Southern California Edison
WODUP A.13-10-020

DATA REQUEST SET A.13-10-020 WODUP ED-SCE-07

To: ENERGY DIVISION
Prepared by: Scott Lacy, P.E.
Title: Project Engineer
Dated: 09/05/2014

Question PD-18.b:

It is our understanding that SCE has installed cathodic protection on existing pipelines in conjunction with construction of SCE's Tehachapi Renewables Transmission Project (TRTP), Segment 3B. Because this work was unanticipated on TRTP, it was not included in the Final EIR project description. As a result, the CPUC prepared a CEQA Addendum to address this project change (SCE's Request for an Addendum dated December 2011; CPUC's CEQA Addendum dated March 2012). To ensure that any construction work and ground disturbance associated with cathodic protection of pipelines, if required, is included in the EIR/EIS for the proposed West of Devers Upgrade Project (WOD-UP):

b. Please explain whether or not these existing pipelines, if any, may require cathodic protection. If cathodic protection is not required, please explain why.

Response to Question PD-18.b:

It is not known at this time if the Proposed Project will result in the need for cathodic protection to be installed on the pipelines listed in response to Data Request No. PD-18.a. A detailed engineering study must still be performed to evaluate the long-term operational impacts of the Proposed Project's resultant electrical system on those pipelines as it relates to corrosion and maintenance safety issues. There are three potential results from such a study, any of which could be applicable for a specific location: 1) cathodic protection is not needed; 2) cathodic protection is needed, but a system is already present and is sufficient for the new electrical configuration; or 3) cathodic protection is needed, and new or upgraded facilities must be installed as a result of the Proposed Project.

Once final engineering design is completed, which would provide the necessary horizontal and vertical clearance dimensions required as inputs to the analysis, SCE would engage the services of a professional firm that specializes in these evaluations, which would include discussions with the owners of these pipelines to verify their locations, sizes, and existing cathodic protections systems in place (or if they even currently exist). The results of this analysis, including detailed information describing exactly what type of cathodic protection would be necessary at a particular location, could be provided to the CPUC once completed. Based on experiences with previous projects, it is reasonable to expect this study to take approximately six months to complete, so SCE won't be able to provide any site-specific determinations until approximately

mid-2015 or later if any portion of the Proposed Project is not selected as the Environmentally Superior Route in the EIR/EIS.

Given that these study results are not expected to be ready for review until after the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) is scheduled to be completed, it is reasonable for the CPUC to take the most conservative approach and evaluate the Proposed Project with the assumption that all seven locations identified in response to Data Request No. PD-18.a will require new or modified cathodic protection equipment to be installed. The response to Data Request No. PD-18.c provides additional details regarding the potential methods of cathodic protection that may be required.