

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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January 11, 2013

Christine McLeod, Project Manager
Regulatory Affairs Department
Southern California Edison
8631 Rush Street, General Office 4 – G10Q (Ground Floor)
Rosemead, CA 91770

Re: Completeness of Southern California Edison's Application for a Permit to Construct the Santa Barbara County Reliability Project (CPUC Proceeding A1210018)

Ms. McLeod:

The Energy Division of the California Public Utilities Commission has completed its review of Southern California Edison's (SCE's) response to the completeness review dated November 19, 2012, regarding the application to construct the Santa Barbara County Reliability Project (SBCRP). The Energy Division received SCE's response via email on December 21, 2012, including Attachments 1 through 3 of 4. Attachment 4 of 4, a DVD containing project GIS data, was received on December 27, 2012.

After reviewing SCE's responses, the Energy Division requests the submittal of additional information. Attached is a list of these items. Additional information submitted in accordance with this letter should be filed as supplements to the above application.

We request that responses to these items be provided to us within thirty days. Upon receipt of the supplemental information, the Energy Division will perform a second review to assess the adequacy of the application.

The Energy Division reserves the right to request additional information at any point in the process. Questions relating to the SBCRP should be directed to me at (415) 703-3175 or lon.payne@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Lon Payne".

Lon Payne
Energy Division
Transmission and Environmental Permitting
California Public Utilities Commission

Cc: Hallie Yacknin, Administrative Law Judge
Nicolas Sher, Legal Division
Rachel Wilkinson, Ecology & Environment Inc.

ENERGY DIVISION RESPONSES TO SCE DEFICIENCY LETTER NO. 1 RESPONSE

Item No. 1: Chapter 1.0, Purpose and Need

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 1 to be adequate.

Item No. 2: Chapter 3.0, Project Description

Upon review of the GIS data contained on the DVD received December 27, 2012, the Energy Division has determined that additional information is required to accurately describe and assess the proposed project. Specifically, the Energy Division previously requested details clarifying existing and replacement components. In particular, the Energy Division requested that details for transmission structures include specifics regarding the type of pole or tower (e.g., wood, steel, lattice steel, lightweight steel, etc.) and whether the structure would be single-circuit or double-circuit for both existing and proposed structures. Currently, the GIS data submitted by SCE does not contain the level of specificity required to assess project impacts, such as visual impacts and impacts related to acreage disturbance. In particular, the data should be clarified as follows:

- 1) The data should more accurately identify the current configuration of subtransmission components in the project area, including the type of structures (e.g., wooden h-frame, lattice steel tower, etc.) and whether each structure is single-circuit or double-circuit. For example, the current data includes a layer called "eng_Structures_Points – STATUS Existing" that labels "Existing" (E) structures; however, the layers called "eng_Structures_Points – STATUS Proposed" and "eng_Structures_Points – STATUS New-R-Ex" do not fully indicate which E structures would be rebuilt. Judging by the placement of some E structures, it is assumed that many of the E structures would be removed and replaced with new structures; however, this is not captured in the data.
- 2) Clarification is required regarding A) which circuits are currently idle and/or would be de-energized and remain in place, B) which would be removed entirely, and C) which would be new construction. For example, near Tower M16-T3, there are four subtransmission circuits identified, including the following associated data:
 - a. **NEW SANTA CLARA-CASITAS-CARPINTERIA**
 - i. **GlobalID:** E9DF94DE-4A66-4979-8973-6FC8171008A9
 - ii. **Status:** Proposed
 - iii. **Segment_ID:** Segment 4
 - iv. **ExtraInfo1:** New Line
 - b. **NEW SANTA CLARA-OJAI-SANTA BARBARA**
 - i. **GlobalID:** 57769C3F-5142-4892-A8F2-E1E7C302F111
 - ii. **Status:** On-line
 - iii. **Segment_ID:** Segment 4
 - iv. **ExtraInfo1:** New Line
 - c. **EXISTING IDLE SANTA CLARA-SAN MARCOS**
 - i. **GlobalID:** F8DA7D47-C9FA-48C8-9BDD-E53D9EE5BB21
 - ii. **Status:** Idle
 - iii. **Segment_ID:** Segment 4
 - iv. **ExtraInfo1:** Removed and Replaced
 - d. **SANTA CLARA-OJAI-SANTA BARBARA**
 - i. **GlobalID:** 409CA9B1-47B6-4182-B696-7B21610A7D3C
 - ii. **Status:** On-line
 - iii. **Segment_ID:** Segment 1¹
 - iv. **ExtraInfo1:** Out of service when project completed

¹ Note that the Segment_ID for the Santa Clara-Ojai-Santa Barbara circuit is called "Segment 1" even in locations along the Segment 4 route. Issues such as these should also be clarified.

According to this data, it is difficult to determine how the lines would be configured upon completion without making assumptions about what is meant by combinations of terms such as a) Proposed/New Line, b) On-line/New Line, c) Idle/Removed and Replaced, and d) Online/Out of service when project completed. For example, the circuit labeled NEW SANTA CLARA-OJAI-SANTA BARBARA is a new circuit that does not currently exist; however, its status is labeled “On-line,” which is assumed to be incorrect. Likewise, the circuit labeled SANTA CLARA-OJAI-SANTA BARBARA is also labeled “On-line” but would be “Out of service when project completed.” It is assumed that the former circuit is new and has not yet been constructed, and the latter circuit exists and would remain in place but would be idled upon completion of the new circuit. If these assumptions are correct, this would appear to result in two circuits, both of which would be called SANTA CLARA-OJAI-SANTA BARBARA.

Similarly, it is assumed that the circuit labeled NEW SANTA CLARA-CASITAS-CARPINTERIA does not currently exist and would be new construction, and the circuit labeled EXISTING IDLE SANTA CLARA-SAN MARCOS exists, but would be removed. Combined with the two SANTA CLARA-OJAI-SANTA BARBARA circuits, the data implies that the end result would be three circuits where there are currently two.

- 3) There also appear to be inconsistencies related to tower naming conventions. For example, there are three towers labeled “Existing” near the M16-T3 Tower as follows (identified by the “Structure_ID”):
- a. **M16-T3 (southernmost tower)**
 - i. **GlobalID:** 188E0B0A-EC42-4E89-BF01-7ADEE3ACD9BF
 - ii. **Segment_ID:** SEG_4
 - iii. **ExtraInfo1:** M16-T3
 - iv. **Str_Type:** Tower
 - b. **M16-T1 (middle tower)**
 - i. **GlobalID:** AFA3C2C9-4D24-4353-9E47-B2AC1A14FC31
 - ii. **Segment_ID:** SEG_4
 - iii. **ExtraInfo1:** CONSTR 92 M6T3
 - iv. **Str_Type:** Tower
 - c. **M16-T1 (northernmost tower)**
 - i. **GlobalID:** 9ED13047-9CB1-4BDB-AD44-AD5648C3B17A
 - ii. **Segment_ID:** SEG_4
 - iii. **ExtraInfo1:** M16-T1
 - iv. **Str_Type:** Tower

Note that although the M16-T1 Tower (northernmost tower) is labeled “SEG_4,” it is clear when viewed against satellite imagery that this tower is part of the adjacent 220-kV line and is not part of the project. The middle tower, which is also labeled M16-T1, includes additional information in the field labeled ExtraInfo1, which states “CONSTR 92 M6T3,” possibly indicating that the tower number is incorrect. The middle tower (M16-T1/CONSTR 92 M6T3) is assumed to be the tower that would be removed and replaced as part of the project. It is assumed that this tower would be replaced with a tubular steel pole in order to support the two new circuits (the NEW SANTA CLARA-CASITAS-CARPINTERIA and NEW SANTA CLARA-OJAI-SANTA BARBARA circuits); however, this information is not captured in the data.

The M16-T3 Tower, which is adjacent to the M16-T1/CONSTR 92 M6T3 Tower to the south, appears to parallel the two circuits labeled NEW SANTA CLARA-CASITAS-CARPINTERIA and NEW SANTA CLARA-OJAI-SANTA BARBARA; however, neither of these circuits has been constructed. Therefore, it is assumed that the existing M16-T3 Tower supports the existing SANTA CLARA-OJAI-SANTA BARBARA circuit and would remain in place to support the idled circuit.

The information discussed above under 1, 2, and 3 are examples of the general inconsistencies uncovered in the data. The description of activities provided above is based on assumptions related to the number of circuits and the types of structures that currently exist or would be constructed. The Energy Division requests that SCE clarify whether these assumptions are accurate and provide a cleaner version of the data that contains additional details regarding the specific type of structures that currently exist and those that would be constructed, including whether they are single-circuit or double-circuit.

Item No. 3: New Right-of-Way

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 3 to be adequate.

Item No. 4: Components to be Replaced or Idled and/or Left in Place

Due to the history of this project, the Energy Division requests that SCE provide written notice prior to performing work within the Electrical Needs Area, such as the work described in SCE's Item No. 4 response. In addition, the Energy Division requests that SCE submit any prior written communication in which SCE described the removal of the four towers identified as M6-T4 and requests that SCE describe the exemption under which this work was completed. The Energy Division also requests that SCE clarify the location of these towers as they are neither described in the PEA nor included in the GIS data received on December 27, 2012.

Item No. 5: Access and Spur Roads

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 5 to be adequate.

Item No. 6a: Helicopters

According to Section 4.2, Agricultural and Forestry Resources, "Helicopters would be used to install telecommunications cable along Segments 1 and 2..." (page 4-68). If SCE intends to use helicopters as described in Section 4.2, then the Energy Division requests that SCE provide a more detailed description of helicopter construction.

Item No. 6b: Helicopters

Provided that information regarding the remaining 29 spans referenced in response 6b is provided at a later date, for the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 6b to be adequate. Note that the Energy Division acknowledges SCE's statement that the FAA may require marker balls on the adjacent 220-kV line instead of the reconstructed 66-kV line; however, in order to conservatively assess visual and other impacts, FAA marker spans should be identified for the 66-kV line in lieu of the FAA's decision. Impacts associated with placement on the 220-kV span would likely not vary substantively from impacts associated with placement on the 66-kV span.

Item No. 7a: Vegetation Removal

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 7a to be adequate.

Item No. 7b: Vegetation Removal

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 7b to be adequate.

Item No. 8: 4.3 Air Quality

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 8 to be adequate.

Item No. 9: 4.4, Biological Resources

For the purposes of this completeness review, the Energy Division finds SCE's response to Item No. 9 to be adequate.

UNADDRESSED ITEM FROM DEFICIENCY LETTER NO. 1

Applicant Proposed Measures

Applicant Proposed Measure AQ-1 states, “Graded and/or excavated in active areas of the construction site shall be monitored by (*indicate by whom*) at least weekly for dust stabilization” (emphasis added). The Energy Division requests that SCE specify the responsible party.

NEW ITEMS FOR DEFICIENCY LETTER NO. 2

Telecom Line

Upon review of the GIS data contained on the DVD received December 27, 2012, the Energy Division identified a telecommunications line labeled “proposed,” which runs parallel to Segment 3A from the Carpinteria Substation. The line then diverges from Segment 3A, travels east across Rincon Road, and roughly parallels Highway 101 through the Coastal Zone. The line then runs northeast, possibly along a microwave path, and then travels south along Highway 33. The line ends at 99 South Ventura Avenue in Ventura. The Energy Division requires additional information on this component as it is not depicted on Figure 3.1-8 in the PEA or described in Chapter 3.

Cumulative

In light of the unique history of this project, as well as the amount of work that has taken place within the area in the last several months, the Energy Division requests a complete list of all SCE projects currently under construction within the Electrical Needs Area or that SCE anticipates will be constructed within the Electrical Needs Area in the next five years. In addition to a list of projects, the Energy Division requests that the location of these projects be identified on a map in order to enable the Energy Division to understand where these projects are located in relation to the Santa Barbara County Reliability Project.

In order to assess the cumulative impact of past projects, the Energy Division also requests that SCE submit photos of the structures that were removed and replaced during construction of Segment 1 and Segment 2 between 1999 and 2004. Specifically, the Energy Division requests clarification regarding whether the original structures were single-circuit or double-circuit, as well as the specific type of tower or pole (wood h-frame, lattice steel tower, etc.).