

# 1. Comments and Responses to Comments

## 1.1 Purpose of Response to Comments Document

This document, in conjunction with the SCE Devers–Palo Verde No. 2 Transmission Line Project Draft EIR/EIS (May 2006), constitutes the Final EIR/EIS on the Proposed Project. The Final EIR/EIS has been prepared pursuant to CEQA Section 21000 et seq., California Public Resources Code, and in accordance with the Guidelines for the Implementation of CEQA Section 15000 et seq., California Code of Regulations, Tit. 14. The Notice of Preparation (NOP) describing the Proposed Project was published on October 18, 2005. The Final EIR/EIS will be used by the CPUC as part of its CPCN approval process, which includes selecting project alternatives, adopting mitigation measures, and reviewing project costs. The BLM, as Lead Federal Agency, shall be responsible for ensuring compliance with all requirements of NEPA and the Council on Environmental Quality (CEQ) regulations for implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508). This Final EIR/EIS contains all comments on the Draft EIR/EIS and responses thereto. The focus of the responses to comments is on the disposition of significant environmental issues as raised in the comments, as specified by Section 15088(b) of the State CEQA Guidelines and 40 CFR 1503.4 under NEPA.

## 2. Information Provided During Draft EIR/EIS Comment Period

During the Draft EIR/EIS comment period, several parties requested that the CPUC and BLM provide additional information that would better enable them to prepare comments on the Draft EIR/EIS and for the Arizona Corporation Commission hearings. In order to provide this information to the public, their requests are reproduced in this Final EIR/EIS. Table 2 presents a listing of the requests and a description of resulting information. Following the table, the actual information requested and disseminated is presented.

**Devers–Palo Verde No. 2 Transmission Line Project**  
**COMMENTS AND RESPONSES TO COMMENTS**

**Table 1. Information Provided During the Comment Period**

Name	Regarding	Date	Method of Communication
Sevak Khatchadourian	Asks if project would impact his property	5/24/06	Email
Donald G. Begalke	Requests names of companies/agencies/consultants at Harquahala Public Information Meeting	6/8/06	Email
Donald G. Begalke	Asks 7 questions related to AZ and the regional transmission system and alternatives	6/18/06	Email
Leroy Ellinghouse, California Department of Water Resources	Asks if East Branch of CA Aqueduct is affected by the project	6/13/06	Email
Richard Mead	Asks about the location of the project related to property	6/30/06	Voicemail
Ross Lybarger	Asks about the location of the project related to property	6/30/06	Email
Donald G. Begalke	Asks 7 questions about the commenting process, alternatives, and aerial maps	7/3/06	Email
D. Sanders	Asks about the location of the project related to property	7/7/06	Voicemail
Tom Floyd	Asks for a depiction of different styles of transmission towers	7/20/06	Voicemail; U.S. Mail
Donald G. Begalke	Asks if SCE has access to comments during the APP & TLSC hearing	7/28/06	Email
Dale Walters, P.E., Agua Caliente Band of Cahuilla Indians	SCE has indicated that DPV2 would not require a Conditional Use Permit for traversing Reservation lands. Requests a copy of SCE's letter to the CPUC, which includes a citation of federal law supporting this contention	8/7/06	Email

**Email from Sevak Khatchadourian:**

Dear project Managers,

I just received the Notice of Availability, Draft Environmental Impact Report/Environmental Impact Statement for the proposed Devers-Palo Verde No. 2 Transmission Line Project. I would like to know if the power lines will be passing through my property APN 811-052-016 and APN 811-052-017. And if they are, what will be my compensation.

Thanks.

*EIR/EIS Team Response:*

*Mr. Khatchadourian -*

*We have referred your question to Southern California Edison; they will research your parcel location and let you know how (and if) your property would be affected. SCE would also be the entity that could advise you on compensation. Please let me know if you do not receive an answer from them within a week. Thank you.*

**Email from Donald G. Begalke (1 of 2):**

Providing transport to H.V. Tues. for a person that also attended the Scoping Meeting in Avondale, Az., we were planning to share the names of Aspen, SCE and BLM staff? We've duplicated some, and apparently discussion caused missing some. There were 2 consultants, too. A Mr. Clarkson (?), his company is a subcontractor to Aspen in these efforts? Another consultant, APG?

Please, including yourself and others of the tour, list each name by company/agency/... involved with the Aspen Workshop in Harquahala Valley. Did some of the folks on the tour with you attend the H.V. 7PM Workshop also?

The beginning of the 2PM workshop seemed to go as planned -1st hour. The gentleman from Blythe, Az. had requested that a part of the workshop be a "sit-down question/answer part" (so that discussions/answers would be heard by all attendees). When you arrived near 5PM, one of your staff and Mr. Horne of SCE each recommended emails so that answers could be received by Arizonans prior to the June 26th Hearing before the Az. PP&TL Siting Committee. We did inform you that you were the recommended recipient for additional questions. At least Mr. Horne will be answering questions via email also.

I commend the Aspen personnel at the 2PM meeting for their efforts to keep us on track for the purpose of the workshop. There is confusion with the EIR/EIS with respect to the two states. And what was not in the EIR/EIS caused queries??-!! The processes are different for the two states.

Mr. Clarkson took some tries at answering questions that Aspen personnel did not because items of queries were not in the Aspen EIR/EIS. Also, the other gentleman from APG tried answering queries also; I thought it strange that he did not wear a name-badge.

Will send you some additional queries later today or tomorrow. Thank you for your help with names, companies/agencies/consultants.

*EIR/EIS Team Response:*

*Mr. Begalke -*

*I'm sorry I didn't get to talk with you in person last week. Following are the people who attended the Workshop last week:*

*BLM: Steve Fusilier (Yuma Office)*

*CPUC: Billie Blanchard (arrived with me at about 3:30 p.m.)*

*Aspen Environmental Group (prime contractor for preparation of the EIR/EIS):*

*Sandra Alarcón-Lopez (management and land use, social sciences)*

*Chris Huntley (biology)*

*Hedy Born (alternatives)*

*Aspen Team authors of the EIR/EIS (subconsultants to Aspen):*

*Michael Clayton (Michael Clayton & Associates, Visual Resources)*

*Eleanor Gladding (SWCA, biology - arrived about 4 p.m.)*

*Susan Goldberg (Applied Earthworks, cultural resources)*

*Other people not connected with preparation of the EIR/EIS:*

*Jack Horne, SCE*

*Mickey Siegel (EPG, environmental consultant to SCE and not a contributor to the EIR/EIS)*

*We are reviewing your other questions this week. Thank you for your participation.*

Email from Don Begalke (2 of 2) 6/18/06 — responses follow each question:

**This email includes additional questions unanswered at the 2PM Workshop in Harquahala Vly, Az. on the proposed DPV2 Project.**

**1. The EIR/EIS can confuse, and on Page ES-1, the last paragraph, 7th Line we read "Nuclear Regulator Commission". When did the NRC participate in any siting or commission hearing in Az. regarding DPV1? In what Az. document would folks find "the NRC on record" about the line siting?**

*The Nuclear Regulatory Commission was one of the Lead Agencies under the National Environmental Policy Act (NEPA) that prepared the EIS for the DPV1 Project. The NRC was a NEPA Lead Agency because the DPV1 line was to connect directly with the substation at the Palo Verde Nuclear Generating Station. We don't know how this document, or any NRC information was used in the Arizona siting case.*

**2. The EIR/EIS discusses some generating alternatives in SCE's service area and their eliminations as alternatives. In the readings though the financial environments are not explained in detail. For example on ES-31, new facilities at or near the Etiwanda Substation does not inform the new MW - ? Nor does it explain details on transmission infrastructure? Comparative costs? Since SCE uses "economics" as a primary reason for DPV2, the costs are missing regarding such alternatives from the EIR/EIS; why?**

*Cost and economics are not issues addressed in the alternatives analysis in the EIR/EIS for two reasons. First, the California Environmental Quality Act (CEQA) states that economic effects shall not be considered as significant effects on the environment (CEQA Guidelines 15131). Second, CEQA states that alternatives may not be eliminated simply because they are more costly (CEQA Guidelines 15126.6(c)).*

**3. SCE owns most of the Mohave Power Plant at/near Laughlin, Nv. Refitted as a "natural gas" power plant, how many MW can be imported to SCE's customers? SCE already has the transmission lines from Mohave to their service area.**

*Please refer this question to SCE.*

**4. How many transmission lines from Az. connect with the switchyard at the Mohave Plant? Why is that information, and the importability of power to the SCE service area not included in the EIR/EIS? How many MW can be imported to SCE's area via those NW Az. Lines? Are there other Nevada lines to the Mohave Switchyard? MW via line from Nv.?**

*Please refer this question to SCE.*

**5. Southern California is an area with high solar power potential. When did SCE apply to the CPUC for a solar generating station? For how many MW?**

*Please refer this question to SCE.*

**6. Visual photos from the ground are in the EIR/EIS. For the DPV1 Line and the corridor through the KOFA Wildlife Refuge, where are the aerial photos in the EIR/EIS to assess the scars and conditions?**

*The aerial photographs presented in EIR/EIS Appendix 10 show the DPV1 transmission line. The access road used to construct that line is still in use today and is maintained by SCE. This access road and the spur roads leading to each tower are not visible in the Appendix 10 air photos at the scale printed, but they are visible on the ground and on the more detailed air photos used for the field work of the EIR/EIS team.*

**7. Is this EIR/EIS for hearings in both Az. and Ca.? Since the Az. PP&TL Siting Committee has a hearing June 26, 2006, what are the omissions of this EIR/EIS with respect to the Colorado River to Palo Verde Nuclear Generating Station portion of the DPV2 Project?**

*The EIR/EIS was not prepared to support the Arizona hearings, but only for use by the CPUC and BLM in their processes (Certificate of Public Convenience and Necessity/Right of Way Grant, respectively) to evaluate applications from SCE for the DPV2 Project. The environmental information included in the EIR/EIS may be useful to the Siting Committee or SCE in that proceeding, but the document was not prepared for that purpose.*

Email from Leroy Ellinghouse, California Department of Water Resources:

Here is a copy of the Thomas Guide Map that has the alignment for the East Branch of the California Aqueduct. I've drawn arrows on the alignment, let me know if think we'll be affected. Thanks.

*EIR/EIS Team Response:*

*Leroy -*

*Attached is a map [see next page] showing where the transmission lines for the DPV2 project cross the East Branch of the aqueduct. As you can see on the attached map, the towers in this area will be recon-ducted only -- no new tower construction will be required in this area. Please let me or Billie Blanchard know if you have any additional questions.*

**East Branch of California Aqueduct  
Crossing of the West of Devers Corridor between Loma Linda and Grand Terrace**

- Gold line is unaffected by DPV2 Project (no change to towers or conductors).
- Green line towers would be reconducted but towers shown on this page would not be re-built.



Voice mail from Richard Mead 6/30/06:

Please call me regarding the location of property I own with respect to the location of the DPV2 Project.

*EIR/EIS Team Response:*

*[We provided Mr. Mead with maps showing the location of his property, and also referred him to SCE.]*

Email from Ross Lybarger 6/30/06:

To Whom it may concern,

I received a notice in the mail regarding the DPV2 project. I was wondering what the location would be in relation to my property that is located in the hills of Nuevo?

There is a transmission line (tower) very close if not on my property. I was unable to locate any info online at the given internet site. Any help would greatly be appreciated.

Respectfully, Ross Lybarger

*EIR/EIS Team Response:*

*Mr. Lybarger -*

*If there's a tower on or near your property in the Nuevo area, that would most likely be the Devers-Valley No. 1 transmission line. You received the mailing because Southern California Edison may construct a second line immediately adjacent to the existing towers. The new towers would be located about 100 feet to the south and/or east of the existing towers. If you like, we can send you a map of this transmission line (SCE's security rules prevent us from posting the detailed maps on the internet). We can also send you a copy of the Executive Summary for the Draft EIR/EIS, which explains the proposed DPV2 project and the alternatives, or a CD of the complete Draft EIR/EIS (about 2000 pages).*

*The Devers-Valley No. 2 line is an alternative to the "West of Devers" upgrades that SCE originally proposed to construct, but which may not be permitted by the Morongo Band of Mission Indians due to their desire to eliminate SCE's existing towers from their present location on tribal land.*

*If you can give us the parcel number or approximate street/intersection location for your property, we can mark it on the maps we send you. Let us know how we can help.*

*Sincerely,  
Susan Lee*

Email from Don Begalke 7/3/06 — responses follow each question:

**1. Will a "draft comments" booklet be published before work commences on the final EIR/EIS?**

*No. The comments on the Draft EIR/EIS will be published in the Final EIR/EIS.*

**2. Are specific comments and the commenters' data (name, address, phone number, email address) provided in the draft-comments booklet?**

*The comment letters (or emails or faxes) will be reproduced in the Final EIR/EIS so if the letters contain address and other contact information, that information will be published in the Final EIR/EIS.*

**3. Can the "No Project Alternative" category consist of more than one alternative?**

*The "No Project Alternative" is defined in Section C.6 of the Draft EIR/EIS and regulatory information is presented in Section C.6.1. As explained in Section C.6.1, the No Project Alternative is "what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services". Therefore, each EIR/EIS presents a scenario defining what is expected to occur if the project is not approved or constructed. Definition of this scenario requires some speculation.*

**4. Did alternatives exist that did not end up in the draft?**

*The Draft EIR/EIS included discussion of all alternatives of which the preparers were aware. Several of these alternatives were not analyzed in detail because they did not meet the environmental and regulatory screening criteria. Section 3 (Overview of Alternatives) of Appendix 1 (Alternatives Screening Report) of the Draft EIR/EIS presents a summary of all alternatives considered, including those that were eliminated after preliminary screening.*

**5. May a Public submit a new alternative, not in the draft?**

*Yes, a new alternative may be suggested in comments on the Draft EIR/EIS.*

**6. Back to my aerial photo inquiry, which you did answer with reference to Appendix 10 (why did I not recall those photos before asking you?). On what date(s) did Aspen, or some subcontractor, take the photos appearing in Appendix 10 of the draft EIR/EIS?**

*The aerial photos were provided to Aspen by SCE, or if necessary, photo coverage was acquired by the Aspen Team GIS specialists.*

**7. Altitude differences seem to exist when looking at photo-to-photo in Ap.10. What are the altitudes at which each photo in Ap.10 was taken?**

*Information not available*

**Phone Call from D. Saunders 7/7/06**

Mr. Saunders represents Loma Linda University, which owns several parcels north of Banning. He wanted to understand how the Proposed Project would affect the property.

*EIR/EIS Team Response:*

*Attached, as promised in our telephone conversation of this morning, is a photo of the 3 sets of transmission towers that cross the Loma Linda U property near Sunset Avenue. Below the photo is a diagram showing how those 3 sets of towers would be consolidated into two, if the project proposed by SCE were to proceed. As we discussed, it now seems more likely that an alternative route (Devers-Valley No. 2 Alternative, located south of the I-10) will go forward and there will be no immediate changes to the lines in your area. However a final decision on this will not be made until late this year when the CPUC and BLM issue decisions on the project proposed by SCE.*

**Phone Call from Tom Floyd 7/20/06**

Mr. Floyd was concerned that he would not have adequate time in which to provide comments on the Draft EIR/EIS. He would like to comment regarding the style of transmission tower proposed by SCE.



*EIR/EIS Team Response:*

*We informed Mr. Floyd that the comment period has been extended to August 11, 2006. We also provided him with copies of descriptions and illustrations of tower types from Section B (Project Description) of the Draft EIR/EIS.*

**Email from Don Belgke**

Ms. Susan Lee  
Vice-President  
Aspen Environmental Group  
San Francisco, Ca.

Dear Ms. Lee:

Az.'s primary campaigns have been crunching these past few weeks as early/mail balloting begins August 9th.

Took some time to attend a different meeting today, and some attendees were also faces/voices in the processes on the SCE DPV2 EIR/EIS. Listening to their discussion of commenting on the draft causes concern.

As you may have heard, on 6/12/06 I filed in the ACC processes as an Intervener against SCE's DPV2 application. Two hearing days before the APP&TLSC were held in June. In continuance til Aug. 21st, hearing days will occur, including possibly 4 in September.

The comment period on the draft EIR/EIS ends August 11, 2006. If comments are presented to Aspen, does SCE have access to them while the APP&TLSC hearing is ongoing?

Performing adjudications or supervising same during the last 18 years of my public employment, am yet investigating items in or not in the draft. I still expect to send comments on August 11th.

Sincerely yours,

Donald G. Begalke  
PO Box 17862  
Phoenix, Az. 85011-0862  
Telephone: (602)279-3402

*EIR/EIS Team Response:*

*Dear Mr. Begalke:*

*When comments are submitted to the CPUC and BLM, they are considered to be public. We will release them to any party upon request. Earlier this week, SCE has requested copies of all comments received on the Draft EIR/EIS, and we provided them with all comments received through July 26, 2006. It's likely that they will request (and receive) copies of future comments as well, prior to the publication of the Final EIR/EIS.*

*If you would also like to receive copies of comments, we will be happy to provide them. When making a request, please let us know if you would like to receive them electronically (we have been making PDF files of each comment) or if you would like us to mail paper copies to you.*

*Sincerely,*  
*Susan Lee*

#### Email from Dale Walters

Aspen Environmental Group:

Via letter dated December 16, 2005, the CPUC was advised that a Conditional Use Permit for the Devers–Palo Verde No. 2 Transmission Line would be required for those portions of the project which traverse the Agua Caliente Indian Reservation. Southern California Edison has indicated to Tribal Planning that the project's proponents disagree and that SCE's written response to the CPUC includes a citation of federal law supporting this contention.

Tribal Planning has requested a copy of Southern California Edison's response, however was informed by SCE on Friday, August 4, 2006, that the written response, which includes the citation, would not be available until late in the week of August 7/8 (Lin Juniper, SCE Local Public Affairs Department, (760-202-4231). As the deadline for input on the Final EIR/EIS is Friday, August 11, 2006, SCE suggested that Tribal Planning contact Aspen Environmental Group directly for a copy of SCE's response to the Tribe's concerns.

Approximately two miles of the proposed alignment traverses the jurisdictional area of Tribal Government. Tribal Planning and Development will need to secure a copy of SCE's letter in order to prepare a rational response to the jurisdictional questions.

Thank you,  
Dale Walters, P.E.  
Senior Civil Engineer  
Tribal Planning and Development  
Agua Caliente Band of Cahuilla Indians

*EIR/EIS Team Response:*

*Dear Mr. Walters -*

*Thank you for your message and email. Attached is the court decision that SCE provided to us regarding the crossing of the Agua Caliente Indian Reservation when the Devers-Palo Verde No. 1 transmission line was built in 1980. The Draft EIR/EIS did not take a position regarding whether or not the legal resolution to the permitting issue would be the same now as it was in 1980 (see discussion on Draft EIR/EIS pages D.4-36 and D.4-37) - we have left the resolution of that issue to SCE and the tribe.*

*If we receive comments on this issue as described in the Draft EIR/EIS from either the tribe or from SCE, we will review them and consider modifying the text in the Final EIR/EIS, if required. Please let us know if you have any other questions.*

*Sincerely,*  
*Susan Lee*

### 3. General Responses to Major Comments

This section addresses issues that were raised by many commenters and that therefore required a detailed response. General Responses address the following topics:

- GR-1 – Eliminate new impacts within the Kofa National Wildlife Refuge
- GR-2 – The DPV2 Project provides no benefit to Arizona
- GR-3 – Why is the DPV2 Project needed?

#### General Response GR-1: Eliminate New Impacts Within the Kofa National Wildlife Refuge

Commenters expressed concerns regarding impacts to the Kofa National Wildlife Refuge (NWR) and protection of the desert bighorn sheep. This response also addresses questions about why no alternatives were evaluated in detail that would avoid the Kofa NWR.

The baseline setting and potential impacts from the Proposed Project to Kofa NWR are discussed within each Section D issue area of this EIR/EIS under the segment titled “Kofa National Wildlife Refuge.”

In response to the concerns about impacts to the Kofa NWR, and as required under the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA), a reasonable range of alternatives to the project was evaluated. Alternatives were considered that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Alternatives are addressed in most detail in Appendix 1, Alternatives Screening Report. Within this report, Section 2 summarizes the requirements of CEQA and NEPA with respect to alternatives. Based on review of previous environmental documents prepared to analyze the DPV1 and DPV2 projects, knowledge of the area, and evaluation of feasible route options throughout the entire area around Kofa NWR, the following three alternatives were considered as methods of avoiding impacts to Kofa National Wildlife Refuge:

- **SCE North of Kofa NWR–South of I-10 Alternative.** Diverges from the proposed DPV2 route approximately 42.5 miles from its origin at Harquahala Switchyard and heads northwest approximately 1.5 miles before turning west-northwest towards I-10. Crosses north of Kofa NWR and the New Water Mountains, south of I-10, and eventually rejoins the proposed DPV2 route 0.5 miles north of Yuma Proving Ground and 8 miles west of Kofa NWR.
- **SCE North of Kofa NWR–North of I-10 Alternative.** Similar to the North of Kofa NWR–South of I-10 Alternative (see above), except it would cross I-10 twice and Arizona U.S. Highway 60 once to follow the Celeron/All American Pipeline corridor north of I-10.
- **North of Kofa Alternative.** Diverges from the proposed route at the series capacitor just east of the Kofa NWR and travels north of Kofa NWR and south of I-10. Rejoins the Proposed Project approximately 1.25 miles west of the boundary of Kofa NWR and south of Quartzsite

These alternatives are illustrated in Figure Ap.1-2a (on the following page) and are addressed in detail in Appendix 1, Sections 4.2.5, 4.2.6, and 4.2.7, as well as in Sections C.5.2.1, C.5.2.2, and C.5.2.3, and Executive Summary Section ES.2.3 in this EIR/EIS. To compare these three alternatives to the Proposed Project, it is necessary to compare them over an equivalent portion of the transmission line. Consequently, the comparison of the acreage impacted by the Proposed Project and each alternative compares from Milepost 42.0 to Milepost 86.0 of the Proposed Project route. All of the alternatives

would diverge from the Proposed Project route and re-join the Proposed Project route between these mileposts.

### Alternatives Outside of Kofa NWR

As a result of greater impacts to recreation, visual, and biological resources, and the challenges in obtaining regulatory approvals, all three alternatives that would avoid Kofa NWR were eliminated from full consideration in this EIR/EIS and the route through the wildlife refuge was found to be the most environmentally preferred. All three alternatives would meet project objectives, but all would also be outside of BLM-designated utility corridors. With the SCE North of Kofa NWR–North of I-10 Alternative it may not be feasible to obtain the required amendment to the Lower Gila South RMP, which currently prohibits overhead transmission lines. Each of the alternatives would create a new corridor with associated ground disturbance (there are few usable access roads and the routes would be 3.4 to 10 miles longer than the portion of the Proposed Project that each would replace). As a result, there would be substantially greater impacts to bighorn sheep and currently undisturbed biological resources, and potentially significant visual impacts through previously undisturbed land. The SCE North of Kofa NWR–North of I-10 Alternative and SCE North of Kofa NWR–North of I-10 Alternative routes, which traverse through the La Posa Recreation Areas, would impact a greater number of recreation users than the Proposed Project's route through Kofa NWR. Views from I-10 and residences and recreation areas along Highway 95 and along the La Posa Plains would also be impacted by the new transmission corridor created by the alternatives and would reduce the scenic quality of these views.

### *Regulatory Feasibility Issues*

Each of the alternatives would be technically and legally feasible and would meet all of the stated objectives of the Proposed Project. However, all three would likely take more time to complete permitting requirements, so none of them would likely be completed by the end of 2009.

All three of the alternatives around Kofa NWR would be on BLM lands outside of established BLM utility corridors, and as such each of their approvals would require BLM approval for creation of a new utility corridor. Because the Resource Management Plans for the SCE North of Kofa NWR–South of I-10 Alternative and the North of Kofa Alternative routes do not specifically prohibit transmission lines in the area, a new ROW grant would be required, but a Plan amendment would not be necessary. This requirement would not make the two alternatives infeasible, but would add to the regulatory complexity of them.

However, approval of the SCE North of Kofa NWR–North of I-10 Alternative would require an amendment to the Lower Gila South RMP. The Lower Gila South RMP prohibits overhead lines north of I-10 between townships 16W and 18W (BLM, 1985) due to sensitive lambing grounds for bighorn sheep and sensitive visual resources. The requirement for a plan amendment may not make the alternative infeasible, but it would add a series of regulatory requirements.

Figure Ap.1-2a North of Kofa Alternatives  
[CLICK HERE TO VIEW](#)

### ***Environmental Impacts of Alternatives North of Kofa NWR***

All three of the alternatives would offer some biological resources, recreation, land use, and visual resources advantages by eliminating temporary and permanent impacts that would result from adding a second set of towers adjacent to the existing corridor through the Kofa NWR. Based on surveys of the entire route performed by EIR/EIS staff on December 13-19, 2005, the North of Kofa Alternative would also be located in a less culturally sensitive area than the Proposed Project route through the Kofa NWR.

**However, even though the alternatives would reduce impacts to biological and recreational resources, visual resources and land use by being outside of a wildlife refuge, and would eliminate policy inconsistencies associated with construction of a new transmission line on protected refuge land, each would result in similar or greater impacts to these resources outside of Kofa NWR.** For instance, the alternatives would traverse similar habitat for biological resources as the Proposed Project, but would result in substantially more permanent ground disturbance and habitat lost, so it would likewise result in potentially significant impacts to sensitive bighorn sheep or desert tortoise populations.

The following paragraphs present a more detailed description of the environmental disadvantages of all of the alternative routes that were considered outside of Kofa NWR.

**Additional Route Length and Ground Disturbance.** The three routes would be approximately 3.4 to 10 miles longer than the proposed route, which will affect the length and intensity of short-term construction impacts and ground disturbance, increasing impacts in air quality, noise, transportation and traffic, hazardous materials related to environmental contamination, and geologic resources related to soil erosion. The potential to disturb unknown cultural resources and impact vegetation and wildlife is also increased with greater ground disturbance. Increased disturbance and removal of vegetation could increase the chance of noxious weed introduction as well as the removal of more native desert vegetation. In addition, the Proposed Project would be able to utilize existing access for access to new transmission towers. The alternatives, however, would require additional access and spur roads which would result in permanent ground disturbance and corresponding loss of habitat.

**Project Components and Acreage of Disturbance.** Tables GR.1-1 and GR.1-2 compare project components and impacts associated with the Proposed Project and the North of Kofa Alternatives. Note that the Proposed Project, overall, would result in substantially less acreage of new disturbance (the alternatives would affect from 88 to 128 acres of additional disturbance).

**Table GR.1-1. Comparison of Project Components between Proposed Project Mileposts 42.0 and 86.0**

	Proposed Project	SCE North of Kofa – North of I-10 Alternative	SCE North of Kofa – South of I-10 Alternative	North of Kofa Alternative
Length of transmission line	44.0 miles	49.1 miles	47.4 miles	55.0 miles
Number of Lattice Steel Towers (approximate)	150	167	161	187
New Access Roads	0.0 miles	46.0 miles	44.3 miles	51.4 miles
New Spur Roads	3.7 miles	4.1 miles	4.0 miles	4.6 miles
<b>New Permanent Area Occupied (acres)</b>				
Tower Footings	1.5	1.7	1.6	1.9
Access Roads	0.0	78.0	75.2	87.2
Spur Roads	6.2	7.0	6.7	7.8
Series Compensation	2.0	2.0	2.00	2.0
Total	9.7	88.7	85.6	98.9
<b>New Temporary Area Occupied (acres)</b>				
Transmission Line Structures	134.6	150.2	145.0	168.3
Construction Yards	5.0	5.0	5.0	5.0
Pulling Stations	13.2	14.7	14.2	16.5
Splicing Stations	2.9	3.3	3.2	3.7
Batch Plant Areas	2.9	3.3	3.2	3.7
Series Capacitor Banks	1.00	1.0	1.00	1.0
Total	159.7	177.5	171.6	198.1
<b>Total Area Occupied (acres)</b>				
<b>Grand Total</b>	<b>169.4</b>	<b>266.2</b>	<b>257.2</b>	<b>297.0</b>

Note: Affected area estimates are based on the following factors:

- 0.010 acre per lattice steel tower- permanent
- 14' (width) x 130' (length) spur roads at every tower – permanent
- 14' (width) access roads - permanent
- 0.9 acre per tower pad – temporary
- 0.9 acre per pulling station, one every 3 miles – temporary
- 0.2 acre per splicing station, one every 3 miles – temporary
- 2.0 acres per batch plant, one every 30 miles – temporary
- Areas occupied by facilities installed within existing substation and communications site properties are not included in estimates.

Source: SCE, 2005.

**New Transmission Corridor.** Each of the three alternatives would establish a new transmission line corridor and would require considerable upgrading and construction of new roads, as opposed to the Proposed Project, which would use existing access for construction and maintenance along the DPV1 corridor. In general, consolidating transmission lines within common utility corridors, as proposed with DPV2, is desirable because it minimizes land disturbance, barriers to wildlife movement, and additional visual impacts that typically result from separate transmission line corridors. In addition, constructing the project within a corridor separate from a designated utility corridor (e.g., the DPV1 corridor) would create land use consistency issues because the route would be inconsistent with the BLM RMPs. In addition, for the SCE North of Kofa NWR–North of I-10 Alternative, plan amendments would be necessary in order for the BLM to grant approval of this alternative ROW due to its location through townships 16W to 18W north of I-10.

Table GR.1-2 presents a comparison of linear miles of impacts for each alternative in areas of high resource value: desert tortoise habitat, bighorn sheep habitat and lambing grounds, recreational areas, and BLM Resource Management Plan restricted areas. Each of these topics is addressed below the table and is depicted on Figure Ap.1-2a.

Table GR.1-2. Comparison of Impacts between Proposed Project and North of Kofa Alternatives

Alternative	Acres of Disturbance	Miles of Category 2 Desert Tortoise Habitat Traversed	Miles of Bighorn Sheep Habitat Traversed	Distance to nearest Lambing Ground	Miles through Recreation Area or Kofa NWR	BLM RMP Restrictions
Proposed Project	169.4 acres	0.0 miles	16.2 miles	0.6 miles	25.0 miles (Kofa NWR)	None
SCE North of Kofa – North of I-10	266.2 acres (96.8 acres more than Proposed Project)	9.4 miles	9.4 miles	0.2 miles	6.9 miles (La Posa Recreation Site and LTVA; La Posa Designated Camping Area)	Lower Gila South RMP prohibits overhead transmission lines between townships 16W and 18W
SCE North of Kofa – South of I-10	257.2 acres (87.7 acres more than Proposed Project)	4.5 miles	4.5 miles	1.3 miles	5.1 miles (La Posa Recreation Site and LTVA; La Posa Designated Camping Area)	None
North of Kofa	297.0 acres (127.6 acres more than Proposed Project)	16.3 miles	16.3 miles	0.3 miles	0.0 miles (La Posa Recreation Site and LTVA; La Posa Designated Camping Area)	None

**Biological Resources – Wildlife.** Although the alternatives would avoid crossing the Kofa NWR, all three alternatives could have greater adverse impacts than the Proposed Project. The SCE North of Kofa-South of I-10 Alternative route would create a new disturbed corridor through undisturbed BLM Category 2 Desert Tortoise habitat, which could increase impacts and mitigation for tortoises rather than building adjacent to an existing line. The Proposed Project in Kofa NWR, while on valuable desert tortoise habitat, does not have a comparative habitat designation since it would not be on BLM-administered land. In addition, a new corridor along this alternative route would result in a greater potential to impact bighorn sheep migration corridors that cross under I-10 to reach the lambing grounds. Although the SCE North of Kofa-South of I-10 Alternative would be farther from lambing grounds than the Proposed Project, it would result in new disruptions to the migration corridors and would disturb approximately 87.7 more acres of undisturbed desert habitat than the Proposed Project.

The SCE North of Kofa-North of I-10 Alternative would have a greater adverse impact to bighorn sheep than the Proposed Project. In addition, a portion of the alternative's route between townships 16W and 18W would result in impacts to bighorn sheep lambing grounds identified in the BLM's Lower Gila South RMP, an area deemed unsuitable for overhead transmission lines. As described above for the SCE North of Kofa-South of I-10 Alternative, the North of I-10 Alternative would also disrupt migration corridors. Additionally, the North of I-10 Alternative would run within approximately 0.2 miles of bighorn sheep lambing grounds. Additionally, the route would pass through BLM Category 2 Desert Tortoise habitat, which could increase impacts and mitigation for tortoises. The SCE North of



Kofa-North of I-10 alternative would permanently disrupt approximately 96.8 more acres of undisturbed desert habitat than the Proposed Project.

For the North of Kofa Alternative the EIR/EIS team completed a biological survey of the entire length of the North of Kofa Alternative on December 5-7, 2005. The results of the survey in regards to biological regulations and concerns included the following resources:

- Suitable habitat for the Sonoran Desert tortoise (BLM sensitive and State WSCA) was identified along almost the entire route.
- Suitable habitat and suitable migratory habitat for the desert bighorn sheep was identified along the route within the Plomosa Mountains, and adjacent to the route north of the New Water Mountains and New Water Mountains Wilderness Area.
- Loggerhead shrikes, a BLM sensitive status bird, were observed near the southwest and southeast ends of the route.
- No special status bat species were observed; however, a few mineshafts were observed near the central portion of the route on BLM and private land.
- Several species of plants protected under the ADA Arizona Native Plant Law were observed along the route. Protection categories did not include any Highly Safeguarded plants.

Overall, the North of Kofa Alternative would require disturbance of a 37-mile corridor that is relatively undisturbed at this time. A new access road would need to be constructed, following portions of existing unpaved or 4-wheel drive roads. In addition, disturbance would occur in areas with no existing access roads, such as mountain foothills. Bighorn sheep inhabit the mountainous areas of western Arizona and migrate through the foothills when moving from one area to another. When comparing this alternative route to the proposed route through the Kofa NWR, the same types of biological resources would be affected; however, the degree of effect would increase significantly when assessing impacts to the bighorn sheep due to the creation of a new corridor through undisturbed wilderness. As described above for the SCE North of Kofa Alternatives, the North of Kofa Alternative would be approximately 0.3 miles closer than the Proposed Project to the nearest bighorn sheep lambing grounds and would also create a new disruption to migration corridors. The North of Kofa Alternative would pass through Game Management Unit (GMU) 44B South, which includes the Plomosa and New Water Mountains and has had a downward trend from 2002 to 2003. The alternative route would affect an area not currently crossed by a utility corridor, and would require disturbance of 127.6 acres more land than the proposed route.

**Recreation.** The North of Kofa NWR–South of I-10 Alternative and the North of Kofa NWR–North of I-10 Alternative would both cross through the heavily used La Posa Recreation Site and Long-Term Visitor Area and adjacent to the La Posa Designated Camping Area. Mineral and gem shows and swap meets during the winter draw tens of thousands of visitors to these recreation areas every year. Construction activities would disrupt recreation in these areas and a new utility corridor through these areas would reduce their recreational value.

**Visual Resources.** As the transmission line for any of the alternatives would diverge from the existing DPV1 ROW, it would create new visual impacts with the creation of a new utility corridor. Each of the routes would reduce various scenic views, including those of the Plomosa Mountains and New Waters Mountains from I-10, from residences and recreationists using the La Posa Recreation Site and Long-Term Visitor Area, and within the potential future Dripping Springs ACEC.

## General Response GR-2: The Project Provides No Benefit to Arizona

Several commenters stated that it is unfair for the State of Arizona residents and businesses to bear the environmental impacts of the project while the benefits would accrue primarily to ratepayers in the State of California.

The Purpose and Need for the Proposed Project is briefly discussed in Section A.2, but it is not an issue addressed under CEQA or NEPA. The need for this project is not addressed or decided within this EIR/EIS. As discussed above, the CPUC Administrative Law Judge is evaluating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporation Commission in a separate proceeding will also be addressing project need.

According to SCE and the California ISO, Arizona would receive some economic benefits from the Project also, as explained in the following paragraphs.

**Benefits to Arizona.** In addition to these regionwide economic benefits of transmission projects, SCE has stated in its Application for a Certificate of Environmental Compatibility (CEC) to the Arizona Corporation Commission (ACC) that:

DPV2 would provide strategic and economic benefits to Arizona, California, and the Southwest including enhanced power pooling opportunities, increased emergency interconnection support, improved reliability, and increased utilization of existing Arizona generation facilities [online at <http://www.cc.state.az.us/utility/electric/SCE-App1.pdf>].

SCE further states that generating companies have located themselves in the Palo Verde area to access two large markets: Arizona and southern California. DPV2 would enhance this market by adding transmission capacity between Arizona and southern California. Expanding this market is beneficial to Arizona as it adds high-paying jobs in the energy marketplace, creates economic multiplier impacts due to these jobs, and increases corporate and personal tax base in future years. The employment and tax benefits that would accrue to Arizona from the DPV2 Project include the following:

- Provide approximately 150 jobs during the two-year construction phase.
- Create positive economic impacts from all direct, indirect, and induced employment totaling an estimated \$85 million.
- Generate property tax revenues to state and local government during the construction phase and the first 10 years of operation of approximately \$24 million.

Thus although DPV2 would provide benefits to California, as stated in SCE's PEA and the CAISO economic modeling, it is alleged that DPV2 would also provide benefits to Arizona. However, the purpose of this EIR/EIS is to analyze potential impacts of the project proposed by SCE, not to address purpose and need.

## General Response GR-3: Why is the DPV2 Project Needed?

The Purpose and Need for the Proposed Project is briefly discussed in Section A.2, but it is not an issue addressed under CEQA or NEPA. The need for this project is not addressed or decided within this EIR/EIS and neither the CPUC nor BLM have the authority to require construction of new generating facilities in California or elsewhere. As discussed above, the CPUC Administrative Law Judge is evalu-

ating project need through economic modeling during the Phase 1 General Proceeding (I.05-06-041). The Arizona Corporation Commission in a separate proceeding will also be addressing project need.

As stated by SCE in the PEA and described on page A-7 in Section A.2, the objectives for building DPV2 are to:

- Increase California’s access to low-cost energy by adding 1,200 MW of transmission import capability into California from the Southwest. This is expected to substantially benefit California by reducing energy costs.
- Enhance competition among generating companies supplying energy to California.
- Provide additional transmission infrastructure to support and provide an incentive for the development of future energy suppliers selling energy into the California energy market.
- Provide increased reliability of supply, insurance value against extreme events, and flexibility in operating California’s transmission grid.

As stated in SCE’s Proponent’s Environmental Assessment (PEA) submitted to the CPUC in April 2005 and summarized in Section A.2 of the Draft EIR/EIS, the DPV2 project is primarily driven by the need to provide additional high-voltage electrical transmission infrastructure to enhance competition among energy suppliers, and increase reliability of supply, which will enable California utilities to reduce energy costs to customers by about \$1.1 billion over the life of the project. Specifically, DPV2 will increase transmission capacity by 1,200 megawatts (MW), allowing California access to cost-effective energy in the southwestern United States, and thereby displacing higher-cost generation in California.

Development of new transmission facilities to areas where generation has been more easily sited and constructed may spur development of new competitive generation to provide further insurance against future electricity crises.

In addition, the CAISO conducted an independent review of DPV2 and also found the DPV2 project to be a necessary and cost-effective addition to the CAISO-controlled grid.<sup>1</sup> The CAISO Board approved the DPV2 project on February 24, 2005 and directed SCE to proceed with the permitting and construction of the transmission project, preferably to the completed by the summer of 2009.

As discussed in Section A.1.4 (CPUC Proceeding on the Economic Assessment of Transmission Lines) of this EIR/EIS, in addition to environmental issues, which are considered under CEQA/NEPA and are addressed in this EIR/EIS, the DPV2 project has raised other non-environmental issues for the CPUC’s consideration, including the need for the project and ratemaking issues. Therefore, as a coordinated but independent proceeding, the CPUC has opened an Order Instituting Investigation (OII) (I.05-06-041) to consider appropriate principles and methodologies for assessment of the economic benefits of transmission projects, including DPV2, that are submitted for CPUC approval. Assigned Administrative Law Judge (ALJ) Charlotte TerKeurst stated that evidence regarding DPV2 should be received in two phases. Phase 1 would address economic methodology and need issues, with testimony to be received and evidentiary hearings to be held on a consolidated basis with I.05-06-041. Phase 2 in A.05-04-015 would address environmental and routing issues related to DPV2, with evidentiary hearings after the Draft EIR/EIS is released.

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<sup>1</sup> <http://www.caiso.com/docs/09003a6080/34/e4/09003a608034e440.pdf>.

On June 20, 2006, ALJ TerKeurst released a Proposed Decision on the Opinion on Methodology for Economic Assessment of Transmission Projects in the Phase 1 proceeding. As stated in the Proposed Decision, benefits of a proposed transmission project can be evaluated by comparing estimates of total costs that would be incurred without the proposed project and total costs if the proposed project is built. Such comparisons include assumptions about the resource mix, which may differ in the scenarios with and without the proposed project.

In addition to base case (most likely) scenarios, the effects of possible variations in key factors of the analysis, e.g., load growth or fuel prices, also should be considered in assessing likely economic benefits of a proposed project. In economic evaluations of transmission projects, there are three general categories of costs and benefits: (1) the change in total production costs, or energy benefits, (2) changes in other quantifiable economic benefits and costs not included in production cost analyses, and (3) factors whose expected economic effects cannot be monetized. These three categories are described below and in more detail in the Proposed Decision.

**Energy Benefits.** In evaluating a proposed transmission project, assessment of the distribution of potential benefits and costs among geographic areas and among various types of market participants is important. Because of the interconnected nature of the Western electricity system, the relevant geographic region affected by a transmission project may be much larger than the CAISO control area, particularly if the project is an inter-regional upgrade, such as DPV2. Four economic evaluations were submitted in the Phase 1 proceeding and all four determined energy benefits based upon production cost modeling of the entire Western Electricity Coordinating Council (WECC) area.

At the most basic level, energy benefits are the difference between the production costs to serve load in a region without the proposed transmission project and the lower production costs with the upgrade in service. Of course, while transmission upgrades are generally viewed as providing positive energy benefits, this may not be true for all projects or from all perspectives. A transmission upgrade will lower production costs if it increases market access to economic supply. However, there will be a redistribution of benefits among consumers, producers, and transmission owners. In particular, a transmission project that increases access to economic power will reduce costs to consumers, thus increasing the consumer surplus. At the same time, the project may reduce income for those generators not accessed by the transmission upgrade, reducing the producer surplus. It may also reduce transmission owners' congestion revenues and thus the transmission surplus. Thus, the energy benefits due to a transmission project consist of the net changes in consumer costs (consumer surplus), producer net income (producer surplus), and congestion revenues flowing to transmission owners or holders of transmission rights (transmission surplus). The sum of the changes in consumer surplus, producer surplus, and transmission surplus equals the change in energy production costs.

**Other Quantifiable Economic Benefits and Costs.** In addition to expected energy benefits and project costs, other potential economic benefits and costs of a proposed project may be identified and quantified and thus included in an economic assessment, including:

- Reductions in operating costs;
- Changes in system losses;
- Environmental benefits or costs;
- Capacity benefits;
- Capital and other costs or benefits resulting from resource substitution; and
- Increased transmission revenues from CAISO wheeling service and Existing Transmission Contracts.

These benefits and estimates attributable to DPV2 will be assessed in a later decision in A.05-04-015.

**Non-monetized Considerations.** There could also be considerations that may be relevant to a proposed transmission project and whose benefits or costs may not be quantifiable, including:

- Access to renewable resources;
- Non-monetized environmental impacts;
- Fuel diversity benefits;
- Reliability impacts;
- Enhanced system operational flexibility;
- Mitigation of market power, to the extent not quantified;
- Potential for increased reserve resource sharing; and
- Job creation or losses.

The Phase 1 Proposed Decision states that the Commission will consider such non-monetized aspects of the proposed project, along with other relevant factors, in assessing an applicant's CPCN request later in the process.

## 4. List of Commenters and Responses

This section provides responses to comments received during the Draft EIR/EIS public review period, which commenced on May 1, 2006 and ended on August 11, 2006. Responses to issues and concerns raised by several commenters are addressed in a set of General Responses (GR-1 through GR-3). More detailed responses are provided to individual comments in Sections A through E, which provide copies of the comments submitted on the Draft EIR/EIS, as well as comments provided during the Public Participation Hearings held on June 6 and 7 and July 24, 2006. Each comment set, including the transcripts from the Public Participation Hearings, is followed by the corresponding responses. Comment letters are presented chronologically, in the order of the date of the comment, followed by errata and minor text clarifications. The comments from the Applicant, SCE, are presented at the end of the comment letters as Comment Set E.

Comment letters are in the following categories:

- A. Public Agencies
- B. Community Groups, Non-Profit Organizations and Private Companies
- C. Private Individuals
- D. Public Participation Hearings
- E. The Applicant

Table 3 listed all parties that commented on the Draft EIR/EIS, the date of their comments, and the comment set number that defines the organization of responses in this Final EIR/EIS.

**Devers–Palo Verde No. 2 Transmission Line Project**  
**COMMENTS AND RESPONSES TO COMMENTS**

**Table 2. Commenters and Comment Set Numbers**

<b>Agency/Affiliation</b>	<b>Commenter's Name/Title</b>	<b>Date of Comment</b>	<b>Comment Set No.</b>
<b>Public Agencies or Their Representatives</b>			
Maricopa County Parks & Recreation Department	Chris Coover, Maricopa Trail Manager	5/30/06	A1
Riverside County Flood Control District	Teresa Tung, Senior Civil Engineer	5/24/06	A2
Flood Control District of Maricopa County	Angie Hardesty, ROW Permit Specialist	6/05/06	A3
California Regional Water Quality Control Board, Colorado River Basin Region	John Carmona, Senior Water Resources Engineer	6/05/06	A4
Coachella Valley Water District	Mark L. Johnson, Director of Engineering	6/13/06	A5
California State Water Resources Control Board	Elizabeth Haven, Assistant Division Chief, Division of Water Quality	6/19/06	A6
Arizona Game & Fish Department	William C. Knowles, Habitat Specialist	6/21/06	A7
Palo Verde Irrigation District	Roger Henning, Chief Engineer	6/27/06	A8
California Department of Parks and Recreation	Gary Watts, District Supervisor	8/02/06	A9
U.S.D.I. Fish and Wildlife Service	Chris Schoneman, Project Leader	8/10/06	A10
U.S.D.I. Bureau of Indian Affairs	James J. Fletcher, Superintendent	8/11/06	A11
Agua Caliente Band of Cahuilla Indians	Thomas Davis, Chief Planning and Development Officer (8/11); Richard M. Begay, Director, Tribal Historic Preservation Office (8/18)	8/10/06 and 8/18/06	A12
U.S.D.I. Bureau of Reclamation	William J. Liebhauser, Director, Resources Mgmt Office	8/11/06	A13
Morongo Band of Mission Indians	George Forman	8/11/06	A14
U.S.D.A. San Bernardino National Forest	Jean Wade Evans, Forest Supervisor	8/11/06	A15
Irrigation and Electrical Districts Association of Arizona	Robert S. Lynch, Counsel and Assistant Secretary-Treasurer	8/11/06	A16
California Department of Fish and Game	Scott Dawson, Senior Environmental Scientist	8/11/06	A17
United States Fish and Wildlife Service	Benjamin N. Tuggle, Acting Regional Director	8/18/06 and 10/12/06	A18
U.S. Environmental Protection Agency	Duane James, Manager, Environmental Review Office	8/19/06	A19
<b>Organizations, Nonprofits, and Private Companies</b>			
Maricopa Audubon Society	Robert A. Witzeman MD, Conservation Chair	6/19/06	B1
Southern California Gas Company - Sempra Energy	James Chuang, Environmental Specialist/Land Planner	6/28/06	B2
Yuma Audubon Society	Cary W. Meister, Conservation Chair	8/08/06	B3
Five Star, Inc.	Valorie Melton	8/10/06	B4
Neighborhood Coalition of Greater Phoenix	B. Paul Barnes, President	8/11/06	B5
Center for Biological Diversity	Lisa T. Belenky, Staff Attorney	8/11/06	B6
Desert Southwest Transmission Project	Bob Mooney, Project Director	8/11/06	B7
Sierra Club	Sandy Bahr, Conservation Outreach Director	8/11/06 and 8/25/06	B8
3M	Jeffery D. Harris, Attorney at Law	8/11/06	B9
Arizona Wilderness Coalition	Jason Williams, Regional Director	8/11/06	B10

**Table 2. Commenters and Comment Set Numbers**

Agency/Affiliation	Commenter's Name/Title	Date of Comment	Comment Set No.
<b>Private Citizens</b>			
E. S. Robison	N/A	5/15/06	C1
Nancy Kroenig	N/A	6/05/06	C2
Matt Kalina	N/A	6/05/06 and 6/19/06	C3
Walace Nogueira Jr.	N/A	6/06/06	C4
Ms. Alecs Sakta	N/A	6/19/06	C5
Joe Gardner	N/A	6/21/06	C6
Carol Tepper	N/A	6/24/06	C7
Michael Quinlan	N/A	7/05/06	C8
Peter Bengtson	N/A	7/03/06	C9
Mary Justice	N/A	7/12/06	C10
Les Starks	N/A	7/26/06 and 7/31/06	C11
Bettina Bickel	N/A	7/31/06	C12
Richard Strandberg	N/A	7/27/06	C13
Thomas L. Floyd	N/A	7/30/06	C14
Alan Timmerman	N/A	8/09/06	C15
Melissa Lopez	N/A	8/10/06	C16
Jack Grenard	NA	8/10/06	C17
Lola Boan	N/A	8/10/06	C18
Elna Otter	N/A	8/10/06	C19
R. Scott Jones	N/A	8/10/06	C20
Lynn Ashby	N/A	8/10/06	C21
Art Merrill	N/A	8/10/06	C22
Lon Stewart	N/A	8/11/06	C23
Jennifer Leitch	N/A	8/11/06	C24
Paul Franckowiak	N/A	8/11/06	C25
Lynn DeMuth	N/A	8/11/06	C26
Jon Findley	N/A	8/10/06	C27
Ken G. Sweat	N/A	8/11/06	C28
Donald G. Begalke	N/A	8/11/06	C29
<b>Speakers at Public Meetings</b>			
Speakers at Beaumont, California	Ralph Smith	6/7/06	D1
Speakers at Palm Desert, California	Julian Veselkov	6/8/06	D2
Speakers at Beaumont, California	None	7/24/06	D3
<b>The Applicant</b>			
Southern California Edison Company	Thomas Burhenn	7/13/06 and 8/4/06	E1
Southern California Edison Company	Thomas Burhenn	8/10/06	E2
Southern California Edison Company	Thomas Burhenn	8/11/06	E3
Southern California Edison Company	Thomas Burhenn	8/11/06	E4
Southern California Edison Company	Thomas Burhenn	8/17/06	E5