
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298
October 19, 2011

VIA FIRST CLASS MAIL AND EMAIL



Susan Nelson
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, California, 91770

Re: FAA lighting/marketing requirements for Tehachapi Renewable Transmission Project

Dear Susan:

This letter is intended to guide Southern California Edison's (SCE) efforts to attain and maintain compliance with Federal Aviation Administration (FAA) regulations with respect to the Tehachapi Renewable Transmission Project (TRTP), which has been the subject of various e-mail, telephone, letter and in-person discussions between the staffs of the California Public Utilities Commission (CPUC) and SCE in recent weeks. This guidance is intended to be applied to all sections of TRTP, including Segments 1, 2, and 3.

In the EIR's Mitigation and Monitoring Plan (MMP) approved by the Commission in Decision (D. 09-12-044), the MMP addressed SCE's responsibilities with respect to the FAA regulations:

“L-2b Aircraft flight path and safety provisions and consultations. Prior to construction, SCE shall consult with the Federal Aviation Administration (FAA) and ensure the filing of all forms and associated specifications per the requirements of Federal Aviation Regulations (FAR) Title 14, Part 77. In addition, prior to the start of construction, SCE shall consult with all affected Airport Land Use Commissions (or their alternative process) and the FS to ensure that construction, operation, and maintenance of the Project does not conflict with local aircraft operations or associated safety provisions.”

Energy Division directs SCE to continue analyzing FAA regulations establishing standards for addressing obstructions in navigable airspace that is proximate to airports. The CPUC Staff understands that SCE has submitted numerous filings to the FAA

regarding the various elements of the TRTP (e.g., towers, catenaries or construction cranes) requesting consultation on potential obstructions to navigable airspace created by those elements, and that the FAA has responded to some of these requests. Energy Division Staff further understands that SCE has not submitted FAA filings regarding many structures because detailed final engineering analysis has not been completed by SCE. Energy Division Staff also understands that FAA filings have not been submitted regarding TRTP Segments 1-3.

As to TRTP elements that have already been constructed and/or installed, where the FAA has determined that the structure could constitute a potential hazard without lighting and/or marking, Energy Division directs SCE to expeditiously pursue the safe installation of the recommended lighting and/or marking. Energy Division Staff understands that SCE is in the process of procuring lighting and markers to fulfill this goal and that such installation may require supplemental engineering analysis to determine how to complete such installations while maintaining structural integrity of the towers and catenaries, some of which have been completed.

As to TRTP elements that have not yet been constructed and/or installed where the FAA has determined that the structure(s) could constitute a potential hazard without lighting and/or marking, Energy Division Staff advises that SCE needs Commission approval prior to installing catenary marker balls, lighting, or any other facility not originally authorized by the Commission in D. 09-12-044 regarding TRTP Segments 4-11. As directed by the CPUC, on October 17, 2011 SCE filed a Petition For Modification to the above referenced decision, which includes in part modifications intended to achieve and maintain compliance with FAA regulations.

SCE should not perform any new or additional tower construction and conductor stringing in areas that have a high probability of being subject to FAA mitigations. To that end, conductor stringing in the City of Chino Hills within 1000 feet of any residences should not be undertaken. Ground construction activities that do not require tower erection, such as preconstruction clearing, fencing, surveys, road maintenance, et cetera, may continue. Post tower construction activities such as demobilization and post construction mitigation may also continue. .

Regarding Transmission Tower M54-T3A, as referenced in the FAA letter dated April 25, 2011 Notice of Presumed Hazard, the Energy Division directs SCE to immediately resolve the hazardous conditions as identified by the FAA. SCE should report to Energy Division Staff on the actions and timelines that have been and will be undertaken to resolve the hazardous conditions on a bi-weekly basis, both for Tower M54-T3A and all other FAA mitigation measures.

As to TRTP Segments 1-3, Energy Division directs SCE to comply with FAA standards regarding potential obstructions to navigable airspace in an expeditious manner in order to achieve FAA compliance.

Very truly yours,
/S/

Mary Jo Borak
Program and Project Supervisor
Infrastructure Permitting and CEQA

cc:

Angela Whatley, SCE Legal
Thomas Burhenn, SCE
John Boccio, Energy Division
Robert Strauss, Energy Division
Ken Lewis, Energy Division
Elizabeth Dorman, Attorney, Legal Division
Arocles Aguilar, Assistant General Counsel
Frank Lindh, General Counsel
Paul Clanon, Executive Director