubic yards)	(cubic yards)				
Proposed Cal City-Edwards-Holgate							
Earthwork Detailed Grading (New Access Road,							
O&M Structure Pads, Blading, and Removal and	<u>108,000</u>	<u>108,000</u>					
Recompaction)	<del>15,000</del>	<del>15,000</del>	0				
Proposed Kramer-Cal City							
Earthwork Detailed Grading (New Access Road,							
O&M Structure Pads, Blading, and Removal and	<u>154,000</u>	<u>154,000</u>					
Recompaction)	<del>10,000</del>	<del>10,000</del>	0				
Proposed Cal City Substation							
Earthwork Detailed Grading	34,000	34,000	0				

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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.

#### **Response to Question 16:**

Per PEA Section 3.3.3.1, removal or modification of Lightweight Steel (LWS) poles, H-frames, tubular steel poles (TSP), and lattice steel towers (LST) is not anticipated at this time.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Yigit Dedemen Job Title: Senior Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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.

#### **Response to Question 17:**

PEA Section 3.5.5.1.3 correctly states that each TSP would require approximately 15 to 154 cubic yards. Please see SCE's response to Question 6 of this data set for updated information PEA Section 3.3.3.4.5.2. information and updated Table 3-3 Structures to be Installed.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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.

#### **Response to Question 18:**

This information is not yet available and is anticipated to be completed during final engineering.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Jonathan Samson Job Title: Project Engineer Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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?

#### **Response to Question 19:**

Per PEA Sections 3.3.2.1.2 and 3.3.2.1.4, there would be protection and telecom installations at the existing MEERs at Kramer and Edwards Substations and Holgate Switchyard AND within the proposed MEER at Cal City Substation.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Alexander Podruski Job Title: Construction Advisor/ Technical Specialist Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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?

#### **Response to Question 20:**

The distribution pole removal activity would be generally the same as what is described in the above- mentioned sections. The activity would be completed by the same construction crews using the same equipment as the transmission line construction activities.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Pablo Ibarra Job Title: Distribution Planner Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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.

#### **Response to Question 21:**

Please see SCE's response to Question 13 for a distribution construction discussion. Please see attachment *A. 23-03-005\_ED-SCE-003\_Q21.PDF*, which provides a sample cross section of a duct bank and a figure showing typical distribution vault details.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Fred Moreno Job Title: Manager, Planning Received Date: 2/23/2024

Response Date: 3/22/2024

### **Question 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.

### **Response to Question 22:**

The telecom manhole illustrated in Figure 3-7 is an underground structure that would be typically located at the last subtransmission structure outside the substation fence. Telecom manholes are typically used for splicing, pulling, adding slack, and transitioning from overhead fiber to underground fiber.

### DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Alexander Podruski Job Title: Advisor, Project Construction Received Date: 2/23/2024

Response Date: 3/22/2024

#### **Question 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?

#### **Response to Question 23:**

As described in PEA Section 3.5.14.2.3, approximately 31,475 gallons of liquid waste would be generated during construction of the Proposed Project. While the footnote on PEA page 3-67 indicates this total is based on 70 workers on-site, this appears to be an error. The total of 31,475 gallons of liquid waste is based on an average of 97 workers onsite each day, consistent with the text of this section (0.52 gallons per construction worker per day; 97 workers; 6 days per week; up to 24-month construction schedule).

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Alexander Podruski Job Title: Manager, Planning Received Date: 2/23/2024

Response Date: 3/22/2024

### **Question 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.

### **Response to Question 24:**

PEA Tables 3-10 and 3-11 include activities and equipment descriptions associated with the distribution and telecommunication components of the Project. Except for the "splice lab," which is included in the equipment descriptions, no additional equipment will be required for the distribution and telecommunication components of the project.

Distribution components would be completed by the same crews and equipment installing the new transmission structures and conductors.

Telecom "fiber" would be installed by the same crews and equipment that are installing the new transmission conductors.

The splice lab, which is captured separately, would be performing the telecom splicing functions.

## DATA REQUEST SET ED-SCE-003

To: Energy Division Prepared by: Rey Gonzales Job Title: Sr. Environmental Project Manager Received Date: 2/23/2024

Response Date: 3/22/2024

## **Question 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.

## **Response to Question 25:**

The BMPs identified in Section 3.5.11 and 3.5.13 of the PEA Project Description are intended to reflect the types of BMPs required for compliance with applicable regulatory requirements pertaining to dust, erosion, and runoff control as well as hazardous materials management. For the purposes of the CEQA analysis, these BMPs will be implemented and should be considered part of the Project. However, SCE requests the following revisions (denoted in <u>underlined</u> text below) to hazardous materials management BMPs included in Section 3.5.13.2 of the PEA Project Description, as non-SCE employees who remain on-site for less than one day (e.g., delivery drivers) may not be subject to formal training requirements:

- BMP-WM-1, Material Delivery and Storage. The construction team will implement this BMP to prevent, reduce, or eliminate the discharge of pollutants from material delivery and storage to the stormwater system or watercourses by minimizing the storage of hazardous materials on-site, storing materials in watertight containers and/or a completely enclosed designated area, installing secondary containment, conducting regular inspections, and training <u>applicable</u> employees and subcontractors.
- BMP-WM-2, Material Use. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to the storm drain system or watercourses from material use by using alternative products, minimizing hazardous material use on-site, and training <u>applicable</u> employees and subcontractors.
- BMP-WM-4, Spill Prevention and Control. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to drainage systems or watercourses from leaks and spills by reducing the change for spills, stopping the source of spills, containing and cleaning up spills, properly disposing of spill materials, and training <u>applicable</u> employees.

• BMP-WM-6, Hazardous Waste Management. The construction team will implement this BMP to prevent or reduce the discharge of pollutants to stormwater from hazardous waste through proper material use, waste disposal, and training of <u>applicable</u> employees and subcontractors.