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

February 18, 2014

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

As explained in the following paragraphs, the Application remains incomplete, but while waiting for SCE to assemble the remaining information, the CPUC will begin EIR/EIS preparation immediately, and work with the BLM on a schedule that is very similar to SCE's proposed application schedule. Assuming the missing data is submitted by the end of June 2014, the application would be deemed complete at that time. The Draft EIR/EIS can be published in late September 2014 after incorporation of the remaining information. Delays in publication of the Draft EIR/EIS will result if SCE's data is not adequate or is not provided by June 30, 2014.

SCE has submitted information in response to the deficiency letter in several parts between mid-December 2013 and late January 2014. The supplemental information provided by SCE during December 2013 and January 2014 has resulted in provision of much of the data that can be used to prepare the project EIR/EIS. **However, there are still information gaps in critical areas that would prevent preparation of an adequate and complete Draft EIR/EIS in a timely manner**. SCE has stated that the outstanding information that was identified in the CPUC's deficiency letter (dated November 25, 2013) will be submitted by the end of June 2014. While SCE is assembling the remaining data required for preparation of a complete and adequate Draft EIR/EIS, the Energy Division has decided that it can move forward with the following items:

- Notice of Preparation and Notice of Intent;
- Scoping and Agency Consultation;
- Section 106 Tribal Consultation; and
- Preparation and Agency review of an initial internal Administrative Draft EIR/EIS.

Outstanding Completeness Items - The remaining information gaps from the November 25, 2013 deficiency letter are listed below. If SCE's data is not provided by the end of June 2014 (as promised by SCE) for each of these remaining items, the schedule for publication of the Draft EIR/EIS will be delayed. As stated above, the CPUC's consultant team will use the information provided to date to prepare most of an administrative draft EIR/EIS while waiting for the remaining data which includes the following:

- 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
- Biological and cultural resources survey updates for small areas not surveyed
- Status of FAA hazard marking for shoo-fly structures and 15 missing 220 kV towers
- 66 kV and 12 kV structure tables
- Locations of tree removals
- Implementation of the agreed-upon approach to cultural resources assessment
- Details on construction schedule and locations/duration of shoo-flies to be used

To document our request for this information, Attachment A lists critical missing items that are expected to the CPUC for an adequate complete EIR/EIS analysis. In addition to these outstanding completeness items, the EIR/EIS Team will be actively defining additional information, not required for Application completeness, but that will support our EIR/EIS preparation. The CPUC Energy Division will request this additional information in the form of data requests to SCE during the course of the CEQA and NEPA processes. Data requests are likely to include additional project description details, preliminary engineering design for alternatives that may be developed by the EIR/EIS Team, and other resource information identified during EIR/EIS preparation.

We are available to meet with you at your convenience to discuss any of the items in this letter. Should you have any questions, please call me at (415) 703-2068 or email at billie.blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

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

Attachments (1)

cc: Tom Burhenn, Southern California Edison
Jessica Hecht, CPUC Administrative Law Judge
Molly Sterkel, CPUC Energy Division, Program Manager
Mary Jo Borak, CPUC Energy Division, CEQA Group Supervisor
Nicholas Sher, CPUC Legal Division
Jason Reiger, CPUC Legal Division
Holly Roberts, Bureau of Land Management
John Kalish, Bureau of Land Management
Susan Lee, Aspen Environmental Group
Hedy Koczwara, Aspen Environmental Group
Audrey Lee, Commissioner Peevey's Advisor

Attachment A. Outstanding Completeness Items West of Devers Upgrade Project

All items in Table A-1 below have been promised by the end of June 2014 except for the following items, which may take longer to prepare because they cannot be completed until the detailed engineering is finalized first. Should SCE provide additional information as engineering proceeds, then the EIR/EIS will reflect the updated data.

1. *Cultural Resources Assessment and Additional Cultural Surveys* – Table 1 in SCE's draft Cultural Resources Management Strategy states that all cultural resources assessment tasks would be completed by the end of September 2014. Any missing areas that would be impacted by the project would be identified by the end of June 2014 and cultural surveys would be completed within 30 days thereafter (July 2014).

2. *FAA Hazard Markings of Shoo-Flies* – Whenever specific shoo-fly locations are determined throughout the course of final design (June 2014), 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 adequate information is not provided in time for incorporation in the Draft EIR/EIS, Aspen team engineers will use shoo-fly height and location engineering data and existing tower evaluations to develop EIR/EIS assumptions and determine likely locations, if any, of shoo-flies tall enough that they might require FAA review.

3. *Helicopter Use* - SCE will develop a specific helicopter plan regarding use of helicopters following completion of final engineering and selection of a transmission construction contractor. Therefore, until the information is available, the Aspen Team will develop and assume a worst-case scenario for EIR/EIS analysis based on SCE's Preliminary Helicopter Plan submitted with deficiency responses.

4. *Construction Schedule* – SCE stated that 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. Therefore, the CPUC consultant engineering team will develop a detailed reasonable worst-case construction duration for each project phase and will identify specific areas where nearby sensitive receptors may perceive more adverse impacts from longer construction durations.

Table A-1. Deficiency Items Remaining Incomplete

Deficiency Item	SCE's Completeness Response
GIS DATA Items #3a-f (GIS Data and Surveys), #5e (Shoo-Flies), #9c (Helicopter Use), #11a (Access and Spur Roads), #18c (Construction Schedule). GIS Data for access and spur roads, pull/tension sites, guard pole and splice sites, shoo-flies, grading/slope stabilization, and helicopter landing zones	• SCE's Response (12/20/13): SCE expects to provide the above GIS data to the CPUC by the end of June 2014. As stated in SCE's email (dated 1/10/14), SCE continues to work to identify additional existing access roads as part of its ongoing design effort. As such, not all potential access roads were included in the January 10, 2014, GIS submittal, but will be updated when additional design information becomes available.

Table A-1. Deficiency Items Remaining Incomplete

Deficiency Item	SCE's Completeness Response
CULTURAL SURVEYS Item #3, Part 2a (GIS Data and Surveys). Cultural Surveys of Missing Areas (if identified as areas of impact based on further engineering)	• SCE's Response (12/20/13 and 1/24/14): Any missing areas that would be impacted by the project would be identified by the end of June 2014 and cultural surveys would be completed within 30 days thereafter (July 2014)
BIOLOGICAL SURVEYS Item #3, Part 2b (GIS Data and Surveys). Biological Resources Surveys of Missing Areas	• SCE's Response (12/20/13): The triangular area east of Segment 1 is a supplemental survey area and will be surveyed by the spring of 2014.
66 kV & 12 kV STRUCTURE TABLES Item #4a (Structure Information). 66 kV and 12 kV Structure Information Table	• SCE's Response (12/27/13): SCE does not currently have this information for its 66 kV and 12 kV structures and will not be available for approximately 6 months. As soon as the information is available for the lower voltage structures, SCE will provide it to the CPUC and Aspen.
FAA EVALUATION OF SHOO-FLIES Item #5c (Shoo-Flies) and #16a and #16b (FAA Hazard Marking). Description of any FAA 7460 filings for shoo-fly structures/spans and for 15 missing structures (per 2/4/14 email)	• SCE's #5c and #16b Response (12/20/13): SCE has not yet identified potential shoo-fly structure locations, nor whether any potential shoo-fly structures would require FAA review. 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. • SCE's #16a Response Follow-Up (2/4/14): The FAA consultant has not yet evaluated these 15 [missing] structures, however given that the 15 structures are essentially the same distance away from the Banning Airport area as those structures in the tables that are immediately east and west of this area, we believe that it would be safe to assume that they would be treated the same. In other words, we expect that these 15 structures will need to be filed with the FAA, but will come back with "No Hazard" determinations without the need for structure lighting. Once the refined engineering is completed in June 2014, we will update the tables including these 15 structures.
TREE REMOVAL Item #11d (Access and Spur Roads) and #12d (Vegetation Clearance). Describe any locations of tree removal. Describe the types and approximate number and size of trees that may need to be removed.	• SCE's Response (12/20/13 and 12/27/13): As further engineering is completed and trees are identified to be removed, SCE will provide this information to the CPUC and Aspen. SCE anticipates providing additional information by the end of June 2014.
CULTURAL RESOURCES APPROACH Item #15a (Cultural Resources). Implementation of the agreed upon cultural resources assessment approach	• SCE Response (1/24/14 and 1/28/14). After reviewing SCE's 1/17/14 response on cultural resources, the CPUC provided a response on 1/24/14, defining requirements and schedule for each task. SCE provided additional details on 1/28/14 and comments on the approach on 1/30/14. Per the conference call on 1/30/14 and the email from Susan Goldberg on 2/5/14, the approach is acceptable to the CPUC and is considered final. The CPUC will track progress of completion of each task to ensure that all required data is received in accordance to the agreed upon schedule and prior to publication of the Draft EIR/EIS.

Table A-1. Deficiency Items Remaining Incomplete

Deficiency Item	SCE's Completeness Response
CONSTRUCTION SCHEDULE Items #18b-c (Construction Schedule) and #5a (Shoo-Flies). Detailed schedule and construction sequence for each Segment, including the expected duration of use of shoo-flies at each location	• SCE's #5a and #18c Response (12/20/13): SCE expects to provide additional shoo-fly information to the CPUC and Aspen by the end of June 2014. • SCE's #18b Response (12/20/13): 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.