

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 10, 2014

Ryan Stevenson
Regulatory Policy & Affairs
Southern California Edison
8631 Rush Street, General Office 4 - G100
Rosemead, CA 91770

Re: Data Request #8 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. Attached please find Data Request No. 8, which defines the additional questions we have at this time for alternatives and recreation. Additional data requests may be necessary to address other CEQA or NEPA topics as we move forward with EIR/EIS preparation.

We would appreciate your prompt responses to these data requests, which will allow us to maintain our current schedule. Given our desire to maintain an aggressive schedule, we request that responses be provided to us within one week if possible (by October 17, 2014). If this is not possible, please provide me with an estimated response date for any information that can't be provided within a week.

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
Xiao Selena Huang, 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 Koczwar, Aspen Environmental Group
Nicholas Sher, CPUC Legal Division

SCE West of Devers Upgrade Project Data Request No. 8

West of Devers Upgrade Project Data Request No. 8 includes requests related to the Project Description and Recreation. Note that Data Request PD-26 relates both to the Project Description and to Alternatives.

Project Description

PD-24 SCE responded to Data Request PD-22.A.ii (included in DR7; response received September 25, 2014). This response was incomplete. The request was intended to provide the CPUC with a better understanding of the project need and objectives; it asked for the MW load at substations and/or MW power flow through the substations then to the downstream system. The response only addressed local load (showing a total of 1,809 MW).

A. Please describe the portion of the project's capacity (in MW) that would flow to other downstream portions of the system.

B. Please provide this power-flow information for each of the individual circuits, disaggregated per circuit, as defined in Data Request PD-22 item iv.

PD-25 SCE responded to Data Request PD-21, along with responses to ALT-8, ALT-9, and ALT-10 (included in Data Request 7; SCE responses received September 26, 2014). These responses raise additional questions on the potential growth-inducing impacts of the Proposed Project, potential indirect effects, and potential connected actions. SCE's responses suggest that the Proposed Project may be needed in order to serve certain upstream facilities and projects that depend on the Proposed Project for their operation. For each of the following, please explain on how the project or projects are dependent on the Proposed Project:

A. The generation projects identified in PEA Table 1.1 having executed Large Generation Interconnection Agreements (1,485 MW).

B. The generation projects identified in PEA Table 1.1 under negotiation and study for Large Generation Interconnection Agreements (994.5 MW).

C. The three additional renewable generation projects (total 500 MW), mentioned in response to Data Request ALT-10 as having filed requests for interconnection since the October 2013 filing of the Proposed Project PEA.

D. The Path 42 Upgrades that are in process by SCE and the Imperial Irrigation District (IID) to increase the transfer from IID to approximately 1,500 MW, as mentioned in response to Data Request ALT-10.

E. The planned 500 kV line from Delaney substation in Arizona to SCE's Colorado River substation.

PD-26 SCE's response to Data Request ALT-11 (received September 26, 2014) identified a previously undisclosed aspect of the Proposed Project related to the potential need to take generation offline. This aspect may have direct or indirect environmental impacts

meriting discussion in the EIR/EIS. The response indicates that the Proposed Project may achieve 4,800 MW of continuous flow after tripping offline 1,400 MW of generation, under the loss of the proposed Devers-Vista No. 1 and 2 220 kV transmission lines (an N-2 contingency).

A. Please quantify the level of generation tripping (MW) that would be occur with the existing system configuration under comparable existing N-2 contingencies, including the loss of Devers-Valley No. 1 and 2 500 kV transmission lines.

B. Please describe the nature of the generation tripping that could occur by describing what resource (fossil fuel or renewable) and geographically where generators would be curtailed.

C. Please describe the resource (fossil fuel or renewable) and geographical location of the replacement generation that would need to incrementally run at a higher capacity to replace the 1,400 MW tripped offline.

D. Please describe what level of generation would need to be tripped with the Proposed Project completed and in service but under other N-2 contingencies, including the loss of Devers-Valley No. 1 and 2 500 kV transmission lines.

E. Please describe the environmental effects of project-related generation tripping and incrementally running replacement generation.

Recreation

REC-3 **Park Closures.** The PEA section on Recreation (Section 4.15.4.2, NEPA Impact Assessment) states that “Construction of the 220 kV transmission lines and related ancillary facilities... could directly and indirectly impact recreational uses in certain areas. For example, trails (such as the Pacific Crest Trail and SCE Corridor Trail Class I Path), parks (such as Noble Creek Regional Park, Stetson Community Park, and Oak Valley Park) and private recreation facilities (such as private golf courses, campgrounds, equestrian facilities, and private parks) transect the WOD corridor and could be temporarily affected by construction activities. During the construction period, recreational users would not be allowed access to the existing recreational areas located within the existing WOD corridor.

A. Please list the specific recreational facilities SCE anticipates would require closure and the tentative duration of such closures.

B. Please explain whether SCE anticipates any closures of the Pacific Crest Trail where it is located within the existing WOD corridor and if so, what the duration of such closures would be.

REC-4 **Easements.** Data Request REC-1 asked for copies of use agreements for all recreational facilities located in the project ROW. In a conference call on August 21, 2014, SCE agreed to provide sample easements for review and consideration in response to this data request; SCE provided two sample easements in Data Response REC-1 on September 15, 2014. However, the two sample easements SCE provided were for easements crossing private lands that are not currently used for recreation.

Please provide a sample easement for publicly-owned lands that are currently used for recreation. For example, an acceptable sample easement would be for a parcel where

the following parks or open spaces are located: Nobel Creek Regional Park, Stetson Community Park, Oak Valley Park, or the City of Beaumont parcel between N. Deodar Drive and S. Monte Verde Drive.