

**Southern California Edison  
RTRP A.15-04-013**

**DATA REQUEST SET A.15-04-013 RTRP-ED-SCE-12**

**To: ENERGY DIVISION  
Prepared by: Kenneth Spear  
Title: Project Manager  
Dated: 06/20/2018**

**Question Air-1:**

**Provide list of equipment that SCE believes need an exception from the requirement for Tier 4 engines.** SCE’s comment on MM AQ-02 indicates that exceptions from the requirement for Tier 4 engines are typically allowed for off-road equipment if (1) the equipment is specialty or unique and cannot be found with a Tier 4 engine after a due diligence search; (2) the equipment is not in use for more than 5 days total; and/or (3) the equipment is registered under CARB’s Statewide Portable Equipment Registration Program.

Provide a clear list of what exact type(s) of equipment are not available with Tier 4 engines and why. If certain pieces of equipment are available with Tier 3 but not Tier 4 engine, please note this. Clearly identify the construction activity that the equipment would be used to complete, the number of days, and the number of hours per day.

**Response to Question Air-1:**

SCE’s comment regarding proposed language in Supplemental Environmental Impact Report (“SEIR”) pg. 4.3-46 asserted the following:

<p><b>Air Quality and Greenhouse Gas Emissions</b></p>	<p>4.3-46</p>	<p>During Project construction, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule). <u>Exceptions may be allowed only on a case by case basis for three specific situations: (1) an off-road equipment item that is a specialty, or unique, piece of equipment that cannot be found with a Tier 3 or better engine after a due diligence search; and/or (2) an off-road equipment item that would be used for a total of no more than 5 days; and/or (3) the off-road equipment is registered under CARB’s Statewide Portable Equipment Registration Program.</u></p>	<p>There are circumstances where a contractor may have a special piece of equipment that is needed for a short period of time. SCE suggests the DSEIR identify those special circumstances in which a contractor could get an exception to the emissions standards. Similar language has been approved for other SCE projects (i.e., Valley South Subtransmission Project and West of Devers).</p>
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SCE’s proposed edits were intended to outline a process for exceptions in the event that equipment with Tier 3 engines or better cannot be procured in support of construction.

After inquiry and further consideration in response to this request, SCE is unable to identify and provide a specific equipment list enumerating future, non-Tier 4 engines that our construction contractor may request to use during construction. The need for this exception will likely arise

on a case-by-case basis, if at all, and will depend on conditions not yet established (*e.g.* , availability of equipment, planned duration of equipment's use, final engineering, *etc.* ).

Specifically, it is SCE's experience that a need occasionally arises where a specialized piece of equipment is required for a short period of time that is unavailable with a Tier 4 engine. For example, on past projects, SCE has been unable to procure Tier 4-compliant equipment including PM 10 Certified sweepers (Santa Barbara Reliability Project ("SBRP")), Sag Cat/wire stringing equipment (SBRP and the Tehachapi Renewable Transmission Project ("TRTP")), certain Heavy lift or off road cranes (TRTP), and Horizontal Directional Drilling ("HDD") equipment (TRTP undergrounding segment in Chino Hills). Generally, the reasons such equipment are unavailable include:

- § The equipment is so specialized that Tier 4-compliant versions don't exist (*e.g.* , HDD equipment/wire stringing equipment);
- § The equipment is so rare that if compliant versions exist, SCE does not have timely access to them within the project schedule (*e.g.* , certain heavy cranes and/or off road cranes);
- § Regulatory changes occur that create a greater need than supply (*e.g.* , PM10-compliant sweepers); and/or
- § The equipment doesn't exist in California and transporting said equipment to California from other states would negate any air quality benefits associated with that equipment's use.

Examples of correspondence reflecting the SCE's past requests and subsequent CPUC approval of non-compliant Sag/Cat wire stringing equipment and street sweepers in support of the SBRP are attached hereto for reference.

Because there are occasions where certain specialized equipment cannot be procured with Tier 4 engines, SCE's comment was meant to provide flexibility in the event those circumstances arise. Additionally, our comment was also meant to provide suggestions regarding how we can limit the timeframe in which a non-Tier 4 engine piece of equipment would be in use.