PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 30, 2024

Mr. David Balandran
Regulatory Affairs – Infrastructure Programs & Projects
Southern California Edison
8631 Rush St.
Rosemead, CA 91770

**Subject: Southern California Edison's Control-Silver Peak Project (A.21-08-009) – Data Request No. 2**

Dear Mr. Balandran:

Please find attached Data Request No. 2 for the Control-Silver Peak Project. Many of the items within this data request pertain to alternatives, including the Highway 6 Alternative. Note that, at this time, the CPUC intends to carry forward for analysis both variations of the Highway 6 Alternative, namely the version originally presented by SCE in its PEA (refer to Figure 4.1-2) and the version proposed by the Bureau of Land Management (BLM) and the United States Forest Service (USFS). The biggest difference between the two variations is that the PEA version would remove nearly the entire length of Segment 3 across the White Mountains (and install Distributed Energy Resources [DERs] at the White Mountain and Deep Springs substations), while the BLM/USFS version would only remove the portion of Segment 3 between White Mountain Substation and the tap-connection to Deep Springs Substation (with no DERs). Thus, references to the "Highway 6 Alternative" in this data request are inclusive of both variations and data provided in response to this request should cover the maximum extent of both variations.

However, acknowledging that portions of the Highway 6 Alternative pass through Nevada, information regarding alternative components or environmental resources outside of California **does not need to be provided**. Rather, SCE should limit its responses to this data request to the portions of the Highway 6 Alternative and associated resources that occur within the State of California. Additionally, to the extent portions of the Highway 6 Alternative alignment are already fully covered by surveys/data for the Proposed Project (e.g., Segment 3), this does not need to be provided again – unless otherwise indicated.

We understand that it will take some time to respond to the items in this data request. Additionally, CPUC is aware that SCE is responding to separate requests issued by BLM and USFS. Therefore, CPUC is not providing a deadline for responses currently. CPUC will continue to engage with SCE, along with BLM/USFS, during regular meetings, including discussing the timing of responses and any questions that arise out of this request.

Regards,

*Eric chiang*

Eric Chiang
California Public Utilities Commission

**Data Request No. 2 (August 30, 2024) for SCE's Control Silver Peak Project (A.21-08-009)**

**Note: This data request is limited to components and resources within the State of California. SCE should not provide information on any aspects of alternatives occurring outside of California (e.g., Nevada).**

| # | Resource Area / Topic | Source / PEA Page # | Data Request Item | Request Date | Reply Date | Status | Follow-Up Request |
|---|---|---|---|---|---|---|---|
| 1 | Alternatives – Highway 6 Alternative – Description | N/A | **Highway 6 Alternative Characteristics**<br>Please provide detailed information on the Highway 6 Alternative components and construction process. To the extent feasible, this should be comparable to the level of detail provided for the Proposed Project in the PEA. However, where detailed engineering has not been performed, please estimate or provide a range while explaining your assumptions. If it is believed a higher operating voltage will be required (e.g., 115 kV), please confirm this to the extent feasible and/or make assumptions based on the highest possible voltage (i.e., with potential for greatest impacts).<br>Please provide the following for the Highway 6 Alternative:<br>▪ Subtransmission structure type and characteristics, including height, diameter, foundation type/depth, etc.<br>▪ Subtransmission conductor characteristics, to the extent they differ from the Proposed Project.<br>▪ Approximate subtransmission structure locations in GIS.<br>▪ For portions of Segment 6 where existing distribution line parallels or overlaps the proposed alignment, indicate whether this distribution line would be underbuilt on new subtransmission structures.<br>▪ Indicate the height of the existing distribution poles along portions of Segment 6.<br>▪ Provide a potential (conceptual) layout for equipment and DERs (e.g., PV panels) at the White Mountain and Deep Springs substations, which would be necessary for implementing the PEA version of the Highway 6 Alternative.<br>▪ Describe the substation modifications that would be necessary to support the alternative, including details (e.g., footprint size, likely equipment, etc.) on any new metering station/substation and modifications to existing substations (including to support a higher operating voltage).<br>▪ Describe the easement requirements for the Highway 6 Alternative, including length of alignments requiring new permanent or modified right-of-way (ROW) or easements.<br>▪ Describe the Highway 6 Alternative construction process, focusing on Segment 6 and any differences between the alternative (both variations; see footnote) and the Proposed Project for other segments, excluding portions within Nevada.<br>▪ Describe construction access, again with a focus on Segment 6.<br>▪ Provide a breakdown of temporary and permanent disturbance associated with the alternative, including the different types of temporary staging/work areas, similar to what was provided in PEA Table 3.5-3 for the Proposed Project.<br>▪ Provide in GIS the anticipated staging and construction laydown areas (CLAs), access routes, temporary work pads, pull-and-tension/stringing sites, and other temporary disturbance areas for the alternative.<br>▪ Indicate any additional equipment that may be required to construct the alternative, relative to that indicated for the Proposed Project in PEA Table 3.6-1.<br>▪ Provide an estimated construction schedule, including phasing for Segment 6. | | | | |

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| 2 | Alternatives – Highway 6 Alternative – Description | Technical Feasibility Study on the Highway 6 Alternative, p. 6 | **Cost Estimate**<br>In SCE's response (June 2023) to BLM's request regarding the technical feasibility of the Highway 6 Alternative, SCE estimated the cost of the BLM-modified version of the alternative: "Overall, the preliminary estimates developed for this response show that the BLM's Hwy 6 Alternative would be expected to increase the project budget by $130M, or 50%, from approximately $260M to approximately $390M." Since that time, SCE has indicated that implementation of the Highway 6 Alternative could require increased operating voltage (e.g., 115 kV) due to the long line length. The higher voltage would then necessitate larger poles and conductor, as well as additional substation upgrades. Based on this, please provide a revised cost estimate for the Highway 6 Alternative that is reflective of the anticipated operating voltage. | | | | |
| 3 | Alternatives – Highway 6 Alternative – Aesthetics | N/A | **Additional KOPs/Simulations**<br>Please obtain additional key observation point (KOP) photos for the locations shown in the attached map (Exhibit A). Prepare visual simulations showing the anticipated features (subtransmission poles, lines) from these additional KOPs. Note that the locations are approximate – capture the KOP photos based on the detailed alternative information (e.g., specific pole/alignment locations) such as to reflect the maximum impact on aesthetics and public views. Additionally, to the extent higher voltage facilities (e.g., 115 kV) would be substantially taller/larger than the 55 kV facilities proposed under the Proposed Project, please provide updated visual simulations for KOPs along Segment 3. For example, please provide updated simulations for KOPs 3-1, 3-2, 3-4, 3-5, 3-6, 3-11, 3-12, 3-16, and 3-19, as designated in the POD materials. | | | | |
| 4 | Alternatives – Highway 6 Alternative – Biological Resources | PEA, Appendix C | **TLRR Sensitive Species and Habitat Report**<br>Please provide a "TLRR Sensitive Species and Habitat Report," comparable to what was provided for the Proposed Project, for the Highway 6 Alternative. The report should include biological resources data for the Highway 6 Alternative, in particular for Segment 6, including vegetation mapping, habitat assessments, focused special-status wildlife surveys, botanical surveys, and known locations of special-status species. Please provide GIS or kmz files of all biological survey data for the Highway 6 Alternative. | | | | |
| 5 | Alternatives – Highway 6 Alternative – Biological Resources | N/A | **Vegetation Communities**<br>Provide calculations of temporary and permanent disturbance of each vegetation community that would be affected by the Highway 6 Alternative and include all areas of vegetation removal in the GIS database. Distinguish between disturbance that would occur in previously developed areas (i.e., paved, graveled, or otherwise urbanized) and naturally vegetated areas. | | | | |
| 6 | Alternatives – Highway 6 Alternative – Biological Resources | N/A | **Jurisdictional Waters**<br>Please provide a report identifying potential Wetlands and Other Waters for the Highway 6 Alternative. This report does not need to be considered a formal jurisdictional delineation. Provide calculations of temporary and permanent disturbance of each jurisdictional water and include all areas of impacts in the GIS database. | | | | |

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| 7 | Alternatives – Highway 6 Alternative – Biological Resources | N/A | **Resource Agency Correspondence**<br>Provide details of any important correspondence between SCE and the resource agencies regarding the Highway 6 Alternative. Provide any biological resource GIS data that has been received from the resource agencies. | | | | |
| 8 | Alternatives – Highway 6 Alternative – Biological Resources | N/A | **Tree Removals**<br>Identify the types, locations, approximate numbers, and sizes of trees that may need to be removed or trimmed substantially for the Highway 6 Alternative. Identify any potentially protected trees that may be removed or substantially trimmed for implementation of the alternative, such as but not limited to riparian trees, bristlecone pines, or other trees. Provide associated GIS data. Additionally, describe the types of equipment that would typically be used for tree removal. | | | | |
| 9 | Alternatives – Highway 6 Alternative – Biological Resources | Technical Feasibility Study on the Highway 6 Alternative, p. 8 | **Golden Eagle Data**<br>The June 2023 Technical Feasibility Study on the Highway 6 Alternative (SCE's response to the BLM's data request) indicated that historic golden eagle nests have been documented along the Highway 6 Alternative alignment. Could you provide this data regarding golden eagle nests as it doesn't appear to be publicly available? | | | | |
| 10 | Alternatives – Highway 6 Alternative – Biological Resources | N/A | **Post-Construction Restoration and Revegetation**<br>Provide a Habitat Restoration and Revegetation Plan that includes, or would apply to, the Highway 6 Alternative. | | | | |
| 11 | Alternatives – Southern Route | N/A | **Cost Estimate and Routing**<br>SCE has indicated in a meeting with CPUC that a Southern Route Alternative (generally following the Highway 168 alignment to Big Pine, and then following Highway 395 to Bishop) would cost substantially more than the Proposed Project. Based on the meeting, this would be due to the need to establish a new subtransmission line route (and associated access roads) through rugged terrain, the longer length of the line, and the need to construct a new substation in Big Pine. Please provide a rough/conceptual cost estimate for a Southern Route Alternative and identify a proposed (conceptual) route in GIS. Additionally, please elaborate on the factors that could make construction of such an alternative technically challenging and/or costly, as well as the environmental impacts that SCE believes could be exacerbated by the alternative. | | | | |

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| 12 | Alternatives – Undergrounding | N/A | **Alternative Characteristics**<br>CPUC would like to consider and document an Undergrounding Alternative for the Alternatives Screening Report. This would involve rebuilding Segments 2 and 3 as underground (rather than overhead) subtransmission lines. At a conceptual level, please provide information on such an alternative:<br>▪ Estimated route (to the extent it would differ from the Proposed Project overhead route for Segments 2 and 3); provide a figure and/or GIS files, as applicable.<br>▪ Alternative components (e.g., duct bank dimensions/depth of installation; splice vaults [if needed]; transition stations [if needed], etc.).<br>▪ Construction methods description (e.g., trenching, excavation for splice vaults, etc.), including any technical challenges of constructing an underground subtransmission line through steep/rugged terrain.<br>▪ Estimated cost.<br>▪ Operations and maintenance considerations (e.g., possible need to maintain alignment free of woody vegetation to protect underground facilities). | | | | |
| 13 | Proposed Project – Project Description | PEA, Sections 3.3.2.2.3, 3.3.7, 3.3.14.1, and 3.5.5.3, and Figure Set 3.5-3 | **Underground Cable Installation**<br>Clarify whether underground cable installation would occur at/adjacent to the White Mountain Substation. Sections 3.3.2.2.3, 3.3.7, 3.3.14.1, and 3.5.5.3 of the PEA indicate that fiber optic cable would be installed underground at and in the vicinity of *only* Control Substation and the Fish Lake Valley Metering Station. However, Figure Set 3.5-3 of the PEA appears to show new underground telecommunication segments around White Mountain Substation as well. Please clarify the discrepancy. If underground cable installation work would occur at White Mountain Substation, provide an updated version of Table 3.5-5 showing substation surface disturbance information that includes White Mountain Substation. | | | | |
| 14 | Proposed Project – Biological Resources | PEA, Appendix C | **Updated Sensitive Species and Habitat Surveys**<br>The June 2019 TLRR Sensitive Species and Habitat Report (PEA, Appendix C) indicates that the last field survey for the Proposed Project alignment was performed in 2018. We understand that BLM has requested updated surveys, and the CPUC will also require updated surveys. Please provide updated survey reports for the Proposed Project. | | | | |
| 15 | Proposed Project – Biological Resources | N/A | **Greater Sage Grouse**<br>Provide the most updated version of SCE's Sage Grouse Management Plan. | | | | |
| 16 | Proposed Project – Hazards Analysis | PEA, Section 5.9.1.2, p. 5-165 | **Airport Comprehensive Land Use Plan**<br>Could you provide a copy of the Inyo County Airport Land Use Commission's Policy Plan and Airport Comprehensive Land Use Plan (CLUP), dated December 1991, referred to in the PEA? | | | | |

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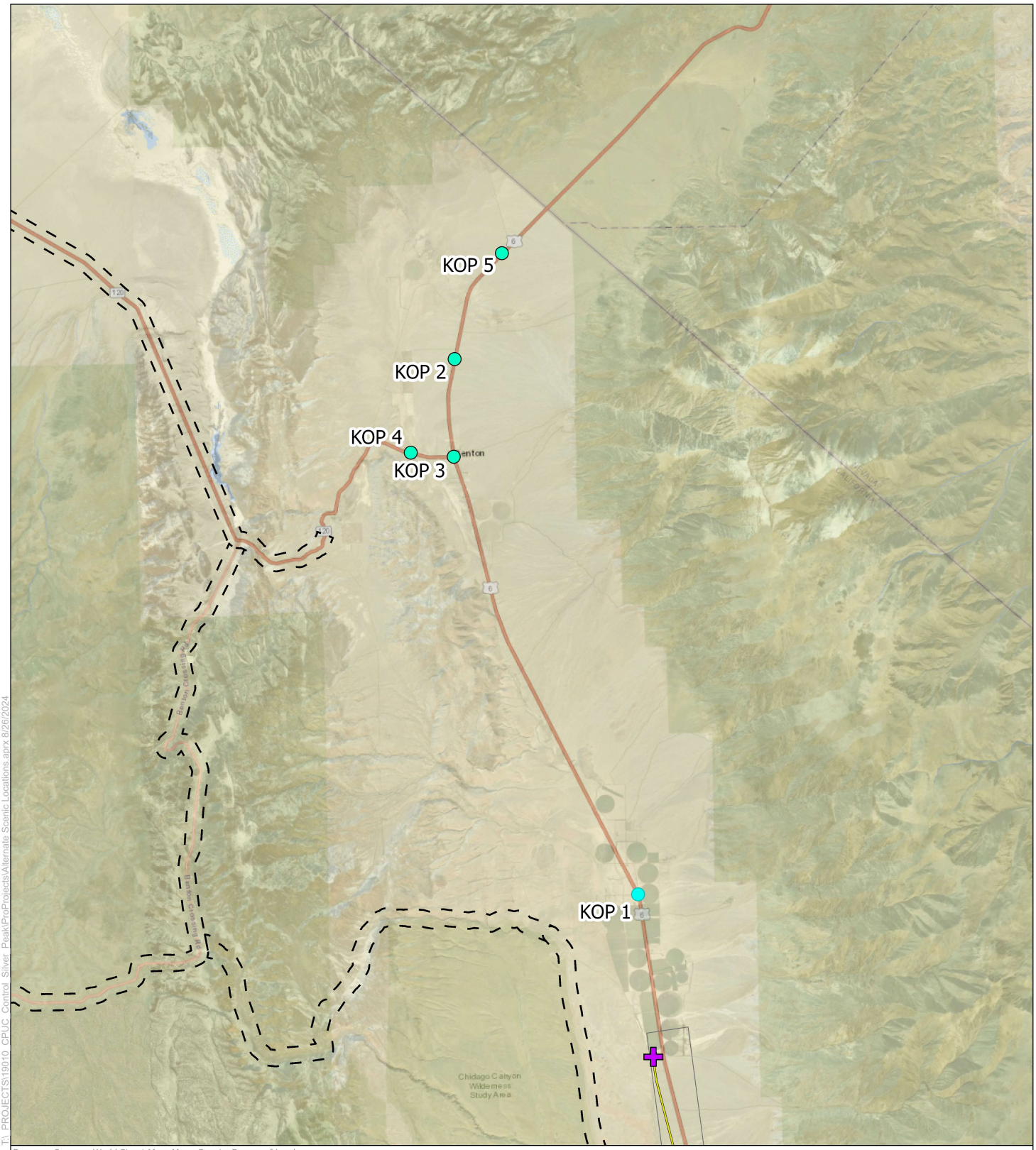
| 17 | Proposed Project – Cumulative Impacts | PEA, Table 7.101, p. 7-2 | **Cumulative Project Status**<br>The PEA identified several cumulative projects which we were not able to locate online. Could you provide a status update on these projects (e.g., whether they are completed or still ongoing/planned)?:<br>▪ SCE-2: SCE Control-Silver Peak 55 kV Reliability Project<br>▪ SCE-3: Zack 55/12 kV (D): HFRA RTU CB Relay Upgrades - (1) Total Relay<br>▪ SCE-4: Zack 55/12 kV (D): Replace station battery (ZACK SWITCHER Battery) | | | | |




T:_PROJECTS\16010_CPUC_Control_Silver_Peak\ProProjects\Alternate Scenic Locations aprx 8/26/2024

Basemap Sources: World Street Map: Mono County, Bureau of Land Management, Esri, HERE, Garmin, NGA, USGS, NPS
World Imagery: Earthstar Geographics

**Exhibit A**
**Proposed Hwy 6 Alternative KOPs**

N

0 2.5 5
Miles

- Proposed KOPs
- Existing KOP
- Mono County Scenic Districts

MONTROSE ENVIRONMENTAL