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

June 1, 2018

Mr. Thomas Diaz
Licensing & Regulatory Affairs
Southern California Edison
2244 Walnut Grove Ave. 235G/GO4
Rosemead, CA 91770

Re: Application Completeness – SCE Eldorado-Lugo-Mohave Series Capacitor Project - Proponent's Environmental Assessment - Application No. A.18-05-007

Dear Mr. Diaz:

On May 2, 2018, SCE submitted an Application for a Permit to Construct (PTC) and a Proponent's Environmental Assessment (PEA) for the proposed Eldorado-Lugo-Mohave Series Capacitor Project (A.18-005-007). The Energy Division used the California Public Utilities Commission's (CPUC's) Information and Criteria List, as well as the requirements outlined in General Order (GO) 131-D and the PEA Checklist as the basis for evaluating the completeness of the PEA and determining whether sufficient information had been provided for the CPUC to complete its environmental assessment of the project under the California Environmental Quality Act (CEQA). Section 15100 of the CEQA Guidelines provides the lead agency 30 days to assess the completeness of the project proponent's application.

The CPUC Energy Division has determined that the PEA is deficient in some respects and that additional information is needed before it can be determined that the application is complete for review. Tables identifying these deficiencies is attached.

Pending a determination of application completeness, CPUC cannot move forward with required steps in the CEQA process. However, while waiting for SCE to assemble and provide the requested information to address these deficiencies, the CPUC will prepare for developing the required CEQA document. Delays in publication of the Draft EA/MND may result if SCE's information is not adequate or is not provided by June 30, 2018.

To document our request for information, Attachments A and B list critical missing items needed for the CPUC to prepare an adequate and complete CEQA analysis. In addition to these outstanding completeness items, the CPUC and its Consultant may identify additional information that is needed. This is information may not be required for Application completeness, but may be needed to support our CEQA document preparation. The CPUC Energy Division will request this additional information in the form of data requests to SCE during the course of the CEQA processes.

We are available to meet with you at your convenience to discuss any of the items in this letter. Should you have any questions, please call me at (415) 703-2068 or email at billie.blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie C. Blanchard
Senior Analyst/Project Manager
Infrastructure, Planning, and Permitting Branch/Energy Division

Attachments (2)

cc: Rosalie Barcinas, Southern California Edison
Lonn Maier, CPUC CEQA Unit Supervisor
Molly Sterkel, CPUC Energy Division, Program Manager
Greg Heiden, CPUC Legal Division
Greg Miller, Bureau of Land Management, Calif. Desert District
Susan Lee, Aspen Environmental Group
Fritts Golden, Aspen Environmental Group

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
I. General Application Requirements (from CPUC ICL Section I) [Verified by Docket Office]				
Form and Size	Rule 2	Docket Office		Checked by Docket Office
Title and Docket Number	Rule 3 per ICL (Rule 2.1 per Rules of Practice and Procedure)	Docket Office		Checked by Docket Office
Signatures	Rule 4 per ICL (Rule 2.2 per Rules of Practice and Procedure)	Docket Office		Checked by Docket Office
Verification	Rules 5 & 6 per ICL (Rule 2.4 per Rules of Practice and Procedure)	Docket Office		Checked by Docket Office
Copies	Rule 7 per ICL (Rule 2.5 per Rules of Practice and Procedure)	Docket Office		Checked by Docket Office
Contents	Rule 15	Docket Office		Checked by Docket Office
Articles of Incorporation	Rule 16	Docket Office		Checked by Docket Office
Financial Statement	Rule 17	Docket Office		Checked by Docket Office
II. Applications for CPCN (from CPUC ICL Section II)				
Construction Or Extension of Utility Facilities	Rule 18	CPUC Energy Division/ Aspen	N/A	Not Applicable – Application is for a PTC, not a CPCN
Exercise of Franchise Rights	Rule 19	N/A	N/A	
Exercise of Franchise Rights Not Yet Granted	Rule 20	N/A	N/A	
Common Carrier Certificates	Rule 21	N/A	N/A	
Warehouses	Rule 22	N/A	N/A	

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
Environmental Information Requirements: CPUC ICL Section V				
4. Significance				
In evaluating significance both primary or direct and secondary or indirect effects shall be considered. Primary effects are those immediately related to the project. Secondary effects are consequences associated more closely with the primary effects than to the project itself. New suburban growth may be a primary effect of an electric transmission line extension for example, whereas possible effects, such as traffic congestion and consequent air pollution, would be secondary effects.	CPUC ICL Section V.4	CPUC Energy Division/ Aspen	Yes	Included in PEA
5. Incorporation by Reference				
The PEA may incorporate material by reference when to do so would reduce bulk without impeding agency or public review. Any such incorporation shall, however, include a summary of the matter to which reference is made and an explanation of its relevance to the project. No material may be incorporated by reference unless it is reasonably available, or is made reasonably available for inspection by the Commission and potentially interested members of the public.	CPUC ICL Section V.5	CPUC Energy Division/ Aspen	Yes	No material is specifically incorporated by reference.
7. Format for PEA				
Cover Sheet	CPUC ICL Section V.7	CPUC Energy Division/ Aspen	Yes	Included in PEA
Table of Contents			Yes	Included in PEA
PEA Summary			Yes	Included in PEA
Project Purpose and Need			Yes	Included in PEA
Project Description			Yes	Included in PEA
Environmental Setting			Yes	Included in PEA
Environmental Impact Assessment Summary			Yes	Included in PEA
Detailed Discussion of Significant Impacts			Yes	Included in PEA
Appendices (if any)			Yes	Included in PEA
8. Cover Sheet				
The cover sheet shall consist of a single sheet containing: • the title "Proponent's Environmental Assessment," • the caption of the proceeding for which the PEA has been prepared, • the docket number of the proceeding, and • the name, address, and telephone number of the project proponent.	CPUC ICL Section V.8	CPUC Energy Division/ Aspen	Yes	None

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
9. PEA Summary				
Each PEA shall contain a summary, which shall briefly state the major conclusions, areas of controversy, and major issues, which must be resolved (including the choice among reasonably feasible alternatives and mitigation measures, if any). The summary should normally be two to ten pages in length, but may be shorter or longer depending upon the complexity of the project and the number and significance of the project's impacts.	CPUC ICL Section V.9	CPUC Energy Division/ Aspen	Yes	A summary is provided.
10. Project Purpose and Need				
All PEAs shall contain an explanation of the objective or objectives of the project. This shall be accompanied by an analysis of the reason why attainment of these objectives is necessary or desirable. The analysis should normally not exceed a page or two in length except where significant or potentially significant project impacts have been identified in the Environmental Impact Assessment Summary required by Section V, 13. Where such impacts have been identified, the analysis of project purpose and need must be sufficiently detailed to permit the Commission to independently evaluate the project need and benefits in order to accurately consider them in light of the potential environmental costs. This requirement may be satisfied by reference to specific portions of the project application, which address this issue.	CPUC ICL Section V.10	CPUC Energy Division/ Aspen	Yes	SCE's objectives are defined. However, data requests may be required for clarification.
11. Project Description				
The description of the project shall contain the following information, but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. (a) The precise location and boundaries of the project shall be shown on a detailed map, preferably topographic. The location shall also be shown on a regional map. (b) A general description of the project's technical, economic, and environmental characteristics considering the principal engineering proposals and supporting public service facilities. The requirements of this section may be satisfied by reference to specific portions of the project application, which address these issues and include this information.	CPUC ICL Section V.11	CPUC Energy Division/ Aspen	No	Please refer to comments on the Project Description in Attachment B.

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
12. Environmental Setting				
The PEA must include a description of the environment in the vicinity of the project and within the potential range of impact as it exists before commencement of the project. Both local (site-specific) and regional perspectives must be provided. The description should include some discussion of the topography, land use patterns, and general biological environment. Detailed descriptions should be limited to those elements of the environment, which may be subject to a potentially significant impact. The setting must, however, be sufficiently described to permit an independent evaluation by the Commission of elements, which could be impacted by the project. All elements of the environmental setting necessary to fully understand impacts identified as significant or potentially significant in the Environmental Impact Assessment Summary required by Section V, 13 shall be described in detail.	CPUC ICL Section V.12	CPUC Energy Division/ Aspen	No	Please refer to specific comments by discipline in Attachment B.
13. Environmental Impact Assessment Summary				
Every PEA shall contain an Environmental Impact Assessment Summary in the form attached [CEQA Initial Study Checklist]. This summary shall be employed as an aid in determining the scope and detail of the environmental setting and impact analyses. All impacts identified as significant or potentially significant must be explained in detail in accordance with the criteria stated in Section V, 14. All elements of the environmental setting necessary to fully understand such impacts shall be described in detail in accord with Section V, 12. All other answers provided on the form should be briefly explained in the space provided or on additional sheets attached to the Summary as necessary. These brief explanations should contain no detailed studies, research, or analysis. Each enumerated question shall be answered "yes," "no," "potential," or "unknown" in column 1 labeled “IMPACT" to indicate whether the project involved will result either directly or indirectly in any impact of the type identified. If it is felt that there will or may be an impact of the type listed, an attempt to quantify the impact must be made by the proponent and indicated in column 2 labeled "SIGNIFICANCE." If it can be seen with certainty that the impact or potential impact will be significant, the answer "significant" shall be given. If the impact or potential impact is difficult to quantify but a substantial body of opinion can be expected to consider the impact to be significant, the answer "potentially significant" shall be given. If despite good faith efforts the proponent is unable to provide any reasonable estimate of the significance of the impact the answer "unquantified" shall be given. If it can be seen with certainty that the impact or potential impact under consideration will not be significant, the answer “insignificant" shall be given.	CPUC ICL Section V.13	CPUC Energy Division/ Aspen	Yes	The checklist is included as PEA Appendix A.

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
14. Detailed Discussion of Significant Impacts				
The PEA shall include a detailed discussion of all project impacts and potential impacts of significance. The cumulative effect of the project's impacts shall also be discussed in detail where such cumulative effect is significant. Impacts should be discussed in the order of importance or significance. Any data and analyses shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or incorporated by reference in accord with Section V, 5. Distinctions between factual findings and assumptions or subjective judgments should be made clear. In addition to the analyses of individual project impacts, the PEA for all projects which may have a significant effect on the environment shall address the following:	CPUC ICL Section V.14	CPUC Energy Division/ Aspen	No	Please refer to specific comments by discipline in Attachment B.
(a) Mitigation Measures Proposed to Minimize the Significant Effects. Describe significant, avoidable, adverse impacts, including inefficient and unnecessary consumption of energy, and measures to minimize these impacts. The discussion of mitigation measures shall distinguish between the measures, which are proposed by project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce adverse impacts. This discussion shall include an identification of the acceptable levels to which such impacts will be reduced, and the basis upon, which such levels were identified. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.	CPUC ICL Section V.14a	CPUC Energy Division/ Aspen	No	No significant impacts have been identified and minimal APMs have been included in the PEA. Measures to address other potentially significant impacts will need to be included in the MND. Itis clear that additional mitigation will be required and specific plans developed (e.g., helicopter plan, hazardous materials handling, etc.) Please refer to specific comments in Attachment B.
(b) Alternatives to the Proposed Action. Describe all reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and why they are rejected in favor of the ultimate choice. The specific alternative of "no project" must also always be evaluated, along with the impact. The discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly.	CPUC ICL Section V.14b	CPUC Energy Division/ Aspen	Yes	Alternatives are described in PEA Section 6.2 (Description of Project Alternatives and Impact Analysis). Because work is on existing lines, alternatives are limited.

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(c) The Growth-Inducing Impact of the Proposed Action. Discuss the ways in which the proposed project could foster economic or population growth, either directly or indirectly, in the surrounding environment. Included are projects, which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristics of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.	CPUC ICL Section V.14c	CPUC Energy Division/ Aspen	Yes	Alternatives are described in PEA Section 6.2 (Description of Project Alternatives and Impact Analysis)
(d) Organizations and Persons Consulted. The PEA shall include a list of persons, and their qualifications, responsible for compiling the detailed information for each area of environmental concern, and a discussion of the methods used to produce such information.	CPUC ICL Section V.14d	CPUC Energy Division/ Aspen	Yes	PEA Appendix B includes a List of Preparers
15. Affected Property Owners				
The names and mailing addresses of all owners of land over, under or on which the project, or any part of the project, may be located, and owners of land adjacent thereto, shall be listed in an appendix to the PEA.	CPUC ICL Section V.15	CPUC Energy Division/ Aspen	No	A hard copy mailing list for owners within 300 feet is in the Application. We need to request electronic Excel version. See Attachment B (PEA Checklist)
PEA Requirements (from GO 131-D)				
(a) A detailed description of the proposed transmission facilities, including the proposed transmission line route and alternative routes, if any; proposed transmission equipment; such as tower design and appearance, heights, conductor sizes, voltages, capacities, substations, switchyards, etc.; and a proposed schedule for certification, construction, and commencement of operation of the facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Please refer to comments on Project Description in Attachment B (PEA Checklist).
(b) A map of suitable scale of the proposed routing showing details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	The PEA includes general and detailed maps. Detailed maps are in Appendix E Detailed Route Map. GIS information was also provided.
(c) A statement of facts and reasons why the public convenience and necessity require the construction and operation of the proposed transmission facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	PEA Chapter 2 describes SCE's position on the need for the project.

Attachment A. CPUC Information and Criteria List (ICL) Review for SCE ELM Series Capacitor Project A.18-05-007				
Requirement	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(d) A detailed statement of the estimated cost of the proposed facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	Application estimates cost at $225 million
(e) Reasons for adoption of the route selected, including comparison with alternative routes, including the advantages and disadvantages of each.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	Alternatives are described in PEA Section 6.2 (Description of Project Alternatives and Impact Analysis).
(f) A schedule showing the program of right-of-way acquisition and construction.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	PEA Section 3.7.9 Construction Schedule, Table 3-16 includes the Project Schedule, but it is not sufficiently detailed. See Attachment B (PEA Checklist)
(g) A listing of the governmental agencies with which proposed route reviews have been undertaken, including a written agency response to applicant's written request for a brief position statement by that agency. (Such listing shall include The Native American Heritage Commission, which shall constitute notice on California Indian Reservation Tribal governments.) In the absence of a written agency position statement, the utility may submit a statement of its understanding of the position of such agencies.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	PEA Appendix C: Agency Consultation identifies agencies consulted and tribes contacted. Letters to Native American tribes are provided. PEA Checklist includes request for complete tribal-related communications.
(h) A PEA or equivalent information on the environmental impact of the project in accordance with the provisions of CEQA and this Commission's Rule of Practice and Procedure, Rules 17.1 and 17.3. If a PEA is filed, it may include the data described in Items (a) through (g) above.	GO 131-D Section IX. A.		Yes	The PEA was filed with the PTC Application. Specific deficiency comments on the PEA are discussed in Attachment B.
Potential Exposure To Electric And Magnetic Fields (EMF)				
Applications for a CPCN shall describe the measures taken or proposed by the utility to reduce the potential exposure to electric and magnetic fields generated by the proposed facilities, in compliance with Commission order. This information may be included in the PEA required by Rules of Practice and Procedure 17.1.	GO 131-D Section X. A.	CPUC Energy Division/ Aspen	Yes	The EMF Field Management Plan is included in the PTC Application as Appendix F.

Attachment B. Proponent's Environmental Assessment (PEA) Checklist

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
Coversheet		
Should be a single sheet with the following information: ▪ Title "Proponent's Environmental Assessment" ▪ Proceeding for which the PEA has been prepared; ▪ Docket number of the proceeding ▪ Name, address, and telephone number of the project proponent	Yes	All defined requirements are met. Docket/application number was not on PEA, but has since been provided after Docket assignment – A.18-05-007
Table of Contents		
The format of the PEA document should include, but is not limited to, the following:[1] ▪ Table of Contents ▪ PEA Summary (e.g., Executive Summary) ▪ Project Objectives ▪ Project Description ▪ Environmental Setting ▪ Environmental Impact Assessment Summary (e.g., Environmental Impacts and Mitigation Measures);[2] also includes: – Cumulative Impacts ▪ Detailed Discussion of Significant Impacts; also includes: – Mitigation Measures to Minimize the Significant Effects – Project Alternatives, if appropriate[3] – Growth-Inducing Impacts, if appropriate ▪ Federal permits/actions requiring NEPA review ▪ List of Preparers[4] ▪ Lists of Tables and Figures and Appendices (if any)	Yes	Table of Contents included in PEA. Environmental setting provided within each resource topic, rather than a stand-alone description.
Chapter 1: PEA Summary Note: PEA Table 1-1 (PEA Checklist Key) also presents useful reference as to where information is provided.		
Typically from two to ten pages in length depending on complexity of the project and the number and significance of the projects impacts.	Yes	Summary included in PEA as Chapter 1.

[1] References for each section should be included at the end of the respective section.

[2] Environmental Setting, Impacts and Mitigation Measures may be discussed in one section

[3] Alternatives and Growth-Inducing Impacts discussions may not be required for projects that have no significant impacts.

[4] The PEA shall include a list of persons, their organization and their qualification, responsible for compiling the detailed information for each section

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
PEA summary should include, but is not limited to, the following: ▪ the major conclusions of the PEA; ▪ any areas of controversy; ▪ any major issues that must be resolved including the choice among reasonably feasible alternatives and mitigation measures, if any; ▪ a description of inter-agency coordination, if any; and ▪ a description of public outreach efforts, if any.	Yes	Discussion of major conclusions of the PEA and areas of controversy are cursory but sufficient for a summary. In particular, ▪ Section 1.6 presents major conclusions ▪ Section 1.4 summarizes agency coordination ▪ Section 1.7.1 summarizes potential controversy and major issues ▪ Section 1.7 describes public and agency outreach
Chapter 2: Project Purpose and Need and Objectives		
2.1 Overview – This section lists the information necessary under CEQA to describe the objectives, purpose and need for the Proposed Project. Additional information regarding purpose and need may be required from the Applicant to be included in its application to the CPUC in accordance with the Public Utilities Code CPUC General Order 131-D.		
Generally not more than two pages in length, except where significant or potentially significant project impacts have been identified. Analysis of project objectives, purpose and need must be sufficiently detailed to permit the Commission to independently evaluate the project need and benefits in order to accurately consider them in light of the potential environmental impacts.	Yes	Included as PEA Section 2.1, Overview.
Explanation of the objective(s) and/or Purpose and Need for implementing the Proposed Project.	Yes	Included in PEA Section 2.2. Project Objectives.
2.2 Project Objectives – Analysis of the reason why attainment of these objectives is necessary or desirable. Such analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives which will aid any appropriate CEQA alternatives screening process.	Yes	Included in PEA Section 2.2, Project Objectives (and repeated in Section 3.3, Project Objectives)
Chapter 3: Project Description		
3.1 Project Location		
Geographical Location: County, City (provide project location map(s)).	Yes	Included in PEA Chapter 3, Section 3.1. Project Description
General Description of Land Uses within the project site (e.g., residential, commercial, agricultural, recreation, traverses vineyards, farms, open space, number of stream crossings, etc.).	Yes	Included in PEA Chapter 3. Section 3.1, Project Location; Subsection 4.10.1.1, Existing Land Uses. Descriptions are general because much of land is Federal and developed uses are sparse.

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
Describe if the Proposed Project is located within an existing property owned by the Applicant, traverses existing rights of way (ROW) or requires new ROW. Give the approximate area of the property or the length of the project that is in an existing ROW or which requires new ROWs.	No	Information is provide in PEA Chapter 3.1 (Project Location) and 4.10.1.1 (Existing Land Uses). However, the PEA identifies a potential need for addition land rights for capacitors and/or repeater sites (either new rights or expanded ROW). No information is provided on the mechanism to obtain these rights. Federal land cannot be condemned, and would require ROW grants from BLM and/or NPS. This would also apply to any new access roads and work areas not already under SCE control. • Please give the approximate length of the project that is in existing ROW and the area of new ROW required, and its location(s). .
3.2 Existing System		
Describe the local system to which the Proposed Project relates; include all relevant information about substations, transmission lines and distribution circuits. Note: regional system maps would remain confidential for security reasons.	Yes	Included in PEA Chapter 1 and Section 3.2 (Existing System).
Provide a schematic diagram and map of the existing system.	Yes	Included in Chapter 3, Section 3.2, as Figures 3-2 and 3-3.
Provide a schematic diagram that illustrates the system as it would be configured with implementation of the Proposed Project.	No	Chapter 3, Figure 3-3. Schematics of various project components are provided, however, no schematic drawings of the improvements to the substations were provided in the PEA. Please provide schematic diagrams of changes to the affected substations.
3.3 Project Objectives – Can refer to Chapter 2, Project Purpose and Need, if already described there.	Yes	Objectives are described in PEA Chapter 2 (Section 2.2) and Section 3.3, Project Objectives.

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
3.4 Proposed Project		
Describe whole of the Proposed Project. Is it an upgrade, a new line, new substations, etc.?	No	Section 3.4 describes the Proposed Project. However, Section 3.5.2.4 (Distribution Poles) identifies approximately 100 wood poles that are to be installed. A footnote states that they are subject to further design and are not included in the GIS data submitted. These poles are not included in the Project Components list (Section 1.1) although the components list does include the extension or reroute of approximately 2 miles of overhead 12 kV distribution circuits to provide light and power to the Newberry Springs and Ludlow series capacitors, which may be where the 100 poles would be installed. This is not clear. Nor is it clear what access exists or would need to be developed for these poles. • Please provide the location of the distribution poles and any associated work areas and any earthwork, such as trenching, new access or spur road, etc. Revise the project description to include the distribution component of the project. Include this distribution component of the project on maps such as are provided in Appendix e. Detailed Route Maps. • Please confirm that all access roads are included in Appendix e. Detailed Route Maps and the GIS data, and in all calculations of disturbed areas. If not, please update this information. Include access to the 12 kV distribution system noted above as well as new permanent and temporary access roads developed under the proposed project. The project description addresses the level of O&M staffing (Section 3.8.1) but does not identify whether additional staff will be required for O&M or if O&M will be performed by existing staff or contractors, and no additional staff will be required. • Please confirm if there are any new staff required for ongoing O&M of the proposed project.
Describe how the Proposed Project fits into the Regional system. Does it create a loop for reliability, etc.?	Yes	PEA Chapter 1

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
Describe all reasonably foreseeable future phases, or other reasonably foreseeable consequences of the Proposed Project.	No	Future system upgrades resulting from project implementation are not discussed. No discussion is provided in the PEA of potential upgrades elsewhere on transmission and distribution systems that may result from increasing the capacity of the 500 kV lines in the proposed project. E.g., no information is provided on renewable projects that would be able to go forward due to increased capacity or on any transmission system changes that may be required from increased power being delivered over the project lines. • Please identify what existing or potential renewable or other energy projects may make use of the increased transmission capacity on the lines. • Please provide information on new or changed transmission or distribution assets that may be required as a result of increasing the capacity of the project's 500 kV lines.
Provide capacity increase in MW. If the project does not increase capacity, state it.	Yes	The proposed capacity increase is included in the PEA, Section 3.4.1.
Provide GIS (or equivalent) data layers for the Proposed Project preliminary engineering including estimated locations of all physical components of the Proposed Project as well as those related to construction. For physical components, this could include but is not limited to the existing components (e.g., ROW, substation locations, poles, etc.) as well as the proposed pole locations, transmission lines, substations, etc. For elements related to construction include: proposed or likely lay-down areas, work areas at the pole sites, pull and tension sites, access roads (e.g., temporary, permanent, existing, etc.), areas where special construction methods may need to be employed, areas where vegetation removal may occur, areas to be heavily graded, etc. More details about this type of information are provided below.	No	Initial GIS data have been provided to Aspen Environmental Group, CPUC's Environmental Contractor However, the data are incomplete and have changed since being provided. As noted above, the PEA states that approximately 100 wood distribution poles would be installed as part of the project. Please provide the GIS data for these pole locations. If final engineering is not available, please provide preliminary locations. Ten proposed helicopter landing zones (HLZs) have been eliminated per email communications between Rey Gonzales (SCE) to Jim Shearer (BLM). • Please provide updated GIS data that eliminates these LZ locations. If new HLZs are planned, indicate where they would be located. • Please update all tables and calculations showing permanent and temporarily disturbed areas affected by these HLZ changes (as well as the 100-pole distribution system noted above.).
3.5 Project Components		
3.5.1 Transmission Line		
What type of line exists and what type of line is proposed (e.g., single-circuit, double-circuit, upgrade 69 kV to 115 kV).	Yes	Included in description of Proposed Project, Section 3.5 (Project Components).
Identify the length of the upgraded alignment, the new alignment, etc.	No	The PEA project descriptions does not include the 100 wood distribution poles. However, the project description does identify 2 miles of distribution line as part of the project. • Please confirm or clarify whether the distribution line for which 100 poles would be installed is included in description of Proposed Project, Section 3.5 (Project Components).

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
Would construction require one-for-one pole replacement, new poles, steel poles, etc.?	Yes	Included in description of Proposed Project, Section 3.5 (Project Components).
Describe what would occur to other lines and utilities that may be collocated on the poles to be replaced (e.g., distribution, communication, etc.).	No	No information was provided on whether there are any collocated utilities would be affected and, if so, how they would be handled. • Please identify if there are any collocated utilities or lines affected by the proposed project.
3.5.2 Poles/Towers		
Provide the following information for each pole/tower that would be installed and for each pole/tower that would be removed: ▪ Unique ID number to match GIS database information. ▪ Structure diagram and, if available, photos of existing structure. Preliminary diagram or "typical" drawings and, if possible, photos of proposed structure. Also provide a written description of the most common types of structures and their use (e.g., Tangent poles would be used when the run of poles continues in a straight line, etc.). Describe if the pole/tower design meets raptor safety requirements. ▪ Type of pole (e.g., wood, steel, etc.) or tower (e.g., self-supporting lattice). ▪ For poles, provide "typical" drawings with approximate diameter at the base and the tip; for towers, estimate the width at base and top. ▪ Identify typical total pole lengths, the approximate length to be embedded, and the approximate length that would be above ground surface; for towers, identify the approximate height above ground surface and approximate base footprint area.	No	Section 3.5.2 (Poles/Towers), Appendix E Detailed Route Maps, and GIS files need to include the 100-pole distribution system that is being proposed as part of the project.
Describe any specialty poles or towers; note where they would be used (e.g., angle structures, heavy angle lattice towers, stub guys); make sure to note if any guying would likely be required across a road.	No	• Please provide the required information for the approximately 100 wood poles proposed to be installed.
If the project includes pole-for-pole replacement, describe the approximate location of where the new poles would be installed relative to the existing alignment.	No	• Please provide the required information for the approximately 100 wood poles proposed to be installed.
Describe any special pole types (e.g., poles that require foundations, transition towers, switch towers, microwave towers, etc.) and any special features.	No	• Please provide the required information for the approximately 100 wood poles proposed to be installed.
3.5.3 Conductor/Cable		
3.5.3.1 Above-Ground Installation		
Describe the type of line to be installed on the poles/tower (e.g., single circuit with distribution, double circuit, etc.).	Yes	Included in Section 3.5.3.1, Above-Ground Installation.

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Requirement	**Complete?**	**Deficiency Comments**
Describe the number of conductors required to be installed on the poles or tower and how many on each side including applicable engineering design standards.	Yes	Included in Section 3.5.3.1, Above-Ground Installation.
Provide the size and type of conductor (e.g., ACSR, non-specular, etc.) and insulator configuration.	Yes	Included in Section 3.5.3.1, Above-Ground Installation.
Provide the approximate distance from the ground to the lowest conductor and the approximate distance between the conductors (i.e., both horizontally and vertically) Provide specific information at highways, rivers, or special crossings.	No	Typical ground-to-conductor distances are provided in Section 3.5.3.1. Table 4.16-1 (Roadway Network in the Vicinity of the Proposed Project) identifies roads. However, the required information regarding crossings (e.g., highways, rivers, etc.) is not provided. • Please identify highways, major roads, railroads, canyons, rivers, and similar features crossed by the proposed project. Include the distance between the lowest conductor and the ground.
Provide the approximate span lengths between poles or towers, note where different if distribution is present or not if relevant.	Yes	Not described but available in the GIS data.
Describe if other infrastructure would likely be collocated with the conductor (e.g., fiber optics, etc); if so, provide conduit diameter of other infrastructure.	No	No information on collocated infrastructure is provided in the PEA. • Please see Section 3.5.1 above. SCE needs to confirm whether there is collocated infrastructure.
3.5.3.2 Below Ground Installation [Note: provide the best information available in the absence of a detailed geo-technical study.]		
Describe the type of line to be installed (e.g., single circuit cross-linked polyethylene-insulated solid-dielectric, copper-conductor cables).	Yes	Included in description of Proposed Project, Section 3.5.3.2.
Describe the type of casing the cable would be installed in (e.g., concrete-encased duct bank system); provide the dimensions of the casing.	Yes	Included in description of Proposed Project, Section 3.5.3.2.
Provide an engineering 'typical' drawing of the duct bank and describe what types of infrastructure would likely be installed within the duct bank (e.g., transmission, fiber optics, etc.).	Yes	Included in description of Proposed Project, Section 3.5.3.2.
3.5.4 Substations		
Provide "typical" Plan and Profile views of the proposed substation and the existing substation if applicable.	No	Plan and profile views are provided for Mid-Line Series Capacitors but not for substations that require modifications. Section 3.5.5 describes changes at substation. • Please provide plan and profile views of substations as they would appear after modification.

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Requirement	**Complete?**	**Deficiency Comments**
Describe the types of equipment that would be temporarily or permanently installed and provide details as to what the function/use of said equipment would be. Include information such as, but not limited to: mobile substations, transformers, capacitors, and new lighting.	Yes	Descriptions provided in PEA.
Provide the approximate or "typical" dimensions (width and height) of new structures including engineering and design standards that apply.	No	This information is not provided for the substations that require modifications. • Please provide plan and profile views of substations as they would appear after modification.
Describe the extent of the Proposed Project. Would it occur within the existing fence line, existing property line or would either need to be expanded?	Yes	Included in description of Proposed Project.
Describe the electrical need area served by the distribution substation.	N/A	No distribution substations would be affected by the Proposed Project.

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Requirement	**Complete?**	**Deficiency Comments**
3.6 Right-of-Way Requirements		
Describe the ROW location, ownership, and width. Would existing ROW be used or would new ROW be required?	No	PEA (Section 3.6, Right-of-Way Requirements) identifies the existing ROW. The PEA notes that additional land may be required, but provides no specifics. Section 3.6 states "Certain land rights may need to be acquired and/or amended. The status of any applications to federal agencies is unknown. New BLM ROW would be needed between the proposed Newberry Springs Series Capacitor and Ludlow Series Capacitor and from the existing distribution line to the Kelbaker and Lanfair Fiber Optic Repeaters. Distribution to the fiber optic repeaters would be added to the BLM/NPS Lugo-Mohave ROW grants." Kelbaker and Lanfair Repeaters are on NPS land. • Please provide information needed to define the ultimate ROW required for the proposed project. . Provide an explanation of the status of the existing ROW in the Preserve (originally granted by BLM but now under NPS jurisdiction). Explain if existing grants of ROW remain in force and what additional land rights will need to be granted, and by what agency (BLM, NPS, BOR, State Lands Commission) will need to grant the additional land and the mechanisms required to obtain the land. Identify the status of any ROW grant application(s). Please identify the location and acreage of any additional land not currently granted to SCE. – ROW is also addressed in Land Use Section 4.10.2.1, Regulatory Setting: Federal Section. The text states that federal authorizations including a ROW grant from the BLM and a Special Use Permit from the NPS would be required. • Additional information is needed regarding the ROW grant and Special Use Permit. Specifically, what is the current width of the ROW, where would it need to be expanded on public (as well as private) land and who would issue the ROW (BLM and/or NPS). What land designations underlie where the ROW expansion is needed. Is the existing ROW within a utility corridor along any of the lines? Similarly, provide additional information regarding the conditions of the Special Use Permit. • Section 4.10.1.1, Existing Land Uses (Area of Critical Environmental Concern pg. 4.10-3 and 4.10-4) states that the project cross a number of different ACECs. Under the DRECP, the ACECs have disturbance caps. • For ACECs and any other special-status areas crossed by the project, please identify what disturbance caps may apply and describe how the proposed project would not exceed any caps.
If new ROW is required, describe how it would be acquired and approximately how much would be required (length and width).	No	The method for acquiring new ROW or property is not described. See above.
List properties likely to require acquisition.	No	Specific properties are not identified. See above.

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Requirement	**Complete?**	**Deficiency Comments**
3.7 Construction		
3.7.1 For All Projects		
3.7.1.1 Staging Areas [Note: while not all potential local site staging areas will be known prior to selection of a contractor, it is expected that approximate area and likely locations of staging areas be disclosed.]		
Where would the main staging area(s) likely be located?	Yes	Included in description of Proposed Project. PEA Table 3-7 identifies 17 potential staging yard sites, but does not indicate ownership. Unless some are eliminated, all will be considered in the environmental evaluation.
Approximately how large would the main staging area(s) be?	Yes	Size of each is included in description of Proposed Project.
Describe any site preparation required, if known, or generally describe what might be required (i.e., vegetation removal, new access road, installation of rock base, etc.).	Yes	PEA Chapter 3 Project Description describes general site preparation at Capacitors, Repeaters, and yard/work areas.
Describe what the staging area would be used for (i.e., material and equipment storage, field office, reporting location for workers, parking area for vehicles and equipment, etc.).	Yes	Included in description of Proposed Project.
Describe how the staging area would be secured, would a fence be installed? If so, describe the type and extent of the fencing.	No	Use of perimeter fencing identified in Section 3.7.1.1 (Staging Areas). However, the type and extent of fencing is not fully described. • Please describe the type of fencing that would be used, the extent of the fencing, how it would be secured so as to not fail, and whether any special treatments would be used (e.g., visual screening).
Describe how power to the site would be provided if required (i.e., tap into existing distribution, use of diesel generators, etc.).	Yes	PEA Section 3.7.1.1 notes that local distribution lines or generators may be used, depending on site location.
Describe any grading activities and/or slope stabilization issues.	Yes	PEA Section 3.7.1.1. - Use of grading to form level surface for compaction and gravel installation is described in general.
3.7.1.2 Work Areas [Note: understanding that each specific work area may not be determined until the final work plan is submitted by the construction contractor, estimate total area likely to be disturbed.]		
Describe known work areas that may be required for specific construction activities (i.e., pole assembly, hill side construction, etc.).	Yes	Included in description of Proposed Project, GIS data, and Appendix E maps.

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Requirement	**Complete?**	**Deficiency Comments**
For each known work area, provide the area required (include length and width) and describe the types of activities that would be performed.	Yes No	PEA Section 3.7.1.2 Work Areas describes work areas in general, and includes Table 3-8 that lists laydown/work area features and the preferred size. The terminology in Table 3-8 does not correspond with that used in the legends on maps in Appendix E. Detailed Route Maps • Please provide a revised table that is consistent with the legend on the maps. E.g., "Tower Work" and "Wire Setup" are used in legends but are not in the table provided. Helicopter Landing Zones are identified on the maps, but are not listed in the table.
Identify the approximate location of known work areas in the GIS database.	Yes	Included in description of Proposed Project.
How would the work areas likely be accessed (e.g., construction vehicles, walk in, helicopter, etc.)?	No	Specific details are not provided in the PEA regarding how individual work areas would be accessed. . Methods of access in general are discussed, but not for individual sites. • Please confirm that where road access is available, vehicle access will be used. If not, please describe. Also, given distances, if helicopter transport of crews is envisioned, please confirm that they will use only approved Helicopter Landing Zones.
If any site preparation is likely required, generally describe what and how it would be accomplished.	Yes	Included in description of Proposed Project. Grading and vegetation removal are treatments to be use on an as-needed basis.
Describe any grading activities and/or slope stabilization issues.	No	Grading and slope stabilization are included in the description of the proposed project in a general way, based on the need for level surfaces. No specific locations are identified for specific surface treatments. • Unless information is available for grading, slope stabilization, and benching at specific locations, the environmental analysis will need to assume that all work areas will be 100% disturbed by grading or other earthwork.
Based on the information provided, describe how the site would be restored.	No	Specific details on vegetation restoration are not provided in the PEA. SCE states a Revegetation Plan would be written, but does not provide details on restoration methods beyond sites being restored to pre-disturbance conditions or left with rock ground cover if that is what the owner wants. APM-BIO-01 • Please provide any available additional information on restoration and revegetation methods that SCE anticipates including in its Revegetation Plan.

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Requirement	Complete?	Deficiency Comments
3.7.1.3 Access Roads and/or Spur Roads		
Describe the types of roads that would be used and or would need to be created to implement the Proposed Project. See table below as an example of information required. Road types may include, but are not limited to: new permanent road; new temporary road; existing road that would have permanent improvements; existing road that would have temporary improvements, existing paved road; existing dirt/gravel road, and overland access.	No	PEA Section 3.7.1.3 describes access and spur roads in general and treatments that would occur depending on the slope of the land surface. • Please describe the types of access/spur roads to be used (e.g., existing dirt, new permanent, new temporary, etc.) and the estimated acreage of each type. Provide preliminary engineering sufficient to indicate where ground disturbance is expected to be required for access/spur road development or enhancement.
For road types that require preparation, describe the methods and equipment that would be used.	Yes	Included in description of Proposed Project, Section 3.7.1.3.
Identify approximate location of all access roads (by type) in the GIS database.	Yes	Included in the GIS data and Appendix E (Detailed Route Map).
Describe any grading activities and/or slope stabilization issues.	No	Grading and slope stabilization are included in the description of the proposed project in a general way. No specific locations are identified for specific surface treatments. • Unless information is available for grading, slope stabilization, and benching at specific locations, the environmental analysis will need to assume that all access/spur roads will be disturbed by grading or other earthwork.

Type of Road	Description	Area* Proposed Project
Existing dirt road	Typically double track. May have been graded previously. No other preparation required, although a few sections may need to be re-graded and crushed rock applied in very limited areas for traction.	___ acres
New Permanent	Would be ___ feet wide, bladed. No other preparation required although crushed rock may need to be applied in very limited areas for traction.	___ acres
Overland Access	No preparation required. Typically grassy areas that are relatively flat. No restoration would be necessary.	___ acres

*Based on typical road width of ___feet

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Requirement	**Complete?**	**Deficiency Comments**
3.7.1.4 Helicopter Access [Note: While full extent of helicopter utilization won't be ascertained until the construction contractor conducts a field review, the applicant should provide best estimates of likely helicopter utilization based on geographic and other conditions.]		
Identify which proposed poles/towers would be removed and/or installed using a helicopter.	No	This information is not provided in the PEA. Helicopter use is planned, but how and where helicopters will be used is not specified. APM-NOI-01 and APM-NOI-02 address some distance/elevation requirement related to noise impacts. • Please provide a preliminary Helicopter Plan that identifies probably flight paths, any know restrictions that apply to the project area, how loads will be managed to ensue save rigging, transport, and delivery, data capture for tracking flight history, etc.
If different types of helicopters are to be used, describe each type (e.g., light, heavy or sky crane) and what activities they will be used for.	No	The PEA provides "typical" use information for helicopters, states helicopters would be light and medium duty, and identifies a range of potential uses. The PEA is not clear as to extent, purpose, and location of helicopter use. • Please provide specific information on how helicopters will be employed during project construction.
Provide information as to where the helicopters would be staged, where they would refuel, where they would land within the Project site.	No	PEA Section 3.7.1.4 (Helicopter Access) identifies where helicopters will be staged (likely airports). The PEA defers any specific information on helicopter use, staging, refueling, etc to some future time after "final engineering, contract award, conditions of permits, and Contractor preference." SCE states "helicopters must be able to land within SCE ROWs, which could include landing on access or spur roads". • Please define under what conditions helicopters could land on any access or spur roads. Identify which of the potential yards would be used as fly yards.
Describe any BMPs that would be employed to avoid impacts caused by use of helicopters, for example: air quality and noise considerations.	Yes	PEA provides two Noise APMs regarding operating near residences and schools. If required, other helicopter-specific measures will be identified in the MND for dust, ESAs, sensitive habitats, or other resources potentially affected.
Describe flight paths, payloads, hours of operations for known locations and work types.	No	PEA Section 3.7.1.5 states flight paths will be determine prior to construction by the helicopter contractor. Potential helicopter activities are described as potential uses but without specificity as to locations and types of work. • See above for helicopter-specific requested information
3.7.1.5 Vegetation Clearance [Note: specific amounts and types of vegetation removed may not be known until plant surveys, field reviews and project engineering are complete. However, the applicant is expected to have a reasonable estimate of the vegetation clearance required for each project based on established data available for each project area.]		
Describe what types of vegetation clearing may be required (e.g., tree removal, brush removal, flammable fuels removal) and why (e.g., to provide access, etc.).	Yes	Vegetation clearing is identified for the 2 capacitor sites and 3 repeater stations as well as for new access roads, if needed. Unspecified vegetation clearing is identified as being needed at work areas and yards.

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Requirement	**Complete?**	**Deficiency Comments**
Identify the preliminary location and provide an approximate area of disturbance in the GIS database for each type of vegetation removal.	Yes	Vegetation type included in GIS files.
Describe how each type of vegetation removal would be accomplished.	Yes	SCE has describe vegetation removal will be done by grading. Analysis may identify alternative methods.
For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.	No	The PEA notes shrub and brush removal would be required but does not identify the need for tree trimming or removal. • Please confirm if any tree trimming or removal is anticipated to occur as a result of project construction.
Describe the types and approximate number and size of trees that may need to be removed.	No	See above.
Describe the type of equipment typically used.	Yes	Part of equipment lists: Table 3-15 (Equipment Description) and Attachment 3-D (Construction Equipment and Workforce Estimates.
3.7.1.6 Erosion and Sediment Control and Pollution Prevention during Construction		
Describe the areas of soil disturbance including estimated total areas, and associated terrain type and slope. List all known permits required. For project sites of less than one acre, outline the best management practices (BMPs) that would be implemented to manage surface runoff. Things to consider include, but are not limited to, the following: ▪ Erosion and Sedimentation BMP's; ▪ Vegetation Removal and Restoration; and/or, ▪ Hazardous Waste and Spill Prevention Plans.	Yes	Total area of disturbance provided, and can also be calculated from GIS data. Permits identified.
Describe any grading activities and/or slope stabilization issues.	No	Please see comments under 3.7.1.2 and 3.7.1.3
Describe how construction waste (i.e., refuse, spoils, trash, oil, fuels, poles, pole structures, etc.) would be disposed.	Yes	PEA provides location and capacity of landfills in Section 4.17 Utilities and Service Systems; it is briefly discusses that approved transporter and disposal contractors would be used and would be consistent with applicable laws.
3.7.1.7 Cleanup and Post-Construction Restoration		
Describe how cleanup and post-construction restoration would be performed (i.e., personnel, equipment, and methods). Things to consider include, but are not limited to, restoration of the following: ▪ Natural drainage patterns; ▪ Wetlands; ▪ Vegetation; and ▪ Other disturbed areas (i.e. staging areas, access roads, etc.).	No	Detailed information required in the checklist is not provided in PEA. The project description states restoration would be to pre-construction state. . APM BIO-1 provides for preparation of a Revegetation Plan. • Please describe how cleanup and post-construction restoration would be performed. If this information is provided in other responses, please indicate this. In order to assess potential impacts, information is required to understand the extent and nature of disturbances and what will occur to restore disturbed areas.

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Requirement	**Complete?**	**Deficiency Comments**
3.7.2 Transmission Line Construction (Above Ground)		
3.7.2.1 Pull and Tension Sites		
Provide the general or average distance between pull and tension sites.	Yes	Included in description of Proposed Project.
Provide the area of pull and tension sites, include the estimated length and width.	Yes	Included in description of Proposed Project.
According to the preliminary plan, how may pull and tension sites would be required, and where would they be located? Please provide the location information in GIS.	Yes	Included in description of Proposed Project and included in GIS data.
What type of equipment would be required at these sites?	Yes	Included in description of Proposed Project.
If conductor is being replaced, how would it be removed from the site?	No	No information is provided on the removal of any conductor. • Please describe the removal and disposal of any replaced conductor.
3.7.2.2 Pole Installation and Removal		
Describe how the construction crews and their equipment would be transported to and from the pole site location. Provide vehicle type, number of vehicles, and estimated number of trips and hours of operation.	No	PEA Sections 3.7.2.2 (Pole/Tower Installation and Removal, Attachment 3-D (Construction Equipment and Workforce Estimates) and Section 4.16 (Transportation and Traffic) identify all of the equipment and vehicles anticipated to be used. However, from the information provided it is not clear how many vehicles and vehicle trips will occur to and from the pole sites. • Please describe the transport of crews and equipment to and from pole site locations; identify vehicle types, number of vehicles, estimated number of trip, and hours of operation.
Pole and Foundation Removal		
Describe the process of how the poles and foundations would be removed.	Yes	Included in description of Proposed Project.
Describe what happens to the hole that the pole was in (i.e., reused or backfilled)?	Yes	Included in description of Proposed Project.
If the hole is to be filled, what type of fill would be used, where would it come from?	Yes	Included in description of Proposed Project.
Describe any surface restoration that would occur at the pole site?	Yes	Included in description of Proposed Project.
Describe how the poles would be removed from the site?	Yes	Included in description of Proposed Project.
Top Removal – If topping is required to remove a portion of an existing transmission pole that would now only carry distribution lines, please provide the following: ▪ Describe the methodology to access and remove the tops of these poles. ▪ Describe any special methods that would be required to top poles that may be difficult to access, etc.	No	The PEA does not identify what poles will be topped where they are located, the method to access and top these poles, and any special methods that may be required. • Please provide the top removal information required. If no poles are to be topped, please indicate that.

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Requirement	Complete?	Deficiency Comments
Pole/Tower Installation		
Describe the process of how the new poles/towers would be installed; specifically call out any special construction methods (e.g., helicopter installation) for specific locations or for different types of poles/towers.	Yes	Included in description of Proposed Project. Specific towers proposed for helicopter construction not listed. A limited number of towers/poles will be replaced/installed. Some LST will be raised or cages added to the top to accommodate OPGW installation and clearances.
Describe the types of equipment and their use as related to pole/tower installation.	Yes	Included in description of Proposed Project.
Describe actions taken to maintain a safe work environment during construction (e.g., covering of holes/excavation pits, etc.).	Yes	Included in description of Proposed Project.
Describe what would be done with soil removed from a hole/foundation site.	Yes	Included in description of Proposed Project.
For any foundations required, provide description of construction method(s), approximate average depth and diameter of excavation, approximate volume of soil to be excavated, approximate volume of concrete or other backfill required, etc.	Yes	Included in description of Proposed Project.
Describe briefly how poles/towers and associated hardware are assembled.	Yes	Included in description of Proposed Project.
Describe how the poles/towers and associated hardware would be delivered to the site; would they be assembled off-site and brought in or assembled on site?	Yes	Included in description of Proposed Project. However, PEA provides range of delivery methods and does not specify what methods will be used at what locations.
Provide the following information about poles/tower installation and associated disturbance area estimates:	Yes	Included in description of Proposed Project. Limited pole/tower installation.

SUMMARY OF TYPICAL POLE/TOWER INSTALLATION METRICS

	Proposed Project (approximate metrics)
Pole Diameter: • Wood • Self-Supporting Steel	 ___ inches ___ inches
Lattice Tower Base Dimension: • Self-Supporting Lattice Structure	 ___ feet
Auger Hole Depth: • Wood • Self-Supporting Steel	 ___ to ___ feet ___ to ___ feet
Permanent Footprint per Pole/Tower: • Wood • Self-Supporting Steel • Self-Supporting Steel Tower	 ___ sq. feet ___ sq. feet ___ sq. feet

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Requirement		**Complete?**	**Deficiency Comments**
Number of Poles/Towers: • Wood • Self-Supporting Steel • Self-Supporting Steel Tower	___ ___ ___		
Average Work Area around Pole/Towers (e.g., for old pole removal and new pole installation): • Tangent structure work areas • Dead End / Angle structure work areas	___ sq. feet ___ sq. feet		
Total Permanent Footprint for Poles/Towers	Approx ___ acres		
3.7.2.3 Conductor/Cable Installation			
Provide a process-based description of how new conductor/cable would be installed and how old conductor/cable would be removed, if applicable. Note, graphical representation of the general sequencing is helpful for the reader here.		Yes	Included in description of Proposed Project.
Generally describe the conductor/cable splicing process.		Yes	Included in description of Proposed Project.
If vaults are required, provide their dimensions and approximate location/spacing along the alignment.		Yes	Included in description of Proposed Project.
Describe in what areas conductor/cable stringing/installation activities would occur.		Yes	Included in description of Proposed Project.
Describe any safety precautions or areas where special methodology would be required (e.g., crossing roadways, stream crossing).		Yes	Included in description of Proposed Project.
3.7.3 Transmission Line Construction (Below Ground) 3.7.3.1 Trenching			
Describe the approximate dimensions of the trench (e.g., depth, width).		Yes	Included in description of Proposed Project (applicable only to 66 kV line).
Describe the methodology of making the trench (e.g., saw cutter to cut the pavement, back hoe to remove, etc.).		Yes	Included in description of Proposed Project. Backhoe will be typical method. Approx. 1,000 feet of underground fiber optic installation.
Provide the total approximate cubic yardage of material to be removed from the trench, the amount to be used as backfill and the amount to subsequently be removed/disposed of off-site.		No	PEA Section 3.7.3.1 (Trenching) does not provide an estimate of cubic yardage of material excavated, used as backfill, or disposed of off-site. • Please provide estimates of total material excavated, amount used as backfill, and disposition of any remaining excavated material.

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Requirement	**Complete?**	**Deficiency Comments**
Provide off-site disposal location, if known, or describe possible option(s).	No	Information is not provided on the handling of removed trench material. • Please identify known or potential off-site disposal locations for excess excavated material. If excess material is not to be disposed of off-site, please describe its fate.
If engineered fill would be used as backfill, provide information as to the type of engineered backfill and the amount that would be typically used (e.g., the top two feet would be filled with thermal-select backfill).	No	The PEA identifies that trenching for fiber optic installation will be a minimum of 36 inches deep and conduit will be covered with approximately 30 inches of concrete slurry. Conduit installation for underground distribution cables is don't described except for the size of the trench. • Please identify whether engineered backfill will be used and the amount. Also, describe the underground distribution trench construction and how the trench will be filled and finished.
Describe if dewatering would be anticipated, if so, how the trench would be dewatered, what are the anticipated flows of the water, would there be treatment, and how would the water be disposed.	No	The PEA does not identify whether dewatering is anticipated. • Please identify if trench dewatering is anticipated to be required anywhere on the project. If so, please describe how the water would be handled, treated, and disposed.
Describe the process for testing excavated soil or groundwater for the presence of pre-existing environmental contaminants that could be exposed as a result of trenching operations.	Yes	The PEA describes its procedures in Section 4.8 (Hazards and Hazardous Materials), Page 4.8-32.
If a pre-existing hazardous waste were encountered, describe the process of removal and disposal.	Yes	The PEA describes its procedures in Section 4.8 (Hazards and Hazardous Materials), Page 4.8-32. .
Describe any standard BMPs that would be implemented.	No	The PEA identifies that SWPPS containing BMPs and an HMMP would be implemented during construction. Standard BMPs are not enumerated in the PEA. • Please identify and describe the BMPs SCE anticipates including in SWPPS to address contamination encountered during trenching.
3.7.3.2 Trenchless Techniques: Microtunnel, Bore and Jack, Horizontal Directional Drilling		
Provide the approximate location of the sending and receiving pits.	N/A	The PEA anticipates only open-cut trenching. It describes horizontal directional drilling (HDD) but identifies no locations where it is anticipated to be used. No trenchless construction techniques are specifically proposed.
Provide the length, width and depth of the sending and receiving pits.	N/A	See above. Sending and receiving pits can cause substantial disturbance to biological and cultural resources. If used, these sites would require investigation and clearance.
Describe the methodology of excavating and shoring the pits.	N/A	No trenchless construction techniques are proposed.

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
Describe the methodology of the trenchless technique.	N/A	No trenchless construction techniques are proposed.
Provide the total cubic yardage of material to be removed from the pits, the amount to be used as backfill and the amount to subsequently be removed/disposed of off-site.	N/A	No trenchless construction techniques are proposed.
Describe process for safe handling of drilling mud and bore lubricants.	N/A	No trenchless construction techniques are proposed.
Describe process for detecting and avoiding "fracturing-out" during HDD operations.	N/A	No trenchless construction techniques are proposed.
Describe process for avoiding contact between drilling mud/lubricants and stream beds.	N/A	No trenchless construction techniques are proposed.
If engineered fill would be used as backfill, provide information as to the type of engineered backfill and the amount that would be typically used (e.g., the top two feet would be filled with thermal-select backfill).	N/A	No trenchless construction techniques are proposed.
Describe if dewatering would be anticipated, if so, how the pit would be dewatered, what are the anticipated flows of the water, would there be treatment, and how would the water be disposed.	N/A	No trenchless construction techniques are proposed.
Describe the process for testing excavated soil or groundwater for the presence of pre-existing environmental contaminants.	N/A	No trenchless construction techniques are proposed.
If a pre-existing hazardous waste were encountered, describe the process of removal and disposal.	N/A	No trenchless construction techniques are proposed.
Describe any grading activities and/or slope stabilization issues.	N/A	No trenchless construction techniques are proposed.
Describe any standard BMPs that would be implemented.	N/A	No trenchless construction techniques are proposed.
3.7.4 Substation Construction		
Describe any earth moving activities that would be required; what type of activity and, if applicable, estimate cubic yards of materials to be reused and/or removed from the site for both site grading and foundation excavation.	Yes	Provided in PEA.
Provide a conceptual landscape plan in consultation with the municipality in which the substation is located.	N/A	No municipalities affected, remote site.
Describe any grading activities and/or slope stabilization issues.	Yes	Provided in PEA.
Describe possible relocation of commercial or residential property, if any.	N/A	All substation work is proposed in existing substations. No relocations are associated with series capacitors or repeaters.

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Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects

Requirement	Complete?	Deficiency Comments
3.7.5 Construction Workforce and Equipment [Note: in the absence of project specific data, provide estimates based on past projects of a similar size and type.]		
Provide the estimated number of construction crew members.	Yes	Included in description of Proposed Project.
Describe the crew deployment, would crews work concurrently (i.e., multiple crews at different sites); would they be phased, etc.	No	The PEA provides estimated range of total daily construction personnel on the project (15 to 346, average 159), but does not associate it with crews or phasing. • Please describe crew deployment and overall phasing of work activities. Include which activities would be concurrent or continuous, and which would be undertaken in phases.
Describe the different types of activities to be undertaken during construction; the number of crew members for each activity i.e. trenching, grading, etc.; and number and types of equipment expected to be used for said activity. Include a written description of the activity. See example below.	No	A table has been provided (Attachment 3-C) for individual pieces of equipment, number of pieces of equipment, and number of personnel and hours associated with each type of equipment, but a written description of the activity is not included. Attachment 3-C provides numeric information but is not descriptive. • To more fully understand the various activities to be undertaken during construction, please provide a narrative description of construction activities for major project elements. Examples include the distribution system, OPGW wire installation, substation changes, and tower and earth work associated with discrepancy adjustments. For each element, identify the sequence and duration of activities, expected size of crews, and equipment required.

Activity	People	Quantity of Equipment
Survey	3	1 pickup truck
Access Road Construction	2 to 3	1 bulldozer (D-8 Cat)
		1 motor grader
		1 pickup truck
		1 water truck (for construction)
Auger Holes, Direct Embed Poles	5	1 hole digger
		1 backhoe or bucket excavator
		1 water truck
		1 pickup truck
		1 line truck
Material Haul	3	1 tractor/trailer
		2 yard and field cranes or line trucks
		1 fork lift
Structure Assembly, Per Crew 2 Crews Required	4	1 pickup truck
		1 truck (2 ton)
Structure Erection, Per crew; 2 Crews Required (includes old pole removal)	4	1 truck (2 ton)
		1 pickup truck
		1 bucket truck
		1 line truck

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Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects

Requirement			Complete?	Deficiency Comments
Wire Installation (includes old conductor removal)	8	1 wire reel trailer 1 diesel tractor 1 Crane 1 line truck 3 pickup trucks 2 bucket trucks 2 3-drum pullers 1 single drum puller (large) 1 double bull-wheel tensioned (heavy)		
Right-of-Way Restoration and Cleanup	4	1 Truck 1 motor grader 1 pickup truck 1 water truck		
Provide a list of the types of equipment expected to be used during construction of the Proposed Project as well as a brief description of the use of the equipment. See example below.			No	An equipment list has been provided (as Chapter 3 Attachment 3-C). However, a written description of equipment use is not included. • Please provide a brief description of the equipment and its use. See the example below and to the left.

EQUIPMENT EXPECTED TO BE USED DURING PROJECT CONSTRUCTION

Type of Equipment	Use
• Bucket Truck (i.e. Cherry Picker) • Crane • Backhoe or Bucket Excavator • Crew-Cab Truck/Pick-Ups • Diesel Tractor • Dump Truck • Fork Lift • Grooming/Grading Equipment: – dozer – water truck – motor grader • Hole Auger/Truck Auger • Line Truck and Trailer • Mobile Offices • Pullers, Reel Dolly • Tensioned • Tractor/Trailer • Two-Ton Truck • Static Wire Reel Trailer	• Lift and transport workers • Erect pole structures, lift and transport heavy construction items • Transport personnel, tools, and materials • Pull pole trailer for multi-pole loads • Haul material • Lift and transport heavy construction items • Road construction (staging, pull sites) – move/compact soils – compaction and dust control – to properly pitch road for run-off • Excavate holes • Haul conductor, poles, equipment, materials, and people, and to install pole/conductor • Supervision and clerical office • Install conductor • Install and move conductor • Haul materials, equipment, tools, etc. • Haul materials • Transport reels of conductor

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Requirement	Complete?	Deficiency Comments
3.7.6 Construction Schedule – Provide a Preliminary Project Construction Schedule; include contingencies for weather, wildlife closure periods, etc. See example below.	Yes	Section 3.7.9 (Construction Schedule), Table 3-16, shows approx. start date and duration.

PROPOSED CONSTRUCTION SCHEDULE

Project Activity	Proposed Project (Month/Year or Month/Year to Month/Year)
Permit to construct adopted and effective	_____
Acquisition of required permits	_____
Right-of-way / property acquisition	_____
Final engineering completed	_____
Construction begins	_____
Transmission line construction	_____
Temporary Substation Construction	_____
Substation construction	_____
Project operational	_____
Clean up	_____

3.8 Operation and Maintenance		
Describe the general system monitoring and control (i.e., use of standard monitoring and protection equipment, use of circuit breakers and other line relay protection equipment, etc.).	Yes	Included in description of Proposed Project.
Describe the general maintenance program of the Proposed Project, include items such as: ▪ Timing of the inspections (i.e., monthly, every July, as needed); ▪ Type of inspection (i.e., aerial inspection, ground inspection); and ▪ Description of how the inspection would be implemented. Things to consider, who/how many crew members; how would they access the site (walk to site, vehicle, ATV); would new access be required; would restoration be required, etc.	Yes	Included in description of Proposed Project.
If additional full time staff would be required for operation and/or maintenance, provide the number and for what purpose.	No	PEA Section 3.8 (Operation and Maintenance) describes O&M activities but does not specify if additional full time O&M staff would be required. • Please confirm whether O&M activities for the proposed project would require additional staff.
3.9 Applicant Proposed Measures – If there are measures that the Applicant would propose to be part of the Proposed Project, please include those measures and reference plans or implementation descriptions.	Yes	Table of APMs included in the PEA Executive Summary.

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Requirement	**Complete?**	**Deficiency Comments**
Chapter 4: Environmental Setting		
Note: The discussion of Environmental Setting may be combined within each resource area in the Environmental Assessment Summary.		
For each resource area discussion, the PEA must include the following: ▪ A description of the physical environment in the vicinity of the project (e.g. topography, land use patterns, biological environment, etc.) – local environment (site-specific) – regional environment ▪ A description of the regulatory environment/context – Federal – State – Local	Yes	Included for each resource discussion.
Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact.	Yes	PEA provides discussion of all resource topics identified under CEQA Guidelines. .
Chapter 5: Environmental Impact Assessment Summary		
Using the California Environmental Quality Act Guidelines, Appendix G, as guidance, assess the potential environmental impacts (e.g., No Impact, Less than Significant, Less than Significant with Mitigation and/or Significant Unavoidable) of the Proposed Project's construction, operation and maintenance activities. See below for information that should be used in this assessment. See Chapter 6 in regards to proposed mitigation measures.		
5.1 Aesthetics – Provide visual simulations of prominent public view locations, including scenic highways to demonstrate the before and after project implementation. Additional simulations of affected private view locations are highly recommended.	Yes	Photos, KOPs, and Simulations provided for key project areas. Aesthetics uses BLM approach; is silent on whether this is acceptable to NPS, which administers the Mojave National Preserve.
5.2 Agriculture Resources – Identify the types of agricultural resources affected.	Yes	No significant agriculture. California does not identify agricultural resources on federal lands.

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Requirement	**Complete?**	**Deficiency Comments**
5.3 Air Quality		
Provide supporting calculations / spreadsheets / technical reports that support emission estimates in the PEA.	No	The PEA Air Quality (and GHG emission) calculations are incomplete because activity assumptions do not appear to be included. The PEA includes "Appendix F: Air Quality Calculations" (pp. F-1 to F-11). The appendix refers to CalEEMod as the basis for emission factors. However, calculating each emission rate depends on multiplying the activity assumption with each emission factor. The activity assumptions that were used to arrive at all Air Quality and GHG totals should be shown. The activity assumptions in the calculations supporting PEA Air Quality Tables 4.3-8 and 4.3-9 and GHG Table 4.7-1 are needed. This can be in the form of tables, spreadsheets, or CalEEMod results reports. Also, the PEA's use of CalEEMod from 2013 and the ARB OFFROAD 2007 model needs to be updated to the current versions of the models. • Please address the deficiencies noted above.
Provide documentation of the location and types of sensitive receptors that could be impacted by the project (e.g., schools, hospitals, houses, etc.). Critical distances to receptors is dependent on type of construction activity.	Yes	Table provided with distance to individual sensitive receptors. Location on transmission lines is sometimes provided in miles in some cases; mile information has not been provided but can be calculated from GIS data and air photo review.
Identify Project Green House Gas (GHG) emissions: ▪ Every project will quantify GHG emissions from a business as usual snapshot. That is, what the GHG emissions will be from the proposed project if no mitigations were used. ▪ Every project will quantify GHG emission reductions from every Applicant Proposed Measure that is implemented. The quantifications will be itemized and placed in a table format. ▪ Every project will identify the net emissions of a project after mitigations have been applied. ▪ Applicant will calculate and quantify GHG emissions (CO2equivalent) for the project including construction & operation. ▪ Applicant will calculate and quantify the GHG reduction based on reduction measures proposed for the project. ▪ Applicant will propose Applicant Proposed Measures (APM) to implement and follow to maximize GHG reductions. If sufficient, CPUC will accept them without adding further mitigation measures. ▪ Applicant will discuss programs already in place to reduce GHG emissions on a system wide level. This includes Applicant's voluntary compliance with USEPA SF6 reduction program, reductions from energy efficiency, demand response, LTPP, et al.	No	The PEA provides GHG mitigation (APMs). However, GHG estimates should use current versions of CalEEMod and ARBOFFROAD models. The annual SF6 leakage rates and equipment counts assumed in the calculations supporting PEA GHG Table 4.7-2 need to be provided. Basis for GHG estimates in Table 4-7.1 is not provided. • Please address the deficiencies noted above.

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Requirement	**Complete?**	**Deficiency Comments**
The assessment of air quality impacts must be consistent with PEA Sections 3.7.5 and 3.7.6, as well as with the PEA's analysis of impacts during construction, including traffic and all other emissions.	Yes	CPUC/BLM Team will perform air quality assessment consistent with the project description and other applicable issue areas, such as traffic
5.4 Biological Resources – In addition to an impacts analysis:		
Provide a copy of the Wetland Delineation and supporting documentation (i.e., data sheets). If verified, provide supporting documentation. Additionally, GIS data of the wetland features should be provided as well.	Yes	Provided in the PEA, Appendixes H, I, and J, and GIS files.
Provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided.	Yes	Provided in the PEA, Appendix G, and GIS files. However, biological information for yards appears to have not been provided.
5.5 Cultural Resources – In addition to an Impacts Analysis:		
Cultural Resources Report documenting a cultural resources investigation of the Proposed Project. This report should include a literature search, pedestrian survey, and Native American consultation.	No	SCE has provided some reports to BLM, which in turn has provided them to Aspen/CPUC. Reports received Include 1. Include Historic Resources Assessment (Built Enviro. Report) 2. Class III Cultural Resources Inventory (Vol. I) 3. Class III Cultural Resources Inventory (Vol III) 4. Class III Cultural Resources Inventory (Vol. IV) • Please provide any and all reports and appendices not provided previously. See below. As of this Completeness Review (May 31, 2018), the following have not been completed or have not been provided to CPUC: • Class III Cultural Resources Inventory (Vol II) • Class III Cultural Resources Inventory (Vol V) • Appendices for Vol I, III, & Iv, which include Record Search Results • Paleontology Report for California and Nevada • Cultural Resources Record Search Results • Copy of Paleontology Record Search Results – Natural History Museum of LA County & Nevada State Museum
Provide a copy of the records found in the literature search.	Yes	See above.

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Requirement	**Complete?**	**Deficiency Comments**
Provide a copy of all letters and documentation of Native American consultation.	No	Letters sent to tribes are provided in the PEA as part of Consultation. No information is provided on any responses or other communication. A reply message from NAHC to SCE regarding Sacred Lands Files Search request is provided, but not the original request letter to NAHC. • Please provide a complete record of communications regarding tribal issues, including outreach call log (if any), Sacred Lands Files Search and any other requests to NAHC, attachments sent with the outreach letters sent to each tribe, copies of any written responses or call logs from tribes to SCE.
5.6 Geology, Soils, and Seismic Potential – In addition to an impacts analysis:		
Provide a copy of geotechnical investigation if completed, including known and potential geologic hazards such as ground shaking, subsidence, liquefaction, etc.	No	SCE states that a geotechnical report will be provided under separate cover when available. • Please provide a copy of the geotechnical report that includes the information enumerated to the left. In addition: PEA Section 4.6. Geology, Soils, and Seismic Potential has numerous problems that need to be rectified:[• The references that are included in the reference list are not cited anywhere in the text; the few reference citations that are included on the figures and tables appear to be incorrect or are not included in the reference list. Please rectify. • A project Geotechnical Report is referenced several times in the section as related to future project design and to reduce potential geologic impacts by following recommendations in the geotechnical report. The report needs to be provided. • Subsection 4.6.1.1 Geologic Setting provides a brief summary of the geologic units in the project area and a figure that shows the aerial distribution of the units, however it does not include any description of the units that specifically underlie the proposed project components. Please provide. • Subsection 4.6.1.2 Soils lists the primary soil types underlying the proposed project and provides a table of soil characteristics. However, this section does not include any discussion of erodible or expansive (shrink-swell) soils as they relate to the proposed project. Table 4.6-1 Soils in the Proposed Project Area presents soil characteristics, however it does not present any soil expansion data, which can be obtained from the SSURGO soil database shrink-swell data. Some soils in the general project area are known to have moderate to high expansion potential. Please provide this information.

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project **Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects**		
Requirement	**Complete?**	**Deficiency Comments**
(Continued) Provide a copy of geotechnical investigation if completed, including known and potential geologic hazards such as ground shaking, subsidence, liquefaction, etc.		• It is not clear what type of erosion information is presented in the table, as the SSURGO soil databases contains data for both wind and water erosion. Please specify or present both types of erosion information. • The text of subsection 4.6.1.2 notes that soil data (SSURGO data from the USDA was used) was not available for a portion of the proposed project, which leaves large areas of the proposed project without soils information. However more generalized soil data for the missing areas can be found in the USDA's STATSGO2 database. Please provide this information. • The numbering for subsection Faults, Seismicity, and Related Hazards seems to be missing (should be 4.6.1.3), as it is it appears to be part of the Soils subsection. Some of the seismic hazard subsections are numbered and some are not. Please renumber the subsections appropriately. • The Faults, Seismicity, and Related Hazards subsection presents a very brief discussion of faults near the proposed project with no description of the individual faults or fault zones, except for Table 4.6-2 which presents minimal information for the faults as related to the proposed project. The section should include some description of the faults that are closest to the proposed project. Table 4.6-2 presents Maximum Estimated Earthquake Magnitude, however only a few faults have data presented and the data that are presented is out of date; more current data for the faults and data for more of the faults can be found on the USGS Earthquake Hazards Program website. Please update this section. • The Strong Ground Motion subsection presents peak ground acceleration (PGA) data for the Project alignment segments and substations as 10 percent probability of exceedance in 50 years (10% in 50 years, which corresponds to a return interval of 475 years for a maximum considered earthquake) for the proposed project alignment. Please note that the current California Building Code uses the 2% probability of exceedance in 50 years (2% in 50 years) for design calculations (which corresponds to a return interval of 2,475 years and for a maximum considered earthquake). Table 4.6-3 presents Earthquake Intensity information including comparative peak ground acceleration ranges. Please specify in the table whether these are 2% in 50 years or 10% in 50 years PGS numbers.

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Requirement	**Complete?**	**Deficiency Comments**
(Continued) Provide a copy of geotechnical investigation if completed, including known and potential geologic hazards such as ground shaking, subsidence, liquefaction, etc.	No	• Subsection 4.6.1.3 Liquefaction does not correctly associate geologic units and groundwater levels with liquefaction potential. The subsection refers to soil characteristics that were presented in the Soils subsection and groundwater levels. Liquefaction analysis should be based on presence of shallow water (less than 50 feet depth) and density of the underlying geologic units (not the surficial soils), i.e. loose alluvial materials with shallow groundwater would be liquefiable. Shallow groundwater is known to present near the playas Rabbit Lake and Lucerne Lake. Please verify that the San Bernardino County Hazard Maps do not map any liquefaction hazard areas at the proposed project components. • Subsection 4.6.1.4 Slope Instability only discusses soil characteristics as they pertain to slope instability, however characteristics of the geologic units are just as or more important to slope stability issues and needs to also be discussed in this section. Additionally, please verify that the County of San Bernardino Hazard Maps do not include mapped landslide hazard areas near the project components. • Subsection 4.6.1.5 Differential Settlement needs to also discuss the potential for differential settlement of soils and surficial geologic units due to seismic shaking that may not be directly tied to liquefaction but to differential compaction of varying unit types due to the shaking. • Subsection 4.6.1. Subsidence does not correctly correlate subsidence, groundwater withdrawal, and geology. Geologic units at depth subside when the aquifers are overdrafted and the formerly saturated sediments compact into the spaces formerly occupied by water. Regional subsidence does not have anything to do with drainage characteristics of surficial soils as discussed in the subsection. Several areas of known subsidence due to groundwater withdrawal have and are occurring in the Mojave area, including in the Lucerne Valley adjacent to the proposed project. This data is available from the USGS. Please rewrite this section to include the correct information about regional subsidence and subsidence that is occurring in the Mojave area near the proposed project. • Subsection 4.6.1.7 Expansive or Collapsible Soils does not include any of the data or information on expansive soils (shrink-swell potential) that is readily available from the SSURGO database, as discussed above in the comments for subsection 4.6.1.2.

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Requirement	**Complete?**	**Deficiency Comments**
5.7 Hazards and Hazardous Materials [Note: reference and list the documents that apply:] –In addition to an impacts analysis:		
Environmental Data Resources report.	Yes	Provided in PEA Appx I. However additional information is required. Appendix H of the PEA includes the following document used for analyses of hazardous materials in the EIR section - "Hazardous Materials Assessment, Southern California Edison, West Of Devers Upgrade Project, Riverside and San Bernardino Counties, California" by Ninyo & Moore dated September 5, 2013. This document refers to "Aerial photographs of the project area were provided by EDR taken in 1968, 1975, 1989, 1994, and 2002" and "historical topographic maps from EDR, for the years 1942, 1954, 1956, 1957, 1967, 1972, 1973, 1975, 1979, 1980, 1988, and 1996. USGS 7.5 Minute Series maps for Banning, Beaumont, Cabazon, Desert Hot Springs, El Casco, Elsinore, Palm Springs, San Bernardino, Sunnymead, Redlands, San Jacinto, and Whitewater" which are not listed in the reference section of the document, but were reviewed by Ninyo & Moore as part of their analyses. Please provide copies of these EDR historic reports.
Hazardous Substance Control and Emergency Response Plan	No	The PEA identifies that a Hazardous Substance Control and Emergency Response Plan will be required but provides no specific information on content. • For this plan, please provide (1) the required plan in draft or (2) an APM that specifies the content of the plan that will be provided.
Health and Safety Plan	No	The PEA identifies that a Health and Safety Plan will be required but provides no specific information on content. • For this plan, please provide (1) the required plan in draft or (2) an APM that specifies the content of the plan that will be provided.
Worker Environmental Awareness Program (WEAP)	No	The PEA identifies that a WEAP will be required but provides no specific information on content. • For this plan, please provide (1) the required plan in draft or (2) an APM that specifies the content of the plan that will be provided.
Describe what chemicals would be used during construction and operation of the Proposed Project. For example: fuels, etc. for construction, naphthalene to treat wood poles before installation.	Yes	Discussed in PEA 4.8 and Table 4.8-2
5.8 Hydrology and Water Quality – In addition to an impacts analysis:		
Describe impacts to groundwater quality including increased run-off due to construction of impermeable surfaces, etc.	Yes	Discussed in PEA Section 4.9
Describe impacts to surface water quality including the potential for accelerated soil erosion, downstream sedimentation, and reduced surface water quality.	Yes	Discussed in PEA Section 4.9

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Requirement	**Complete?**	**Deficiency Comments**
5.9 Land Use and Planning – In addition to an impacts analysis:		
Provide GIS data of all parcels within 300' of the Proposed Project with the following data: APN number, mailing address, and parcel's physical address.	Yes	Locations provided in GIS files
5.10 Mineral Resources – Data needs already specified under Chapter 3 would generally meet the data needs for this resource area.	Yes	Provided in PEA Section 5.11
5.11 Noise – Provide long term noise estimates for operational noise (e.g., corona discharge noise, and station sources such as substations, etc.).	Yes	Provided in PEA Section 5.12 and Appendix K.
5.12 Population and Housing – Data needs already specified under Chapter 3 would generally meet the data needs for this resource area.	Yes	Provided in PEA Section 5.13
5.13 Public Services – Data needs already specified under Chapter 3 would generally meet the data needs for this resource area.	Yes	Provided in PEA Section 5.14
5.14 Recreation – Data needs already specified under Chapter 3 would generally meet the data needs for this resource area.	Yes	Provided in PEA Section 5.15
5.15 Transportation and Traffic [Note: the traffic impact assessments should be based on likely or probable routes.]		
Discuss traffic impacts resulting from construction of the Proposed Project including ongoing maintenance operations.	Yes	Provided in PEA Section 5.16 and Appendix L.
Provide a preliminary description of the traffic management plan that would be implemented during construction of the Proposed Project.	No	This is not provided. • Please provide a preliminary description of the traffic management plan. It is recognized that details will be forthcoming during pre-construction plan review. Also, briefly describe the use of traffic control for temporary road closures during helicopter external load overflights of frequently used roadways (e.g. Interstate and local highways).
5.16 Utilities and Services Systems – Describe how treated wood poles would be disposed of after removal, if applicable.	Yes	Project description identifies that any wood poles removed would be disposed of at authorized land fill.
5.17 Cumulative Analysis		
Provide a list of projects (i.e., past, present and reasonably foreseeable future projects) within the Project Area that the applicant is involved in.	Yes	Provided in PEA Section 4.18. Will need to be updated to make current.
Provide a list of projects that have the potential to be proximate in space and time to the Proposed Project. Agencies to be contacted include but are not limited to: the local planning agency, Caltrans, etc.	Yes	Provided in PEA Section 4.18

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Requirement	**Complete?**	**Deficiency Comments**
5.18 Growth-Inducing Impacts, If Significant		
Provide information on the Proposed Project's growth inducing impacts, if any. The information should include, but is not necessarily limited, to the following: ▪ Any economic or population growth, in the surrounding environment that will directly or indirectly, result from the Proposed Project. ▪ Any increase in population that could further tax existing community service facilities (i.e., schools, hospitals, fire, police, etc.), that will directly or indirectly result from the Proposed Project. ▪ Any obstacles to population growth that the Proposed Project would remove. ▪ Any other activities, directly or indirectly encouraged or facilitated by the Proposed Project that would cause population growth that could significantly affect the environment, either individually or cumulatively.	Yes	Provided in PEA Section 6.19
Chapter 6: Detailed Discussion of Significant Impacts		
For project impacts that could be potentially significant, the PEA must discuss the following:		
6.1 Mitigation Measures Proposed to Minimize Significant Effects – Within the Environmental Impact Assessment Summary, for impacts where a number of mitigation measures are available to reduce impacts, each mitigation measure should be discussed and the basis for selecting a particular mitigation measure should be stated.	Yes	In Section 5.1, APMs have been included in the PEA to reduce project impacts.
6.2 Description of Project Alternatives and Impact Analysis		
Provide a summary of the alternatives considered that would meet most of the objectives of the Proposed Project and an explanation as to why they were not chosen as the Proposed Project.	Yes	Provided in PEA Section 5.2.
Alternatives considered and described by the Applicant should include, as appropriate: ▪ System or facility alternatives ▪ Route alternatives ▪ Route variations ▪ Alternative locations.	Yes	Provided in PEA Section 5.2.
A description of a "No Project Alternative" should be included.	Yes	Provided in PEA Section 5.2.
If significant environment effects are assessed, the discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any said significant environmental effects, even if the alternative(s) substantially impede the attainment of the project objectives, and are more costly.	Yes	Provided in PEA Section 5.2. No significant effects are identified for the Proposed Project.

Attachment B: A.18.05.007- Eldorado-Lugo-Mohave Series Capacitor Project Proponent's Environmental Assessment (PEA) Checklist for Transmission Line Projects		
Requirement	**Complete?**	**Deficiency Comments**
6.3 Growth-Inducing Impacts		
Information required to analyze the Proposed Project's effects on growth would vary depending on the type of project proposed. Generally, for transmission line projects the discussion would be fairly succinct and focus on the following: ▪ Would the Proposed Project foster economic or population growth, either directly or indirectly, in the surrounding environment? ▪ Would the Proposed Project cause an increase in population that could further tax existing community service facilities (i.e., schools, hospitals, fire, police, etc.)? ▪ Would the Proposed Project remove obstacles to population growth? ▪ Would the Proposed Project encourage and facilitate other activities that would cause population growth that could significantly affect the environment, either individually or cumulatively?	Yes	Provided in PEA Section 4.13 Population and Housing; Section 5.3 Growth-Inducing Impacts
6.4 Suggested Applicant Proposed Measures to address GHG Emissions		
A menu of suggested APM's that applicants can consider. Applicants can and are encouraged to propose other GHG reducing mitigations. Priority is given to on-site and/or nearby mitigation measures. Off-site mitigation measures within California will be considered. 1. If suitable park-and-ride facilities are available in the Project vicinity, construction workers will be encouraged to carpool to the job site to the extent feasible. The ability to develop an effective carpool program for the Proposed Project would depend upon the proximity of carpool facilities to the job site, the geographical commute departure points of construction workers, and the extent to which carpooling would not adversely affect worker show-up time and the Project's construction schedule. 2. To the extent feasible, unnecessary construction vehicle and idling time will be minimized. The ability to limit construction vehicle idling time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up that limit their availability for use following startup. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The Proposed Project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as	Yes	APMs AIR-01 through AIR -05 have been proposed. APM-AIR-02 specifies use of Tier 4 equipment to reduce tailpipe emissions; APM-AIR-03 reduces equipment idling time; APM-AIR-04 requires maintaining equipment in good working order; APM-AIR-05 encourages carpooling.

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Requirement	**Complete?**	**Deficiency Comments**
part of pre-construction conferences. Those briefings will include discussion of a "common sense" approach to vehicle use. 3. **Use low-emission construction equipment**. Maintain construction equipment per manufacturing specifications and use low-emission equipment described here. All off-road construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program shall meet at a minimum the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in California Code of Regulations, Title 13, Sec. 2423(b)(1). 4. Diesel Anti-Idling: In July 2004, the CARB adopted a measure to limit diesel-fueled commercial motor vehicle idling. 5. Alternative Fuels: CARB would develop regulations to require the use of 1 to 4 percent biodiesel displacement of California diesel fuel. 6. Alternative Fuels: Ethanol, increased use of ethanol fuel 7. Green Buildings Initiative 8. Facility wide energy efficiency audit. 9. Complete greenhouse gas emissions audit. The audit will include a review of the greenhouse gases emitted from those facilities (substations), including carbon dioxide, methane, CFC and HFC compounds, (SF6). 10. There is an EPA approved SF6 emissions protocol. http://www.epa.gov/electricpower-sf6/resources/index.html#three 11. SF6 program wide inventory. For substations keep inventory of leakage rates. 12. Increase replacement of breakers once leakage rates exceed 1% within 30 days of detection. 13. Increased investment in current programs that can be verified as being in addition to what the utility is already doing. 14. The *SF6 Emission Reduction Partnership for the Electric Power Systems* was launched in 1999 and currently includes 57 electric utilities and local governments across the U.S. SF6 is used by this industry in a variety of applications, including that of dielectric insulating material in electrical transmission and distribution equipment such as circuit breakers. Electric power systems that join the Partnership must, within 18 months, establish an emission reduction goal reflecting technically and economically feasible opportunities within their company. They also agree, within the constraints of economic and technical feasibility, to estimate their emissions of SF6,		

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Requirement	**Complete?**	**Deficiency Comments**
establish a strategy for replacing older, leakier pieces of equipment, implement SF6 recycling, establish and apply proper handling techniques, and report annual emissions to EPA. EPA works as a clearinghouse for technical information, works to obtain commitments from all electric power system operators and will be sponsoring an international conference in 2000 on SF6 emission reductions. 15. Quantify what comes into the system and track programmatically SF6. 16. Applicant can propose other GHG reducing mitigations.		
Chapter 7: Other Process-Related Data Needs		
Excel spreadsheet that includes all parcels within 300 feet of any project component with the following data: APN number, owner mailing address, and parcels physical address. [Note: notice of all property owners within 300 feet is required under GO 131-D.]	No	A hard copy is in SCE's Application and in PEA Chapter 6 (Other Process-Related Data Needs). But no Excel spreadsheet was provided. • Please provide an excel file with the required information.