

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 28, 2012

Mr. David Kates
The Nevada Hydro Company, Inc.
2416 Cades Way
Vista, California 92083

Re: Data Request #1 for the TE/VS Interconnect EIR, Application No. 10-07-001

Dear Mr. Kates:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that TNHC has provided, including the Application and Proponent's Environmental Assessment (July 7, 2010). During the analysis of the aforementioned materials, we have identified additional items that require information from TNHC. Attached please find Data Request No. 1, which defines the additional questions we have at this time. It should be noted that additional data requests may be necessary to address other CEQA topics.

We would appreciate your prompt response to data requests. Please respond to as many items as possible within four weeks (by March 30, 2012). It is understood that some of these requests may require more time; however, we request that information be provided to us as soon as each response is available (but no later than April 27, 2012).

Please submit one set of responses to me and one to Fritts Golden at Aspen Environmental Group in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-3221 or bca@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Barnsdale".

Andrew Barnsdale
Project Manager for TE/VS Transmission Project
Energy Division CEQA Unit

Attachment

cc: Angela Minkin, Administrative Law Judge
Nicholas Sher, CPUC Legal Division
Fritts Golden, Aspen Environmental Group

Data Request No. 1

Project Description

PD-1 Attachment 3 to the PEA provides a table indicating permanent and temporary disturbance as well as other information, by tower number. Please confirm the following assumptions are accurate. If not, please provide corrected information:

- a) For the Tower Structure Summary Table, it is assumed that total disturbance is the value under "Temp Dist" and permanent disturbance is listed under "Perm Dist". It is assumed that the difference between these values would be land that would be restored following construction.
- b) The Access Road column indicates the unit of measure as feet. It is assumed that this value indicates the length of the access road associated with the tower. It is also assumed that each road is 20 ft wide. Therefore, a 100-foot long road listed in the table would disturb 2,000 square feet. Please confirm this assumption.
- c) Has the square footage of roads been included in the permanent/temporary columns? It is assumed that an access road is permanent unless otherwise specifically indicated as being restored.
- d) Given the terrain through which the transmission line would pass, it is likely that cut/fill will be required extending outside of the 20-foot roadway. Has an estimate been made of the disturbance outside of the actual roadway?
- e) For Tower 9, it appears that the 300,000 sq ft work area has not been included in the Temp Dist column, which lists only 10,000 sq ft of disturbance.
- f) Information is provided for towers and work areas. Project elements for which information has not been provided or which cannot be distinguished in the provided information include:
 - substations, switchyard, and inlet/outlet structures;
 - improvements to existing access and spur roads;
 - dam and reservoir construction site;
 - material, equipment, laydown, and rock storage areas (if distinct from Work Areas already listed)
 - any project feature or construction area not listed that will result in temporary or permanent disturbance.

For such elements, please provide a corresponding table that identifies information similar to that presented in Attachment 3, including:

- the type of project element or activity that creates disturbance
- its location (or use a unique number corresponding to a unique number on a map)
- the amount of temporary disturbance for that element or activity
- the amount of permanent disturbance for that element or activity

If there are multiple project elements that have a similar function distinguish among them by giving each a name or letter or number designation on a map and in the table so that

information for specific locations and project elements can be discussed and presented without confusion.

- PD-2 For Figure 3.1.1-4 showing the 500-kV alignment between the SCE and SDG&E systems:
- a) General: please explain yellow road marking on sheets – some are labeled ‘track in’ and most are not. What is the difference?
 - b) Sheet 2: Is tower 22 within the Caltrans ROW?
 - c) Sheet 5: For the temporary track in road – does the name ‘temporary’ mean it will be removed and restored after construction?
 - d) Sheet 9: No access is shown to the southern vertical shaft at approximately MP 12.75 or to the central vertical shaft at approximately MP 12.25. Please also describe in text the purpose of these shafts (e.g., labor and equipment access, rock material removal) and whether access is permanent or temporary.
 - e) Sheet 11: labels “Track in” and “Pull Site” are on the sheet, but the extent is not shown for either. We assume these labels appear in error, as the figure indicates this segment of the transmission line would be constructed by helicopter, and it is assumed that pulling and tensioning would also occur by helicopter. Please confirm or correct this assumption.
 - f) Sheet 17: Track in road does not indicate it is temporary – it is assumed that unless specifically identified as temporary (see Sheet 5), roads would be permanent (e.g., See Sheet 24).
- PD-3 New 115 kV transmission lines are proposed by TNHC to run from its proposed Santa Rosa Substation to SCE’s Skylark and Elsinore Substations.
- a) The sheets in Figure 3.1.1-5 lack legends and north arrows. The sheets identify pole locations with various designations (9, S, T). These are not defined. Adjacent to pole locations are numbers and letters (e.g., 03-DCT90, 36 DSC, 03-SCT30, etc). It is assumed these refer to the tower number and type. Please include a legend and provide information on the definition of each abbreviation/designation.
 - b) It does not appear that any of the transmission lines would be underground. If any would be, please distinguish by a different line style on the maps where the 115 kV lines would be underground. For any underground construction in a street right of way, describe construction techniques to be used and the amount of material that would be removed from and imported to the project so as to provide proper bedding and insulation characteristics.
 - c) Indicate the location and extent of any laydown or construction yards required for construction of the 115 kV system.
 - d) Please provide tables summarizing key project features. One table should provide, by unique pole/tower number: the type of pole/tower, its color (if steel), height and base diameter, and whether other lines would be co-located on each pole/tower. Also provide accurately scaled profiles for each pole type proposed.
 - e) Provide acres or square feet of temporary and permanent disturbance from each 115 kV system component. Please ensure that all disturbance estimates for the 115 kV system remain separate from disturbance estimates for the 500 kV and 230 kV portions of the Proposed Project.

- f) Please describe any existing circuits along or near the proposed 115 kV alignment and how they would be located, co-located, or relocated as a result of the TNHC 115 kV installations.
- g) Describe how the proposed system relates to existing transmission facilities (e.g., existing ROWs, poles, and lines) with regard to all construction activities. Describe in detail what steps would be taken install the proposed THNC 115 kV lines without disrupting service on the existing transmission/distribution lines along the proposed alignment.
- h) Construction methods should be described.
- i) Describe any co-located services such as cable television or communications that might need to be relocated, attached to new poles/towers, or otherwise would be affected as a result of the 115 kV project.
- j) Describe the handling and fate of excavated soil and replaced poles, including their disposal.
- k) Describe any road or lane closures required, including their locations, duration, and how they would be managed so as to minimize traffic disruption.

PD-4 In Application A.09-09-022 dated September 30, 2009, SCE proposes construction of Alberhill Substation to better manage its transmission and distribution system in the Temecula-Lake Elsinore area. This project would modify the existing SCE transmission system, shifting load from the Valley Substation to the new substation and modifying 115 kV connections from the new substation to SCE's Skylark and Newcomb Substations. Please describe how the proposed TNHC 115 kV transmission lines relate to and would function with the proposed SCE 115 kV system modifications and upgrades.

PD-5 Both THNC and SCE are proposing interconnections between the existing 500 kV Valley-Serrano transmission line. These are for a switchyard (TNHC Lake) and a substation (SCE Alberhill). Implementation of both proposals would result in two interconnections separated by only a few miles.

- a) If, as an alternative, the proposed Lake Switchyard were located adjacent to the proposed SCE Alberhill Substation, please provide information, figures, and maps that show any realignment of the proposed TNHC interconnect line leading to the switchyard. This should be at the same level of detail as provided for the Proposed Project.
- b) If the proposed Lake Switchyard remained at its proposed location but interconnected to the Valley-Serrano 500 kV transmission line through the proposed SCE Alberhill Substation, please provide information, figures, and maps that show the alignment or alignment alternatives for a TNHC connection between Lake Switchyard and the proposed SCE Alberhill Substation. This should be at the same level of detail as provided for the Proposed Project.

PD-6 Please describe all project decommissioning procedures, including removal and disposal or recycling of equipment, recontouring, and revegetation, and equipment and workforce assumptions for decommissioning activities. Please provide an estimate of the duration of decommissioning activities.

PD-7 Please provide documentation showing that TNHC has obtained an enforceable agreement for the location of the proposed Case Springs Substation.

In a letter dated June 21, 2011 to President Michael Peevey, CPUC, William Tucker, Board Chairman Fallbrook Land Conservancy (FLC), states: "After consideration, we have determined

that, *if yet-to-be-determined compensation can be agreed upon* by FLC and NHC, FLC can accommodate the subject substation at a point along the southwestern boundary of our property, as well as the accompanying transmission towers.” Subsequently, the FLC withdrew its property. No additional information has been forthcoming from TNHC about a new site.

- PD-8 At a meeting with the Cleveland National Forest in 2011, forest staff indicated to CPUC that they may want many of the lattice steel towers (LSTs) proposed for the project to be tubular steel poles (TSPs) instead. Please confer with the CNF regarding towers/poles and provide a memorandum on the outcome of that discussion. If TSPs are to be substituted for LSTs, please identify the locations at which this would occur and how they would be installed at each site. Identify whether new or reconstructed access roads would be required and show their locations on maps.
- PD-9 Provide the location of any access roads or work areas for 1) the alignment segment between the interconnect with SCE’s 500 kV line and Lake Switchyard and for 2) the southern end of the alignment between the originally proposed alignment and the new Case Springs Substation location, if known.

Alternatives

- ALT-1 With regard to the Case Springs Substation proposed to be located on Fallbrook Land Conservancy (FLC) property, please provide information, maps, and figures describing and showing the alignment of the transmission line from its proposed route in Cleveland National Forest to the Case Springs Substation on FLC property. This should include tower types and locations, right of way width and location, construction methods, and locations and acreages of temporary and permanent disturbance. Your response should be at a similar level of detail to that provided for the Proposed Project alignment.
- ALT-2 Please provide information, maps, and figures for the substation, detailing the layout of the substation, equipment, and the interconnection with the SDG&E 230 kV line. Also include any additional roads, poles, or other components that will be needed to develop and maintain the substation.
- ALT-3 With regard to GIS information not previously provide, such as for realignments of portions of the route, please provide final GIS shape files that include all permanent and temporary impacts from tower footprints, tower footings, staging areas, access roads, spur roads, pull sites, fly yards, and any other applicable project feature or construction area not listed here that could have an environmental impact.
- ALT-4 Please provide an electronic copy of TNHC’s hydropower license application submitted to FERC for the LEAPS and TEVS projects.

Air Quality

- AQ-1 Please provide copies of supporting calculations / spreadsheets / technical reports for the emission estimates in the PEA (especially where different from those in the Sunrise Draft EIR/EIS, namely for PEA Table 5.3.2-3 and PEA Table 5.3.2-5).
- AQ-2 Please provide emission estimates and quantification for greenhouse gases, especially carbon dioxide (CO₂). Emissions of CO₂ related to LEAPS construction and operation and the No Action scenario are missing in PEA Table 5.3.2-3 and PEA Table 5.3.2-5.

- AQ-3 Please provide a complete copy of the Clean Air Act Conformity Analysis for the Lake Elsinore Advanced Pumped Storage (LEAPS) Project, dated September 24, 2007, including full copies of attachments with supporting calculations, calculation assumptions, and model input/output data, where used.

Cultural and Paleontological Resources

- CULT-1 Please identify and provide any cultural or paleontological studies, investigations, or evaluations that have been done by or for TNHC for the area that would be affected by the proposed project.
- CULT-2 The PEA indicates that an Historic Properties Management Plan (HPMP) was prepared and submitted to the FERC. That plan would essentially form the basis of required mitigations for adverse effects to cultural resources. Yet, there is no indication that the HPMP was ever approved. Approval would have come in the form of an executed Programmatic Agreement under Section 106 of the National Historic Preservation Act. Please provide a complete copy of the most recent version of the HPMP; the PEA states that a revised draft was submitted to the Tribes and agencies on February 18, 2005.
- CULT-3 A Programmatic Agreement (PA) was drafted and circulated for signature. While the text of the PEA suggests that the PA was approved, a footnote indicates that one of the most critical participants (the California State Historic Preservation Officer) did not sign off. Because the stipulations in the PA (when approved) will form the basis of CEQA mitigations for impacts to cultural resources, it is critical that we ascertain the status of the PA. Please provide a copy of the most recent version of the PA that shows signatures. If the SHPO has not signed the agreement, indicate why not.
- CULT-4 The PEA lists the signatories to the PA, suggesting that all consulting parties have concurred with appropriate and adequate treatment to mitigate adverse effects to cultural resources. Beyond the footnoted exception of the SHPO signature (CULT-2, above), the Pechanga Band of Luiseno Indians is not listed. Please indicate whether the Pechanga Band has signed the PA. If they have not, please describe the reasons why they have not signed. Also, provide copies of all documentation of Native American consultation conducted during the FERC licensing process, as well as a description of any Native American consultation that has occurred since February 2005.

Noise

- NOI-1 Noise-sensitive receptors are mentioned in PEA Section 4.13.1 (p. 4-260) and PEA Section 5.11.1 (p. 5-181), but it is not clear whether land uses have been surveyed around all project components. Please list all noise-sensitive land uses and receptors within 0.5 miles of all Proposed Project components and the distances of each land use or receptor from the nearest Proposed Project component (including any changes to SCE's and SDG&E's systems, including, but not limited to, new and replacement poles, reconductoring, and substations).
- NOI-2 Baseline noise levels are described qualitatively in the noise environmental setting (PEA Section 4.13.1) and in the discussion of Impact N-3 (PEA Section 5.11.1). Ambient noise level monitoring should be conducted at noise-sensitive receptors if needed to quantify the setting (e.g., at the property lines of residences, schools, campgrounds) and away from roads and highways. We recommend conducting a 24-hour noise sample at the nearest residences, schools, campgrounds, and trails. Please identify the noise levels with the averaging period

clearly stated; for each monitoring sample, please provide the date, time, location, weather conditions, primary source of noise, distance to the primary noise source, distance to proposed corridor, and any unusual noise occurrences.

- NOI-3 The level of corona noise near the edge of the transmission line is described approximately in the discussion of Impact N-3 (PEA Section 5.11.1). Corona noise at the right-of-way is variable dependent on the configuration of the circuits, condition and type of conductors, sag, tower height, and distance to edge of right-of-way. The impacts of project-specific noise levels should be modeled and analyzed. Please provide quantified estimates of audible noise for the Proposed Project for each different transmission line configuration during rain or fog conditions, at the edge of the proposed right-of-way, and for each substation site.

Public Health and Safety

- PHS-1 Please provide assumptions, calculations, cross sections, and reports in support of the flood inundation mapping prepared for areas downstream of Decker Reservoir Dam.
- PHS-2 Please describe how public safety will be ensured at the water intake/discharge structure in Lake Elsinore and along any open section of the tailrace and how safety measures will be maintained.
- PHS-3 Please provide a list and descriptions of uses of any and all hazardous materials that may be used during construction and maintenance of the project components, including but not limited to fuel oil, mineral oil, gasoline, helicopter fuel, diesel fuel, transformer oil, lubricants, paint, solvents, and propane. Please also describe hazardous materials containment, safety, and emergency response procedures. Furnish the quantities of hazardous materials used during construction separately from those used during operations and maintenance. Provide maximum storage volumes of each hazardous material, including hazardous materials stored in transformers and other large equipment.
- PHS-4 For the proposed Decker Canyon Dam, please provide an analysis the worst-case consequences of dam failure and an indication on a topographic base of the area potentially affected by failure of the dam. Indicate the length of time from dam failure for water to reach various points in the affected area, and the maximum depth of flooding at those locations.

Socioeconomics, Services and Utilities

- SOC-1 Please provide separate tables identifying the anticipated number of temporary and permanent workers that would be required for construction and operation of the Proposed Project.
- SOC-2 In order for our team to ascertain construction-period housing requirements, please identify the origin of the construction labor pool, and what portion of personnel would relocate to the vicinity for the duration of construction.

Transportation and Traffic

- TRA-1 Please identify all route(s) proposed to be used to deliver construction materials to laydown/assembly yards. Begin from a major regional highway and identify each road that would be traversed to reach the yard(s). If there are alternate routes, please identify those as well.
- TRA-2 With regard to hauling, please:

- a) Identify all temporary storage locations to be used prior to final use or disposal of excavated rock and soil.
- b) Identify whether any rock or soil imported to the yards at Santa Rosa Substation and Lakeview Village will remain on the sites following construction.
- c) Provide calculations of total estimated volume of rock in situ and following excavation. Indicate the expansion ('fluff') factor use to calculate the final total volume of rock or soil to be hauled.
- d) Identify the load size of anticipated haul trucks, total loaded weight, and number of truck trips required to haul rock material to temporary storage and/or the site of final use or disposal.
- e) Provide any weight or load or time-of-day restrictions on roads to be used for materials delivery and rock hauling
- f) Identify the total amount of rock anticipated to be used for construction of Decker Canyon Dam and the amount that will be excess.
- g) Identify anticipated final disposal site(s) for any excess rock or soil and likely routes to the disposal location. (It is our understanding that no rock cannot be disposed of in Cleveland National Forest.)

TRA-3 With regard to construction-worker related traffic:

- a) Please provide an estimate by month of the number of workers that would be involved in each of the following activities: tunnel boring, dam and reservoir construction, transmission line construction, and substation/powerhouse construction.
- b) Please identify any consolidated parking locations and shuttle service that would be provided for construction workers so as to avoid increased traffic in the project vicinity and on Ortega Highway.

TRA-4 Please provide in PDF format copies of all traffic studies carried out in preparation of the PEA. If no construction traffic impact studies have been prepared, please provide the information requested in the remaining Transportation and Traffic data requests below.

TRA-5 It is assumed that the construction work shifts would be from the hours of 8 a.m. to 6 p.m. Please confirm or correct this assumption so that we may perform a traffic impact study for the Proposed Project. If there are project components (e.g., tunnel boring) that will have longer or 24-hour schedules, please so indicate.

TRA-6 Please provide a schedule of construction vehicle and equipment use, so that traffic impacts can be modeled for the duration of construction activities and so that cumulative construction effects can be ascertained. Please update PEA Tables 3.8.6-1 through 3.8.6-3 to include anticipated dates of use of each piece of equipment (e.g., Pickup trucks → Weeks 1 through 52).

TRA-7 Please provide an estimate of the average construction workforce and the peak construction workforce for principal components of the Proposed Project. In providing this information, distinguish between (1) TE/VS project components (e.g., transmission lines, switchyard/substations, tunneling for underground 500 kV line segment), (2) LEAPS

generation project components (e.g., reservoir construction, water tunnel and appurtenances, generation facility), and (3) the 115 kV system.

- TRA-8 Provide an estimate of the commute distance of the construction workforce for each type of construction laborer.

Water Resources

- WAT-1 Please provide copies of any water resource reports, including those for Lake Elsinore, that have been prepared by TNHC or prepared by others on behalf of TNHC for the project, such as those prepared for the Regional Water Quality Control Board.
- WAT-2 Please describe any discussions with State or Regional Water Quality Control Board staff and with California Department of Fish and Game staff regarding the inter-basin transfer of water and aquatic species from Lake Elsinore to Decker Canyon Reservoir
- WAT-3 Please provide the latest designs for water intake/discharge structures at Lake Elsinore. Provide information on strategies and design features that will minimize entrainment of fish and bottom sediment disturbance.
- WAT-4 Please provide a map showing the maximum shoreline excursion during pumping operations; this should show the shoreline at a particular surface elevation prior to pumping, and at the conclusion of pumping. Provide this information for pumping both when the lake is at its maximum surface elevation and when it is at the lowest surface elevation at which LEAPS operations would be allowed to operate.

Wildfire Risk and Management

- FIRE-1 Please provide any fire-risk or fuel-load studies or evaluations that have been prepared for the project, including any graphics or maps showing the extent of such studies.
- FIRE-2 What extreme wind loading (mph or psf) did TNHC use for design of the transmission line structures? Does TNHC follow the design process outlined in NESC, which uses a Wind Exposure factor and Structure Gust Response factor? Please identify the values and rationale of each of these factors used in structure design.