

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 23, 2011

Susan J. Nelson, AIA
Regulatory Affairs
Southern California Edison
2244 Walnut Grove Avenue, Quad 3D, GO1
Rosemead, CA 91770

RE: Tehachapi Renewable Transmission Project (TRTP), Segments 4-11: Modification #2 to Notice to Proceed (NTP) #20

Dear Ms. Nelson,

On June 17, 2011, Southern Californian Edison (SCE) submitted a variance request (Modification to NTP #20) to allow for various modifications to the Segment 10 Telecom route of the Tehachapi Renewable Transmission Project (TRTP) in Kern County, California. **This Modification #2 to NTP #20 is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE requests a variance (Modification to NTP #20) for various modifications to the Segment 10 Telecom route on Segment 10 Telecom of the TRTP in Kern County, California. Subsequent to the approval of the NTPR (NTP #20 dated November 30, 2010) by the CPUC, project site conditions have been further evaluated and various modifications to the telecom route are needed. A summary of the proposed modifications is provided below.

Rosamond-Windhub Portion of Segment 10 Telecom:

- West side of Windhub Substation, along Oak Creek Road. The planned telecom underground duct bank that runs along Oak Creek Road and enters southward into the substation would be modified. The western end of the originally-planned underground duct bank would be extended approximately 35 feet west, a new manhole installed, and a temporary pulling site added. Also note that the approved wood pole at this location would be repositioned slightly to the south, but remain in the road shoulder, to accommodate the duct bank extension.

In addition, the originally-planned underground duct bank route leading into the substation would be realigned such that its southward turn into the substation would occur approximately 30 feet west of the original alignment. Inside the substation, an additional manhole and temporary pulling site would be added. The approved (easternmost) manhole in the substation would be repositioned slightly to the west to accommodate the realigned duct bank. The length of this realigned portion of duct bank would remain unchanged at approximately 135 linear feet.

The total length of the duct bank along Oak Creek Road and into Windhub Substation would increase to approximately 170 linear feet as a result of the 35 foot extension described above.

Biological Resources: SCE submitted a biological report by ICF International dated June 15, 2011, titled *Biological Survey Report for the Proposed Installation of Additional Underground Duct Bank, Segment 10*

Telecom and 12kV Distribution Line, Kern County, California. The report documents the biological conditions at the proposed NTP Modification Sites along Segment 10 Telecom (Modification Project Component) and the 500-foot buffer (Biological Study Area [BSA]). The biological resources within the Modification Project Component Sites and BSAs were evaluated during general preconstruction surveys associated with the Segment 10 Telecom (ICF 2010cm, 2010da, 2010fa, 1011ba), burrowing owl preconstruction surveys (ICF 2010ac, 2010cn, 2010db, 2011l, 2011bb), and preconstruction special-status bat habitat assessment (ICF 2010bx, 2011ac). Biological resources in the area also were evaluated during several focused surveys, including plant (ICF 2010ag), tree inventory (ICF 2010bf), desert tortoise (ICF and ECORP 2010b), Swainson's hawk (ICF and Bloom 2010a, 2010b), focused burrowing owl (ICF 2010cq), and the relocation efforts for burrowing owl and desert kit fox (ICF 2010dn, 2010ds). Additional clearance sweeps of the Modification Project Component have been conducted routinely since January 26th, 2011. A literature review was also performed as part of the Biological Review for Segment 10 Telecom (ICF 2010bm).

The vegetation communities mapped within the Project Component include disturbed/developed and desert bunchgrass grassland; vegetation communities within the BSA were also mapped as disturbed/developed and desert bunchgrass grassland. Construction activities associated with Segment 10 Telecom are ongoing in the vicinity of the Project Component. No special-status species or nesting birds have been observed within the BSA (FRED). Sweeps of the site have been conducted regularly since January 26th, 2011.

The Project Component was partially surveyed during the original jurisdictional delineation for Segments 4, 5, and 10, and was fully surveyed during preconstruction surveys and clearance sweeps. No jurisdictional features were identified within the BSA (ICF 2010l). If any potential features are subsequently identified, they will be staked and flagged as Environmentally Sensitive Areas (ESAs) for avoidance.

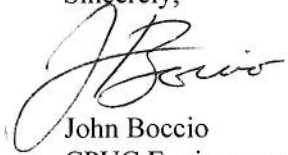
No additional impacts to biological resources are anticipated with the implementation of the subject NTP Modification request.

Cultural and Paleontological Resources: SCE submitted a memorandum dated June 9, 2011 from SCE with the NTP Modification Request stating that no cultural resources will be impacted by the proposed Modifications to the Segment 10 Telecom Route. The various modifications along the Segment 10 Telecom Route are within previously surveyed portions of the Tehachapi Renewable Transmission Project (TRTP), where a record search and both cultural and paleontological surveys showed that no cultural resources exist (Gust and Scott 2009; Pacific Legacy 2010). Previously conducted paleontological assessments indicate that the area of the proposed Modification area is located within sediment that has the potential for yielding paleontological resources (Gust and Scott 2009). Since there is a possibility that paleontological resources exist, paleontological monitoring is recommended if ground disturbing construction activities exceed a depth of two feet. No additional impacts to cultural or paleontological resources are anticipated with the implementation of the subject NTP Modification request.

The conditions noted below shall be met by SCE and its contractors:

- Since there is a possibility that paleontological resources exist, paleontological monitoring shall be conducted if ground disturbing construction activities exceed a depth of two feet.
- All conditions required by Notice to Proceed (NTP) #20 shall apply to the subject area and activities.
- Copies of all relevant permits, compliance plans, NTP #20, and this Modification to NTP #20 shall be available on site for the duration of construction activities where applicable.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Boccio".

John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen