



California Public Utilities Commission



April 14, 2023

VIA EMAIL

Lori Charpentier
Southern California Edison Company
2244 Walnut Grove Avenue
Post Office Box 800
Rosemead, California 91770

SUBJECT: Cal City Substation 115 kV Upgrade Project – Data Request 1

Dear Mrs. Charpentier,

As the California Public Utilities Commission (CPUC) proceeds with the environmental review for SCE's Cal City Substation 115 kV Upgrade Project (proposed Project), we have identified additional information that is needed to adequately conduct the California Environmental Quality Act (CEQA) review. Specifically, we are looking for further details on the proposed Project. Please provide the information requested below (Data Request 1) by April 28, 2023, 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
Project Manager for the Cal City Substation 115 kV Upgrade Project
Energy Division

cc: Christine Root, CPUC Energy Division
Tammy Jones, Senior Attorney, SCE
Rey Gonzales, Senior Project Manager, SCE
Matthew Fagundes, ESA
Michael Manka, ESA

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Data Request 1

Cal City 115 kV Upgrade Project's CEQA Evaluation

PEA Chapter 3, Project Description:

1. Section 3.2.2: Distribution Getaways do not appear to be illustrated in the Appendix A maps. Please provide a figure (and associated GIS layer) that illustrates the distribution getaway locations.
2. Section 3.2.2.5: Can Edwards Substation currently receive power from the tap to Southbase Substation?
3. Section 3.2.3: The discussion indicates that the Project would improve reliability at Edwards Substation by constructing a new second source line to Edwards Substation from Holgate Switchyard. Would reliability at Edwards Substation also be improved from the new line from California City Substation?
4. Figure 3-5a: The image of the upper right pole appears to illustrate a double circuit configuration with six conductors, but the figure indicates it is a single circuit configuration; please clarify.
5. Section 3.3.3: The footnote on page 3-16 discusses a proposed battery energy storage system (BESS) project adjacent to Cal City Substation site as "part of the interim mitigation projects described in Chapter 2." This is not described in Chapter 2. Please provide additional information about BESS project and clarification about how it relates to SCE's Project.
6. Section 3.3.4.2.1: The discussion indicates all poles would be in single circuit configuration but Figure 3.4-5a shows at least one double circuit pole. Please clarify.
7. Sections 3.5.1.2: The discussion states that "no temporary or permanent gates are proposed," but gates are described elsewhere as proposed for staging areas and for California City Substation. Please clarify.
8. Section 3.5.5.1: Approximately how many distribution poles would be topped?
9. Section 3.5.12.1: Describe who the anticipated water provider would be.

Chapter 4, Description of Alternatives:

10. Chapter 4: Provide the 10-year planning period demand growth projections based on estimated growth rates for the substation service areas; and power flow studies for the subtransmission system and Electrical Needs Area (ENE), including model files, that were used to support SCE's forecasts of electrical demand. This information may be used for the screening of alternatives relative to meeting the objectives identified for the Project.
11. Regarding the Sequoia Boulevard Alternative, would it be feasible for the northern portion of the route north of Sequoia Boulevard be co-located as a double circuit configuration that would include the Cal City-Edwards-Holgate line? Would it be feasible for the alternative alignment in Cal City to be moved a sufficient distance north of aesthetics resources Viewpoint 3 to reduce the visual prominence of the Project in that area?

PEA Section 5.1, Aesthetics:

12. Section 5.1.1: Provide the time, date, camera details, and height for each viewpoint. A general date range [March-August 2022] was provided but it is unclear if/how this corresponds to the photographs used for Figure 5.1-2.

PEA Section 5.3, Air Quality:

13. Section 5.3.4.2: Provide a pdf version of Appendix B.

14. Section 5.3.4.4: Health risk results for both construction and operations were presented qualitatively. Given the relatively close proximity to sensitive receptors and the extended duration of construction activities, a quantitative health risk assessment (HRA) should be completed for construction of the Cal City Substation and Staging Areas 1-15, 1-16, and 1-17. The amount of off-road diesel equipment operations at Staging Area 1-2 and Staging Area 1-3 should be clarified as well.

PEA Section 5.4, Biological Resources

15. Section 5.4.1.2: The text mentions Figure set 5.4-1 through 5.4-3; however, no such figures were included in the PEA. Please provide the missing Figure set 5.4-1 through 5.4-3.
16. Table 5.4-2 remove Global ranking for Nevada Joint Fir to ensure consistency in table.
17. Section 5.4.1.8: The BLM Desert Renewable Energy Conservation Plan (DRECP) serves as a habitat conservation plan (HCP) for the entire Project site, as described in Appendix A of the Biological Resources Technical Report; however, PEA Section 5.4.4.2.6 states that there are no adopted HCPs or natural community conservation plans within the study area. Please clarify. Note as the Project area is within the California Desert Area Plan and covered by the record of decision for the DRECP, this also applies to the visual resources methodology.

Section 5.5, Cultural Resources:

18. Provide electronic copies of the following references: Wesson et al. 2021 report and the Urbana Preservation & Planning 2021 report.

Section 5.6, Energy:

19. Section 5.6.1.1: This section contains the statement, "Substation operation consumes approximately 4.5 amperes of electricity under typical operating conditions.". Please clarify if this refers to the Cal City Substation, each of the substations associated with the Project, or all of the substations associated with the Project and provide existing power consumption as kilowatt hours rather than amperes.
20. Section 5.6.1.1: Please describe O&M activities and provide an estimate of current O&M energy use (equipment, fuel use, vehicle trips).

Section 5.7, Geology:

21. Section 5.7.4.3: Please send additional geotechnical reports for remaining Project components when they are available.

Section 5.9, Hazards, Hazardous Materials, and Public Safety:

22. Section 5.9.1.2: The section states that a portion of the proposed Project would be within Edwards Air Force Base but does not specify the associated airport land use plan with which the Project needs to comply.
23. Sections 5.9.4.2.5 and 5.9.4.2.8: The Project is outside the California Municipal Airport Land Use Compatibility Plan (ALUCP) zone, but is there an equivalent airport land use plan for Edwards Air Force Base that would regulate the Project?

Section 5.10, Hydrology and Water Resources:

24. Section 5.10.4.2.2: The section states that construction is estimated to require approximately 476 acre-feet of water. Please clarify what proportion of this estimated water would be sourced through groundwater. If recycled water is proposed for use, clarify the anticipated source for reclaimed or recycled water.

Section 5.11, Land Use:

25. Section 5.11.1.2: Identify special land uses by milepost and segment.

Section 5.12, Mineral Resources:

26. Figure 5-12: The figure appears to list the Russell I as a prospect. This is the active Rio Tinto (also known as 20 Mule Team borax) mine operated by U.S. Borax. The Project is adjacent but does not cross the mine footprint. Please clarify.
27. Figure 5-12: The figure identifies an active sand gravel pit along Interstate 395. No such mine is visible on aerial images of the area.

Section 5.13, Noise:

28. Section 5.13.1.1: Provide a kmz file with data showing identified sensitive receptor locations on Figure 5.13-1 relative to the Project alignments and alternatives.
29. Section 5.13.1.2: Were the noise measurements taken at sensitive receptors? Please provide the basis for choosing the measurement locations.
30. Section 5.13.1.2: What are the five measurements at each 20-minute interval for the long-term measurement data presented in Appendix M?

Section 5.14, Population and Housing:

31. Section 5.14.4.4: Would the construction/operational workforce be sourced through the local area or would there be a need for temporary relocation. If possible, provide the approximate distance construction workers would travel to the site.

Section 5.15, Public Services:

32. Section 5.15.1.1: Provide emergency response times for California Highway Patrol, Kern County Sheriff's Office, San Bernardino Sheriff's Department, California City Police Department, and Edwards Air Force Base 95th Security Forces.

Section 5.19, Utilities:

33. Section 5.19.1.5: Identify the recycling centers and/or destination for solid waste that would be used for construction debris.
34. Section 5.19.4.4: Provide an estimate for operational water demand and the likely source.

Section 5.20, Wildfire:

35. The PDF for PEA Volume 3 is missing the bookmark for Chapter 5.20, Wildfire. Please provide a revised file with the bookmark for posting on the Energy Division's webpage for the Project.

36. Section 5.20.1.2: The PEA states that no historical fires have occurred within 1 mile of the Project. Please provide an expanded discussion for a 5-mile radius (at minimum).
37. Section 5.20.1.2: Provide information on when the Project area last burned.
38. Section 5.20.4.2: Given the “Moderate FHSZ” classification of the Project area, please prepare a Fire Behavior Modeling analysis for the Project.

GIS Data Review:

39. Locations of installed and removed poles do not appear to be properly georeferenced. Please correct and resend the revised GIS package.