

February 14, 2014

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

Sent electronically to: CEQA.Guidelines@ceres.ca.gov

Subject: OPR Solicitation for Comments to Possible Revisions to CEQA Guidelines

Dear Mr. Calfee:

SCE is an investor-owned electric utility responsible for the construction, operation, and maintenance of electric transmission, distribution, and generation facilities throughout a 50,000-square-mile service territory in central and southern California, with a population of over 13 million people. SCE is working diligently to facilitate California's progress towards its ambitious renewable energy goals by 2020. These efforts include improving grid reliability by developing electric transmission projects that deliver renewable energy from third-party generators to SCE's electricity customers. Additionally, SCE pursues modifications to its electrical infrastructure to ensure the availability of safe, reliable, and cost-effective electric service to meet customer demand.

Certain SCE activities require discretionary approval supported by analyses performed pursuant to the California Environmental Quality Act (CEQA). In light of CEQA's relevance to these activities, SCE offers the following three comments on the Governor's Office of Planning and Research's (OPR) current efforts to revise the CEQA Guidelines:

1. SCE supports revising the existing questions in *CEQA Appendix G: Environmental Checklist Form* Sections IV and XVIII(a) (Biological Resources and Mandatory Findings of Significance, respectively) to make those questions consistent with the current CEQA Guidelines Section 15065.
2. SCE supports providing guidance as to when an agency may defer mitigation details under Section 15126.4. In many linear electric power line projects, SCE is often able to reduce the actual construction impacts as compared to the potential impacts analyzed during the CEQA review. SCE supports allowing mitigation to set forth specific performance standards which would allow for the amount of required compensatory mitigation to be commensurate with actual impacts encountered in the field. In that instance, deferring the calculation of the final compensatory mitigation amount until the project is complete would be appropriate.

3. SCE supports revising the *CEQA Appendix G: Environmental Form Checklist* Section XVII (Utilities and Service Systems) to add questions related to energy infrastructure. If a proposed project would require the removal, replacement, relocation, or addition of significant electric and/or gas utility transmission facilities and/or substation(s), the lead agency should review the potential impacts of such activities as a part of the proposed project. Tiering from such an analysis would potentially eliminate the need for a separate environmental review by the California Public Utilities Commission consistent with the State Legislature's findings supporting the exclusion of duplicative environmental analyses expressed in California Public Resources Code section 21093.

SCE appreciates the opportunity to provide these comments. Should you have any questions about our comments, please contact me at 626.302.4459.

Sincerely,

A handwritten signature in black ink, appearing to read "Nino Mascolo", with a long, sweeping horizontal stroke extending to the right.

Nino Mascolo
Principal Manager
Natural Resources and Public Lands

cc: Gaddi Vasquez