

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 20, 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) #88

Dear Ms. Nelson,

On September 15, 2011, Southern Californian Edison (SCE) submitted a variance request in regards to Mitigation Measure AQ-1d to allow for the use of six water trucks on Segments 4, 5, and 10 Transmission Line (T/L) of the Tehachapi Renewable Transmission Project (TRTP) in Kern and Los Angeles Counties, California. **This Variance Request is approved by CPUC based on the following factors:**

- SCE submitted the following information:

SCE submitted a request for a Variance in regards to Mitigation Measure AQ-1d to allow for the use of six water trucks on Segments 4, 5, and 10 Transmission Lines (T/L) of the TRTP in Kern and Los Angeles Counties, California. In accordance with the clarification provided by the CPUC on July 13, 2011, SCE is requesting a Variance from Mitigation Measure AQ-1d to allow the use of several specialized pieces of equipment (water trucks) with pre-2006 engines without CARB-certified Level 3 diesel emission controls. Mitigation Measure AQ-1d pertains to on-road heavy duty diesel haul vehicles (with a gross vehicle weight rating [GVWR] of greater than 33,000 pounds) that are contracted on a continuing basis on TRTP. The mitigation measure requires 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 4, 5, and 10 construction contractor, Henkels & McCoy (H&M), has been unable to find additional water trucks to meet the project construction needs on Segments 4, 5, and 10, and the conditions of MM AQ-1d. H&M has contacted two major equipment rental companies to determine whether compliant equipment are available. Documentation of correspondence with the rental companies has been provided and indicates that the specified equipment are not available.

SCE requests a Variance from MM AQ-1d to allow the use of the following six water trucks on Segments 4, 5, and 10 (all have a GVWR of greater than 33,000 pounds):

- 1988 Peterbuilt, 400 horsepower (HP), VIN# 1XPDCR9X3JD264375
 - 1990 Freightliner, 400 HP, VIN# 1FUYDDYB3LP382131
 - 1994 International, 330 HP, VIN# 2HSFMAHR1RC091591
 - 1995 Peterbuilt, 400 HP, VIN# 1XP5D69X1SD373295
 - 1997 International, 400HP, VIN# 2HSFHALR2YC031440
 - 1998 Ford, 440 HP, VIN# IFTYY96P1WVA30267
- Mitigation Measure AQ-1d states the following:

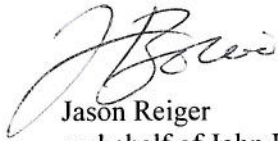
“AQ-1d Heavy Duty Diesel Haul Vehicle On-Road Equipment Standards. Require the use of 2006 engines or pre-2006 engines with CARB certified Level 3 diesel emission controls for all on-road heavy duty diesel haul vehicles that are contracted on a continuing basis for use to haul equipment and waste for the Project.”

The reason for this variance request is that the Segment 4, 5 and 10 construction contractor, Henkels & McCoy (H&M), has been unable to find water 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. Six water trucks are required for construction that cannot meet the requirements of Mitigation Measure AQ-1d. The use of the subject trucks will result in a slight increase in vehicle emissions; however, the sole purpose of the water trucks is to minimize the generation of dust (PM10 emissions) resulting from project vehicles driving the project right-of-way. The net 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:

- Copies of all relevant permits, compliance plans, and 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.

Sincerely,



Jason Reiger
on behalf of John Boccio
CPUC Environmental Project Manager

cc: V. Strong, Aspen