



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

FILED

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In the Matter of the Application of SOUTHERN)
CALIFORNIA EDISON COMPANY (U 338-E))
for a Certificate of Public Convenience and)
Necessity Concerning the Tehachapi Renewable)
Transmission Project (Segments 4 through 11))
_____)

Application 07-06-031

(Filed June 29, 2007)

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
NOTICE OF EX PARTE COMMUNICATION

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Dated: [November 20, 2009](#)

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STATE OF CALIFORNIA**

In the Matter of the Application of SOUTHERN)	
CALIFORNIA EDISON COMPANY (U 338-E))	Application 07-06-031
for a Certificate of Public Convenience and)	
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Transmission Project (Segments 4 through 11))	
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**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.3 of the California Public Utilities Commission (Commission) Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby gives notice of the *ex parte* communication described below.

On Thursday, November 19, 2009, at 12:00 p.m., Mr. Brian Prusnek, SCE's Manager of Regulatory Affairs, delivered a "TRTP Notebook" to each Commissioner's office - Commissioner Peevey, Commissioner Grueneich, Commissioner Chong, Commissioner Simon, and Commissioner Bohn. The Commissioners' offices are located at the California Public Utilities Commission located at 505 Van Ness Avenue, San Francisco, California, 94102. Mr. Prusnek informed each office receptionist that the notebook contained additional materials for the Commissioner to consider. The binders contain written communication consisting of fact sheets and photos summarizing SCE's position regarding Segment 8A and Alternative 4CM. The written communication is contained in Appendix A.

To request a copy of this notice, please contact Henry Romero at (626) 302-4124 or by e-mail at henry.romero@sce.com.

Respectfully submitted,

[DANIELLE R. PADULA](#)

/s/ Danielle R. Padula
By: [Danielle R. Padula](#)

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Appendix A

TRTP Notebook

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT
Information Regarding Segment 8A and Alternative 4CM

TAB	DESCRIPTION
1.	<p><u>Topic One:</u> Potential Delay of Implementation of Alternative 4CM</p> <p>A. Fact Sheet re: Delay</p> <p>B. Fact Sheet re: Litigation Risk</p> <p>C. Aerojet Letter dated 11/12/09</p> <p>D. Photos</p> <ul style="list-style-type: none"> ○ Photo of Danger Sign on Aerojet Property ○ Photos of Condition of Proposed Access Road ○ Aerojet Property <p>E. Exhibit SCE-14 (Map of Alternative 4CM and Segment 8A)</p>
2.	<p><u>Topic Two:</u> Safety of Segment 8A in Chino Hills</p> <p>A. Fact Sheet re: Safety</p> <p>B. Figures from Final EIR</p> <ul style="list-style-type: none"> ○ Figure 2.2-40 ○ Figure 2.2-41 <p>C. Visual Resource Simulations from Final EIR</p> <ul style="list-style-type: none"> ○ Figure 3.14-48a ○ Figure 3.14-48b ○ Figure 3.14-49a ○ Figure 3.14-49b <p>D. Photos</p> <ul style="list-style-type: none"> ○ Exhibit SCE-09 Ex. L ○ Exhibit SCE-09 Ex. M ○ Exhibit SCE-09 Ex. N
3.	<p><u>Topic Three:</u> Costs of Segment 8A Compared to Alternative 4CM</p> <p>A. Fact Sheet re: Costs</p> <p>B. Cost Chart</p> <p>C. Cost Table Showing Omissions</p>
4.	<p><u>Topic Four:</u> Increased Environmental Impacts of Alternative 4CM</p> <p>A. Fact Sheet re: Environmental Impacts</p> <p>B. Exhibit SCE-44 (Map of Alternative 4CM)</p>

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: ALTERNATIVE 4CM DELAY SUMMARY

I. Delay of Progress Towards RPS Goals.¹

- TRTP's timely completion is critical for California to meet its RPS goals, and expected delays associated with Alternative 4CM would hinder timely completion of the project and progress towards meeting renewable goals.

II. Aerojet Property Issues, Including MEC Remedial Work and DTSC Approval, Would Significantly Delay Construction.²

- Alternative 4CM would require a switching station, transmission lines, and access roads on Aerojet's property, which was used for 40 years to test munitions. **Preparing the Aerojet property for construction, including completing remedial work for munitions and explosives of concern (MEC) and obtaining DTSC approval, would delay construction by about 26-44 months, depending on the process for acquisition of the Aerojet property and whether MEC is found on the property.**

III. Switching Station Site Instability Would Delay Construction.³

- The switching station requires a level area more than twice the size of a football field, and the switching station site is space-constrained with hilly, unstable terrain. This poses **landslide, slope stability, and grading issues**. SCE would also need to widen the access roads to support construction equipment and materials, which could **create a hazard because the area is susceptible to landslides**. These site instability issues would add complexity and delay to the construction process.

¹ FEIR at 2-95 to 2-96; D.04-06-010 at 40; D.04-12-007 at 105.

² July 29, 2009 Letter from DTSC to Chino Hills' City Attorney [Ex. Aerojet-08].

³ FEIR at 4-62 to 4-63; SCE's Rebuttal Testimony, Jack M. Collender [Ex. SCE-04 at 28:20-29:10]; Concept Site Development Plan [Ex. SCE-09 at Ex. F].

IV. Additional Site Investigations.⁴

- Significant geotechnical studies are necessary along the entire Alternative 4CM route, including the switching station site and access roads, to develop construction plans. SCE would also need to commission a meteorological study to calculate the appropriate load cases for the transmission lines proposed for Alternative 4CM.
- Once these investigations are complete, SCE would need to analyze the results, design the structures, and identify and design any necessary mitigation measures. **These processes, which are already underway for proposed Segment 8A, would further delay TRTP's completion.**

V. Amendment to the Chino Hills State Park General Plan.⁵

- Alternative 4CM is inconsistent with the Chino Hills State Park General Plan because it would run through the Core Habitat Zone. Alternative 4CM requires a General Plan amendment from the California Parks and Recreation Commission, which is likely to take at least one year and **could take longer or be denied due to public protest.**
- Routing a transmission line in a state park can be politically charged. The Sunrise transmission line proposed for Anza Borrego State Park and the toll road proposed for San Onofre State Beach were opposed and recently denied.

VI. Alternative 4CM Would Delay Completion of the Proposed Project by Approximately 2 Years at Best and 3.5 Years at Worst.

- Given all the additional regulatory, site, and construction issues that Alternative 4CM raises, Alternative 4CM would delay completion of the proposed Project by approximately 2 years at best and 3.5 years at worst. The best-case scenario assumes no MEC is found on the Aerojet property, no delays in acquisition of the Aerojet property, and no construction delays due to environmental restrictions relating to endangered species. The worst-case scenario also assumes no construction delays due to environmental restrictions relating to endangered species. If those construction delays were to occur, however, then the total delay due to Alternative 4CM would be even longer.

⁴ SCE's Rebuttal Testimony, Ronald J Carrington [Ex. SCE-03 at 8:6-11]; Ex. SCE-10C, Confidential Exhibit R § 2.1 at 2-1; Hearing Tr. 684:3-8.

⁵ SCE's Rebuttal Testimony, Charles A. Adamson [Ex. SCE-04 at 31:18-32:14]; Comment Letter from California Department of Parks and Recreation (Apr. 3, 2009) [Ex. SCE-24]; FEIR Response to Chino Hills at App. H.A-305, H.A-321.

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: AEROJET PROPERTY DELAY AND DTSC CARVE-OUT PROCESS

I. Aerojet Property Issues Would Significantly Delay Construction.

- Aerojet's property was used for 40 years to test munitions and has been undergoing hazardous waste cleanup for 16 years. The potential remains for MEC to be present on the property. DTSC has not yet approved completion of corrective action, including measures required for the possible presence of MEC. **Even with the more expedited "carve-out" alternative limited to the areas needed for Alternative 4CM, completion of corrective action and DTSC approval would delay construction of the proposed Project by about 26-44 months, depending on the process for acquisition of the Aerojet property and whether MEC is found on the property.**

II. Steps Required Before Construction Could Begin.¹

- **Step 1: Develop Detail Plan (6 Months):** SCE would need to develop a detail plan to determine the location for the switching station, transmission lines, and access roads on the Aerojet property.
- **Step 2: Negotiate with Aerojet and Acquire Property (6 Months at Best; 13 Months at Worst with Condemnation Proceedings):** SCE would need to negotiate and agree with Aerojet on who would be financially and legally responsible for the investigative work, additional sweeps for MEC, and reporting to complete corrective action and obtain DTSC approval. SCE would also need to acquire the property proposed for Alternative 4CM from Aerojet before it could access and prepare the property for construction. If SCE is able to purchase this property from Aerojet through negotiation, then negotiation and property acquisition would take a total of about six months. If SCE is not able to purchase this property from Aerojet, SCE would then need to acquire the property through condemnation proceedings. In that worst-case scenario, negotiation and property acquisition would take a total of about thirteen months.

¹ July 29, 2009 Letter from J.T. Liu, DTSC, to Mark D. Hensley, Chino Hills City Attorney [Ex. Aerojet-08]; November 12, 2009 Letter from Thomas M. Donnelly, Counsel for Aerojet, to California Public Utilities Commissioners; Direct Testimony of Scott Goulart on Behalf of Aerojet [Ex. Aerojet-01]; July 21, 2009 Supplemental Testimony of Scott Goulart on Behalf of Aerojet [Exhibit Aerojet-03]; October 13, 2009 Letter from Manny Alonzo, DTSC, to Michael S. Fleager, Chino Hills City Manager [Ex. CH-84].

- **Step 3: Obtain Carve Out (11 Months at Best; 22 Months at Worst with Presence of MEC):** Construction could not start until DTSC has determined that no further corrective action is needed. The fastest way to obtain this determination is through a carve out, which would apply just to the part of the property used for Alternative 4CM. The carve out may require additional corrective action for MEC and is subject to many contingencies. The time to obtain a carve out does not include the time required for Steps 1-2 listed above. If MEC is found, all bets are off.
 - **A Carve Out Would Involve Several Engineering and Regulatory Steps:**
 - **Carve Out Step 1:** SCE must complete and submit final engineering plans to DTSC.
 - **Carve Out Step 2:** DTSC must review the final engineering plans.
 - **Carve Out Step 3:** DTSC must review and approve the Data Gap Report that Aerojet has already submitted in light of the final engineering documents to determine whether any data gaps about the presence of MEC exist in the areas to be used for Alternative 4CM. If DTSC finds inadequacies with the Data Gap Report, it would need to be revised, which would cause delay.
 - **Carve Out Step 4:** DTSC must determine whether additional corrective action for MEC is needed.
 - **Carve Out Step 5:** SCE must undertake completion of additional corrective action, **possibly including additional sweeps for MEC and remedial work.**
 - **Carve Out Step 6:** DTSC must prepare a detailed Statement of Basis and environmental review documents to comply with CEQA.
 - **Carve Out Step 7:** DTSC releases the Statement of Basis and CEQA documents for public comment.
 - **Carve Out Step 8:** DTSC must respond to public comments.
 - **Carve Out Step 9: If DTSC identifies the need for additional corrective action during the public comment period, SCE must complete that action.** This could include additional sweeps for MEC and remedial work.
 - **Carve Out Step 10:** Once corrective action is complete, SCE would file a Corrective Measures Completion Report.
 - **Carve Out Step 11:** DTSC must issue a determination that no further corrective action is needed for the property proposed for Alternative 4CM. (Steps 6-11 are the last steps referred to in the October 13, 2009 letter from DTSC, assuming that Step 9 does not include additional corrective action.)

- DTSC estimates that the carve out would take 11 months if no additional MEC is identified and if no further corrective action is needed. If additional MEC is identified or if additional corrective action is needed, then DTSC recognizes that the carve out could take much longer. Aerojet similarly testified that its 12-month estimate for obtaining a carve out did not include the time required to implement any additional corrective measures in the carve-out area should DTSC determine that further corrective measures are required. SCE estimates that the carve out could take at least 22 months if these additional corrective measures are required.
- **Step 4: Geotechnical Site Work (3 Months):** SCE would need to conduct geotechnical work at the site in order to develop site design.
- **Step 5: Switching Station Design (4 Months):** SCE would need to finalize site design and any engineering modifications made during the carve-out process.
- **Step 6: Site Grading and Preparation (25 Months):** SCE would need to complete site grading and preparation for the switching station site. SCE estimates that this would take 25 months, assuming no geological problems at the site.
- **Total Delay Before Construction Could Begin:** Steps 1-6 must occur before construction on the Aerojet property could begin, and these steps would delay construction by approximately 26-44 months, depending on the process for acquisition of the Aerojet property and whether MEC is found on the property.

III. Alternative 4CM Would Delay Completion of the Proposed Project by Approximately 2 Years at Best and 3.5 Years at Worst.

- As a result, Alternative 4CM would delay completion of the proposed Project by approximately 2 years at best and 3.5 years at worst. The best-case scenario assumes no MEC is found on the Aerojet property, no delays in acquisition of the Aerojet property, and no construction delays due to environmental restrictions. The worst-case scenario assumes no construction delays due to environmental restrictions as well. If those construction delays were to occur, then Alternative 4CM would delay completion of the proposed Project even further.

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: LITIGATION RISK

I. Chino Hills' Easement Lawsuit Will Not Succeed.

- SCE has extremely broad rights under the terms of the easements for the existing right-of-way (ROW) through Chino Hills and the easements do not limit the voltage of transmission line that may be constructed in the ROW.
- The easements contain similar language and grant SCE: “permanent and exclusive easements and rights of way to construct, reconstruct, maintain, operate, enlarge, improve, remove, repair, and renew an electric transmission line consisting of a line of steel towers, wires, cables and other structures, including ground wires, both overhead and underground, with necessary and convenient foundations, insulators and cross-arms placed on said towers, and other appurtenances connected therewith, convenient and necessary for the construction, maintenance, operation, regulation, control, and grounding of electric transmission lines . . .” Exhibit CH-14 (emphasis added).
- If needed, SCE could condemn any additional rights within the existing 150-foot ROW required for the transmission line in Chino Hills as soon as a decision choosing the environmentally superior alternative through Chino Hills is granted. *See* Cal. Pub. Util. Code §§ 610-626 (granting utilities the power of eminent domain). Typically, the time required to obtain pre-judgment possession of the property is about 7 months and at that point construction could begin. Chino Hills will not be able to delay implementation of TRTP.
- As noted in the Proposed Decision, Chino Hills’ attempt to delay the project through its own litigation (including any threatened challenge to a CPCN) is problematic because taking into consideration this lawsuit would set dangerous Commission precedent that would allow an opponent of any project to stop it merely by threatening litigation.
- Adopting Alternative 4CM also will wrongly encourage projects to be sited in communities that do not have the resources to litigate or in more environmentally-sensitive areas like state parks.

II. Alternative 4CM Has Greater Opposition and Litigation Risk than Segment 8A.

- Segment 8A, as proposed by SCE, has been identified as the environmentally superior route in the Final Environmental Impact Report (FEIR) and in the Proposed Decision. Its environmental impacts have been thoroughly analyzed in the CEQA process and has little likelihood of affecting threatened or endangered species. In contrast, Alternative 4CM would traverse environmentally sensitive areas, including land that has been designated as critical habitat for the California gnatcatcher, a federally endangered species, and impact a state park.
- Several parties are on record opposing Alternative 4CM, including a state agency (Department of Parks and Recreation), an environmental group (California State Parks Foundation), and a private landowner (Aerojet).
- Certain environmental groups supported Alternative 4CM because they thought it would be tied to the 21st Century Green Partnership \$50 million plan. The Proposed Decision and the FEIR expressly conclude that the 21st Century Green Partnership plan cannot be legally required. Without the 21st Century Green Partnership plan, it is reasonable to anticipate that environmental group support for Alternative 4CM will erode and that several groups will oppose the routing of the transmission line through a state park.
- The risk of opposition, litigation, or denial of approval of infrastructure projects in state parks is real, as recent experience shows. SDG&E's Sunrise Project's request to route through Anzo Borrego State Park and the Toll Road's proposal to go through the San Onofre State Beach were both rejected due in large part to intense public opposition.
- That these lawsuits have not been filed yet does not mean that selection of Alternative 4CM is litigation-proof.

JONES DAY

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November 12, 2009

VIA EMAIL AND U.S. MAIL

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Re: A.07-06-031 -- In the Matter of the Application of Southern California Edison (U 338-E)
for a Certificate of Public Convenience and Necessity Concerning the Tehachapi
Renewable Transmission Project (Segments 4 through 11)

Dear Commissioners:

I am writing on behalf of our client, Aerojet-General Corporation, granted party status in this proceeding on April 29, 2009. As you probably know by now, the City of Chino Hills objects to Southern California Edison's proposed route for Segment 8 of the Tehachapi Renewable Transmission Project (the "TRTP"), and has proposed its Alternative 4CM. This alternative would result in the placement of a switching station, transmission lines and towers, and other infrastructure on the southern portion of Aerojet's property in Chino Hills. Aerojet opposes Alternative 4CM for several reasons, among them that the placement of transmission infrastructure on Aerojet's property would result in a loss of use of a substantial portion of Aerojet's property, and diminish the value of the remainder of the property. Aerojet has spent tens of millions of dollars cleaning up its property (once used as an ordnance research, development and testing facility) so it can develop it residentially, and has achieved important milestones in that effort. Nevertheless, because of Aerojet's prior treatment of hazardous waste on the property, it remains a "RCRA facility," meaning it is still subject to federal and state hazardous waste regulations and corrective action requirements. We refer you to our opening and reply briefs filed in this matter for further background and information.

California Public Utilities Commissioners
November 12, 2009
Page 2

We are concerned that the City of Chino Hills has not properly characterized the amount of time it would take for the southern portion of Aerojet's property to be "carved out" from the RCRA facility designation, and thus RCRA's requirements, so it could be used for the placement of transmission infrastructure under the City's Alternative 4CM. The California Department of Toxic Substances Control ("DTSC"), which is the lead State agency overseeing Aerojet's cleanup, has prepared two letters (dated July 29, 2009 and October 13, 2009) setting forth the required steps and timing for a "carve-out." Both letters are attached. In the July 29 letter, DTSC gives an estimate of *at least 11 months* for the entire process. In the October 13 letter -- which the City has cited in its ex parte notices, and we assume in its presentations to the Commissioners and their advisors -- DTSC gives a 45-60 day estimate, *but only for one component of the carve-out process: the time it would take for DTSC to undertake its "corrective action complete determination."* As DTSC makes clear in its October 13 letter, consistent with its prior July 29 letter, DTSC would not even begin the process of making this determination until it has received a formal request from Aerojet, supported by technical reports indicating -- and explaining why -- no further action is required with respect to any potential contaminants, as well as a legal description and map of the area to be carved out, and a detailed fact sheet that would be sent to the public as part of the public notice and comment requirements. Of course, if further corrective action is required in the carve-out area, the whole schedule would lengthen.

Moreover, in its October 13 letter, DTSC notes that "the 45 to 60 day timeline . . . for a Corrective Action Complete Determination after submission and completion of the survey and fact sheet information is contingent on the number of comments received during the public notice comment period." It is worth noting that it recently took DTSC nearly two years to review and approve the technical reports supporting closure of another portion of Aerojet's facility, and then another several months for DTSC to respond to public comments on its clean closure determination.

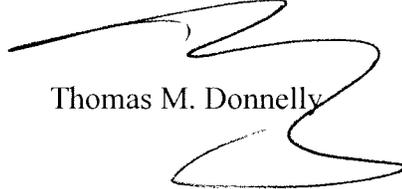
DTSC has never suggested, nor could it, that it would take just 45 to 60 days to achieve carve-out. As DTSC makes clear in its letters, the entire process -- including the property owner's part and DTSC's part -- would take at least 11 months.

Finally, none of these estimates account for the time it would take for Aerojet and SCE to negotiate the terms of SCE's purchase of the southern portion of Aerojet's property (and grant of easement over any other portion, if necessary), including which company would be legally and financially responsible for any further corrective measures, for preparing the reports and other submittals required by DTSC, and for securing carve-out. Since Alternative 4CM is not Aerojet's proposal -- in fact, Aerojet opposes it -- Aerojet would not be inclined to initiate the carve-out process, including preparing all of the necessary reports and undertaking any additional corrective measures, without first reaching agreement on property purchase terms and conditions with SCE. The time spent on these negotiations would be in addition to the 11-month carve-out estimate given by DTSC.

California Public Utilities Commissioners
November 12, 2009
Page 3

We look forward to meeting with you at the En Banc on November 20, 2009.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Thomas M. Donnelly'. The signature is stylized with several loops and a long horizontal stroke at the end.

Thomas M. Donnelly

Encls.

SFI-623532v1



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maziar Movassaghi
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Arnold Schwarzenegger
Governor

July 29, 2009

Mr. Mark D. Hensley
City Attorney
City of Chino Hills
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CORRECTIVE ACTION COMPLETION TIMELINE, TEHACHAPI RENEWABLE ENERGY TRANSMISSION PROJECT, AEROJET GENERAL CORPORATION, CHINO HILLS FACILITY (EPA ID NO. CAD981457302)

Dear Mr. Hensley:

Thank you for your June 29, 2009 letter requesting clarification of the Department of Toxic Substances Control's (DTSC's) position on two issues related to the Proposed Southern California Edison Tehachapi Renewable Energy Transmission Project. Those issues are presented below with a corresponding summary of DTSC's position.

Issue #1: Does DTSC concur with Mr. Michael Short's conclusion? Parsons has contracted with the City of Chino Hills for environmental services. Mr. Short represents Parsons as their technical expert for munitions and munitions related response actions. Mr. Short concluded that it is highly unlikely that there are any Munitions and Explosives of Concern (MEC) items on the surface or subsurface of the corridor. Mr. Short also highly recommended that a surface clearance be conducted on the portion of the route which runs through the Aerojet and Paige properties, and that an ordnance recognition course be given to all site personnel.

Response:

DTSC reviewed existing information pertaining to previously conducted investigations and response actions for the Aerojet Chino Hills project. DTSC agrees with Mr. Short's conclusion. However, DTSC's concurrence is limited at this time to the area on the Aerojet property proposed for a power line corridor and not to the access route to the corridor. From DTSC's review and the information provided, it is unclear to what extent the access road will be modified or reworked. Specifically, the details of the road work

Mr Mark D. Hensley
July 29, 2009
Page 2

and its distance from the centerline of the roadway are unclear. Given that previous MEC response actions have recovered MEC within areas very close to the road way, DTSC is unable to provide a No Further Action Determination and Corrective Action Completion for the access route at this time. DTSC will re-assess the application of a No Further Action determination upon completing the recommended surface clearance and submittal of final engineering design documents detailing roadway alignment and any plans for modifications

Issue #2: What is the Length of time that would be required to obtain a "no further action" letter?

Response:

A No Further Action Determination and Corrective Action Completion for the "carve out" area would involve several steps, each with its own contingencies, as follows:

1. DTSC must base its Determination on the final engineering documents, which have not been submitted by Southern California Edison. Once the documents are submitted, DTSC's review would take 4 to 6 weeks. However, a deficient or unclear submittal may require subsequent resubmittal(s) and additional review and comment.
2. Once DTSC deems the document acceptable for public review, the document will be made available to the public to comment on the proposed remedy and Determination. The comment period is 45 days. Concurrent with the comment period on the proposed action would be a comment period on the proposed CEQA determination for the project. Preparation and approval of the CEQA documents by DTSC for public review can take 4 to 6 weeks, but may be longer if there are complex environmental issues.
3. Upon completion of the 45 day comment period, DTSC must respond to all comments received for DTSC's proposed RCRA Remedy and CEQA Determination. Although it is expected that the response will take 3 to 4 weeks, the length of time is dependent on the number and complexity of the comments.
4. Once the comments are responded to and following possible changes to the Remedy based on the comments, the remedial engineering work would be conducted. As stated above, the amount of time required to conduct the necessary engineering work following DTSC approval is not clear. Once the work is completed, a Corrective Measures Completion Report (Report) would be submitted to DTSC for review and approval.

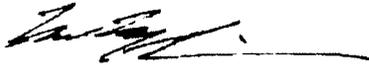
Mr Mark D. Hensley
July 29, 2009
Page 3

5. Upon DTSC approval of the Report, DTSC would issue a No Further Action determination, based on the proposed land use submitted by the landowner. DTSC would conduct additional public notice activities to notify the public of the determination.

As stated above, each of these steps involves unknown contingencies, each of which can delay the project by a matter of weeks or months. Based on the limited information and data available, DTSC's initial estimate is that Corrective Action Completion would take approximately eleven months. However, this is only an estimate. The actual amount of time may be longer or shorter. Also, please note that the imposition of three furlough days per month will have an uncertain impact on DTSC's already limited resources. DTSC remains dedicated to its mission and stakeholders, and looks forward to working with you regarding the schedule and successful completion of the project.

If you have any questions regarding this or other matters, please do not hesitate to contact the project Manager, Robert Romero, at (714) 484-5316 or email romero1@dtsc.ca.gov.

Sincerely,



J.T. Liu, Unit Chief
Brownfields and Environmental Restoration Program

cc: Michael S. Fleager, City Manager
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October 13, 2009

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PROPOSED SOUTHERN CALIFORNIA EDISON TRANSMISSION LINES, AEROJET
GENERAL CORPORATION, CHINO HILLS FACILITY (EPA ID NO. CAD981457302)

Dear Mr. Fleager:

This is in response to the October 7, 2009 letter from Mr. Mark Hensley, requesting that the Department of Toxic Substances Control (DTSC) state whether it concurs with a letter dated October 7, 2009 from the City's consultant, Michael Short of Parsons Engineering, regarding the Proposed Southern California Edison Tehachapi Renewable Energy Transmission Project (TRTP). The letter addresses whether there are ordnance related hazards on the Aerojet property that affect its suitability for the City's proposed alternative for the TRTP project. Mr. Short concludes that with normal mitigation measures in place and subject to the facilities being located on the property as outlined in his letter, there are no significant impediments for utilizing the Aerojet property for the City's proposed alternative.

DTSC concurs with Mr. Short's letter, with the following addition: In the bottom of the second paragraph, he states- "**If, and only if, the roadway is to be expanded in width**, this will require construction support provided by two unexploded ordnance (UXO) technicians." DTSC wishes to add that at least one of the two on-site UXO technicians performing this task must meet the minimum qualifications for a Technician III as defined in the Department of Defense Explosive Safety Board's Technical Papers (TP)# 18 - MINIMUM QUALIFICATIONS FOR UNEXPLODED ORDNANCE (UXO) TECHNICIANS AND PERSONNEL (see: <http://www.ddesb.pentagon.mil/techpapers.html>), with the other Technician having the qualifications of at least a Technician II level.

This concurrence does not constitute an endorsement of the City's proposed route for the TRTP, nor does it constitute a RCRA Corrective Action Completion Determination for the parcel that would be used for the route. A Corrective Action Complete Determination releases the owner/operator of a RCRA permitted facility from liability

Mr. Michael S. Fleager
October 13, 2009
Page 2

and constitutes a discretionary action under CEQA. To initiate the Corrective Action Complete Determination, the facility owner/operator must provide the following items to DTSC:

A Corrective Action Complete Determination Request from the owner/operator of the parcel

This request must include a description of the Corrective Action performed to date at Areas of Concern (AOCs) or Solid Waste Management Units (SWMU) at the site which have received a satisfactory No Further Action concurrence from the Department. Underground Storage Tanks should have a No Further Action concurrence from the Regional Water Quality Control Board or the delegated Local agency. No Further Action concurrence documents should be included in the request as part of the appendix or attachment. A summary table is recommended when there are a large number of AOCs/SWMUs. It is crucial that the information in this request be factual and accurate, and matches the legal description and the map(s) mentioned below. DTSC will not initiate the public comment period until those requisites are met. However, DTSC will be available to help consultants to ensure that the information is factual and accurate.

Legal description

A metes and bounds description of the parcel(s) covered by the proposed Corrective Action Complete Determination performed and signed by a registered Land Surveyor.

Map(s)

One or more map(s) as necessary, to visualize the parcel(s) proposed for Corrective Action Complete Determination in the context of the entire RCRA permitted facility.

Fact Sheet

A document describing the proposed Corrective Action Complete Determination, including the history of the site, corrective action completed at AOCs/SWMUs on the parcel, and any other pertinent information. The target audience of this Fact Sheet is the general public and serves the requirements of CEQA.

Public Notice

The owner/operator must public notice the Fact Sheet and other CEQA documents in a major newspaper and also maintains a document repository for the public to access the documents referenced in the Fact Sheet.

DTSC also wishes to add that the 45 to 60 day timeline mentioned in your letter for a Corrective Action Complete Determination after submission and completion of the survey and fact sheet information is contingent upon the number of comments received during the public notice comment period.

Mr Michael S. Fleager
October 13, 2009
Page 3

If you have any questions regarding this letter, please do not hesitate to contact me at (714) 484-5425, or the project Manager, Robert Romero, at (714) 484-5316.

Respectfully,



Mr. Manny Alonzo
Unit Chief
Brownfields and Environmental Restoration Program - Cypress Office

cc: Mr. J. T. Liu, Cheif
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Mr. Michael S Fleager
October 13, 2009
Page 4

cc: Mr Robert Romero
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Sacramento, California 95813-6000

**DANGER • EXPLOSIVES
HAZARDOUS WASTE AREA
UNAUTHORIZED PERSONNEL
KEEP OUT**

**PELIGRO • EXPLOSIVOS
AREA DE DESPERDICIOS
PERSONAS NO AUTORIZADOS
MANTENERSE AFUERA**



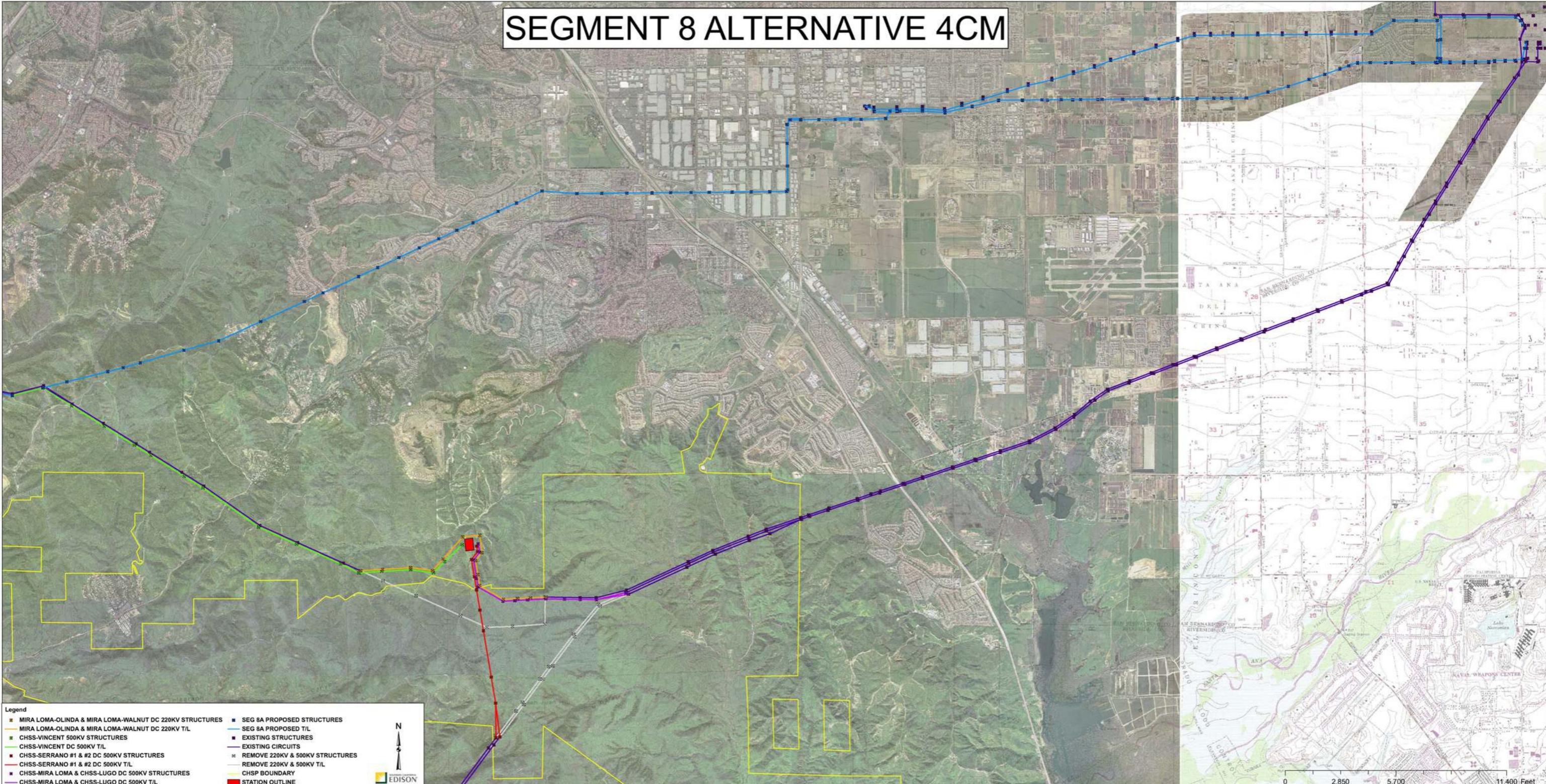




Proposed Switching Station Location



SEGMENT 8 ALTERNATIVE 4CM



- Legend**
- MIRA LOMA-OLINDA & MIRA LOMA-WALNUT DC 220KV STRUCTURES
 - MIRA LOMA-OLINDA & MIRA LOMA-WALNUT DC 220KV T/L
 - CHSS-VINCENT 500KV STRUCTURES
 - CHSS-VINCENT DC 500KV T/L
 - CHSS-SERRANO #1 & #2 DC 500KV STRUCTURES
 - CHSS-SERRANO #1 & #2 DC 500KV T/L
 - CHSS-MIRA LOMA & CHSS-LUGO DC 500KV STRUCTURES
 - CHSS-MIRA LOMA & CHSS-LUGO DC 500KV T/L
 - SEG 8A PROPOSED STRUCTURES
 - SEG 8A PROPOSED T/L
 - EXISTING STRUCTURES
 - EXISTING CIRCUITS
 - REMOVE 220KV & 500KV STRUCTURES
 - REMOVE 220KV & 500KV T/L
 - CHSP BOUNDARY
 - STATION OUTLINE



0 2,850 5,700 11,400 Feet

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: ALTERNATIVE 4CM SAFETY SUMMARY

- I. The construction, operation, and maintenance of TRTP can be accomplished safely and without risk to Chino Hills residents or the public.**
- II. Construction of large structures occurs frequently in similar settings, and people live near large structures throughout the world. Transmission structures are no different.**
- III. SCE has a stellar safety record, and its thorough inspection procedures are designed to identify any potential problems with structural integrity *before* problems occur.¹**
- SCE requires full-scale pole testing and inspection for all new pole designs. Each Tubular Steel Pole (TSP) design utilized along Segment 8A will be thoroughly inspected and tested prior to installation to ensure the integrity of its design.
 - Each structure is designed with a factor of safety of 1.5 over the calculated load induced by the maximum statistical probable wind speed with a 50 year recurrence in the Chino Hills area, which would be approximately 72 mph, based upon meteorological analysis. Accordingly, the structures in Segment 8A would be designed to withstand winds of at least 89 mph. By comparison, GO-95 Light requires a design wind speed of just 56 mph
 - Because earthquakes and liquefaction potential are commonly dealt with in Southern California, ground motion from earthquakes and liquefaction issues are incorporated into analysis, design, and construction of TRTP.
- IV. TRTP’s design not only meets, but in many instances *exceeds* GO-95’s safety standards.²**
- For example, SCE complies with or exceeds GO-95’s safety factors for towers, insulators and hardware, and foundations against uplift. SCE also exceeds GO-95 requirements with regard to construction grades, which dictate minimum safety factors. GO-95 requires a “Grade B” construction level for 500 kV transmission lines, except where the line crosses railroads and communication lines, where it must comply with “Grade A” standards, which impose higher safety factors. Even though most of TRTP could be built to Grade B standards, SCE will design all of TRTP to Grade A standards or higher.
 - Below is a table of the differences in safety factors between SCE and both GO-95 Grade “A” and “B,” demonstrating how SCE either complies with or exceeds Grade “A”

¹ See Carrington, Ex. SCE-03 at 15:18-25; Ex. SCE-11 Amended Ex. P; Légeron, Ex. SCE-05 at 10:12-15; SCE Opening Brief 52-53; Collender, Ex. SCE-04 at 54:13-15; FEIR at 3.7-37.

² See Proposed Decision at 54-58, 80; Ex. SCE-10, Ex. R and T, Table 9 at 5-7, Table 7 at 5-2, Table 5 at 3-6 to 3-8; SCE Opening Brief 47-49.

construction grade requirement.

	SCE	GO95 Grade "A"	Grade "B"
towers	1.5	1.5	1.25
hardware	3	2	2
insulators	3	3	2
conductor	3	2	2

- SCE also uses greater conductor loading strength than required by GO-95 (50% v. 35%), as well as greater clearances than required by GO-95 (by up to an additional several feet).

V. TSPs are safe for use in the Chino Hills area, and their risk of failure is extremely low.³

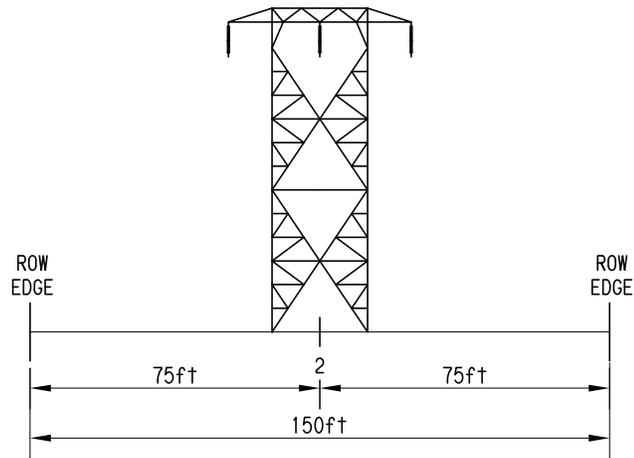
- TSPs have been used safely for decades all over the world. Their engineering, technology, testing, modeling, and analysis are both well known and well understood. SCE has approximately 1,000 TSPs on its system in the 220 kV and 500 kV family and there have been zero failures. Approximately 90% of these are 220 kV, which have been used by SCE for decades. When lower voltages are included, SCE has more than 7,000 TSPs on its system.
- SCE has previously used 500 kV TSPs—on the Antelope-Pardee line, the Antelope-Windhub line and the Inland Energy Valley line.
- Pole failure is extremely rare, but even so, the term “failure” does *not* equal collapse. TSPs are more likely to bend than collapse due to their design. Additionally, conductors and ground wires constrain pole movement, and keep it in line within the right-of-way (ROW).
- If the Commission has any concerns about the safety of TSPs, SCE can substitute Lattice Steel Towers (LST) for TSPs, or add even more safety factors to the design.

³ See Proposed Decision at 57; Carrington, Ex. SCE-10C at Exhibit S; Adamson, Tr. 460:10-25; Carrington, Tr. 585:8-18; FEIR General Response 10 Appendix H-37; Légeron, Ex. SCE-05 at 6:12-15; FEIR General Response 10 Appendix H-37; SCE Reply Brief 50; SCE Opening Brief 59, n. 54.

EXISTING ROW

FACING EAST

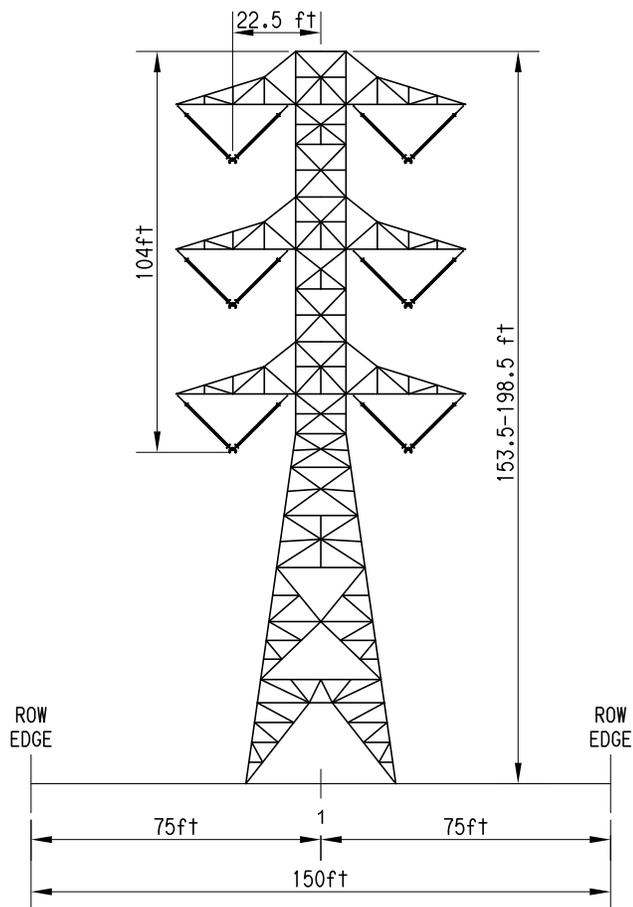
220kV SC TOWER



FUTURE ROW

FACING EAST

500kV DC DHT TOWER



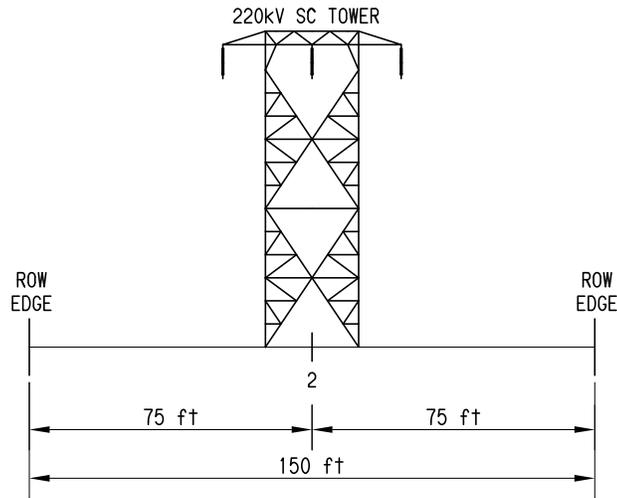
Source: SCE, 2007d.



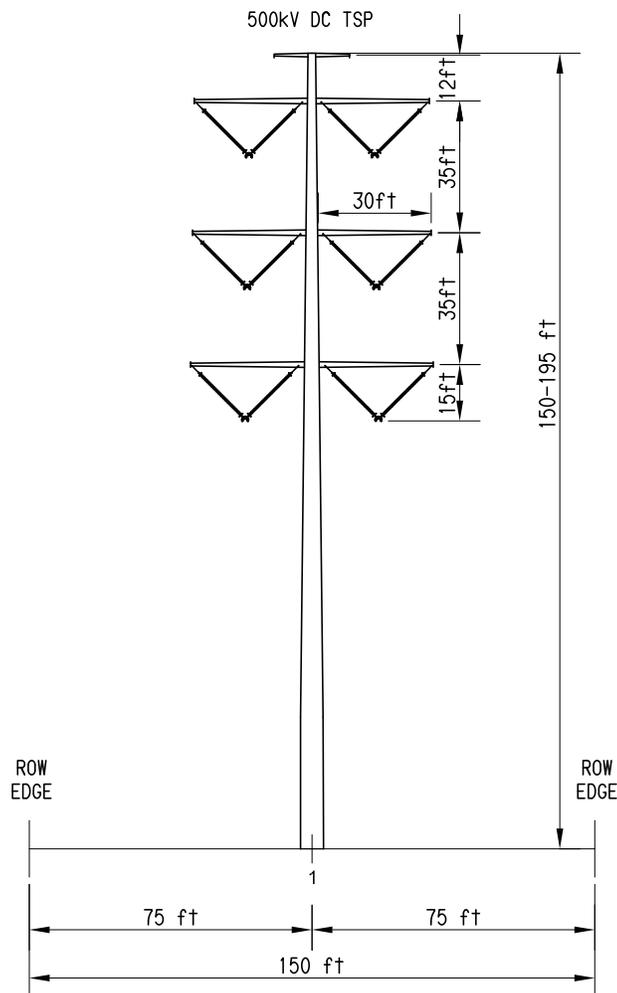
NOTE:
 This drawing represents potential changes
 between existing and future ROW cross sections.

Figure 2.2-40
Segment 8 ROW Cross-Section
(S8A MP 19.2 to S8A MP 22.9)

EXISTING ROW
 FACING EAST



FUTURE ROW
 FACING EAST



Source: SCE, 2007d.



NOTE:
 This drawing represents potential changes
 between existing and future ROW cross sections.

Figure 2.2-41
Segment 8 ROW Cross-Section
(S8A MP 22.9 to S8A MP 26.4)



Figure 3.14-48a (Revised)
Existing Conditions
for KOP-South-13
Intersection of Avenida Anita/
Avenida Compadres,
Chino Hills (Alternative 2,
Segment 8)

Source: SCE, 2007.



Figure 3.14-48b (Revised)
Visual Simulation
for KOP- South-13
Intersection of Avenida Anita/
Avenida Compadres,
Chino Hills (Alternative 2,
Segment 8)
Source: SCE, 2007.



Figure 3.14-49a (Revised)
Existing Conditions
for KOP-South-14
Coral Ridge Park, Chino Hills
(Alternative 2, Segment 8)

Source: SCE, 2007.



Figure 3.14-49b (Revised)
Visual Simulation
for KOP- South-14
Coral Ridge Park, Chino Hills
(Alternative 2, Segment 8)

Source: SCE, 2007.



Detail of Rough Terrain Crane proposed for use during removal operation.
12-4-2007 015.jpg



Detail of skid mounted 30,000 lb. puller. This piece of equipment is used to pull conductors during wire stringing operations. The back of the machine is aligned with the direction of the pull.
12-4-2007 013.jpg



Detail showing distance from the structure for setting of pole. Poles can and are installed without arms when necessary. Poles are set in sections (joints are visible in the photo).

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: COST OF CONSTRUCTING ALTERNATIVE 4CM

I. Chino Hills underestimates the cost of the switching station required by Alternative 4CM.¹

- Background: Alternative 4CM requires construction of a new 500 kV gas-insulated (GIS) switching station on Aerojet property that would not be built under the Proposed Segment 8A. As shown on the cost comparison chart, Chino Hills underestimates the cost of the switching station by \$41 million.
- SCE estimates that the costs to build the new switching station (assuming no problems due to geology) are approximately \$121 million. SCE's estimate is based on **actual costs recently incurred** building the 500 kV GIS Rancho Vista substation.
- By contrast, Chino Hills developed its cost estimates as follows:
 - Mr. Shirmohammadi received an email from a vendor estimating \$40 million for the GIS switchgear only. He “just doubled it to cover everything” and admits that his estimate is “very rough.” Mr. Arora called Mr. Shirmohammadi’s estimate “a wild guess.”
 - Mr. Arora estimated costs of \$59 million, but he omitted many key elements from his estimate. He also subtracted \$10 million from his estimate after Mr. Shirmohammadi expressed concern that Mr. Arora’s estimate would be inconsistent with his own.
 - When Mr. Arora’s omitted costs are added to his estimate, his estimate is very close to SCE’s, as shown in the table on page 110 of SCE’s Reply Brief (copy attached).
- **The \$41 million difference between SCE and Chino Hills estimates is purely a result of Chino Hills omitting significant cost elements from its estimate**, such as the cost of grading the site, building dead end structures to bring the transmission lines into the substation, bringing distribution power to the site, etc. SCE’s real world numbers, based on direct material and labor components, are more reliable than Chino Hills’ “wild guess.”

¹ References: Ex. SCE-11, Amended Ex. I; Ex. SCE-66C; Ex. SCE-70; Ex. SCE-74; Ex. SCE-79; Ex. CH-78 at Attachment E, fn 1; Hearing Tr. 429:9-430:6, 915:2-9, 1620:12-1622:13, 1638:24-26, 1716:1-5, 1719:24-1722:7.

II. Chino Hills underestimates the cost of new transmission line required by Alternative 4CM.²

- Background: Alternative 4CM requires construction of 11.3 miles of new transmission line through hilly terrain. To develop the cost of new transmission, SCE used component by component cost estimating. This involves computer design for the transmission line and takes into account actual terrain and expected location and type of transmission structures needed in the cost estimate. As shown on the cost comparison chart, Chino Hills underestimates this cost by \$17 million.
- The parties agree that it is more expensive to construct transmission line in hilly terrain than flat terrain. This is because hilly terrain requires the use of more dead-end structures.
 - **Dead-end structures cost nearly twice as much as TSPs** (\$1.945M v. \$1.109M).
 - More than half of the structures in the 11.3 miles of line (500 kV and 220 kV) needed to build Alternative 4CM are dead-end structures.
- Despite acknowledging that it is more expensive to build transmission line in hilly areas, Chino Hills' estimate uses average costs and assumes that the Alternative 4CM route is mostly flat.
 - Chino Hills' estimate for 500 kV uses an average cost of \$7.8 million per mile. Chino Hills took the \$7.8 million figure from SCE's estimate for the part of TRTP between the City of Duarte and the Mesa substation near Monterey Park and Montebello (Segment 7, Element 3). **That part of TRTP is mostly flat and is thus not representative of costs in hilly terrain.**
 - The bottom line is that using average costs here as Chino Hills does ignores terrain issues and artificially lowers the cost of building new transmission for 4CM.

² References: Ex. SCE-14; Ex. SCE-92; Ex. CH-13, Attachment A; Ex. CH-19; Ex. CH-74; SCE Response to Chino Hills Data Request Set 19 Question 2 and page 2 of attachment thereto; Hearing Tr. 401:3-9, 448:11-18, 555:19-25, 889:6-18, 896:13-20, 1682:12-24.

III. Chino Hills overestimates the cost of transmission line avoided by Alternative 4CM.³

- **Background:** Proposed Segment 8A contains 33 miles of double circuit 500kV transmission line plus additional 220 kV structure work. Under Alternative 4CM, the eastern 16 miles (“8A East”) does not need to be built (i.e., it is “avoided”). The western 17 miles (“8A West”), which includes additional 220kV structure work, must be built no matter which alternative is selected. As shown on the cost comparison chart, Chino Hills overestimates the cost of 8A East by \$16 million.
- To calculate the cost of 8A East, Chino Hills assumed that the 8A West, which is hilly and includes additional 220kV structure work, would cost the same on a per-mile basis as Segment 7, Element 3—**the same mostly flat terrain with no 220kV structure work that is used for estimating Alternative 4CM costs**. Chino Hills then subtracted that amount from SCE’s total estimate for the 33 miles of double circuit 500kV transmission line under Proposed Segment 8A, and incorrectly claims that the balance is the cost avoided by choosing 4CM. Under Chino Hills’ logic:
 - **\$267.1M** (SCE estimate for all of Proposed Segment 8A).
 - **MINUS \$133.0M** (Chino Hills’ estimate of 8A West, based on Segment 7, Element 3 flat terrain cost of \$7.8M/mile).
 - **EQUALS \$134.1M** (Chino Hills’ estimate for 8A East).
- Chino Hills claims these numbers make sense and that 8A East must be more expensive than 8A West solely because it contains TSPs. This assertion is wrong because 8A West is through hilly terrain and includes 23 new 220kV structures. By applying the flat average rate for the Segment 7, Element 3 double circuit 500kV transmission line work only to that area, it artificially inflates the costs that would be avoided along 8A East.
 - Even though the double circuit 500kV line 8A East accounts for roughly half of the entire Proposed Segment 8A (16 of 33 miles), **it only contains 35% of the dead-end structures** (16 of 45); 8A West has 65% of the dead-end 500kV lattice towers, 23 additional 220kV structures, and is therefore more expensive to build.
- Again, using average costs here as Chino Hills proposes ignores terrain issues, the additional 220kV work and is therefore not accurate.

³ References: Ex. CH-13, Attachment A; Hearing Tr. 895:10-18, 1682:12-24, 1699:22-1700:25.

IV. Chino Hills' estimate does not include \$30 million in upgrades to the Chino Mira Loma lines recently identified by CAISO.⁴

- CAISO recently identified approximately \$30 million in upgrades to the Chino Mira Loma lines that must be completed for system reliability purposes. Chino Hills' cost estimate for Alternative 4CM does not include the cost of the upgrades.

⁴ Reference: 2009 CAISO Transmission Plan, amended June 2009 at 157, 162-63, 172-176; Ex. CH-13, Attachment A.

Alternative 4CM Net Costs – SCE vs. Chino Hills

(Constant 2009 \$millions)

Item / Component	SCE	Chino Hills	Delta
Alternative 4CM Cost Additions			
Switchyard	\$ 121	\$ 80	\$ 41
Transmission (500 kV & 220 kV)	\$ 113	\$ 96	\$ 17
Substation (Protection, Security, etc.)	\$ 7	\$ -	\$ 7
Other	\$ 30	\$ 25	\$ 5
<i>Subtotal</i>	\$ 271	\$ 202	\$ 69
Segment 8 Cost Reductions			
Transmission - 500kV	\$ (119)	\$ (135)	\$ 16
Transmission - 220 kV, 66 kV*	\$ (49)	\$ (49)	\$ -
Substation	\$ (9)	\$ (9)	\$ -
Land	\$ (4)	\$ (4)	\$ -
Other	\$ (21)	\$ (23)	\$ 2
<i>Subtotal</i>	\$ (202)	\$ (220)	\$ 18
4CM Facility Net Costs / (Savings)	\$ 69	\$ (18)	\$ 87

* Because CAISO has determined that the Chino to Mira Loma 220kV transmission line is required for reliability, these cost reductions should be reduced by \$30 million.

Source: Exhibit SCE-11, Amended Exhibit I; Exhibit CH-13, Attachment A; Exhibit Ch-76.

<p align="center">Items Omitted From Mr. Arora’s Estimate for the 500 kV GIS Switching Station¹</p>	<p align="center">Estimated Cost of Omitted Item</p>
Civil work/additional ground/soil work/foundations for site and access roads	<p align="right">\$30,929,800</p>
Dead-end structures/Air bushing support structures	<p align="right">\$5,785,900</p>
Emergency generating set	<p align="right">\$260,000</p>
Station distribution power	<p align="right">\$4,000,000</p>
Costs associated with RCRA clean-up for contaminants and munitions	<p align="right">Unknown</p>
Contingency ²	<p align="right">\$20,825,000 - \$30,825,000</p>
<p align="right">Total Omitted Costs:</p>	<p align="right">\$61,800,700 - \$71,800,700</p>
<p align="right">Total Included Costs:</p>	<p align="right">\$59,500,000</p>
<p align="right">Total Arora Estimate After All GIS Substation Costs Included:</p>	<p align="right">\$121,300,700 - \$131,300,700</p>

¹ See SCE Reply Brief at 110.

² Includes \$10 million subtracted from Mr. Arora’s initial \$80 million estimate to make it “consistent” with Mr. Shirmohammadi’s estimate.

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: ALTERNATIVE 4CM ENVIRONMENTAL IMPACTS

I. **Alternative 4CM Is Environmentally Inferior and Infeasible.**¹

- Unlike proposed Segment 8A, Alternative 4CM would require new right-of-way (ROW) in Chino Hills State Park and on private property, traverse the Core Habitat Zone in the Park, and traverse designated critical habitat for the federally-listed California gnatcatcher. Alternative 4CM would therefore have far greater environmental impacts than proposed Segment 8A. Based on these greater environmental impacts, as well as on constructability and cost issues, Alternative 4CM is infeasible.
- The Final Environmental Impact Report (FEIR) finds that proposed Segment 8A is part of the environmentally superior alternative.

II. **Summary of Alternative 4CM Environmental Impacts from the Final EIR.**²

- **Biological Resources:** Alternative 4CM would cause a net increase to disturbance of sensitive vegetation communities, wildlife, and habitat, including riparian areas.
 - Alternative 4CM would traverse primarily natural habitats such as high quality, natural streams and the Core Habitat Zone in the Park, while the proposed Project would traverse primarily disturbed, developed, and agricultural lands. The Park's General Plan explains that the Core Habitat Zone has the "highest biological resource sensitivity in the park."
 - Alternative 4CM would cross and disturb designated critical habitat for the California gnatcatcher.
- Preliminary evaluations of the switching station site on the Aerojet property and near the proposed route of Alternative 4CM on Chino Hills State Park identify sensitive habitat and the potential for several federally listed threatened and endangered species, including the least Bell's vireo and the Southwestern Willow Flycatcher.

¹ FEIR at 5-46 to 5-50.

² FEIR at 3.14-143 to 3.14-147, 3.4-306 to 3.4-307, 4-62 to 4-64; Draft CPUC CEQA Findings of Fact § VIII.3.3 (Nov. 3, 2009); SCE's Rebuttal Testimony, Tracey A. Alsobrook [Ex. SCE-04 at 34-38]; Direct Testimony of Scott Goulart on Behalf of Aerojet [Ex. Aerojet-01]; Testimony of Claire Schlotterbeck on Behalf of Hills for Everyone [Ex. HFE-02]; Chino Hills State Park General Plan (Feb. 1999) [Ex. SCE-23].

- **Visual Resources:** The existing ROW already contains 220 kV transmission towers, while Alternative 4CM adds new ROW and transmission infrastructure on the Park and on property owned by Aerojet and other private landholders.
 - While the new Tubular Steel Poles (TSP) proposed for the existing ROW will be taller than the existing 220 kV towers they replace along proposed Segment 8A, these new towers will not impact visual resources to the extent of adding new transmission infrastructure on the Park and private property as required under Alternative 4CM.
 - Alternative 4CM would potentially place the switching station within view of Key Observation Point (KOP)-South-22: Vellano Development.
- **Geological Resources:** Due to its longer length and location, Alternative 4CM would increase construction and ground disturbance in hillside areas with known landslides and slope stability issues, as well as earthquake-induced slope failures. The increased ground disturbance resulting from the greater amount of grading required for access and spur roads and for the new switching station also increases the potential for erosion and degradation of paleontological resources.
- **Environmental Contamination and Hazards:** Alternative 4CM would be located near a former burn area at the Aerojet project, and DTSC has not issued final hazardous materials clearance for all areas. Alternative 4CM increases the potential to encounter environmental contamination and hazards.
- **Land Use:** Alternative 4CM, unlike proposed Segment 8A, would be inconsistent with the Park's General Plan.
- **Fire Impacts:** Alternative 4CM increases the miles of new transmission line through the high-risk Tehachapi Fireshed by 8.3 miles. By requiring new and expanded ROW in a high-risk landscape, Alternative 4CM would increase the potential risk of wildfire and interfere with firefighting operations
- **Air Quality:** Alternative 4CM has the highest air quality emissions in Segment 8 of the Alternative 4 routes.
- **Cultural Resources:** Alternative 4CM would be located in an area of higher cultural resources sensitivity than proposed Segment 8A. The Project Area of Potential Effect (APE) has identified a greater number of cultural resources.

SCE TEHACHAPI RENEWABLE TRANSMISSION PROJECT

FACT SHEET: 21st CENTURY GREEN PARTNERSHIP INFEASIBILITY

I. Conflicts with CEQA and Constitutional Requirements for Mitigation.¹

- The 21st Century Green Partnership proposes that SCE pay up to \$50 million for Chino Hills State Park to use at its discretion for four categories: bio-corridor expansion, habitat enhancements, viewshed enhancements, and operational enhancements. **These categories do not provide mitigation that is proportional and related to Alternative 4CM's impacts. The FEIR and the Proposed Decision have found that the 21st Century Green Partnership plan violates CEQA and constitutional requirements and thus the Commission cannot require SCE to fund the plan.**
- The mitigation already required in the FEIR would reduce biological impacts for Alternative 4CM to below the level of significance, except for cumulative biological impacts. **The bio-corridor expansion and habitat enhancements would not reduce Alternative 4CM's cumulative biological impacts** and therefore would not provide meaningful additional mitigation.
- **Viewshed enhancements would be ineffective** because they would not provide meaningful mitigation for visual impacts beyond that in place in the FEIR. Further, SCE previously committed to remove de-energized transmission lines from the Park separate from TRTP.
- The operational enhancements would include an endowment to hire one environmental scientist and ranger to monitor the impacts of Alternative 4CM construction, monitor the proposed habitat enhancements, and manage new lands to be acquired through the proposed bio-corridor expansion. The 21st Century Green Partnership does not explain how the environmental scientist and ranger's work is proportional or related to Alternative 4CM's impacts. Instead, the endowment is for unspecified future programs and improvements, which is not valid mitigation under CEQA.

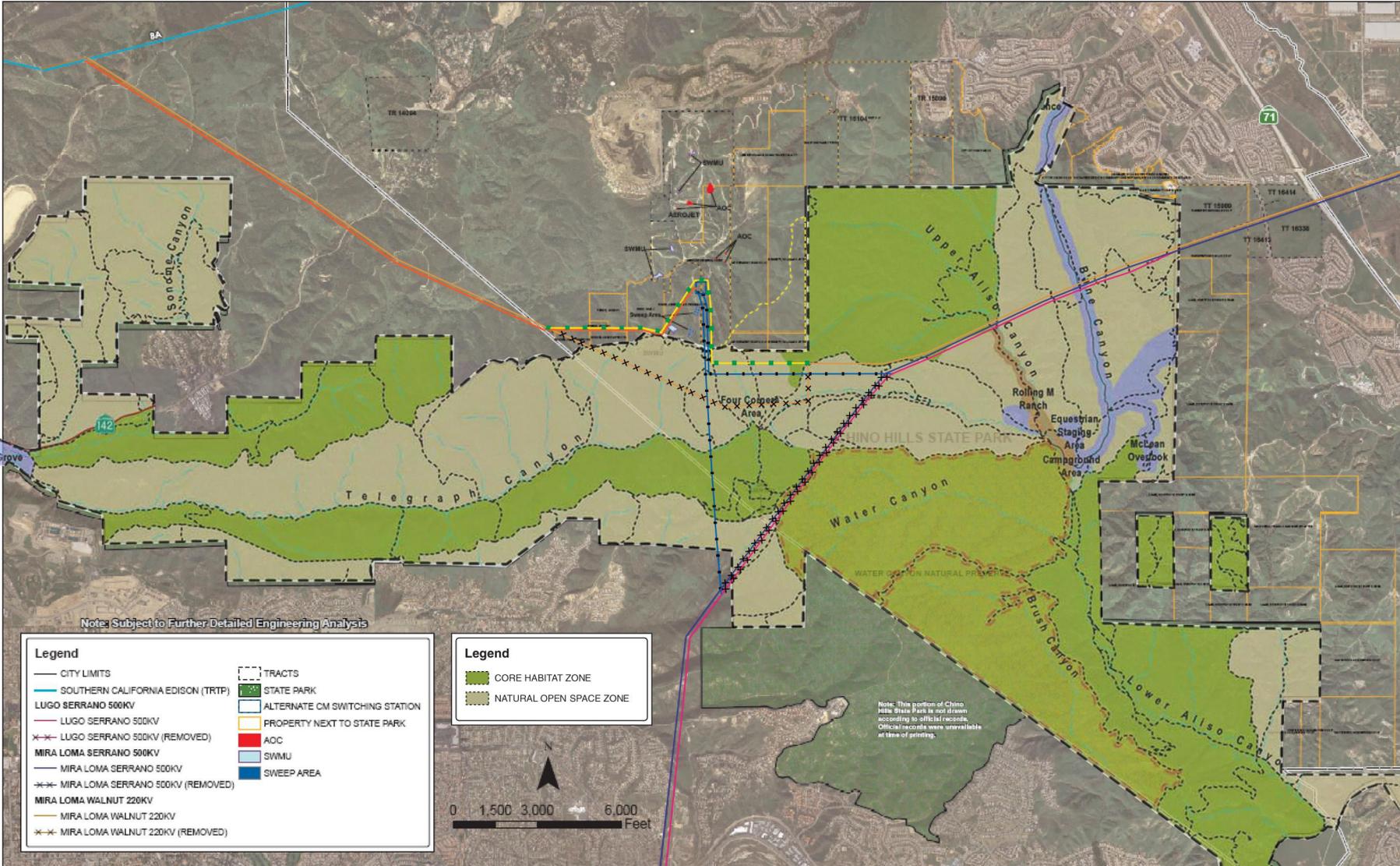
¹ *Dolan v. City of Tigard*, 512 U.S. 374, 391 (1994); *Nollan v. Cal. Coastal Comm'n*, 483 U.S. 825, 834-37 (1987); *Ehrlich v. City of Culver City*, 12 Cal. 4th 854, 872-76 (1996); Cal. Code Regs. tit. 14, §§ 15041(a), 15126.4(a)(4); FEIR at 5-46 to 5-50; CPUC CEQA Draft Findings of Fact § VII.1; Proposed Decision at 48-49.

II. Conflicts with the Commission's Low-Cost/No-Cost EMF Policy.²

- The 21st Century Green Partnership states that the Commission has authority to condition approval on SCE's payment of up to \$50 million based on the Commission's low-cost/no-cost EMF mitigation policy, which provides that up to 4% of a transmission project's cost can be used to incorporate low-cost and no-cost design measures into the project to reduce EMF levels. This statement suggests that the 21st Century Green Partnership is meant to reduce EMF levels.
- **The 21st Century Green Partnership, however, does nothing to reduce EMF levels.** Directing SCE to fund the 21st Century Green Partnership based on the low-cost/no-cost policy would therefore violate the Commission's policy.

² FEIR at 5-49; CPUC CEQA Draft Findings of Fact § VII.1; SCE's Rebuttal Testimony, Thomas A. Burhenn (June 15, 2009) [Ex. SCE-04 at 40:6-16].

Chino Hills State Park Management Zones Crossed By Alternative 4CM (May Version)



Source: Based on City of Chino Hills Alternative 4CM Map (May Version) and Chino Hills State Park General Plan, Figure 6

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) NOTICE OF *EX PARTE* COMMUNICATION** on all parties identified on the attached service list. Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **20th day of November, 2009**, at Rosemead, California.

/s/ Henry Romero
Henry Romero, Analyst-Program/Project
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue
Post Office Box 800
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Utilities Commission

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[TOP OF PAGE](#)
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