

## Comment Set E5

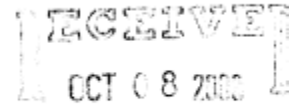


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October 7, 2008

VIA EMAIL & U.S. MAIL

Juralynne B. Mosley  
California Public Utilities Commission  
c/o Aspen Environmental Group  
30423 Canwood Street, Suite 215  
Agoura Hills, CA 91301



BY: .....

Re: El Casco System Project Recirculated Draft  
Environmental Impact Report (SCH No. 2007071076)

Dear Ms. Mosley:

This letter contains Southern California Edison Company's (SCE) comments on the Recirculated Draft Environmental Impact Report (EIR) for the El Casco System Project. Specifically, SCE remains concerned with the recommended mitigation measure for Impact AQ-3 (Emissions Contribute to Climate Change). Mitigation Measure (MM) AQ-3 requires SCE to detect and repair sulfur hexafluoride (SF<sub>6</sub>) leaks associated with the El Casco Substation. MM AQ-3 also requires SCE to report indirect greenhouse gas emissions associated with the proposed project. As discussed below, MM AQ-3 should instead focus on the use of best available technology and reporting practices to minimize SF<sub>6</sub> emissions to the greatest extent practicable.

In response to the Draft EIR, SCE provided detailed comments regarding the air quality analysis of greenhouse gases. First, SCE expressed its concerns regarding the use of a quantitative significance threshold. Second, SCE indicated that the suggested mitigation measure, AQ-3, was not feasible and no mitigation measures should be imposed. Despite SCE's comments, the Final EIR and Recirculated Draft EIR did not alter the greenhouse gas analysis or the language for MM AQ-3. Because we are concerned with the feasibility of implementing the mitigation measure as currently drafted, SCE once again suggests that MMAQ-3 be revised.

With respect to technology, circuit breakers are the only equipment proposed at El Casco Substation that would contain SF<sub>6</sub> gas. As such, one way to reduce SF<sub>6</sub> emissions at this location is by installing equipment that is designed to minimize possible leakage. SCE has developed equipment specifications that it provides to manufacturers of high-voltage circuit breakers. These specifications include a requirement that the SF<sub>6</sub> leakage rate not exceed 0.5 percent per year. The equipment installed at the El Casco Substation would conform to this requirement. To the best of our knowledge, a leakage rate of 0.5 percent represents the best technology currently available. MM AQ-3 should focus on the use of this state-of-the-art equipment as a means for managing SF<sub>6</sub> leaks at the substation.

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## Comment Set E1, continued

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With respect to reporting practices, SCE currently tracks SF<sub>6</sub> gas leakage on a system-wide basis pursuant to its own internal Gas Management Program and a signed Memorandum of Understanding with the Environmental Protection Agency. Although SCE does not currently have a system in place for substation-specific reporting, SCE believes it can implement a program specifically for the El Casco Substation. For example, SCE can track its SF<sub>6</sub> gas inventories and document maintenance activities at the substation. Using this information, SCE can determine the amount of SF<sub>6</sub> that is used to replace gas that has leaked from equipment at the substation. SCE can then perform a calculation to estimate the amount of SF<sub>6</sub> gas emissions associated with the El Casco Substation circuit breakers.

SCE currently voluntarily reports its system-wide emissions to the California Climate Action Registry. SCE can also generate a report specific to the El Casco Substation to provide to the California Public Utilities Commission (CPUC) on an annual basis. This report would contain information regarding leaks that are detected at the substation and actions that are taken to address such occurrences. This monitoring and reporting program would further reduce potential SF<sub>6</sub> emissions and should be incorporated in MM AQ-3.

Finally, because the California Air Resources Board will be establishing regulations for reducing all greenhouse gas emissions, any mitigation measures for the proposed project should expire by the year 2012. At that time, SCE would comply with the regulations that are in place pursuant to AB 32. The revised mitigation measure should therefore also contain a sunset clause in recognition of these pending regulations.

SCE is committed to helping the global community by tracking and reducing its SF<sub>6</sub> emissions. We believe that revising MM AQ-3 as suggested above would assist us in this effort as well as satisfy the CPUC's desire to impose feasible mitigation as required by the California Environmental Quality Act.

SCE appreciates your time and attention in addressing its concerns regarding MM AQ-3. Please let us know if you have any questions.

Very truly yours,



Linda J. Anabtawi

cc: Christine McLeod  
Scott Lacy  
Ted Heath

LJA:cl:1573997

E5-1  
Cont.

## Responses to Comment Set E5 – Southern California Edison Company

**E5-1** Thank you for your comments regarding Mitigation Measure AQ-3. In response to your comments on the feasibility of Mitigation Measure AQ-3, the measure has been revised as follows:

**AQ-3 Avoid Sulfur Hexafluoride Emissions.** SCE shall ensure that Project equipment, specifically the circuit breakers at the El Casco Substation, maintain a leakage rate of 0.5 percent per year or less for sulfur hexafluoride (SF<sub>6</sub>). To accomplish this, SCE shall include this limit as a performance specification for the circuit breakers that would be installed as part of the Project. Maintenance, repair, and replacement of all circuit breakers shall be in a manner that ensures continued compliance with this performance specification. SCE shall demonstrate compliance with this limit by submitting an annual report of SF<sub>6</sub> emissions for the El Casco Substation to the CPUC. This report should contain information regarding leaks that are detected at the substation and the actions that were taken to address such occurrences. The annual SF<sub>6</sub> emission rate is defined as total SF<sub>6</sub> emissions from the El Casco Substation for the most recent reporting year divided by total name-plate capacity of SF<sub>6</sub> at the El Casco Substation (i.e., the total quantity of SF<sub>6</sub> contained in electrical equipment at the end of the reporting year). The annual report of SF<sub>6</sub> emissions at the El Casco Substation shall be submitted to the CPUC until the California Air Resources Board enacts a program to report and restrict SF<sub>6</sub> emissions from the electricity sector under the California Global Warming Solutions Act of 2006 (AB32). SCE shall report SF<sub>6</sub> emissions to the California Climate Action Registry (CCAR) according to CCAR methodologies or alternate methodology approved by the California Air Resources Board. This report shall include the El Casco Substation and indirect GHG emissions from energy imported and consumed to support operation of the system and indirect GHG emissions from transmission and distribution losses.

~~**AQ-3 Avoid Sulfur Hexafluoride Emissions.** SCE shall identify sulfur hexafluoride (SF<sub>6</sub>) leaks and establish a strategy for replacing leaking equipment to reduce SF<sub>6</sub> leaks. To accomplish this, SCE shall develop and maintain a record of SF<sub>6</sub> purchases, an SF<sub>6</sub> leak detection and repair program using laser imaging leak detection and monitoring no less frequently than quarterly, an SF<sub>6</sub> recycling program, and an employee education and training program for avoiding or eliminating SF<sub>6</sub> emissions caused by the Proposed Project. The SF<sub>6</sub> leak detection and repair program shall be provided to the CPUC 90 days prior to project operation. SCE shall also report SF<sub>6</sub> emissions from the Proposed Project to the California Climate Action Registry (CCAR) according to CCAR methodologies or alternate methodology approved by the California Air Resources Board. To develop a complete GHG inventory, SCE shall follow established methodologies to report indirect GHG emissions from energy imported and consumed to support operation of the Proposed Project and indirect GHG emissions from transmission and distribution losses associated with the Proposed Project.~~