

Southern California Edison
A.21-08-009 – TLRR CSP PTC

DATA REQUEST SET C P U C - S C E - 0 0 3

To: CPUC
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Job Title: Senior Construction Project Manager
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Response Date: 2/18/2025

Question 01:

Please provide any comments regarding feasibility, ability to meet most project objectives, and other potential constraints for the route depicted on the figure (attached). As shown, the route would generally follow White Mountain Road and then Highway 168 before reconnecting with the existing subtransmission line toward the Fish Lake Valley Metering Station.



Response to Question 01:

Southern California Edison (SCE) has reviewed and evaluated the Highway 168 Alternative Route (“Alternative”) referenced in *Southern California Edison’s Control-Silver Peak Project (A.21-08-009) – CPUC-SCE-003*. SCE has prepared a desktop-level environmental analysis to assess whether the Alternative is feasible and could meet project objectives, and to identify any potential constraints. The analysis is attached to this data request response, titled “CPUC-SCE-003 Attachment” and concludes that the Alternative appears to be both feasible and able to meet all project objectives.

SCE understands that the CPUC is considering this Alternative to the Proposed Project as a way to reduce significant environment impacts to resources identified during scoping meetings; specifically, impacts within Wyman Canyon, the identified bi-state sage grouse habitat, and the White Mountain City Area of Critical Environmental Concern (“ACEC”). SCE’s desktop analysis includes analysis of impacts in these areas.

The work scope between Control Substation and White Mountain Substation would remain the same for the Alternative as the Proposed Project¹. Similarly, under either the Proposed Project or the Alternative, SCE must continue to supply power to the communications sites along the summit of White Mountain Road. However, after approximately 1,000 feet beyond White Mountain Substation, instead of continuing eastward towards Wyman Canyon, the Alternative would route the lines south and follow White Mountain Road (past the Inyo National Forest Visitor Center at Schulman Grove) and Forest Service Road 35E313 for approximately 8 miles to intersect with Highway 168. From the intersection with Highway 168, the lines would turn eastward for approximately 15 miles, to a location where Highway 168 intersects with the Proposed Project. From that intersection and continuing eastward for the remaining approximately 8 miles to the Fish Lake Valley Metering Station, the work scope for the Alternative would again be the same as the Proposed Project².

The Alternative would permanently remove approximately 15 miles of existing lines between the White Mountain Substation and the new intersection point, including all structures and wires within Wyman Canyon, a portion of the identified bi-state sage grouse habitat, and the White Mountain City ACEC. (Note: The overall scope of the Proposed Project also requires removal of these same facilities, so any previously-identified temporary construction impacts associated with removal efforts in those areas will be the same under both the Proposed Project and the Alternative.)

The Alternative would add approximately 10 line-miles to the overall circuitry between Control

¹ Specifically in Segments 1, 2, and 4, and the easternmost approximately 14.8 miles of Segment 3.

² Where the Alternative crosses Segment 5, approximately 1 mile of existing facilities north of that point would be removed and the 8 structures identified in the Proposed Project for replacement would remain in scope.

Substation and the Fish Lake Metering Station, however, that additional distance *does not* trigger the need to increase the system voltage from 55kV to 115kV, therefore no additional substations would be needed. There would be approximately 275-300 additional poles installed for the Alternative when compared to the Proposed Project, as well as approximately 100-150 acres of additional temporary disturbance associated with these poles, though SCE cannot provide a specific breakdown of quantities and structure types and more precise disturbance areas similar to the formatting found in PEA Tables 3.3-2 and 3.3-3 until a preliminary engineering design is completed.

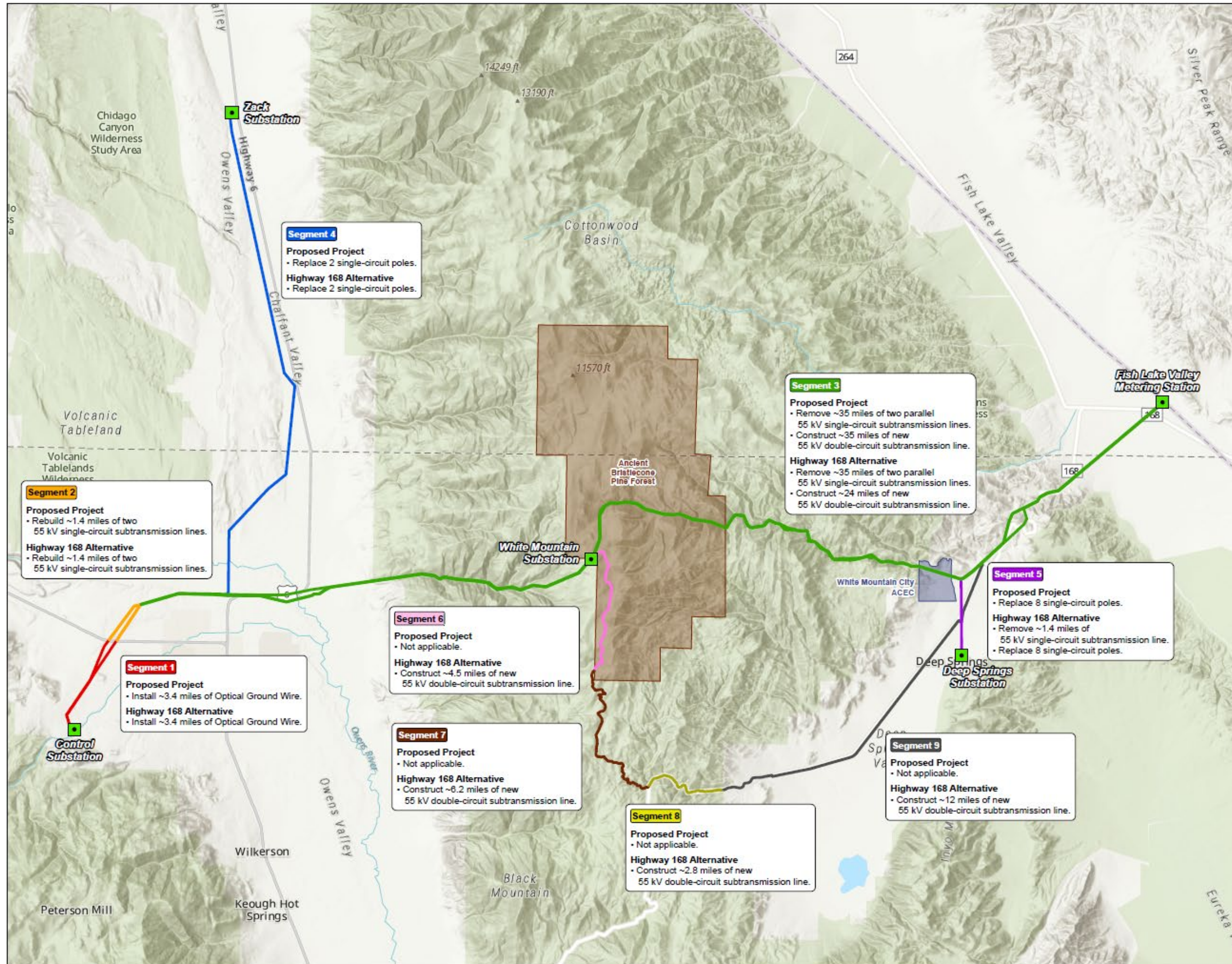
SCE has prepared a desktop-level environmental analysis, separately attached to this data request, that more fully details the Alternative's feasibility, ability to meet most project objectives, and other potential constraints. Through this initial desktop evaluation of the Alternative, SCE has identified that while the Alternative could reduce potential aggregate impacts to some environmental resources, it could also trigger potentially significant impacts to other environmental resources. The attachment provides a summarized comparative analysis of the anticipated impacts of both SCE's Proposed Project and the Alternative.³ The analysis assumes a conventional overhead configuration (i.e., a subtransmission line constructed from a combination of monopoles, H-frames, and aerial conductor), similar to the design configuration used for the Proposed Project.

Refer to Figure 1 at the end of this document for a graphical representation of the conceptual alignment of SCE's Alternative routing.

Similar to SCE's responses to data request CPUC-SCE-002, the information provided for this response is based on a desktop-level analysis without the benefit of any field survey activities. A full evaluation of the various disturbances and impacts to habitats, vegetation, and waters (among others) specific for the Alternative cannot be developed before a preliminary engineering design is completed.

SCE expects that a preliminary engineering design would take at least 4-6 months to complete, then it would take another 6-12 months to perform the surveys needed and data collection. Overall, it would take approximately 10-18 months and cost approximately \$2M to produce the various reports needed to support a full environmental analysis of the Alternative.

³ Not addressed in the memorandum are those impacts that would be the same under either the Proposed Project or under the Highway 168 Alternative (including those associated with work in Segments 1, 2, 4, and 5 as described for the Proposed Project, as well as those associated with work in Segment 3 west of White Mountain Substation).



Legend

- Substation
 - Ancient Bristlecone Pine Forest
 - White Mountain City ACEC
- Control-Silver Peak Alignment Segments**
- Segment 1
 - Segment 2
 - Segment 3
 - Segment 4
 - Segment 5
 - Segment 6
 - Segment 7
 - Segment 8
 - Segment 9

Notes

- Base map source: ESRI World Topographic Map.
- ACEC = Area of Critical Environmental Concern.



Control-Silver Peak Project

**Highway 168 Alternative-Proposed Project
Scope Comparison**

Figure 1