

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 9, 2016

Ian Forrest, Senior Attorney
Southern California Edison Company
Post Office Box 800
Rosemead, CA 91770
Email: ian.forrest@sce.com

RE: Data Request #1 - Certificate of Public Convenience and Necessity for the Riverside Transmission Reliability Project – Application No. A.15-04-013

Dear Mr. Forrest,

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its review of Southern California Edison's (SCE's) Application (A. 15-04-013) for a Certificate of Public Convenience and Necessity (CPCN) for the Riverside Transmission Reliability Project (RTRP).

The CPUC identified a number of data needs that do not rise to the level of deficiencies during review of the Application and SCE responses to Deficiency Reports #1, #2, and #3. These initial data needs are identified in the attached Request for Additional Data.

Information provided by SCE in response to this Request for Additional Data should be filed as supplements to Application A. 15-04-013. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SCE respond to this request no later than April 7, 2016. Please let us know if you cannot provide the information by this date. Delays in responding to these data needs will result in associated delays in preparation of the Subsequent Environmental Impact Report.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SCE's CPCN be approved.

Please direct questions related to this application to me at (415) 703-5484 or Jensen.Uchida@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Jensen Uchida".

Jensen Uchida
Project Manager
Energy Division, CEQA Unit

Mr. Ian Forrest, Southern California Edison
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cc: Mary Jo Borak, Supervisor
Jack Mulligan, CPUC Attorney
Christine Schneider, Panorama Environmental, Inc.
Jeff Thomas, Panorama Environmental, Inc.
Rita Wilke, Panorama Environmental, Inc.

REQUEST FOR ADDITIONAL DATA: DATA NEEDS FOR THE RIVERSIDE TRANSMISSION RELIABILITY PROJECT APPLICATION (A. 15-04-013)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified several areas where more information is needed to prepare a complete and adequate analysis of the proposed project in accordance with the requirements of the California Environmental Quality Act (CEQA), as follows:

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Data Needs	
Number	Data Need
Project Description	
1	<p>Provide cut and fill estimates for site preparation and construction of only the Wildlife Substation.</p> <p>The 2013 RTRP FEIR does not provide separate cut and fill estimates for the Wildlife and Wilderness substations. This information is necessary in order to assess impacts specifically associated with the CPCN application.</p>
2	<p>Identify any proposed structure locations where retaining walls may be required (e.g., structures adjacent to the river or next to Vernola Marketplace). Define the maximum height and length of each required retaining wall.</p> <p>If the Subsequent EIR does not analyze the impacts of retaining walls, SCE will need to file a petition to modify to add retaining walls to the project in the future.</p>
3	<p>Define locations where access roads would be wider than 18 feet and provide the maximum width at each location, including the locations and dimensions where space would be needed to accommodate construction vehicle passing or turn-arounds.</p> <p>The 2013 RTRP FEIR states on page 2-88 that “Some roads may be wider [than 18 feet] depending on final engineering requirements and field conditions.”</p>
4	<p>List the types and frequency of maintenance activities that SCE will perform on unpaved roads, including the Santa Ana River Trail all-weather surface within the proposed SCE ROW and on private lands.</p>
Air Quality	
5	<p>The criteria air pollutant emissions provided in response to Deficiency Report #2 Question 9 included a number of errors and omissions that need to be corrected as described below.</p> <p>(1) The emissions calculations assumed a June 2021 construction start date for the 230-kV transmission line and substation versus a 2018 start date identified in the CPCN application; therefore, the calculated numerical emissions values are lower than they likely would be due to the start date further in the future. Using a later start date uses lower emissions factors, which could inappropriately reduce the</p>

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Data Needs	
Number	Data Need
	<p>calculated emissions. Provide emissions calculations with emission factors that reflect the 2018 construction start of construction or provide an updated construction schedule that identifies a June 2021 start date.</p> <p>(2) Emissions estimates included the two RPU 69-kV routes. Provide a new emissions analysis for only the emissions generated by the activities considered in SCE's CPCN application.</p> <p>(3) The criteria air pollutant emissions were calculated with mitigation incorporated. Provide the unmitigated emissions and calculation spreadsheets. These emissions are required for an adequate CEQA analysis of impacts prior to mitigation.</p> <p>(4) The criteria air pollutant emissions provided by SCE does not specify whether the Localized Significance Threshold (LST) analysis was conducted using mitigated or unmitigated emissions. Provide clarification of the analysis and provide the unmitigated LST emissions and calculation spreadsheets if the LST analysis was conducted using mitigated emissions.</p>
Biological Resources	
6	<p>Provide a complete report for the Delhi Sands flower-loving fly surveys that includes Appendices B, C, and D and species location information in Table 2.</p> <p>The report for the Delhi Sands flower-loving fly surveys, dated November 4, 2006, which is provided as an Appendix to the Biological Resources Technical report is incomplete. The report does not include Appendix B, C, or D and the location column in Table 2 of the report has not been filled in.</p>
7	<p>Provide a burrowing owl survey report for the proposed 230-kV transmission line route.</p> <p>The following burrowing owl report and survey results were referenced in the Biological Resources Section but was not included in the Biological Resources Technical Report (Appendix B of the 2013 RTRP FEIR):</p> <p>TRC Essex. 2006. Draft Riverside Transmission Reliability Report Burrowing Owl and Riparian Bird Species Habitat. Carlsbad, California, unpublished report.</p>
8	<p>Provide the following special-status species report:</p> <p>Davenport, A. 2006. Riverside Transmission Reliability Project San Bernardino Kangaroo Rat <i>Dipodomys merriami parvus</i> & Los Angeles Pocket Mouse <i>Perognathus longimembris brevinasus</i> Survey. Prepared for TRC Essex, Inc.</p> <p>The 2013 RTRP FEIR notes that a focused small mammal survey and trapping study was conducted in 2006 by A. Davenport; however, the report was not included in the Biological Resources Technical Report (Appendix B of the RTRP FEIR).</p>
Cultural Resources	
9	<p>Provide the CPUC and Parus Consulting with a non-redacted version of the Cultural Resources Technical Report including all site records and maps.</p> <p>The Cultural Resources information that was sent to Parus Consulting on December 8, 2015 did not contain the confidential Riverside Transmission Reliability Project Cultural Resources Technical Report (March 2011) prepared by Power Engineers for the RTRP EIR. The technical report is required in order to assess CRHR-eligibility of resources found during the March 2011 survey effort. The technical report is also required to determine if additional cultural resource surveys will need to be performed to examine all areas that may be impacted by the proposed project.</p>

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Data Needs	
Number	Data Need
10	<p>Provide a cultural resources technical report documenting the results of a cultural resources field survey for the areas shown in Attachment A: Cultural Resources Survey Map Book.</p> <p>The cultural resource GIS survey data shows the following locations along the proposed project alignment have not been adequately surveyed:</p> <ul style="list-style-type: none"> • Wildlife Substation • AX2 • AX4 • AX15 • AX16 • AX18 • AX20 • AX21/D1 • I6/JA1 • Staging Yard at Etiwanda Ave
Hazardous Materials	
11	<p>Identify the locations or facilities where hazardous waste and removed treated wood poles will be disposed of as part of the proposed project.</p>
Alternatives and System Analysis	
12	<p>Provide one complete year of transformer loading data for all 220/66 kV "A" Banks at Vista in hourly granularity. Additionally, provide the corresponding generation levels for all RPU generation in hourly granularity. Data for years 2013 or 2014 or both would be sufficient.</p>
13	<p>Explain the primary use of RPU generation. Is this generation ever used for merchant purposes? For example, is this generation ever dispatched based on market prices? Is this generation strictly used to meet RPU demand when such demand is expected to approach or exceed SCE Vista transformer limits? A more detailed explanation of how this generation is utilized is needed.</p>
14	<p>Provide the relevant SCE Transmission Expansion plan that clearly identifies/shows the capacity limitations on Vista 230/66 kV transformers associated with RPU load and need for the RTRP project. The report should include study assumptions, results for Vista 230/66 kV transformers, and proposed mitigations.</p>
15	<p>Provide SCE Drawing #563650 showing Vista 220/66 kV transformers 1A, 2A, 3A, and 4A existing MVA ratings. If not clear in the drawing, please include table showing normal, STELL and LTELL for each of the four A Banks at Vista.</p>
16	<p>Provide explanation of the transformers 1A, 2A, 3A, and 4A circuits. Are they feeding RPU or SCE load? Provide corresponding load data for these circuits for the 2015 peak consistent with data provided in response to questions 5 and 6 of Deficiency Report #3.</p> <p>Response to Question 17 in Deficiency Report #2 suggested that Banks 1A and 2A are dedicated to serving RPU load; however, the One Line for Operation drawing (Dwg. #5345142-9) provided shows two 66 kV circuits not specifically noted as "City of Riverside". These are the 1) San Bernardino Del Rosa and 2) San Bernardino Cardiff Unimed. See section A-6 and A-7 in drawing #5345142-9.</p>
17	<p>Confirm the calculation presented below and that 2015 represented a new peak for RPU.</p> <p>Based on SCE response to questions 5 and 6 of Deficiency Report #3 it appears that the RPU system may have reached a new all-time peak in 2015. This determination is based on the peak load provided for Banks 1A and 2A and the corresponding RPU generation stated to be on line. From response to Questions 5, Banks 1A and 2A have combined load of 524 MW and from Question 6 the total RPU generation was 113.8 MW. Combining these to get the total RPU load results in 637 MW.</p>

Table 1: SCE Riverside Transmission Reliability Project Application 15-04-013 Data Needs	
Number	Data Need
18	<p>What is the existing Short Circuit Duty limits at Vista? Specify what equipment is the limiting factor. Provide the technical study and calculations showing all short circuit contributions at Vista 66-kV, including all study assumptions. Demonstrate why three parallel banks at Vista are not acceptable from SCE's perspective.</p> <p>If the existing ratings for capacitor banks at Vista 66-kV are 63 kA, please explain why upgrading to 80 kA breakers is not a viable alternative.</p>
GIS	
19	<p>The preliminary engineering design that SCE provided in response to Deficiency Report #2, Question 1 on February 9, 2016 is inadequate because it does not include all project components and adequate details regarding project structures. Provide updated GIS that includes the following elements:</p> <ul style="list-style-type: none"> • Boundary for the Wildlife Substation (excluding the RPU Wilderness Substation area) • 230-kV conductor field snub areas • Telecommunication lines between: <ul style="list-style-type: none"> - Mira Loma Substation – Wildlife Substation - Pedley Substation – Wildlife Substation - Vista Substation – Wildlife Substation • Distribution lines that will be relocated as a result of the proposed project (included in Figure 2.3-8 of the 2013 RTRP FEIR). <ul style="list-style-type: none"> - Identify the location of additional ROW that will be acquired to accommodate the relocation, if needed. - Identify the voltages of all distribution lines that need to be relocated. • All proposed temporary work areas including <ul style="list-style-type: none"> - Conductor stringing pull and tension areas - Storage yards - Marshalling yards - Helicopter fly yards - Guard structures • Updated metadata for transmission line structures that identifies structure type and proposed (approximate) height for each structure. • Updated access roads identifying the entire road to be utilized from paved city roadway to project feature. Include metadata that identifies each road as a permanent or temporary access road.

Attachment A: Cultural Resources Survey Map Book