

PUBLIC UTILITIES COMMISSION

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February 21, 2025

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 Recission**

Dear Mr. Balandran:

Thank you for providing responses to many of the items included in the California Public Utilities Commission’s (CPUC) Data Request No. 2, which was issued on August 30, 2024. To date, CPUC has received what it considers to be largely satisfactory responses to Questions 1 (a-b, d-k, m-n), 2, 7, 9, 11, 12, 13, 15, 16, and 17. CPUC reserves the right to ask clarifying and follow-up questions regarding these responses.

For other items, generally involving the locations or specific characteristics of facilities under the Highway 6 Alternative and/or new or updated surveys covering the Highway 6 Alternative alignment, Southern California Edison (SCE) has indicated that preliminary engineering design will take 4-6 months. Then, it would take another 12-16 months to collect additional data or perform surveys as requested under Data Request No. 2. In total, SCE has estimated that it will take up to 24 months to respond fully to Data Request No. 2. SCE has also indicated that the preliminary engineering design for the Highway 6 Alternative alone would cost approximately \$500K.

This timeframe and level of effort is beyond what was intended in CPUC’s Data Request No. 2, and it is beyond what is needed for an alternatives analysis under the California Environmental Quality Act (CEQA). In its original request, CPUC stated that detailed information on the Highway 6 Alternative components and construction process should be provided, and that “to the extent feasible, this should be comparable to the level of detail provided for the Proposed Project in the PEA [Proponent’s Environmental Assessment]” (emphasis added, see Item #1). CPUC’s request also allowed that “where detailed engineering has not been performed, please estimate or provide a range while explaining your assumptions” (see Item #1). In other words, nowhere in Data Request No. 2 did CPUC state or imply that the Highway 6 Alternative needed to be designed to a 60 percent level.

The CEQA Guidelines make clear that alternatives need not be fully designed. Specifically, CEQA Guidelines Section 15126.6(b) states: “The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed

project... the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.” CPUC typically seeks to provide as much detail as possible for alternatives and to evaluate alternatives within individual resource sections of the EIR to provide complete information for decisionmakers; however, it does not require a 60 percent design for alternatives.

Moreover, the schedule for completing requested surveys (e.g., biological resources, etc.) seems excessively long (12-16 months) – particularly when the Highway 6 Alternative would only include primarily an additional roughly 20 miles of subtransmission line alignment within California (i.e., the portion from Zack Substation to the border with Nevada) that is distinct from the Proposed Project. CPUC understands that SCE may need to produce information for the Bureau of Land Management (BLM) regarding the Highway 6 Alternative within Nevada, which adds to the level of effort and perhaps cannot be disconnected from the work solely within California; nevertheless, the schedule is longer than anticipated from CPUC’s perspective.

As such, the CPUC wishes to move more quickly on this project and the analysis within the Draft EIR. Therefore, the CPUC’s consultants (Montrose Environmental) will utilize an estimated route for the Highway 6 Alternative, based on the best available information, and will obtain survey information independently from SCE. This will allow information to be collected this summer and for the CPUC to complete the Draft EIR as soon as possible. Therefore, CPUC **hereby rescinds** the outstanding items under Data Request No. 2. To the extent SCE may still need to prepare comparable information for BLM’s National Environmental Policy Act (NEPA) process, CPUC would like to be kept abreast of these efforts. However, the engineering design and survey information no longer needs to be produced or collected on CPUC’s account.

If there are any questions regarding the contents of this letter, please don’t hesitate to reach out to me.

Regards,



Eric Chiang
California Public Utilities Commission