

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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May 5, 2016

VIA MAIL AND EMAIL

Mr. Jack Horne
Regulatory Affairs and Compliance
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

SUBJECT: Data Request No. 2 for the Southern California Edison Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project

Dear Mr. Horne:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review for Southern California Edison (SCE)'s Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project (Project), we have identified additional information required in order to adequately conduct the CEQA review. Please provide the information requested below (Data Request #2) by May 19, 2016. Please submit your response in hardcopy and electronic format to me and also directly to our environmental consultant, Environmental Science Associates (ESA), at the physical and e-mail addresses noted below. If you have any questions please direct them to me as soon as possible.

Sincerely,

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ESA
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Data Request No. 2

Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project

Project Description

1. Please confirm whether the proposed upgrade of the existing Mira Loma Substation to accommodate the new Mira Loma-Jefferson Subtransmission Line would occur entirely within the fence line of the existing Mira Loma Substation.
2. Regarding PEA Figure 1-1, Electrical Needs Area, please identify and provide supporting GIS for the location of the Bain Substation, as we understand that telecommunications upgrades are proposed there.
3. Please revise PEA Figure 1-2 to include the existing and proposed configurations for the Mira Loma-Jefferson Subtransmission Line, or provide an additional figure to illustrate that information.
4. Based on the explanation provided in Section 3.1.1.3 on PEA page 3-7, it appears that the 12 kV switchrack would have 12 positions, not 13 as indicated. Please confirm which is correct.
5. Regarding the proposed MEER:
 - a. Please provide a cross-section or an explanation indicating whether the roofline is proposed to be peaked or flat.
 - b. Please provide additional information about the air conditioning units. How many are proposed? Which type? If the type is unknown, please indicate a maximum reasonable sound level associated with operation of the units. Please indicate the anticipated timing and during of their anticipated use.
6. Regarding the proposed restroom facilities:
 - a. Please confirm whether the exterior coloring would be consistent with the MEER, i.e., light tan roof and walls with brown/bronze roofline, wall joints, and doorway.
 - b. Trenching for the sewer line would extend from the restroom structure to a point along Leeson Lane. Please estimate the run in terms of length, width, and depth.
 - c. Trenching for the water line also would extend from the restroom structure to a point along Leeson Lane. Please estimate the run in terms of length, width, and depth.
7. Regarding substation access:
 - a. PEA Section 3.5.1.9 indicates electrical power to supply/service the substation is located within Leeson Lane. Would this also be the source of power for the gates? Please provide details.
 - b. In addition to the substation entry gate, an approximately 4-foot-wide walk-in gate is proposed. Will this point of access be secured in any way, e.g., with a padlock, key, or keycard?

8. Regarding the substation perimeter, please describe the material, color, or pattern of the exterior surface of the proposed wall.
9. The fifth sentence of the second paragraph of PEA Section 3.1.3.2 indicates that 420 feet of the existing Archibald-Chino-Corona 66 kV Substation Line would be converted to underground to accommodate the proposed subtransmission line crossing. Based on SCE's stripmaps dated 2/1/2016, it appears existing poles 4787858E and 4389712E would not be removed, indicating that pole 4787858E would be used to support the proposed Mira Loma-Jefferson and Mira Loma Corona No. 2 lines, and pole 4389712E would serve to transition the Archibald-Chino-Corona 66 kV Substation Line from underground to overhead, as well as the proposed Mira Loma-Jefferson 66 kV Subtransmission Line or the Mira Loma-Corona No. 2 Subtransmission Line (currently referred to as the Mira Loma-Corona-Jefferson line). If this is the case, it seems like pole 4389712E would need to be replaced with a pole engineered to transition from underground to overhead, similar to the proposed new pole 106, which presumably transitions the overhead Archibald-Chino-Corona 66 kV Substation Line to underground. Please clarify.
10. The seventh sentence of the second paragraph of PEA Section 3.1.3.2 indicates that from the intersection of Chino Corona Road and Hellman Avenue, the route would continue south along the east side of Hellman Avenue to River Road. However, the existing Mira Loma-Corona-Jefferson subtransmission line to be replaced by the Project is on the west side of Hellman along this road segment. Please confirm if the proposed new poles would be on the west or east side of Hellman Avenue in this area.
11. SCE's stripmaps dated 2/1/2016, indicate that proposed pole 144 would replace existing poles 1868939E and 1868940E, and that proposed pole 145 would replace existing pole 1868942E. Please confirm whether or not there is an existing pole 1868941E that would be replaced by the Proposed Project.
12. Page 17 of SCE's stripmaps dated 2/1/2016, indicate that proposed pole 151 would replace existing pole 1868948E; however, page 18 indicates that this existing pole would be replaced by proposed pole 152. Review of Google Earth satellite images indicate that there are existing poles at each of these proposed pole locations. Please confirm which existing pole would be replaced by proposed pole 151, and which existing pole would be replaced by proposed pole 152.
13. PEA pages 3-10 and 3-11 say that additional electrical distribution circuits would be constructed from the proposed Circle City Substation to serve electrical demand on an as-needed basis. What is a reasonable maximum number of such circuits? Would they be constructed using similar techniques as the previous six?
14. Will a temporary batch plant be used to improve existing or construct proposed roads or for any other proposed work? If so, where would it/they be staged and what would the water source and estimated demand be?
15. Regarding the proposed roads, the PEA indicates that new roads typically would have circular turnaround areas near the structure locations. What diameter is typical?
16. Please estimate a reasonable maximum amount of gravel or crushed rock anticipated for use (by truck load would be fine). From what potential sources? Please provide sufficient information about this material to allow evaluation of traffic and air quality emissions associated with delivery/removal transport.

17. Please provide details about the electrical generator(s) proposed for use, including the times of day, duration, and locations of use.
18. Please provide a version of PEA Table 3-3 that includes identification of APNs for the potential staging yard locations and their current use.
19. The “Remove existing wood pole and replace with LWS pole” row under Source Line Routes in PEA Table 4-4 includes table notes 1 through 3; however, table note 2 makes reference to foundation installations, which the PEA indicates are not required for LWS pole installations. Also, table note 2 indicates that there would be permanent disturbance within 25 feet of the pole, but the permanent disturbance column shows no disturbance for this row. Please clarify the correct disturbance amounts and table notes for this row.
20. The “Construct new LWS pole” row under Source Line Routes in PEA Table 4-4 includes table note 4; however, table note 2 makes reference to foundation installations, which the PEA indicates are not required for LWS pole installations. Please clarify the correct table note(s) for this row.
21. The PEA indicates that temporary power would be in place for the duration of construction at the substation site. Please confirm that the poles and other infrastructure required to provide this temporary power would remain in place to provide power to the substation during the operation and maintenance period.
22. The PEA indicates that TSP sections could be spot-welded together to provide additional stability. Is there any reasonable basis not to assume that welding could occur at any/all TSP locations?
23. Stringing and pull sites deflection points could extend outside of SCE’s existing ROW. What is the reasonable maximum distance that they could do so?
24. Regarding guard structures, please explain how temporary netting would be installed, if used.
25. Please confirm whether any non-trenching construction techniques would be required for underground subtransmission line installation across existing facilities or features (e.g., railroad). If yes, provide descriptions of those techniques and where they would be implemented.
26. Please clarify whether the fiber optic cables would be installed within the same duct bank as the subtransmission line, with the exception of near Corona Substation where the fiber line would be installed in an existing duct bank.
27. Please provide the original images used for PEA Figures 3-8, *Typical Subtransmission Duct Bank*, and 3-9, *Typical Subtransmission Vault*.
28. The PEA indicates that, should groundwater be encountered, it would be pumped into a tank and disposed of at an off-site disposal facility. However, PEA Table 4.17-1 does not appear to include a destination that accepts groundwater. Please provide this information.
29. PEA Section 3.4 states that permanent and temporary land disturbance associated with the Project would be 22.28 acres and 371.72 acres; however, PEA Table 2-4 indicates that the permanent and temporary land disturbance associated with the Project would be 30.88 acres and 342.94 acres. Please clarify.

30. The types of hazardous materials that are likely to be required (albeit in limited amounts) for Project construction, operation, and maintenance are likely to be similar across SCE's projects. The PEA indicates that Material Safety Data Sheets (MSDSs) would be made available at the construction site for all crew members pursuant to their work on this project. Please provide copies of or links to online locations of MSDSs for the most likely/most common hazardous materials to be used.
31. Regarding dust control:
 - a. What is the maximum reasonable volume of water anticipated for dust control? From what potential sources would they be obtained? Please provide sufficient information to address potential water use considerations as well as any related impacts that may result from its transport to the site.
 - b. Please identify which chemical dust suppressants or soil stabilizers could be used at the site so that we may evaluate potential impacts of their use on vegetation and wildlife as well as water quality.
 - c. Is the implementation of dust control measures for service roads (whether paved or unpaved) also proposed for during the operation and maintenance phase?
32. The only Class I landfill we see on the SWRCB's waste acceptance lists is the SAFETY-KLEEN (LAIDLAW) facility in Imperial County. Please provide details about any other Class I landfill option that could be used for this Project.
33. Please provide a copy of the SCE protocol(s) most relevant to the SCE Spill Response Coordinator's assessment, notification, and clearance procedures.
34. Please provide a copy of SCE's written policy, procedure, or standard regarding what is described in the PEA as "SCE's standard approach" to tree pruning, including removal of at least the minimum required by law plus one year's growth, depending on the species.
35. Regarding helicopter use, what is a reasonable maximum, not-to-exceed number of trips per year for total helicopter use, including for emergency response? Please indicate anticipated durations of individual noise events.

Other SCE Projects

36. Please provide a list and descriptions of: SCE projects to be built or applied for within the next 5 years within the electrical needs area defined for the Project, and/or SCE projects that would affect any of the 66 kV subtransmission lines and associated substations that currently serve the electrical needs area.

Cultural Resources

37. Please provide the following documents referenced in Proponent's Environmental Assessment Section 4.5, *Cultural Resources*:

Crawford, Karen. 2015. Addendum 2. Cultural Resources Inventory for the Proposed Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, Riverside and San Bernardino Counties, California. Prepared by ICF. Prepared for SCE.

Hoffman, Robin, Timothy Yates, and Karen Crawford. 2012. Cultural Resources Inventory Report for the Proposed Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, Riverside and San Bernardino Counties, California. Prepared by ICF International. Prepared for SCE—BAR Group, Monrovia, California.

ICF. 2015. Addendum 1. Cultural Resources Inventory Report for the Proposed Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, Riverside and San Bernardino Counties, California. Prepared by ICF. Prepared for SCE—BAR Group, Monrovia, California.

Paleo Services. 2010. *Paleontological Review, Proposed Horsetown Substation Project, Riverside County, California.*

SWCA. 2015. Paleontological Survey Report for the Circle City Substation and Mira Loma-Jefferson Subtransmission Line Project, Riverside & San Bernardino Counties, California. Prepared by SWCA Environmental Consultants. Prepared for SCE.

Williams, Brian. 2015. Cultural Resources Supplemental Record Search Review of the SCE's Circle City Substation and Mira Loma-Jefferson Subtransmission Project, Los Angeles County, California. Prepared by ASM Affiliates, Inc. Prepared for SCE.