
PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

October 20, 2023

Thomas Diaz
Infrastructure Projects & Programs
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, California 91770

Re: Data Request #2 for the SCE EPL TLRR Project (A.23-04-009)

Dear Mr. Diaz:

Southern California Edison Company (SCE) submitted its Certificate of Public Convenience and Necessity (CPCN) and Proponent's Environmental Assessment (PEA) on April 26, 2023. The California Public Utilities Commission (CPUC) Energy Division provided PEA deficiency letters to SCE on May 19 and June 27, 2023 and SCE is currently completing additional analysis.

As we prepare for the environmental analysis for the CEQA compliance document, we have identified additional information needed from SCE. Attached please find Data Request No. 2, which defines the additional questions we have at this time. We would appreciate your prompt responses to our data requests.

One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. in electronic format. Any questions on this data request should be directed to me by email at eric.chiang@cpuc.ca.gov.

Sincerely,

Handwritten signature of Eric Chiang in cursive script.

Eric Chiang
Project Manager, Energy Division

cc:

Case Administration, Southern California Edison
Susanne Heim and Jessica Koteen, Panorama Environmental

Submittal

Document Title: Proponent's Environmental Assessment for Southern California Edison Company's TLRR EPL Project

Data Request Form No. No. 2

Description: Data Request #2

From: Panorama Environmental Inc.

To: Southern California Edison

Date Submitted: October 23, 2023

Determination

- Meets CPUC Requirements, No Additional Information Needed
- Does not Meet CPUC Requirements (see Deficiencies below)
- Additional Data Needed (see Data Requests below)

Data Request

PEA Section or Page #	Comment Code	Data Request
Chapter 5: Environmental Analysis		
5.3 Air Quality/5.8 Greenhouse Gas - Health Risk Assessment		
Draft Health Risk Assessment (dated October 6, 2023)	DR2-1	<p>Issue: Page 2 of the Draft HRA (dated October 6, 2023) memo states that the "CalEEMod output for Phase 02: Staging Areas indicates 0.09 pounds of exhaust PM10 per day from activities at staging yards. By assuming a weekly schedule of six days per week, the total annual DPM emissions from all staging yards is calculated as 28.08 pounds DPM/year. In order to determine DPM emissions from each individual staging yard, SCE assumed that staging yard activity is independent of staging yard size (square footage) and location along the project path. Thus, the total emissions were distributed evenly between staging yards by dividing the number of staging yards at a location by the total number of staging yards for the project and applying that percentage to the total DPM emissions." For example, there is one staging yard on SR-18 and Joshua Road (Bear Valley) near sensitive receptors, which equates to 1 out of 15 total staging areas, or 6.67 percent or 1.872 pounds DPM per year for the staging yard on SR-18 and Joshua Road (Bear Valley). Review of the CalEEMod output (dated May 25, 2023) found values of 0.081 exhaust PM10 pounds per day during 2025, exhaust PM10 0.071 pounds per day during 2026, and 0.061 exhaust PM10 pounds per day during 2027 (i.e., off-road equipment and onsite truck activities). Although not duplicated, the reported value of 0.09 exhaust PM10 pounds per day would produce conservative resultant air concentrations and health impacts.</p> <p>How to Address: The annual CALEEMOD output shows that the total annual DPM emissions associated with staging areas (labeled as Linear, Grading & Excavation) are 0.003104 tons per year or 6.21 pounds per year (2025), 0.011123 tons per year or 22.25 pounds per year (2026), and 0.006453 tons per year or 12.91 pounds per year (2027). It is suggested that these values are more appropriate for the HRA given that DPM health impacts are focused on long-term (i.e., annual) and not short-term exposure periods (less than 24-hour). The staging area activities occur from October 4, 2025 through September 3, 2027; a total of 600 days (or 3 months in 2025, 12 months in 2026, and 8 months in 2027; which is approximately two years of exposure duration). Therefore, the</p>

PEA Section or Page #	Comment Code	Data Request
		total DPM emissions are 0.02068 tons or 41.36 pounds (or an average of approximately 0.009926 tons per year or 19.85 pounds per year over each of the two years). Use of 28.08 pounds per year would produce conservative resultant health impacts. Please review, refer to the data requests below and revise the HRA accordingly.
Draft Health Risk Assessment (dated October 6, 2023) – Appendix B	DR2-2	<p>Issue: Appendix B (Detailed HRA Calculations) uses the annual DPM emission rate of 1.872 pounds per year (as documented in bullet item 1). However, that rate is converted to pounds per hour assumes a total of 8,760 hours to calculate a value of 0.000213699 pounds per hour, which is then used in the calculation of the air concentration and health impacts. Yet, the staging area activities occur for 6 days per week and 10 hours per day (or a total of 3,120 hours). Therefore, the value may need to be 0.0006 pounds per hour. Thus, the annual DPM air concentrations may be approximately 2.8 times underestimated which also potentially underestimates the health impacts.</p> <p>How to Address: Provide justification for the use of 8,760 hours instead of 3,120 hours (i.e., AERSCREEN does not allow the use of operational profiles as the more refined AERMOD) or adjust accordingly. If the use of 8,760 hours is justified, suggest adding note to calculation sheets to explain why 8,760 hours is used.</p>
Draft Health Risk Assessment (dated October 6, 2023) – Appendix B	DR2-3	<p>Issue: Appendix B Detailed HRA Calculations uses a total exposure duration of 1.25 years for residence sensitive receptors. However, the staging area activities occur for 25 months (or 2.08 years). The exposure duration for the period of 0 to 2 years old should be set to 1.83 years for residence and for the period of 16 to 70 years old should be set to 2.08 years. Note 3 of the calculation sheets state that "one year total is assumed as the maximum exposure duration rather than recommended defaults; staging area operations are not expected to exceed one year." This note is inconsistent with the Project Description which includes staging activities for 2.08 years.</p> <p>How to Address: Provide justification for the use of one year given that staging area activities occur from October 4, 2025 through September 3, 2027. Use of the lower exposure duration potentially underestimates the health impacts.</p>
Draft Health Risk Assessment (dated October 6, 2023)	DR2-4	Provide the electronic AERSCREEN input/output files and any other information (such as meteorological data) required to fully duplicate the modeling results.
Draft Health Risk Assessment (dated October 6, 2023)	DR2-5	<p>Issue: Page 3 of the Draft HRA states that the "AERSCREEN model produces estimates of the "worst-case" 1-hour concentrations for a single source of emissions, without the need for hourly meteorological data. It also includes conversion factors to estimate "worst-case" 3-hour, 8-hour, 24-hour, and annual concentrations." It is our understanding that the conversion factor for 1-hour to annual concentration is 0.08 to 0.10.</p> <p>Page 4 of the memo states that "representative meteorological parameters were selected in AERSCREEN for each staging yard. AERSCREEN does not use actual meteorological data files from nearby weather stations; instead, it uses a fully developed set of default meteorological conditions. Default parameters that can be adjusted include minimum and maximum temperatures, climate type, wind speeds, and surface friction."</p> <p>How to Address: Suggest including an annual windrose for Barstow-Dagett Airport, which shows a predominate wind direction from the west</p>

PEA Section or Page #	Comment Code	Data Request
		<p>while the sensitive receptors of concern are located to the southwest, northeast, and southeast of the staging areas; wind directions which occur less than 5 percent of the year. Thus, use of the default conversion factors of 8 to 10 percent result in conservative air concentrations and health impacts.</p>