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October 12, 2015

Christopher Calfee, Senior Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

Submitted Via email to
CEQA.Guidelines@resources.ca.gov

Dear Mr. Calfee:

Subject: Proposed Updates to the CEQA Guidelines Preliminary Discussion Draft, Dated August 11, 2015

Southern California Edison Company (SCE} appreciates the opportunity to review and respond to the comprehensive and preliminary discussion draft of proposed changes to the CEQA Guidelines. We support the efforts to provide efficiency improvements that will make the environmental review process smoother, quicker, and more predictable in the future.

As previously discussed with Office of Planning and Research representatives, SCE strongly recommends an addition to the CEQA checklist, Appendix G, Section XVII Utilities and Service Systems. We believe an opportunity exists for creating greater efficiency in the analysis of projects that may result in the need for new or relocated utility lines, substations, or other facilities, and is consistent with CEQA's existing mandate that the lead agency consider the whole of an action, not simply its constituent parts. Those facilities should be addressed in the CEQA documentation for the projects that create the need for such future utility infrastructure. We recommend the addition of the following language:

XVII. Utilities and Service Systems – Would the project: …

> (h) Require or result in the construction of new natural gas, telecommunication, or electric power facilities, or require the relocation or expansion of existing natural gas, telecommunication, or electric power facilities, the construction, expansion, or relocation of which could cause significant environmental effects?

In addition, SCE supports the proposal to encourage the use of existing regulatory standards, such as resource agency standards, to determine thresholds of significance. This should result in a consistent, predictable approach to environmental reviews.

We also support the proposal to allow lead agencies to include projected future conditions into the definition of environmental baseline. The use of projected future conditions could potentially

allow agencies more flexibility in developing accurate environmental baseline conditions, and account for known future conditions.

We also support the proposal to allow a lead agency to defer specific details of mitigation until after project approval in certain circumstances. In fact, lead agencies should be able to exercise sufficient flexibility in requiring post-construction mitigation based upon the actual impacts of a project rather than the projected impacts analyzed in the CEQA document.

Additionally, we support the proposed changes to the use of the emergency exemption, which would allow for "emergency repairs that require a reasonable amount of planning". This change will provide important flexibility in the planning and design of emergency repairs to utility facilities. For example, if utility poles and lines are damaged in a wildfire, designing the appropriate replacement facilities is critical to ensure public safety and the future reliability of the system. Yet, the need to quickly plan and design for the restoration of service to customers does not take away from the characterization of an "emergency repair".

Thank you for this opportunity to comment on this ongoing effort to improve the CEQA Guidelines. We look forward to continued participation in this process.

Sincerely,

Wendy Miller

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Manager
SCE Corporate Environmental Services

cc: David Kay
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