

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 3, 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: Variance Request (VR) #75

Dear Ms. Nelson,

On July 25, 2011, Southern Californian Edison (SCE) submitted a request for a variance from Mitigation Measure (MM) AQ-1d to allow the use of several specialized pieces of equipment (pullers and reel trucks) with pre-2006 engines without CARB-certified Level 3 diesel emission controls due to the contractor not being able to locate pullers and reel trucks that meet the conditions of MM AQ-1d, Heavy Duty Diesel Haul Vehicle On-Road Equipment Standards, Segments 6 and 11 of the Tehachapi Renewable Transmission Project (TRTP), in Los Angeles County, California. Additional information was submitted on July 28, 2011. **This Variance Request is approved by the CPUC based on the following factors:**

- **Mitigation Measure AQ-1d**, Heavy Duty Diesel Haul Vehicle On-Road Equipment Standards, states the following:

*Require the use of 2006 engines or pre-2006 engines with CARB certified Level 3 diesel emission controls for all on-road heavy duty diesel haul vehicles that are contracted on a continuing basis for use to haul equipment and waste for the Project.*

- SCE submitted the following information:

SCE submitted a request for a variance from Mitigation Measure (MM) AQ-1d to allow the use of several specialized pieces of equipment (pullers and reel trucks) with pre-2006 engines without CARB-certified Level 3 diesel emission controls due to the contractor not being able to locate pullers and reel trucks that meet the conditions of MM AQ-1d. MM AQ-1d pertains to on-road heavy duty diesel haul vehicles that are contracted on a continuing basis on TRTP. The mitigation measure required the use of 2006 or newer engines, or Level 3 emission controls (i.e., particulate matter filter) for pre-2006 engines.

The reason for this variance request is that the Segment 6 and 11 construction contractor, PAR Electrical Contractors, Inc., has been unable to find pullers and reel trucks that meet the conditions of AQ-1d. PAR has contacted major equipment rental companies to determine whether compliant equipment are available. PAR has submitted a letter documenting their search and stating that the equipment is not available.

The pullers will be staying on the right-of-way (ROW) overnight and will typically move only when they move to another pull, which is scheduled about every three (3) weeks. The PERP Tier 3 engines on the back of the pull trucks do the actual pulling and will operate longer.

The reel trucks would occasionally travel to the material/contractor yard to be loaded with conductor, but other than that, will be staying on the ROW. For Segment 11A, PAR estimates that there will be six

(6) reel truck trips per pull, and five (5) pulls, resulting in approximately 30 truck trips of 5–15 miles (round trip) over four (4) months.

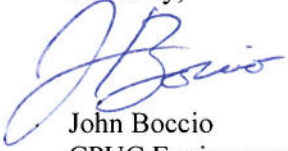
SCE requests a variance from MM AQ-1d to allow the use of the following vehicles on Segments 6 and 11:

- PAR Conductor Puller – Equipment Number WS-1136 – 69,000 pound (lb) gross vehicle weight rating (GVWR) puller on a 1997 Autocar 6x6 HD chassis, 1997 Caterpillar 3306C Engine (PERP registered TIER 3 puller engine)
  - PAR Conductor Puller – Equipment Number WS-1138 – 69,000 lb GVWR3 drum hard line puller on a 2000 International 6x6 HD chassis, 2000 Cummins ISM-305V engine (PERP registered TIER 3 puller engine)
  - PAR Conductor Puller – Equipment Number WS-1186 – 88,000 lb GVWR hard line puller on a 1996 Autocar 6x6 HD chassis, 1998 Cummins M11-330E engine (PERP registered TIER puller engine)
  - PAR Reel Truck – Equipment Number WS-1177 – 1980 AM General M920 Reel Truck 6x6 – 75,000 lb GVWR chassis extra wide wheel stance for stability, 1980 Cummins NTC-400 engine
  - PAR Reel Truck – Equipment Number WS-1179 – 1980 AM General M920 Reel Truck 6x6 – 75,000 lb GVWR chassis extra wide wheel stance for stability, 1979 Cummins TC-400 engine
  - PAR Reel Truck – Equipment Number WS-1181 – 1980 AM General M920 Reel Truck 6x6 – 75,000 lb GVWR chassis extra wide wheel stance for stability, 1980 Cummins TC-400 engine
  - PAR Reel Truck – Equipment Number WS-1184 – 1980 AM General M920 Reel Truck 6x6 – 75,000 lb GVWR chassis extra wide wheel stance for stability, 1980 Cummins NTC-400 engine
- **Air Quality Evaluation:** The reason for this variance request is that the Segment 6 and 11 construction contractor, PAR Electrical Contractors, Inc., has been unable to find pullers and reel trucks that meet the conditions of Mitigation Measure AQ-1d which requires the use of 2006 or newer engines, or Level 3 emission controls (i.e., particulate matter filter) for pre-2006 engines. Three conductor pullers and four reel trucks are required for construction that cannot meet the requirements of Mitigation Measure AQ-1d. SCE has committed, and as conditioned below, the vehicle miles traveled by each truck shall be minimized. With the implementation of the noted condition, there will be a very minor increase in emissions resulting from this Variance; however, this increase in emissions would be negligible in comparison to the total Project emissions and would not affect any of the findings or in any way substantially increase emissions that were already determined to be significant.

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

- A copy of this Variance shall be available on site for the duration of construction activities where applicable.
- This variance approval is limited to the equipment specified above.
- The subject equipment shall remain on the right-of-way overnight and until such time it needs to be moved to the next pull location. It is acknowledged that reel trucks would occasionally travel to the material/contractor yard to be loaded with conductor.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Boccio". The signature is fluid and cursive, with the first name "John" and last name "Boccio" clearly distinguishable.

John Boccio  
CPUC Environmental Project Manager

cc: V. Strong, Aspen