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

February 12, 2015

Ryan Stevenson
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G10O
Rosemead, CA 91770

Re: Data Request #13 for the SCE West of Devers Upgrade Project - Application No. A.13-10-020

Dear Mr. Stevenson:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed all of the documents and materials that SCE has provided, including the Application and Proponent's Environmental Assessment (PEA; dated October 25, 2013), the PEA deficiency response items submitted in late 2013 and early 2014, and SCE's data responses to date. During the analysis of the aforementioned materials, we have identified additional information items needed from SCE. Additional data requests may be necessary to address other CEQA or NEPA topics as we move forward with EIR/EIS preparation.

Attached please find Data Request No. 13, with a follow-up to SCE's responses to Data Request No. 10, submitted to SCE on December 5 and 15, 2014. SCE's responses were provided to the CPUC on February 6 and 10, 2015. We had assumed that these responses would be received before the end of January 2015; therefore our Draft EIR/EIS publication schedule of late March 2015 is no longer possible.

We would appreciate your prompt responses to these data requests. We request that responses be provided to us within one week if possible (by February 19, 2015). If this is not possible, please provide me with an estimated response date for any information that can't be provided within a week. Delays in responding to these data needs will result in further delays in the publication of the Draft EIR/EIS.

Please submit one set of responses to me in both hard copy and electronic format and one to Susan Lee at Aspen Environmental Group in electronic format (unless there are hardcopy-only documents). Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager for West of Devers Upgrade Project
Energy Division CEQA Unit

Attachments (1)

cc: Mary Jo Borak, CPUC Supervisor CEQA Unit
Chris Myers, ORA
Cleveland Lee, Legal Division for ORA

Frank McMenimen, Bureau of Land Management
John Kalish, Bureau of Land Management
Lynette Elser, Bureau of Land Management
Susan Lee & Hedy Koczwara, Aspen Environmental Group
Nicholas Sher, CPUC Legal Division

SCE West of Devers Upgrade Project
Data Request No. 13

The requests below present questions related to SCE's responses to comments presented by the CPUC in Data Request No. 10.

ALT-21 **Follow-up to SCE response on ALT-18a.** The conductor evaluation table provided with SCE's response for ALT-18a indicates that the single-conductor 1033.5 ACSR on the existing double-circuit towers has a clearance violation rate of 43% in the two segments evaluated by SCE.

- **21a.** To understand the extent to which the existing line is experiencing clearance violations under present day normal or emergency operating conditions, please clarify if the emergency rating for the existing line is at the 275 °F value shown in this table.
- **21b.** Please identify the maximum normal and emergency operating temperatures that are actually in place for these two circuits today.
- **21c.** If the emergency rating is not 275 °F, please provide an update on the percentage of clearance violations for the existing single-conductor 1033.5 ACSR at its actual maximum normal and emergency operating temperature.

ALT-22 **Follow-up to SCE response on ALT-18a.** The conductor evaluation table provided with SCE's response to ALT-18a indicates that the single-conductor 1033.5 ACSR on the existing line has a structure overload rate of 13% for the two segments evaluated by SCE. To allow the CPUC and EIR/EIS team to understand the current structure overload conditions shown for the existing line please clarify:

- **22a**. Were the existing structures designed to different wind loading conditions than the 12 psf to 18 psf loading conditions identified by the 2011 meteorological study, noted in response to ALT-18a?
- **22b.** If lower wind pressures were utilized for design of the existing line, please identify the value of wind pressure used and the source for this previously used design condition.

ALT-23 **Follow-up to SCE response on ALT-19a.** Based on the present maximum normal and emergency operating temperatures that are in place for the existing 220 kV circuits on the existing double circuit towers that are using 1033.5 ACSR, please add the calculated ampacities at the present maximum normal and emergency operating temperatures to the table provided with SCE response to ALT-19a.

ALT-24 **Follow-up to SCE response on ALT-18c.** Based on the present maximum normal and emergency operating temperatures that are in place for the existing 220 kV circuits on the existing double circuit towers that are using 1033.5 ACSR please add these temperature values to the SAG/Ten tables provided in response to ALT-18c.

ALT-25 **Follow-up to SCE response on ALT-18a and 19c.** In SCE response to ALT-19c.2b, Note 2 explains that the Sag/Ten report for single-conductor Drake 795 ACCR and the double-bundled Drake 795 ACCR contain the same results. In view of this statement, please clarify why the conductor evaluation table, included in the response for ALT-18a, shows 6% clearance violations for single-conductor Drake 795 ACCR but 8% clearance

violations for the double-bundle Drake 795 ACCR. Similarly, please explain why the table shows 43% clearance violations for single-conductor 1033.5 ACSR but 49% clearance violations for the double-bundle 1033.5 ACSR.

ALT-26 **Follow-up to SCE response on ALT-19e.** In response for Alt-19e.1a, SCE indicates that for the existing lines the W-series towers are typical for those structures found in Segments 3 through 6, while the N-O-P-Q-series towers are found in Segments 1 and 2.

- **26a.** What tower series does SCE propose use for the Proposed Project?
- **26b.** Please expand the response to ALT-19e.1a to include the Tower Loading Diagrams/Trees for the Proposed Project tower series.