

Southern California Edison
Presidential Substation Project A.08-12-023

DATA REQUEST SET Presidential ED-03 (Part 1)

To: CPUC
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Question 51:

EMF

In the Application, Appendix F, Figures 3 and 7 show calculated magnetic field levels along Read Road. These figures do not appear to take into account the sloped topography. Provide revised figures showing the calculated magnetic field levels, with the sloped topography on the south side of Read Road.

Response to Question 51:

This request runs contrary to the findings of the CPUC's D. 6-01-042. In its 2006 decision affirming its "low-cost/no-cost" policy to mitigate EMF exposure for new utility transmission and substation projects, CPUC Decision No. 06-01-042, the CPUC concluded, "Utility modeling methodology is intended to compare differences between alternative EMF mitigation measures and not determine actual EMF amounts." SCE utilizes two-dimensional models not accounting for topography under a given set of load conditions to make the magnetic field calculations included in its project field management plans. These models sufficiently assess relative magnetic field differences between alternate designs because field decreases at one elevation typically result in similar field decreases at other elevations. Similarly, relative field increases at one elevation typically imply relative field increases at other elevations. Accounting for topography does not further the goal of assessing relative magnetic field differences between alternate designs and appears to be aimed at predicting actual future field levels.

In addition, please note the following from the Presidential Substation Scoping Report (page 3, Issues Not Analyzed Under CEQA):

"The EIR will not consider electric and magnetic fields (EMF) in the context of the CEQA analysis of potential environmental impacts because [1] there is no agreement among scientists that EMF creates a potential health risk, and [2] there are no defined or adopted CEQA standards for defining health risk from EMF. Presently, there are no applicable federal, state or local regulations related to EMF levels from power lines or related facilities, such as substations. However, under CPUC decision, D.06-01-042, utilities must incorporate "low-cost" or "no-cost" measures for managing EMF from power lines up to approximately four percent of total project cost."