

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



September 11, 2014

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

**Re: Application Completeness – West of Devers Upgrade Project Proponent’s Environmental Assessment -- Application No. A.13-10-020**

Dear Mr. Stevenson:

On October 25, 2013, SCE submitted its Application for Certificate of Public Convenience and Necessity (CPCN) and Proponent’s Environmental Assessment (PEA) for the proposed Application (A.13-10-020). The Energy Division used the CPUC's Information and Criteria List, as well as the requirements outlined in General Order (GO) 131-D and the PEA Checklist as its basis in evaluating the completeness of the PEA and determining whether or not sufficient information had been provided for the CPUC to complete its initial environmental assessment of the project as required by CEQA. Section 15100 of the California Environmental Quality Act (CEQA) Guidelines provides the lead agency 30 days to assess the completeness of the project proponent’s application. On November 25, 2013, the California Public Utilities Commission’s (CPUC) Energy Division sent a deficiency letter to SCE that defined specific data required before the Application could be deemed complete. On February 18, 2014, the CPUC defined the remaining information components that needed to be submitted, and explained the proposed schedule for preparing the EIR/EIS, given the status of data expected.

**EIR/EIS Schedule.** Based on SCE’s commitments to provide all remaining deficiency information by the end of August 2014, the CPUC and BLM established a tentative schedule that calls for publication of the Draft EIR/EIS in early January 2015. During the past 7 months, and as explained in the February letter, while SCE was assembling the remaining data required for preparation of a complete and adequate Draft EIR/EIS, the Energy Division and BLM moved forward with the following items:

- Issuance of Notice of Preparation and Notice of Intent (complete)
- Scoping (complete) and Agency Consultation (ongoing)
- Initiation of Section 106 Tribal Consultation (in progress)
- Preparation and Agency review of an initial internal Administrative Draft EIR/EIS (in progress)

**Outstanding Completeness Items as of August 2014.** Since February 2014, SCE has submitted information in response to the deficiency letter in several parts. Most recently, SCE stated that the remaining outstanding information that was identified in the CPUC’s deficiency letter of November 25, 2013 would be submitted by the end of August 2014. The information gaps that were identified in the November 2013 deficiency letter are described in Table 1, along with the status of information received in each category.

**Table 1: Status of WOD-UP Deficiency Items**

Deficiency Item	Status as of September 2014
Remaining GIS files for access and spur roads, pull/tension sites, guard pole and splice sites, shoo-flies, grading and slope stabilization, and helicopter landing zones (HLZs)	<ul style="list-style-type: none"> <li>• Information provided on September 2, 2014.</li> <li>• HLZs are not included. However, on July 3, 2014 SCE stated that no specifically designated HLZs will be required for the types of helicopters anticipated to be used on the project. SCE’s Preliminary Helicopter Use Plan was received on December 18, 2013. This is acceptable for EIR/EIS analysis.</li> <li>• “Shoo-fly work areas” are shown as corridors in the updated GIS data. On July 3, 2014, SCE stated that assumptions related to the number of shoo-fly poles would still be consistent with the information provided in the PEA.</li> </ul>
Biological and cultural resources survey updates for small areas not surveyed	<ul style="list-style-type: none"> <li>• <i>Cultural Resources</i>. Areas requiring additional survey are largely the result of identification of shoo-flies, pull sites, and access roads. The survey report and evaluations of any newly discovered resources (none, yet) are expected by September 30, 2014. This timeframe will not delay publication of the Draft EIR/EIS in accordance with the current schedule.</li> <li>• <i>Biological Resources</i>. All biological resources survey data has been received.</li> </ul>
Status of FAA hazard marking for shoo-fly structures and 15 missing 220 kV towers	<ul style="list-style-type: none"> <li>• FAA evaluations for 15 missing 220 kV towers were received on August 22, 2014.</li> <li>• Evaluation of shoo-flies under FAA criteria is no longer expected to be received per SCE’s December 20, 2013 response. This states that whenever specific shoo-fly locations are determined throughout the course of final design and construction planning efforts of the Project, SCE Transmission Engineering will perform the same level of analysis to determine appropriateness for FAA filing as would be performed for any and all permanent structures. If any are found to require filing, that information will be forwarded to the CPUC and their environmental consultant as soon as it is available, along with copies of the filings and resultant FAA determinations. This information will not delay the EIR/EIS schedule, and the consultant team can make assumptions about FAA hazard marking for shoo-flies.</li> </ul>
66 kV and 12 kV structure tables	<ul style="list-style-type: none"> <li>• Structure information was included in GIS data provided on September 2, 2014.</li> </ul>
Locations of tree removals	<ul style="list-style-type: none"> <li>• SCE’s Native Tree Assessment was received on August 29, 2014 as part of Supplemental Response to DR BIO-16.</li> </ul>
Implementation of the agreed-upon approach to cultural resources assessment	<ul style="list-style-type: none"> <li>• Assessment approach is being implemented as agreed upon by SCE, BLM, and CPUC.</li> </ul>
Details on construction schedule and locations/duration of shoo-flies to be used	<ul style="list-style-type: none"> <li>• On May 30, 2014, SCE sent revisions to the construction schedule in the EIR/EIS Project Description, including a general description on the use of shoo-flies.</li> </ul>

**Conclusion Regarding Application Completeness.** As described above, the Energy Division has been reviewing SCE's project information as it has been submitted, between February and September of 2014. Based on this review of SCE's responses, the CPUC Energy Division concludes that the PEA/Application is now complete.

During the past year, the CPUC Energy Division and the EIR/EIS Team has been actively defining additional information required for analysis, but not for Application completeness. Data requests to SCE will continue during the course of the CEQA and NEPA processes. Should you have any questions, please call me at (415) 703-2068 or email at [billie.blanchard@cpuc.ca.gov](mailto:billie.blanchard@cpuc.ca.gov).

Sincerely,

*Billie Blanchard*

Billie C. Blanchard  
PURA V  
Project Manager for West of Devers Upgrade  
Energy Division, CEQA Unit

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