

**California Public Utilities Commission – Southern California Edison
Moorpark-Newbury 66 kV Subtransmission Line Project
DATA REQUEST 1**

February 3, 2014

GIS

1. The Word document accompanying the GIS files (Moorpark-Newbury 66 kV Subtransmission Line Project GIS Data Users Guide) provides use limitations for all the GIS layers associated with the CPUC PEA submittal. However, all feature classes are classified as ‘CONFIDENTIAL – Contains Critical Energy Infrastructure Information (CEII).’ Since most of these feature classes appear in figures in the PEA, it would seem that not all of this information is actually confidential. Please let us know which specific layers are, in fact, confidential, and should not be shown in figures in the EIR.
2. In SCE’s response to CPUC Comments/Questions on the Administrative Draft PEA (comments 68 and 69), SCE states that it provided GIS data on wetland features, and special-status species. However, these data were not included in SCE’s confidential zip file entitled Attachment F.

Project Description

1. Discuss and, if necessary, quantify any steps implemented by SCE that would reduce or eliminate the drop in voltage at the Newbury Substation in 2020 and beyond. What is the Newbury load power factor and have substation and/or distribution capacitors been installed to support voltage by minimizing volt-ampere reactive (var) flow on the 66kV system?

Cultural Resources

1. Please provide a copy of Native American contact letters and responses. Appendix C includes correspondence between the Native American Heritage Commission (NAHC) and SCE. A letter dated 11/20/12 from NAHC includes a list of Native American contacts and a template letter seeking input from those contacts. However, we did not note any correspondence between Native Americans and SCE.
2. Please confirm that the stringing site located between TSPs 35 and 36 was included in the 2007 cultural resources study, or a subsequent study. It is not clear from the 2007 Compass Rose survey report that this area was surveyed.
3. Please confirm that all guard locations have been surveyed.
4. Please provide the date of construction of the Newbury and Moorpark substations.

Biological Resources

1. BonTerra conducted focused surveys for Lyon's pentachaeta and Coneja dudleya. One report specifically clarifies that the survey results were for focused surveys and were not floristic. This means that these surveys were appropriate for complying with the Federal Endangered Species Act (FESA) and California Endangered Species Act (CESA), but are not sufficient under CEQA. The typical CEQA standard for rare plant surveys is to conduct floristic surveys according to CDFG's 2009 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Natural Communities. In the PEA, SCE appears to be relying on focused surveys to state that there would have been no impacts on other plants, and would not be conducting additional surveys in the future. The focused surveys did pick up on other non-listed special-status plants, but we do not think the surveys can be relied on for CEQA. Please confirm whether any floristic surveys were conducted in accordance to CDFG's 2009 Protocols.