

**Southern California Edison**  
**Moorpark-Newbury A.13-10-021**

**DATA REQUEST SET A1310021 Moorpark-Newbury-ED-SCE-02**

**To: ENERGY DIVISION**  
**Prepared by: Kendra Heinicke**  
**Title: Estimator**  
**Dated: 08/15/2014**

**Question Q.01:**

PEA page 3-13 states that future activities remaining in Project Section 4 include installation of “approximately 0.5 mile of 954 SAC...” as well as installation of “an additional length of FRC.”

- a. Please identify the location of the proposed 954 SAC installation along Section 4.
- b. Please identify the location and length of the proposed FRC installation.

**Response to Question Q.01:**

This information has been provided in the tables in the GIS files previously provided to the CPUC. For ease of reference, the tables have been reattached here.

**Feature Class: eng\_SubTrans\_Lines**

Line_Name	KV	Status	TYPE	SHAPE_Length	EXTRAIINFO1	SECTION_ID	Past_Activities	Future_Activities
Moorpark-Newbury	99	Constructed	Overhead	2655.268629		4	New 954 SAC for Moorpark-Newbury 66 kV Subtransmission Line	<Null>
Moorpark-Newbury	66	Constructed	Underground	788.143442	Underground conduit and cable installation	1	Installed Conduit	Install 3000 kcmil copper underground cable
Moorpark-Newbury	66	Proposed	Overhead	26547.271867		2	<Null>	String new 954 ACSR conductor
Moorpark-Newbury	66	Proposed	Overhead	12165.532722		3	<Null>	String 954 ACSR conductor
Moorpark-Newbury	66	Proposed	Overhead	3076.021961		4	<Null>	New 954 SAC for Moorpark-Newbury 66 kV Subtransmission Line
Moorpark-Newbury	66	Proposed	Underground	54.672327		1	<Null>	Underground Stub Out
Moorpark-Newbury	66	Proposed	Underground	429.896901	Underground conduit and cable installation	1	<Null>	Install conduit and 3000 kcmil copper underground cable
Moorpark-Newbury	66	Proposed	Overhead	524.354715		4		New 954 SAC remains to be strung to terminate the new Moorpark-Newbury 66 kV line.

**Feature Class: eng\_FRC\_line**

Segment_ID	Line_Name	Status	EXTRAIINFO1	Length	Shape_Length	Past_Activities	Future_Activities
4	Moorpark-Newbury (FRC)	Proposed		3076.021961	3222.932198	<Null>	Fault Return Conductor to be Installed
4	Moorpark-Newbury (FRC)		New Fault Return Conductor Not Needed	1166.054006	1166.054006	<Null>	<Null>
4	Moorpark-Newbury (FRC)	Constructed		1342.304386	1342.304386	Fault Return Conductor Previously Installed	<Null>

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**Question Q.02:**

PEA Table 3.5-1 (page 3-29) and Section 3.5.2.1 (page 3-27) indicate that lightweight steel (LWS) poles would be 60 to 80 feet above ground. However, PEA Figure 3.5-1 shows LWS poles ranging in height from 60 to 75 feet above the ground surface. Please confirm the maximum LWS pole above ground height.

**Response to Question Q.02:**

The maximum above ground pole height for the LWS poles in Section 4 is approximately 80 feet. Please note, Figure 3.5-1 was incorrect in this regard. A revised Figure 3.5-1 is attached this response.

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**Question Q.03:**

PEA Table 3.5-1 (page 3-29) and Section 3.5.2.2 (page 3-28) indicate that tubular steel poles (TSPs) would be 70 to 135 feet above ground. However, PEA Figure 3.5-1 shows TSPs ranging in height from 70 to 130 feet. Please confirm the maximum TSP height.

**Response to Question Q.03:**

The maximum above ground pole height is 135 feet. The tallest pole is 130 feet and with an added 5 feet for the footing projection, the maximum above ground height would be 135 feet. A revised Figure 3.5-1 is included with SCE's response to Question 2.

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**Question Q.04:**

PEA page 3-27 states: "LWS pole installation would require excavation of holes approximately 30-36 inches in diameter..." PEA Table 3.5.1 (page 3-29) shows the LWS pole approximate auger diameter to be 2-3 feet. Please confirm the minimum diameter of proposed LWS pole hole excavations.

**Response to Question Q.04:**

The minimum diameter of the proposed LWS pole hole excavations is 24 inches. All of the poles previously excavated were excavated with 30 inch minimum auger, however, it is possible that an SCE contractor could use a 24 inch auger to excavate the remaining pole holes.

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**Question Q.05:**

PEA Section 3.5.2.1.1 (page 3-28) states that conductor used to electrically ground the LWS poles “is typically located 1 to 2 feet above the telecommunications facilities and 4 to 6 feet below the distribution facilities.” However, PEA Figure 3.5-1 shows conductor used to electrically ground the LWS poles 3 feet above the telecommunications facilities, and a minimum of 6 feet below the distribution facilities. Please clarify which numbers are correct.

**Response to Question Q.05:**

A field visit confirmed that the installed FRC is between 3 and 6 feet above the communications level and it is at least 6 feet below the distribution facilities. However, it would be acceptable to install the FRC 1 to 2 feet above the telecom and 4 to 6 feet below the distribution facilities. The location of the FRC on the poles may depend on the space available on each particular pole, as well as the height of the pole and field conditions. A revised Figure 3.5-1 is included with SCE's response to Question 2 with clarification about potential FRC placement.

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**Question Q.06:**

PEA Section 3.5.2.1 (page 3-28) states: “At the resumption of construction, the location of any additional guy wires and anchors for LWS poles would be determined on a case-by-case basis. No guying across a roadway would be required.” Given that the Proposed Project would include construction of only two LWS poles:

- a. Please identify whether or not guys and/or guy poles would be required prior to construction based on the angle of the line at each of the poles.
- b. Please describe the type of pole and dimensions that would be used for the guy poles, if required.

**Response to Question Q.06:**

- a. The plan for the remaining two LWS poles to be installed within Newbury Substation is that no guy wires would be necessary. However, if field conditions require that a pole location needs to be shifted due to an unforeseen issue (such as unknown underground utilities), down guys and/or guy stubs could be required. If any guying is required, it would be located entirely within SCE's Newbury Substation property.
- b. A typical guy stub would be approximately 30 feet above ground and 12 inches in diameter.

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**Question Q.07:**

PEA Section 3.5.3.1 (page 3-29) states: "Subtransmission conductor installed on LWS poles is planned to be at least 50 feet above ground as measured at the pole..." However, Figure PEA 3.5.1 shows that the subtransmission conductor would be installed at least 36 or 39 feet above ground. Please clarify which numbers are correct.

**Response to Question Q.07:**

PEA Section 3.5.3.1 is correct. The 66 kV conductor would be at least 50 feet above ground as measured at the pole. The overall pole heights are shown in Figure 3.5-1, and the 66 kV conductor heights should be measured starting from the *top* elevation of the pole, going down. The separation between the conductor levels indicated for the sections below the 66 kV points of support can vary and the minimum G.O. 95 or typical SCE construction standard spacing is referenced. For the project configuration shown as "Section 4 Double Circuit Post-type LWS Pole" in Figure 3.5.1, the 66 kV lines are approximately 50 feet above ground. As noted in SCE's response to Question 2, the heights for the construction should be corrected to reference 60 feet to 80 feet above ground (the actual minimum pole height is 61 feet, SCE rounded this to 60 feet). For the project configuration shown as "Section 4 Dead-End Corner LWS Pole" the above ground heights are limited to 70-75 feet above ground height (this is within the 60-75 feet range shown in the figure). A revised Figure 3.5-1 is included with SCE's response to Question 2 reflecting this clarification.

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**To:** ENERGY DIVISION  
**Prepared by:** Thanos Trezos  
**Title:** Project Engineer  
**Dated:** 08/15/2014

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**Question Q.08:**

PEA Section 3.5.3.1 (page 3-30) states: “SCE is currently evaluating the proposed Project infrastructure with respect to FAA regulations regarding notification, and may file FAA Form 7460-1 as outlined in FAA Part 77. If applicable, SCE would file the form upon completion of final engineering and prior to construction per FAA Part 77. FAA recommendations would be implemented into the design of the Project to the extent practicable. Pursuant to FAA guidance, if a span requires three or fewer marker balls, then the marker balls on the span would all be aviation orange. If a span requires more than three marker balls, then the marker balls would alternate between aviation orange, white, and yellow. Marker balls would be 36 inches in diameter.”

- a. On the December 2013 site visit, SCE provided Environmental Science Associates with maps that show numerous marker ball spans, indicating that the FAA has already provided input. Please provide the CPUC with updated information, including any and all FAA recommendations and SCE notifications to FAA.
- b. Project maps provided by SCE in the field indicate that marker balls would span from poles 25 to 28, between poles 32 and 33, and between poles 39 and 40. Please provide the estimated number of marker balls required for each of these spans, and the anticipated length between marker balls within a span.
- c. Please clarify whether or not marker balls would be installed on all three conductors of the proposed new single circuit line and installed on all six conductors of the proposed new double-circuit line, where applicable. If not, please clarify which conductor(s) would be installed with marker balls.

**Response to Question Q.08:**

- a. The maps that SCE provided to Environmental Science Associates on the December 2013 site visit were based on preliminary analysis. SCE has not contacted FAA regarding this project; consequently FAA has not provided any input. Since FAA determinations are valid for 18 months from the date the agency issues them, SCE will file with FAA the applicable project elements within 18 months of anticipated construction. There is no updated information at this time.

- b. Clarification: project maps provided by SCE in the field indicate that marker balls may be used in the spans between poles 25 to 26, between poles 27 to 28, between poles 32 to 33, and between poles 39 to 40; the span between poles 26 and 27 is not a “*FAA Markerball Span* ”. If marker balls are used at a particular span, their spacing would be in accordance with FAA Advisory Circular AC 70/7460-1K. According to FAA guidance, “*Markers should be spaced equally along the wire at intervals of approximately 200 feet (61m) or a fraction thereof.*” The number of marker balls required for each identified “*FAA Markerball Span* ” would be determined after FAA’s determination is reviewed.
- c. Marker balls will not be installed on all conductors of a span. According to FAA Advisory Circular: “*They (marker balls) should be displayed on the highest wire or by another means at the same height as the highest wire.*”

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**To:** ENERGY DIVISION  
**Prepared by:** Robert Pontelle  
**Title:** Project Attorney  
**Dated:** 08/15/2014

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**Question Q.09:**

PEA Section 3.1 (page 3-2) states: "The 66 kV subtransmission upgrade components of the Project would be built within existing rights-of-way (ROWs), existing easements, fee-owned property, and public ROWs; the substation components of the Project would be built on existing SCE fee-owned property." Please define "fee-owned property."

**Response to Question Q.09:**

The following definition of "fee" applies in this instance: "An inheritable interest in land, constituting maximal legal ownership..." (BLACK'S LAW DICTIONARY (Pocket Edition, 1996), at 254.) Consistent with that definition, as used in the PEA, "fee-owned property" refers to property which is currently legally owned by SCE.

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**Title:** Project Manager-TPD/L&E  
**Dated:** 08/15/2014

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**Question Q.10:**

PEA Section 3.7.1.3 (page 3-49) states: “Prior to the restart of Project construction, some segments of the existing access and spur roads and work areas may be rehabilitated to facilitate the safe movement of construction vehicles and personnel. At present, future construction activities are projected to require only minor rehabilitation work to most existing access and spur roads; this work would be necessary due to the time elapsed between past and future construction activities.” PEA Figures 3.7-1a and 3.7-1b identify areas of road rehabilitations. It is not clear if these areas describe the road rehabilitations associated with past work, or would be the road rehabilitation area proposed for future activities. If they describe the road rehabilitations associated with past work, please provide a figure that shows locations of the proposed future road rehabilitations, including locations that may require widening at curves, grading, and/or vegetation removal. Please also identify the associated mileage of such road improvements.

**Response to Question Q.10:**

All rehabilitation and preparation of access and spur roads was completed prior to the start of the past construction. The locations where there was extensive rehabilitation, i.e., preparing crane pads, work areas, stringing sites and new road sections, were included in the SCE's GIS Database submittal to the CPUC. For future road rehabilitation, and as stated in Section 3.7.1.3, only minor rehabilitation work to the existing access and spur roads is anticipated. Any road or work site location where erosion across the road surface, deterioration of berms and/or swales, water bars, and weed/brush clearing has occurred would be remedied prior to the restart of construction. This work could occur along the entire length of the access and spur roads.

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**Question Q.11:**

PEA Section 3.7.1.1 (page 3-44) states: “The two staging areas at Moorpark Substation are both ‘L’ shaped and have maximum dimensions of approximately 155 yards by 125 yards (Moorpark Substation #1) and approximately 100 yards by 80 yards (Moorpark Substation #2); these areas cover approximately 3.3 acres and 1.7 acres respectively.” However, PEA Table 3.7-1 indicates that Moorpark Substation #1 is the smaller of the two staging areas. Please confirm the acreage of each of the two staging areas.

**Response to Question Q.11:**

The acreages of the two staging areas are correct. The data in the ‘Approximate Area’ column in Table 3.7-1 for Moorpark Substation #1 and Moorpark Substation #2 should be switched so that the areas in the table for the respective staging areas matches the text in Section 3.7.1.1.

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**Question Q.12:**

PEA Section 3.7.1.1 (page 3-44) states: “SCE may identify an additional or substitute staging area(s) prior to the start of future construction activities; additional staging areas would be identified and established as needed to optimize construction efficiency.” To adequately assess the environmental impacts of proposed staging areas, all areas where Proposed Project staging may occur must be clearly identified. Please confirm that the staging areas identified in PEA Table 3.7-1 would provide adequate staging for construction of the Proposed Project, or identify the additional staging areas that would be necessary, and specify their location, pre-project condition, and approximate area.

**Response to Question Q.12:**

SCE typically uses this language in PEAs to provide flexibility for its contractors. However, SCE currently anticipates that staging of equipment would be located at the staging areas identified in SCE's PEA and GIS submittal.

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**Question Q.13:**

PEA Section 3.7.1.1 (page 3-44) states that materials stored at the staging areas may include fuel. PEA Section 3.7.1.1.1 (page 3-45) states that “Normal maintenance and refueling of construction equipment and fuel storage by SCE personnel may occur at Thousand Oaks Service Center, Valencia Service Center or Ventura Service Center.” Please clarify where refueling would occur, and where fuel would be stored.

**Response to Question Q.13:**

Fueling of vehicles will occur at one or more of the following locations: Thousand Oaks Service Center, Valencia Service Center or Ventura Service Center. These locations are already equipped with approved fuel stations. Smaller engine equipment, i.e., small compressors and/or generators, chainsaws, etc., would be field refueled from approved 5-gallon or smaller fuel containers. Any portable equipment designed to be placed on the ground adjacent to a work area would be placed on tarpaulins to catch any inadvertent dripping or spills. Note that refueling equipment procedures would be included within the SWPPP.

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**Question Q.14:**

PEA Section 3.7.1.4 (page 3-50) states: “During future construction activities, helicopters may, if necessary, be refueled at helicopter landing zones.” Please describe the equipment and methods that would be used to refuel helicopters at the landing zones, including any spill prevention procedures that would be followed.

**Response to Question Q.14:**

The equipment used to refuel helicopters would include a fuel truck and the helicopter being refueled; the refueling operation would be accomplished by two personnel, including a fuel tender and helicopter mechanic. Spill prevention procedures as outlined within the California Stormwater Quality Association “Spill Prevention and Control WM-4” (January 2011) and “Vehicle and Equipment Fueling NS-9” (January 2011) would be incorporated in the SWPPP. During helicopter refueling, an absorbent mat would be laid on the ground below the helicopter fuel tank port to catch any inadvertent spills or drips.

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**Question Q.15:**

PEA Section 3.7.1.4 (page 3-50) states that helicopter landing zones would include “ground locations in close proximity to conductor pulling, tensioning, and splice sites; and in previously disturbed areas near construction sites.” It also states that “helicopters must be able to land within or near SCE ROWs, which could include landing on access or spur roads.” As written, these statements would allow SCE to land helicopters in any number of locations. To adequately assess the environmental impacts of proposed helicopter construction activities, all areas where helicopter landings may occur must be clearly identified. Please confirm that the helicopter landing zones identified in PEA Table 3.7-1 would provide adequate landing area for construction of the Proposed Project, or identify the additional helicopter landing zones that would be necessary, and specify their location, pre-project condition, and approximate area.

**Response to Question Q.15:**

The helicopter landing zones identified in Table 3.7-1 will provide adequate landing area for normal construction of the Proposed Project. However, in the event of a flight emergency, the helicopter pilot would land at any location deemed safe by the pilot along or adjacent to the Proposed Project ROW.

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**To:** ENERGY DIVISION  
**Prepared by:** Amanda L Solomon  
**Title:** Biologist  
**Dated:**08/15/2014

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**Question Q.16:**

PEA Section 3.7.1.5 (page 3-56) states: “In Project Section 4, within the outer fenceline of the Newbury Substation, approximately 30 to 40 existing trees will require trimming or removal to facilitate construction. Most of the trees are ornamental species.” Please list the species types of trees that would be removed, including the number and type of any oak trees.

**Response to Question Q.16:**

Tree species located adjacent to the Newbury Substation that are anticipated to be removed or trimmed during construction include myoporum, eucalyptus, Brazilian pepper, California pepper, and Chinese elm. No oaks would be trimmed or removed.

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**Question Q.17:**

PEA Section 3.7.2.2.1 (page 3-66) states that, in limited circumstances, helicopters may be used to dismantle lattice steel towers (LSTs). However, in the discussion of potential helicopter uses during Proposed Project construction (PEA Section 3.7.1.4, page 3-49 to 3-50), SCE only identifies the stringing of conductor and installation of marker balls as activities that would require the use of helicopters. Please confirm all construction activities that may require the use of helicopters.

**Response to Question Q.17:**

To confirm, helicopters would be used in the stringing of conductor and installation of marker balls. Helicopters may also be used to dismantle lattice steel towers (LSTs).

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**Question Q.18:**

Please provide the approximate height of temporary guard structures that would be used during construction of the Proposed Project.

**Response to Question Q.18:**

The approximate height of the guard structures could typically range from 40 - 70 feet depending on the location. However, SCE will be consulting with the applicable agency with jurisdiction of the crossed roadway to determine the final height based on the type and/or height of the crossing to be protected.

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**Question Q.19:**

In the discussion of conductor/cable installation, PEA Section 3.7.2.3 (page 3-70) states: “To ensure the safety of workers and the public, safety devices such as traveling grounds, guard structures or specifically-equipped boom trucks, radio-equipped public safety roving vehicles, and linemen would be in place prior to the initiation of wire stringing activities.” Please provide descriptions of traveling grounds and radio-equipped public safety roving vehicles of how these devices provide safety.

**Response to Question Q.19:**

Traveling grounds are used to eliminate potential for electrical shock hazards during stringing operations and are installed via the traveling ground rollers on the conductor at the “wire pull.” These grounds are typically located on the conductors between the wire dolly and the first structure. When reconductoring, there will be another set of traveling grounds at the wire take up location. Guard structures will be placed prior to stringing conductor to prevent an inadvertent drop of the conductors being pulled from making contact with vehicles and/or the roadway, or other existing lateral overhead wire or cable circuits, i.e., distribution circuit crossing, telephone/cable crossing, etc. Specifically equipped boom trucks could also be used in lieu of guard structures at locations of low vehicular traffic, i.e., where the pulled conductors would cross a driveway or infrequently used road or for electric distribution circuits or service. Radio communication is extremely important for traffic control, pulling in new or removing old conductors, and to serve as an emergency alert to stop all activity when a safety issue or concern arises.

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**Question Q.20:**

PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with rehabilitation of existing access/spur roads and construction work sites. However, the PEA Project Description includes language in numerous places that indicates that work would occur on existing access and spur roads and construction work sites; this work should be considered land disturbance. Below are examples of PEA language that indicate that land disturbance would occur.

- As noted in footnote 1 in Table 3.7-41b, “light brushing” would occur within previously disturbed areas. PEA Section 3.7.1.5, Vegetation Clearance (page 3-55) defines “brushing” as removal of “shrubs and other low-lying vegetation within approximately 2-5 feet of the edge of access or spur roads...to prevent vegetation from intruding into the roadway.”
- PEA Section 3.7.1.5 (page 3-55) declares that “[b]lade-grading, mowing, or brushing may also occur during future construction activities in Project Sections 2, 3, and 4 depending upon the condition of the access roads, spur roads, and construction work sites; vegetation that has grown in these areas in the period between past construction activities and future construction activities would be trimmed and/or removed.”
- PEA Section 3.7.1.3 (page 3-49) states: “Prior to the restart of Project construction, some segments of the existing access and spur roads and work areas may be rehabilitated to facilitate the safe movement of construction vehicles and personnel. At present, future construction activities are projected to require only minor rehabilitation work to most existing access and spur roads; this work would be necessary due to the time elapsed between past and future construction activities.”
- PEA Table 3.7-2 (page 3-48) states that, for existing access roads that would have permanent improvements, “limited sections may require widening at curves or heavier grading.”
- Table 3.7-8b (page 3-83) shows that heavy equipment (e.g., grader, dozer, loader) would be required for ROW clearing, and road and landing work. All of these activities would result in temporary and/or permanent land disturbance.

- a. Please revise PEA Table 3.7-4b to include the estimated miles of road disturbance and the amount of sites disturbed, area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) based on worst-case estimates associated with the proposed construction activities described in the PEA (listed above).
- b. As requested in Data Request Item 10, please provide a figure that shows locations of future road rehabilitations, including locations that may require widening at curves, grading, and/or vegetation removal.

**Response to Question Q.20:**

As stated in the PEA, there would be no additional surface disturbance associated with any future construction of the Moorpark-Newbury project. All areas required for future construction activities were established during the past construction activities; these areas are now “previously disturbed.” The activities that would be performed on these previously disturbed areas (including light brushing, blade-grading, mowing) are normal operations and maintenance-type activities that are periodically and routinely conducted along access roads, spur roads, and in the vicinity of towers/TSPs/poles. These activities are conducted in areas where the surface is currently disturbed, and thus is not considered to be land disturbance.

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**Question Q.21:**

PEA Table 3.7-4b shows zero acres of land disturbance that would be associated with installation of new TSPs, with a footnote that states: “22 new TSPs would be installed utilizing construction areas developed during past construction activities. Some TSP construction work sites overlap existing access and spur road locations rehabilitated during past activities. All disturbances associated with TSP installation are captured on Table 3.7-4a.” However, PEA Section 3.7.2.2.3 indicates that onsite grading could be necessary during site preparation (page 3-67), and that an equipment pad would be constructed within the construction work site if existing terrain around the TSP location is not suitable to support crane activities (page 3-69). In addition, the Proposed Project would include installation of 14 TSP foundations. All of these actions would result in land disturbance, as they would require grading, excavation, and/or removal of existing vegetation. Please revise Table 3.7-4b to accurately describe the area to be disturbed (acres), area to be restored (acres), and area that would be permanently disturbed (acres) as a result of installation of the proposed new TSPs.

**Response to Question Q.21:**

Please refer to SCE's response to Question 20. Depending on the condition of the previously-disturbed areas at the resumption of construction, on-site grading may be conducted within previously-disturbed areas established during past construction activities. Any equipment pads that would be constructed during future construction activities would be constructed within previously-disturbed areas, and thus do not represent new surface disturbance. The excavation of foundations would occur within the previously-disturbed areas, and thus do not represent a new surface disturbance.

*Southern California Edison*  
**Moorpark-Newbury A.13-10-021**

**DATA REQUEST SET A1310021 Moorpark-Newbury-ED-SCE-02**

**To:** ENERGY DIVISION  
**Prepared by:** Xinling Ouyang  
**Title:** Environmental Projects Coordinator  
**Dated:** 08/15/2014

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**Question Q.22:**

PEA Table 3.7-4b shows zero acres of land disturbance from 10 stringing sites, with a footnote that reads: “The ten stringing setup areas established during past construction activities may be used during future construction activities; these disturbance areas are accounted for on Table 3.7-4a. Additional stringing setup areas, if needed, would be established on existing access roads and in areas within the Moorpark-Ormond Beach 220 kV Transmission Line ROW” (page 3-60). Regardless of when the 10 stringing setup locations were established, please confirm that work at the sites would not require ground disturbance, such as light grading, brushing, or vegetation removal. Please update Table 3.7-4b accordingly.

**Response to Question Q.22:**

Please refer to SCE's response to Question 20. Light grading, brushing, or vegetation removal, if necessary, would be conducted on previously-disturbed areas, and would not represent a new surface disturbance. Therefore, Table 3.7-4b is an accurate representation of the temporary and permanent surface disturbance expected as a result of the future construction associated with the Moorpark-Newbury 66 kV Subtransmission Line Project.

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**Question Q.23:**

PEA Table 3.7-4b shows zero acres of land disturbance associated with removal of existing LSTs, and 0.08 acre to be restored, with a footnote that reads: “The construction areas used for removing existing LSTs were established as part of past construction activities, and have been maintained since then; therefore, there would be no additional land disturbance for these activities during future construction activities. The area disturbed during past construction activities for removal of the LST between TSP locations 39 and 40 (0.08 acres) would be restored following final construction activities. This restoration is not associated with the HMRP discussed in Section 4.4” (page 3-60). However, PEA Section 3.7.2.2.1 (page 3-66) describes LST removal and states: “If previously disturbed areas adjacent to the structure are not available, an area would be cleared of vegetation and could be graded if the ground is not level. The crane could be positioned up to approximately 60 feet from the tower location to dismantle the tower.” Please update the numbers in Table 3.7-4b to include consideration of these construction practices.

**Response to Question Q.23:**

Previously-disturbed areas are available adjacent to each LST slated for removal; these areas were established during the past construction activities. Therefore, no new surface disturbance would be necessary to facilitate removal of LSTs, and Table 3.7-4b does not need to be updated.

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**Question Q.24:**

In the discussion on trenching, PEA Section 3.7.3.1 (page 3-37) states: “Excavated materials have been, and would be, disposed of at one of the following locations: Toland Road Landfill, Simi Valley Landfill, AG Reclamation, Bradley Landfill and Recycle, or Antelope Valley Landfill.” This is inconsistent with PEA Section 4.17.1.1, which states: “The Simi Valley Landfill and Recycling Center, operated by Waste Management of California, Inc., would receive solid waste associated with the Project.” Please clarify which solid waste facilities would be used.

**Response to Question Q.24:**

Any of the facilities listed in PEA Section 3.7.3.1 may be used for the disposal of solid waste, including excavated materials. The text in Section 3.7.3.1 should be revised to state as follows: “Excavated materials have been, and *could* be, disposed of at one of the following locations: Toland Road Landfill, Simi Valley Landfill, AG Reclamation, Bradley Landfill and Recycle, or Antelope Valley Landfill.” (Note: This revision replaced "would" with "could.")

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**To:** ENERGY DIVISION  
**Prepared by:** Kevin Darney  
**Title:** Project Manager-TPD/L&E  
**Dated:** 08/15/2014

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**Question Q.25:**

Please describe all construction and operation activities that would require water use, and provide estimates of how much water would be required.

**Response to Question Q.25:**

The construction activities requiring water use would be brushing, mowing, and road and work area rehabilitation at the approaches to work areas for installing TSPs, wood and LWS poles, removal of LSTs and wood poles, and at areas for stringing conductor and helicopter landing zones (other than Moorpark Substation). It is estimated that these activities would require approximately 37 acre feet of water altogether. This estimate is based on three applications of water throughout the day but could taper down to two applications per day as the project progresses.

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**Question Q.26:**

In discussing future operations and maintenance activities of overhead facilities, PEA Section 3.8 (page 3-92) states: "Existing conductors could require re-stringing to repair damages. Some pulling site locations could be in previously undisturbed areas and at times, conductors could be passed through existing vegetation on route to their destination." Please clarify whether or not these activities are considered routine maintenance, and state under what circumstances would SCE not be required to obtain separate approval from the CPUC to conduct re-stringing activities?

**Response to Question Q.26:**

SCE is required per various CPUC general orders to ensure for the safe and reliable operation and maintenance of its electrical system. If the existing conductor or the conductor that is proposed to be installed to complete the Moorpark-Newbury 66 kV Subtransmission Line is damaged during an unforeseen event such as a storm, SCE is obliged to replace or repair such conductor to ensure for the reliable and safe operation of its system. Replacing such conductor in these circumstances could potentially require the use of undisturbed areas to pull in new conductor.

Such work would be exempt from CPUC approvals in that it would typically fall under an exemption from GO 131-D permit to construct requirements and/or CEQA, depending on the nature of the work or emergency associated with such damage. In an emergency situation where the conductor is damaged and may pose a risk to public health and safety, SCE would replace the conductor pursuant to the applicable CEQA categorical or statutory exemption for emergency repairs (e.g., CEQA Guidelines section 15269 and GO 131-D section III.B.1.h). Even in situations where the conductor may be damaged, but no immediate emergency is presented, SCE would replace such conductor pursuant to CEQA Guidelines section 15302 and GO 131-D, Section III.B.1.e (the placing of new or additional conductors, insulators, or their accessories on supporting structures already built).

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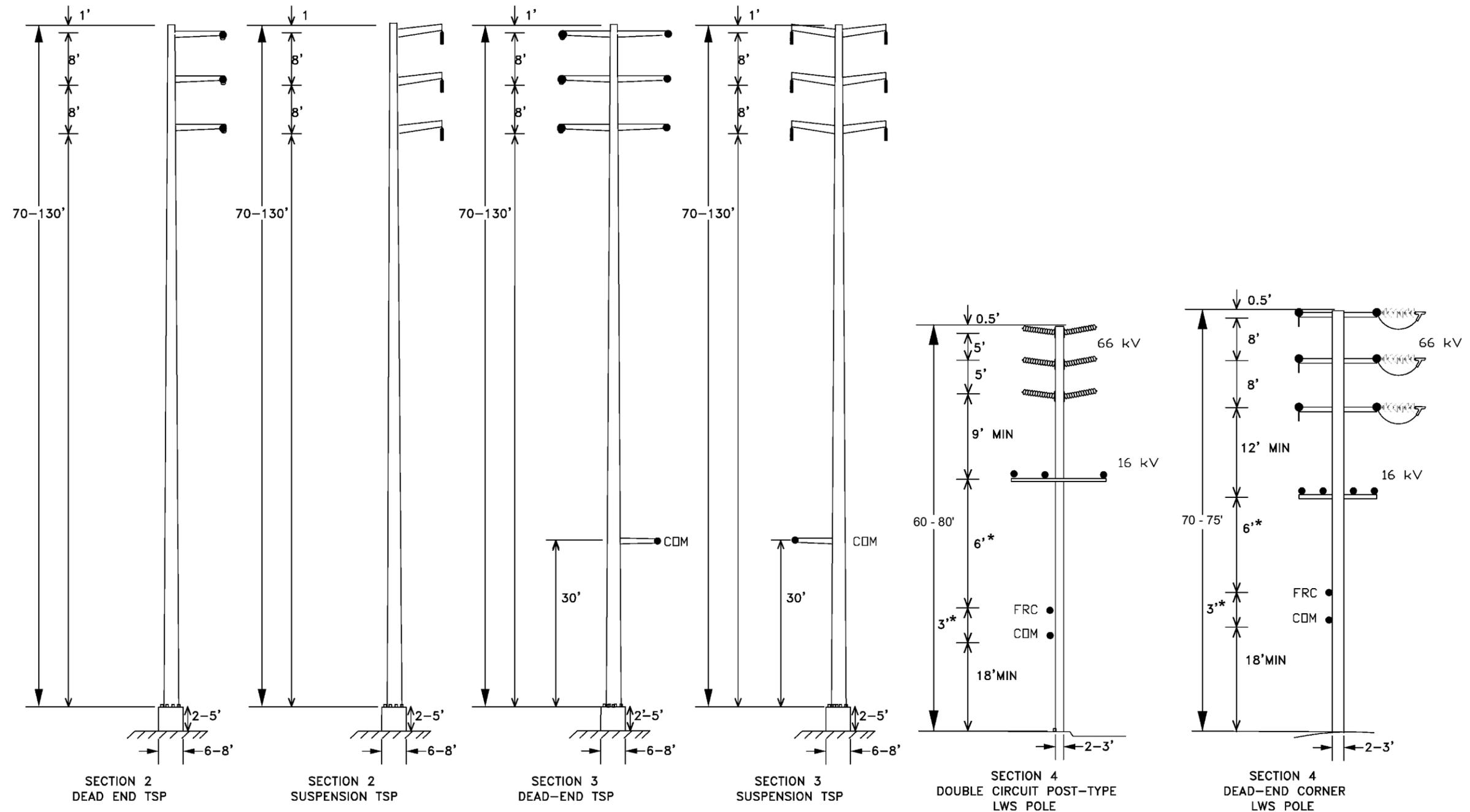
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**Question Q.27:**

In discussing future operations and maintenance activities that would be associated with the overhead facilities, PEA Section 3.8 (page 3-92 and 3-93) states that road maintenance would include moving and establishing berms. Please explain the circumstances under which berm movement and establishment would be necessary.

**Response to Question Q.27:**

Typically, earthen berms, swales and water bars are built-up/cut on the access road to control water flow to maintain the integrity of the access road surface in order to reduce road maintenance frequency. Berms, swales and water bars are damaged primarily through rain erosion. Upslope soils become unstable and release when rain runoff occurs which results in soil/rock medium falling down and collecting in the swale and road surface. Secondary damage could occur if the road is still wet and muddy and vehicles drive on the roads. A dry out period is always recommended for safe vehicular movement and to eliminate or reduce road damage caused by vehicle tires.



Note:  
 \* These dimensions may vary depending on the space available on each particular pole, as well as the height of the pole and field conditions.

SOUTHERN CALIFORNIA EDISON  
 MOORPARK-NEWBURY 66 kV SUBTRANSMISSION LINE PROJECT  
 VENTURA COUNTY, CALIFORNIA  
 PROPONENT'S ENVIRONMENTAL ASSESSMENT

**TYPICAL POLE DESIGN**



Figure  
**3.5-1**