

Southern California Edison
RTRP A.15-04-013

DATA REQUEST SET A.15-04-013 RTRP-ED-SCE-12

To: ENERGY DIVISION
Prepared by: Kenneth Spear
Title: Project Manager
Dated: 06/20/2018

Question Air-1:

Provide list of equipment that SCE believes need an exception from the requirement for Tier 4 engines. SCE's comment on MM AQ-02 indicates that exceptions from the requirement for Tier 4 engines are typically allowed for off-road equipment if (1) the equipment is specialty or unique and cannot be found with a Tier 4 engine after a due diligence search; (2) the equipment is not in use for more than 5 days total; and/or (3) the equipment is registered under CARB's Statewide Portable Equipment Registration Program.

Provide a clear list of what exact type(s) of equipment are not available with Tier 4 engines and why. If certain pieces of equipment are available with Tier 3 but not Tier 4 engine, please note this. Clearly identify the construction activity that the equipment would be used to complete, the number of days, and the number of hours per day.

Response to Question Air-1:

SCE's comment regarding proposed language in Supplemental Environmental Impact Report ("SEIR") pg. 4.3-46 asserted the following:

Air Quality and Greenhouse Gas Emissions	4.3-46	<p>During Project construction, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations (i.e., if Project construction goes beyond the anticipated schedule). <u>Exceptions may be allowed only on a case by case basis for three specific situations: (1) an off-road equipment item that is a specialty, or unique, piece of equipment that cannot be found with a Tier 3 or better engine after a due diligence search; and/or (2) an off-road equipment item that would be used for a total of no more than 5 days; and/or (3) the off-road equipment is registered under CARB's Statewide Portable Equipment Registration Program.</u></p>	<p>There are circumstances where a contractor may have a special piece of equipment that is needed for a short period of time. SCE suggests the DSEIR identify those special circumstances in which a contractor could get an exception to the emissions standards. Similar language has been approved for other SCE projects (i.e., Valley South Subtransmission Project and West of Devers).</p>
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SCE's proposed edits were intended to outline a process for exceptions in the event that equipment with Tier 3 engines or better cannot be procured in support of construction.

After inquiry and further consideration in response to this request, SCE is unable to identify and provide a specific equipment list enumerating future, non-Tier 4 engines that our construction contractor may request to use during construction. The need for this exception will likely arise

on a case-by-case basis, if at all, and will depend on conditions not yet established (*e.g.* .. availability of equipment, planned duration of equipment's use, final engineering, *etc.*).

Specifically, it is SCE's experience that a need occasionally arises where a specialized piece of equipment is required for a short period of time that is unavailable with a Tier 4 engine. For example, on past projects, SCE has been unable to procure Tier 4-compliant equipment including PM 10 Certified sweepers (Santa Barbara Reliability Project ("SBRP")), Sag Cat/wire stringing equipment (SBRP and the Tehachapi Renewable Transmission Project ("TRTP")), certain Heavy lift or off road cranes (TRTP), and Horizontal Directional Drilling ("HDD") equipment (TRTP undergrounding segment in Chino Hills). Generally, the reasons such equipment are unavailable include:

- § The equipment is so specialized that Tier 4-compliant versions don't exist (*e.g.* .. HDD equipment/wire stringing equipment);
- § The equipment is so rare that if compliant versions exist, SCE does not have timely access to them within the project schedule (*e.g.* .. certain heavy cranes and/or off road cranes);
- § Regulatory changes occur that create a greater need than supply (*e.g.* .. PM10-compliant sweepers); and/or
- § The equipment doesn't exist in California and transporting said equipment to California from other states would negate any air quality benefits associated with that equipment's use.

Examples of correspondence reflecting the SCE's past requests and subsequent CPUC approval of non-compliant Sag/Cat wire stringing equipment and street sweepers in support of the SBRP are attached hereto for reference.

Because there are occasions where certain specialized equipment cannot be procured with Tier 4 engines, SCE's comment was meant to provide flexibility in the event those circumstances arise. Additionally, our comment was also meant to provide suggestions regarding how we can limit the timeframe in which a non-Tier 4 engine piece of equipment would be in use.

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Question Air-2:

Provide a revised construction schedule that identifies overlapping construction activities and calculation evidence indicating that SCAQMD air quality emissions thresholds are not exceeded at any time. SCE is requesting modification of MM Air-03 to allow certain construction activities to overlap with RPU construction activities related to the RTRP. SCE stated in a phone call with the CPUC on May 22, 2018, that SCE would conduct additional air quality calculations to develop a new construction schedule with overlapping activities that does not exceed SCAQMD air quality emissions thresholds within the South Coast Air Basin. Please use the current calculation spreadsheets attached to this data request. All calculation spreadsheets and support data used to develop the new schedule should be provided to the CPUC as part of SCE's response to this data request.

Response to Question Air-2:

SCE's comment regarding mitigation measure ("MM") AQ-03 asserted the following:

Air Quality and Greenhouse Gas Emissions	4.3-47	<p>MM AQ-03: Overlap of Construction Activities (Incorporates 2013 RTRP EIR MM AQ-14).</p> <p>The final project construction schedule shall be coordinated to ensure that the Conductor Installation activity shall not occur simultaneously with the TSP Foundation Installation and TSP Erection activities. Furthermore, construction of SCE project components shall not overlap with construction of the RPU components of the RTRP, <u>except where the coordinated construction of areas common to both SCE's and RPU's scopes of work is necessary, or where overlapping construction will not increase air quality emissions.</u> The final construction schedule shall be provided to the CPUC at least 2 weeks prior to construction.</p>	<p>Construction of certain elements common to both SCE and RPU scopes of work will require coordinated and simultaneous construction to avoid unnecessary increases in environmental impacts. For example, the construction of Wilderness and Wildlife substations will share a commonly graded pad, and their interconnection will require simultaneous efforts by SCE and RPU crews. Further, certain construction activities unlikely to significantly impact air quality emissions should be allowed to be undertaken in order to minimize environmental impacts associated with construction delays where possible. This may be verified at the time SCE submits its Notice to Proceed Requests.</p>
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SCE's proposed changes to MM AQ-03 were intended to accommodate overlapping construction in the event such concurrent construction is: (1) necessary; and (2) SCE can demonstrate that overlapping construction will not increase air quality emissions beyond the applicable thresholds of significance.

After inquiry and further consideration in response to this request, SCE is unable to provide specific calculations estimating which future construction activities may overlap. The future

construction schedules of Riverside Public Utilities (“RPU”) and SCE are not sufficiently developed to precisely determine, for the purposes of air quality calculations, which activities will overlap.

Consistent with SCE’s original comment, SCE reiterates its request that flexibility be built into MM AQ-03 in order to accommodate the *potential* for overlapping construction, prescribing limits regarding when such concurrent construction may be undertaken. With that understanding, SCE proposes the following refinements to its proposed revisions of MM AQ-03, in the hope that they better accommodate this flexibility and address any concerns the Energy Division may have regarding same:

"MM AQ-03: Overlap of Construction Activities (Incorporates 2013 RTRP EIR MM AQ-14). The final project construction schedule shall be coordinated to ensure that the Conductor Installation activity shall not occur simultaneously with the TSP Foundation Installation and TSP Erection activities. Furthermore, construction of SCE project components shall not overlap with construction of the RPU components of the RTRP, except where the coordinated construction of areas common to both SCE's and RPU's scopes of work is necessary, and where overlapping construction will not increase air quality emissions **beyond the applicable thresholds of significance**. The final construction schedule shall be provided to the CPUC at least 2 weeks prior to construction."

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Question NOI-1:

Provide clarification regarding the newly proposed 31- and 32-month schedule for Alternative 1 and Alternative 2, respectively. SCE's comment on the Subsequent EIR Noise section indicates that the estimated construction schedule for Alternative 1 and Alternative 2 would take 31 and 32 total months, respectively. Construction of the Revised Project underground segment was estimated to last approximately 18 months. Alternative 1 and Alternative 2 involve similar construction activities and require approximately the same distance of underground construction as the Revised Project. More information is required to understand the estimated schedule for Alternatives 1 and 2.

Response to Question NOI-1:

SCE's comment regarding proposed language in Supplemental Environmental Impact Report ("SEIR") pg. 4.10-19 asserted the following:

Noise	4.10-19	<p>Construction</p> <p>Overhead and Underground Construction.</p> <p>...</p> <p>Construction of the entire 2-mile underground 230-kV transmission line would take approximately 18 months, and would require concrete saws, excavators, and other earth-moving equipment. Underground construction at Distribution Line Relocations #7 and #8 would <u>not require as much time and will not require the heavy equipment needed for the 230 kV component, similar equipment, 230 kV trench, and vault and cable installation for the Revised Project</u> would move along the underground alignment during construction. Receptors along the underground alignment would be exposed to construction noise for up to 3 weeks, <u>excluding weekends; during vault installation, and for shorter time periods during trenching, and cable installation, excluding weekends, however construction in the area will take place over a period of 18 months.</u></p>	<p>SCE suggests edits to this section to reflect the fact that construction techniques, equipment and durations between the 230 kV portions and the distribution portions of the Revised Project would be different.</p> <p>In addition, SCE estimates that construction of the underground portions of Alternative 1 and Alternative 2 would take approximately 31 and 32 total months, respectively. Thus, although construction would occur at varied places along the route of whichever alternative is ultimately selected, noise would be introduced into the community for that entire length of time.</p>
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The paragraph in question refers to the construction of the "2-mile underground 230-kV transmission line..." associated with SCE's "Revised Project." In contrast, the 31□ and 32□ month estimates in SCE's rationales offered for the change (the last column at right) depict the full 4.1 (Alternative 1) or 4.2 (Alternative 2) miles of underground line from the Goose Creek Golf Course to the tap point. In other words, SCE estimates it would take 18 months to complete the approximately 2 miles of underground construction associated with the Revised Project, but 31-32 months to complete the approximately 4 miles of underground construction associated

with Alternatives 1 or 2.

SCE notes that these estimated construction durations are estimated *before* taking into account any impacts from mitigation measures (“MMs”) identified in the Draft Supplemental EIR (“DSEIR”). The currently prescribed MMs effectively limit all underground work to 6 hours per day compared to a standard 10□hour work day (please refer to refer to MM TRANS□02A, MM NOI□02, *etc.*). SCE currently estimates that these daily working time reductions will extend the duration of construction of the approximately 4□mile portions of underground work in Alternatives 1 and 2 from approximately 32 to 44 months.

This estimate assumes linemen crews are available that can work these reduced hours, that the DSEIR mitigation measures apply to entire project (instead of just the revised project components), and that construction employs a 6□day work week. If SCE’s work week is limited to 5 days, the construction duration likely extends from 44 to 54 months.

Limitations of concurrent work between RPU and SCE set forth in MM AQ□03 may also extend construction durations, in addition to those described above. As specified in response to question AIR-2 in this data request set, SCE cannot currently specify which construction activities may overlap and therefore cannot estimate likely construction delays attributable to MM AQ-03.