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

October 29, 2015

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

Re: Data Request #17 for the SCE West of Devers Upgrade Project - Application No. A.13-10-020

Dear Mr. Stevenson:

On September 22, 2015, SCE submitted a comment letter on Draft EIR/EIS. Then on October 27, 2015, SCE submitted its testimony to the CPUC in the proceeding on this project.

The California Public Utilities Commission's Energy Division has some questions related to this comment letter and testimony to clarify SCE's information stated in these documents. These questions are defined in the attached Data Request No. 17. We would appreciate your prompt response to this data request as soon as possible (by November 6, 2015). Delays in responding to these data needs will result in further delays in the publication of the Final 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. 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
Molly Sterkel, CPUC Program Manager
Chris Myers, ORA
Cleveland Lee, Legal Support for ORA
Frank McMenimen, Bureau of Land Management
John Kalish, Bureau of Land Management
John Dalton, Bureau of Land Management
Susan Lee & Hedy Koczwara, Aspen Environmental Group
Greg Heiden, CPUC Legal Division

SCE West of Devers Upgrade Project
Data Request No. 17

The requests below present questions related to Project Description and Alternatives.

Project Description

PD-35 During PEA review, the EIR/EIS team submitted data requests to SCE asking for its construction schedule and timing of possible line outages. SCE's Response to Completeness Item 18 stated,

> The specific sequence in which new towers and conductor will be installed and existing towers and conductor will be removed cannot be fully defined at this time due to several factors including final tower locations (to be defined as part of final engineering), line outage availability/duration, the extent of shoo-fly configurations, construction contractor resource availability, and potential environmental constraints.

The Draft EIR/EIS Project Description (in Section B.3.3.13), which has been reviewed several times and approved by SCE, states,

> Specific shoo-fly locations cannot be determined until final design and engineering efforts are completed and the construction sequencing plans are finalized.

However, SCE's direct testimony filed on October 27, 2015 (pages 25-26) states the following (underlining added):

> Because the four circuits in the WOD corridor are currently operating at full capacity, SCE designed the construction plan for the Proposed Project specifically to limit the amount and duration of required outages. More importantly, the Proposed Project construction plan limits both the number of double-line outages (de-energization of two circuits at one time) and the duration of such outages. SCE believes it could safely construct the Proposed Project while limiting any required double-line outages to less than 24 hours in duration. In contrast, in order to safely construct the Phased Build Alternative, SCE would need to take multiple line outages of up to six months in duration. This means that for up to six months at a time, multiple times during the four-plus-year construction schedule, two or more of the four circuits in the WOD corridor would be out of service. In order to limit the need for extended multiple line outages associated with the Phased Build Alternative, SCE would likely propose to significantly increase the number of temporary structures used during construction. Assuming that there is adequate space and suitable topography to physically construct the increased number of temporary structures within the WOD right of way, the number of multiple line outages needed for the Phased Build Alternative could be reduced, but not entirely eliminated.

Request: Please provide a copy of the construction plan referenced in the testimony statement above. It appears that the SCE construction plan includes illustration of (a) how the double-line outages are identified and how long they would last, and (b) the number

of temporary structures (shoo-flies) required to construct the Proposed Project. This data can be compared with the information to be provided in the following request (ALT-29).

ALT-29 As shown above, SCE's direct testimony (page 25-26) states that "SCE would likely propose to significantly increase the number of temporary structures used during construction."

SCE's comment letter on the Draft EIR/EIS (page 2) states, "The Phased Build Alternative is also legally and economically constrained because the construction methods necessary to construct the Phased Build Alternative will require extended double-, triple- or quadruple-line outages of the existing transmission system that is being modified."

Request: Please provide documentation for these statements that explains the following:

(a) Describe the process that SCE used to determine that "multiple line outages of up to six months in duration" or "extended double-, triple- or quadruple-line outages" would be required for the Phased Build Alternative. Provide a construction plan that illustrates these conclusions.

(b) Describe the process that SCE used to determine how many additional temporary structures would be required for the Phased Build Alternative in comparison to those required for the Proposed Project. Provide a construction plan that illustrates these conclusions.