

PRE-APPLICATION DOCUMENT

BISHOP CREEK HYDROELECTRIC PROJECT FERC PROJECT NO. 1394

SOUTHERN CALIFORNIA EDISON COMPANY BISHOP, CALIFORNIA

1.0 INTRODUCTION

1.1 BACKGROUND

Southern California Edison Company (SCE) is the licensee, owner and operator of the Bishop Creek Hydroelectric Project (Project), Federal Energy Regulatory Commission (FERC) Project No. 1394 located on Bishop Creek near the community of Bishop in Inyo County, California. Project facilities are located within the Inyo National Forest and the John Muir Wilderness (managed by the U.S. Forest Service [USFS]), lands managed by Bureau Land Management (BLM) and on private lands. The Project consists of five developments: Power Plants 2 through 6 on the Middle Fork of Bishop Creek. Three primary storage reservoirs include Southlake Reservoir, Sabrina Lake and Longley Lake. The Project also utilizes diversions and flowlines that collect water from Green Creek (a tributary to Bishop Creek), Birch Creek and McGee Creek. SCE currently operates the Project under a 30-year license that was issued by FERC on July 19, 1994. Because the current license will expire on June 30, 2024, SCE is seeking a license renewal to continue operation and maintenance (O&M) of the Project.

1.2 DOCUMENT PURPOSE AND CONTENT

This Pre-Application Document (PAD) has been prepared in compliance with 18 Code of Federal Regulation (CFR) Part 5, which defines the form and content requirements of the document. The purpose of the PAD is to provide FERC, federal and state agencies, and other interested stakeholders with background information related to Project facilities and engineering, operational, economic and environmental aspects of the Project. The PAD defines pertinent Project issues and potential study needs. In accordance with the regulations, the PAD and associated Notice of Intent (NOI) have been filed with FERC, and distributed to federal and state

resource agencies, local governments, relevant tribal entities, non-governmental organizations (NGO) and other interested parties.

The information contained in this document was assembled based on the requirements set forth in 18 CFR §5.6 (c) and (d) and is organized as follows:

Accompanying this PAD and appendices (Volume I) are additional volumes that will form the basis of the anticipated relicensing process:

- Volume II (Consultation Record) summarizes contacts and consultations completed as part of the early consultation process.
- Volume III (Proposed Technical Study Plans [Study Plans]) will form the basis of the proposed Study Plans to be used by FERC to consider its response to the scoping process.
- Volume IV (Cultural Resources-Confidential Information) contains information that provides details on the location(s) of sensitive cultural resources. Disclosure of this information could be harmful to these resources. Pursuant to 18 CFR §385.1112, SCE requests confidential treatment of this information.
- Volume V (One-Line Diagrams), contains information required by 18 CFR § 5.6(d)(2) that SCE considers to be Critical Energy Infrastructure Information (CEII), and therefore will be filed separately.

2.0 PROCESS PLAN AND SCHEDULE [§ 5.6 (D)(1)]

2.1 DESCRIPTION OF THE INTEGRATED LICENSING PROCESS

SCE elected to relicense the Project using a hybrid version of FERC's Integrated Licensing Process (ILP). As described in Section 2.2 below, some activities have been initiated in advance of the filing of the PAD and NOI to expedite the Study Plan determination process.

To facilitate communication and encourage participation, SCE established a publicly-accessible website for the Project relicensing which contains information about past and current relicensing activities, including meeting notices and agendas, meeting summaries, documents distributed to or received from participants, reference materials, key decisions and links to relevant information sources such as FERC's ILP regulations. Updates to this process plan and schedule will be posted on the website (www.sce.com/bishopcreek). In addition, all materials developed during the relicensing will be available at SCE's California offices located 1515 Walnut Grove Avenue, Rosemead, California 91770, and at the Bishop Creek Hydro Electric Project office located at 4000 E Bishop Creek Road, Bishop, California 93514.

2.2 EARLY LICENSING ACTIVITIES AND CONSULTATION RECORD AND SUMMARY OF CONTACTS

SCE initiated early contact with stakeholders, as described in the Consultation Record and Summary of Contacts (Volume II). The process started with a public meeting in March 2018, the purpose of which was to inform the public about the Project and upcoming opportunities to participate in the relicensing process. Following this public meeting, SCE formed Technical Working Groups (TWGs) with interested stakeholders to identify questions and potential interests related to the relicensing process. Three technical workshops and a site tour were held in 2018, and several webinars were held in early 2019 to develop a common understanding of the issues to be addressed during the relicensing; stakeholders provided input on draft Study Plans that were developed in response to these workshops.

SCE invited federal and state agencies, NGOs and tribes to participate in the public meeting and TWGs. To date, attendees at TWG meetings have included members of the Bishop Paiute Tribe,

USFS, California Department of Fish and Wildlife (CDFW), State Water Resource Control Board (SWRCB), U.S. Fish and Wildlife Service (USFWS), SCE, Kleinschmidt Associates, Psomas, E Read and Associates, Kearns & West, and Historical Research Associates (HRA.

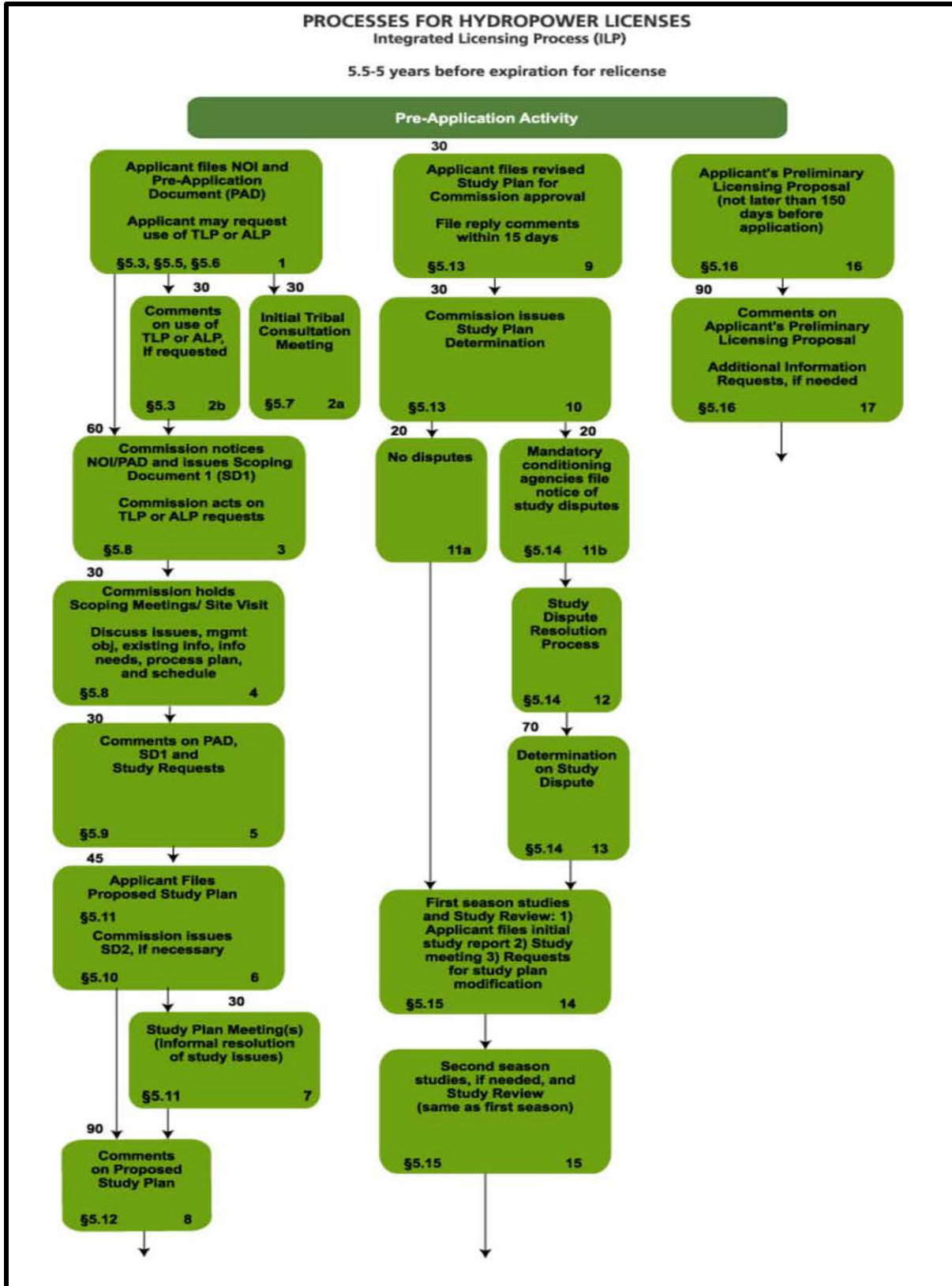
Section 5 of this PAD summarizes identified issues. Section 5 also provides the Technical Study Program overview that SCE trusts will address issues regarding continuing impacts of the Project. The proposed Study Plans provided in Volume II with this filing provide a consultation history that summarizes its development and how comments raised by stakeholders were addressed by SCE. To the extent that SCE is aware, SCE will identify issues that require additional discussion and consultation in each Study Plan; it is SCE's intent to resolve these items before FERC's issuance of Scoping Document 2 (SD2).

It is SCE's belief that the proposed Study Plans anticipate the range of issues that FERC may identify in its scope process under 18 CFR § 5.8 (Notice of Commencement of Proceeding and Scoping Document) and § 5.9 (Comments and Information or Study Requests).

2.3 PROJECT SCHEDULE

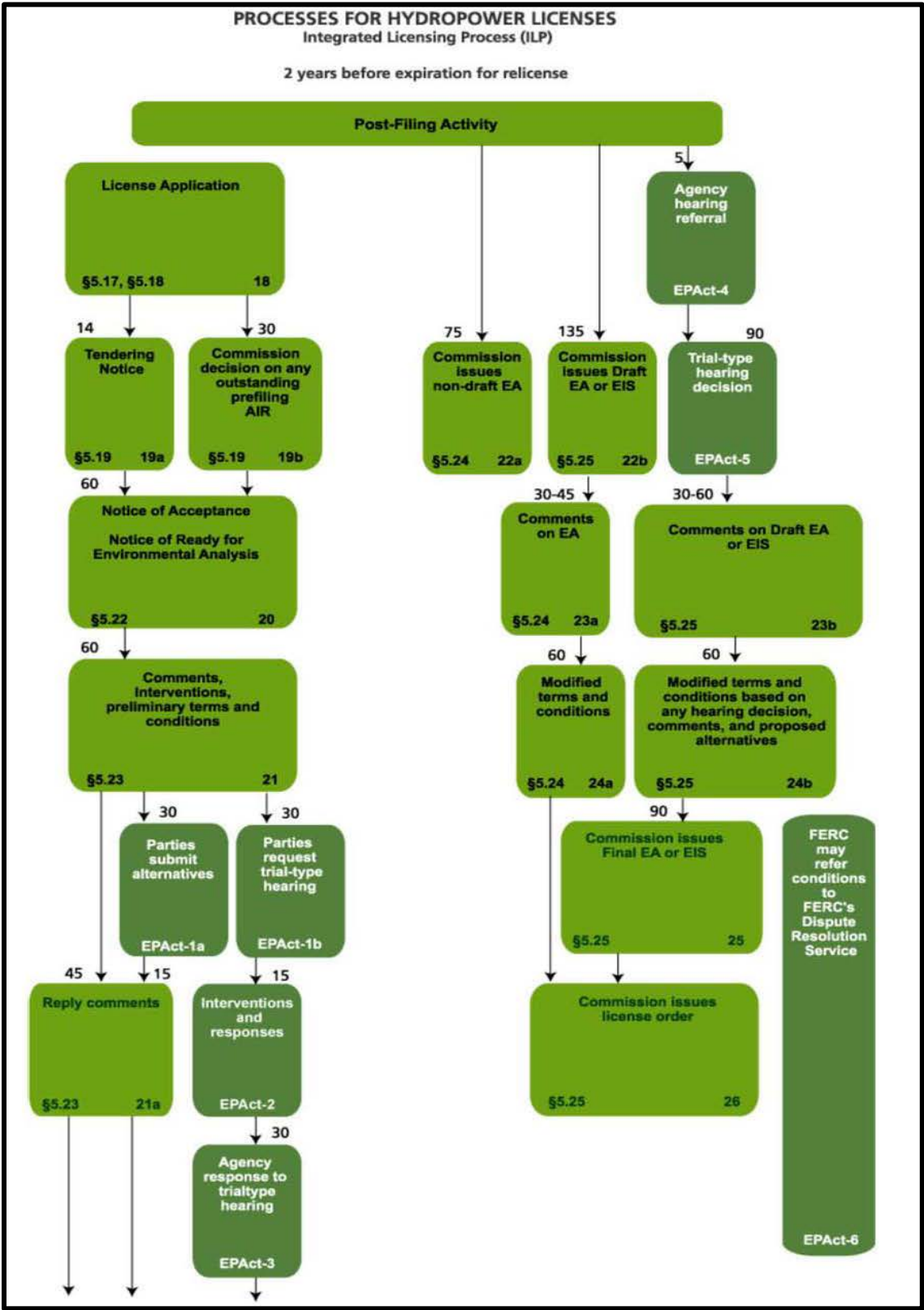
The proposed Relicensing Process Plan and Schedule for the Project was developed consistent with the regulations provided in Title 18 CFR Part 5 ILA application process. As described below, SCE anticipates seeking waivers for some steps of this process, consistent with the early identification of issues and early filing of study plans concurrent with this PAD and NOI.

Figure 2-1 and Figure 2-2 provide an overview of key activities in the ILP.



Source: FERC 2018

FIGURE 2-1 INTEGRATED LICENSING PROCESS PRE-APPLICATION ACTIVITY



Source: FERC 2018

FIGURE 2-2 INTEGRATED LICENSING PROCESS POST-FILING ACTIVITIES

SCE's proposed schedule, found in Table 2-1, provides each of the major relicensing activities in the ILP (pre- and post-filing of the Final License Application [FLA]), associated CFR reference, the party responsible for implementation of the activity, and the deadline for each activity. The proposed Process Plan and Schedule is based on SCE's filing of this Bishop Creek Project NOI and PAD on May 1, (59 days prior to the statutory deadline of June 29, 2019). The deadlines presented in the schedule identify the specific date that each activity must be completed to comply with federal regulations; however, relicensing activities may be completed early, prior to the specific deadline. The ILP regulations provide flexibility regarding when some relicensing activities must be completed. Additionally, the initiation of some activities is dependent upon the completion date of other activities. If necessary, SCE will revise the Process Plan and Schedule for the Project and post the updated version on the Bishop Creek relicensing website.

As described in Section 2.2 above, SCE has been discussing with agencies, issues and concerns regarding the current and proposed operations. These issues are discussed in Section 5.1 below, and complementary studies are described in Section 5.2. Volume III of this PAD and NOI provides more detailed Study Plans, including their development history in consultation with the TWGs, how SCE responded to the comments, and SCE's proposed approach for resolving outstanding issues and the need for ongoing consultation during implementation.

SCE intends to expedite the Study Plan determination process by seeking a waiver of 18 CFR §5.11 and §5.12 of FERC's regulations. Each Study Plan details the comments that have been received to date, and how SCE addressed those comments. Additionally, if needed, the plans identify the decisions that require resolution prior to the request for waiver. SCE will hold technical workshops, as needed to address outstanding issues in advance of the Study Plan request deadline.

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**TABLE 2-1 SCE PROPOSED PROCESS PLAN AND SCHEDULE FOR THE BISHOP CREEK HYDROELECTRIC PROJECT
USING THE HYBRID INTEGRATED LICENSING PROCESS**

FERC 18 CFR §	RELICENSING ACTIVITY	RESPONSIBLE PARTY	ACTIVITY TIME FRAME	DEADLINE^{1,2} (HYBRID ILP)	DEADLINE (STANDARD ILP)
Initiation of Relicensing Process					
5.5 5.5(d)	Filing of Notification of Intent (NOI)	SCE	5 to 5.5 years prior to existing license expiration Filed concurrent with PAD	5/1/2019	5/1/2019
5.5(e)	Request to be non-federal representative under Section 7 of the Endangered Species Act (ESA)	SCE	Provide simultaneously with filing of NOI	5/1/2019	5/1/2019
5.5(e)	Request to initiate consultation under Section 106 of the National Historic Preservation Act (NHPA)	SCE	Provide simultaneously with filing of NOI	5/1/2019	5/1/2019
5.6 5.6(a)	Filing of PAD	SCE	5 to 5.5 years prior to existing license expiration Filed concurrent with NOI	5/1/2019	5/1/2019
FERC Scoping					
5.7	Initial Tribal Consultation Meeting	FERC	Within 30 days following filing of NOI/PAD	5/31/2019	5/31/2019
5.8 5.8(a)	Notice of Commencement of Proceeding and Scoping Document	FERC	Within 60 days of filing NOI/PAD.	7/1/2019	7/1/2019
5.8(a)(b) 5.8(b)(iv)	Issue notice of NOI/PAD and request for comments	FERC	Included in notice of commencement of proceeding	7/1/2019	7/1/2019
5.8(b)(2)	Decision regarding SCE request to initiate informal consultation under Section 7 of the ESA, or Section 106 of the NHPA	FERC	Included in notice of commencement of proceeding	7/1/2019	7/1/2019
5.8(c)	Issue Scoping Document 1 (SD1)	FERC	Concurrent with notice of commencement of proceeding.	7/1/2019	7/1/2019
5.8(b)(3)(viii)	Conduct Public Scoping Meeting and Site Visit	FERC	Within 30 days of the notice of commencement of proceeding	7/31/2019	7/31/2019
5.9 (a)	File comments on PAD and SD1, and provide study requests	Participants	Within 60 days following the notice of commencement of proceeding	8/30/2019	8/30/2019

FERC 18 CFR §	RELICENSING ACTIVITY	RESPONSIBLE PARTY	ACTIVITY TIME FRAME	DEADLINE ^{1,2} (HYBRID ILP)	DEADLINE (STANDARD ILP)
	SCE notify (email) Regulatory Oversight Group of proposed request to expediate the Study Plan Determination Process (waiver)	SCE	Work with Regulatory Oversight Group prior to end of comment period to gain support on request to expedite the study plan process	Mid July 2019	N/A
	Submit request for waiver of FERC regulations (waive Sections 5.11 and 5.12)	SCE	File the day after comment period (provided no comments received)	9/2/2019	N/A
	Issue Notice of Request for waiver of FERC regulations	FERC	Within 7 days of receipt of request for waiver of FERC regulations	9/9/2019	N/A
	File comments on request for waiver of FERC regulations	FERC	Within 15 days following the Notice of Request for Waiver from FERC Regulations	9/24/2019	N/A
	File notice of approval of request for waiver of FERC regulations	FERC	Within 15 days following the Notice of Request for Waiver from FERC Regulations	10/24/2019	N/A
5.10	Issue SD2 (if necessary)	FERC	Within 45 days following the deadline for comments on SD1; <i>would not be necessary if waiver is approved.</i>	N/A	10/14//2019
Study Plan Development					
5.11 5.12	Proposed Study Plan and Study Requests – Technical Study Plans to be included in the PAD and Study Requests are addressed in consultation with stakeholders from March 2018 through March 2019.				
5.11(a)	File Proposed Study Plan	SCE	Not applicable under proposed process: study plan filed with PAD/NOI	N/A	10/14/2019
5.11(e)	File proposal for conducting study plan meeting(s) during 90-day proposed study plan review period.	SCE	Not applicable under proposed process	N/A	10/14/2019
5.11(e)	Conduct Initial Study Plan Meeting	SCE	Not applicable under proposed process	N/A	11/13/2019
5.12	File comments on Proposed Study Plan or submit revised study requests	Participants	Not applicable under proposed process	N/A	1/13/2019
5.13	Revised Study Plan and Study Plan Determination				

FERC 18 CFR §	RELICENSING ACTIVITY	RESPONSIBLE PARTY	ACTIVITY TIME FRAME	DEADLINE ^{1,2} (HYBRID ILP)	DEADLINE (STANDARD ILP)
5.13(a)	File Revised Study Plan	SCE	FERC would consider Technical Study Plan to be Revised Study Plan	N/A	2/12/2020
5.13(b)	File final comments on Revised Study Plan	Participants	Within 15 days following issuance of requested waiver of 5.11 and 5.12	10/24/2019	2/27/2020
5.13(c)	Issue Study Plan Determination	FERC	15 days following the deadline for filing comments on the Revised Study Plan.	11/08/2019	3/13/2020
5.13(d) 5.14(a)	File notice of study dispute	Mandatory Conditioning Agencies	Within 20 days of the Study Plan Determination	N/A	4/2/2020
5.13(d)	Study Plan approved, if no notice of study dispute is filed	FERC	20 days following the notice of study plan dispute filing period	N/A	4/2/2020
Formal Study Dispute Resolution Process					
5.14(d)	Convene Dispute Resolution Panel, if notice of Study Plan dispute is filed	FERC	Within 20 days of the notice of study dispute	N/A	4/22/2020
5.14(i)	File with FERC and serve upon panel members comments and information regarding dispute	SCE	No later than 25 days following the notice of study dispute	N/A	4/27/2020
5.14(k)	Issue findings and recommendations regarding the Study Plan dispute to Director of the Office of Energy Projects	Dispute Resolution Panel	No later than 50 days following the notice of study plan dispute	N/A	5/22/2020
5.14(l)	Issue Written Determination on Study Plan Dispute	FERC	No later than 70 days from the date of filing of the notice of study dispute	N/A	7/31/2020

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame		
Conduct Studies					
5.15(a)	Conduct First Year Studies (for study plans not under dispute)	SCE	October 1, 2019 through September 30, 2020		
5.15(b) 5.15(c)(1)	File progress report and Initial Study Report	SCE	Within one year after FERC approval of the study plan	11/09/2020	3/15/2021
5.15(c)(2)	Conduct Initial Study Report Meeting	SCE	Within 15 days of filing the Initial Study Report	11/24/2020	3/30/2021
5.15(c)(3)	File Initial Study Report Meeting Summary, including any study modifications or new studies	SCE	Within 15 days following the Initial Study Report Meeting	12/09/2020	4/14/2021
5.15(c)(4)	File disagreement with Initial Study Report Meeting Summary	FERC and Participants	Within 30 days following the filing of the Initial Study Report Meeting Summary	01/08/2021	5/14/2021
5.15(c)(7)	If no disagreements are filed, approve Initial Study Report Meeting Summary and any proposed study plan amendments	FERC	Within 30 days following the filing of the Initial Study Report Meeting Summary	01/08/2021	5/14/2021
5.15(c)(5)	If disagreements are filed, file responses to disagreement with Initial Study Report Meeting Summary	FERC, SCE and Participants	Within 30 days of the filing of a disagreement with Initial Study Report Meeting Summary	2/8/2021	6/14/2021
5.15(c)(6)	Resolve disagreement and amend approved Study Plan	FERC	Within 30 days following the due date for responses to disagreement	3/10/2021	7/14/2021
5.15(f)	Conduct Second Year Studies	SCE	October 1, 2020 through September 30, 2021		
5.15(f)	File progress report and Updated Study Report	SCE	Within 2 years after FERC approval of the study plan	11/09/2021	3/15/2022
5.15(c)(2)	Conduct Updated Study Report Meeting	SCE	Within 15 days of filing the Updated Study Report	11/24/2021	3/30/2022
5.15(c)(3)	File Updated Study Report Meeting Summary, including any study modifications or new studies	SCE	Within 15 days following the Updated Study Report Meeting	12/09/2021	4/14/2022
5.15(c)(4)	File disagreement with Updated Study Report Meeting Summary	FERC and Participants	Within 30 days following the filing of the Updated Study Report Meeting Summary	01/10/2022	5/14/2022

FERC 18 CFR §	Relicensing Activity	Responsible Party	Activity Time Frame		
5.15(c)(7)	If no disagreements are filed, approve Updated Study Report Meeting Summary and any proposed Study Plan Amendments	FERC	Thirty days following the filing of the Updated Study Report Meeting Summary	01/10/2022	5/14/2022
5.15(c)(5)	If disagreements are filed, file responses to disagreement with Updated Study Report Meeting Summary	FERC, SCE and Participants	Within 30 days of the filing of a disagreement with Updated Study Report Meeting Summary	2/9/2022	6/14/2022
5.15(c)(6)	Resolve disagreement and amend approved Study Plan	FERC	Within 30 days following the due date for responses to disagreement	3/11/2022	7/14/2022
5.15(f)	Promptly proceed with any remaining undisputed studies or amended studies	SCE			
Filing of License Application					
5.16(a)	File Preliminary Licensing Proposal or Draft Application	SCE	No later than 150 days prior to the deadline for filing a new license application.	1/31/2022	1/31/2022
5.16(e)	File comments on Preliminary Licensing Proposal or Draft License Application	FERC and Participants	Within 90 days of the filing date of the Preliminary Licensing Proposal or Draft Application	5/2/2022	5/2/2022
5.17(a)	File License Application	SCE	No later than 24 months before the existing license expires	6/30/2022	6/30/2022
Notes: 1. For comparison purposes, the table provides the deadline for each item if SCE were to use the standard ILP process*. 2. If deadline falls on a weekend or holiday, the deadline was moved to the following business day. 3. Time periods begin the day after a filing/issuance date. ** Items in blue represent contingent processes in the event of a study dispute; items in green represent proposed discretionary processes to achieve an accelerated study plan determination.					

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2.4 PROPOSED LOCATION AND DATE FOR JOINT AGENCY MEETING AND SITE VISIT

As set forth in the ILP regulations, FERC will issue Scoping Document 1 (SD1) within 60 days of the filing date of the NOI and PAD. In addition, pursuant to 18 CFR § 5.8(b)(3)(viii), FERC will provide public notice and schedule a public scoping meeting and a Project site visit to be held within 30 days of issuing SD1. FERC will notice the dates, times and location of the Scoping Meetings and publish that information in local papers after the filing of the NOI and PAD.

2.5 DOCUMENT CONTROL AND WEBSITE

2.5.1 Proposed Communications Protocol

Effective communication is essential for a timely, cost-effective relicensing. The proposed communication protocol is a revised and updated approach that was utilized in the early consultation phase of the PAD and Study Plan development process described in Section 2.2. The proposed Communication Protocol provides participation guidelines for the relicensing process for SCE, interested parties, governmental agencies, NGOs, Native American tribes and the public (Appendix A).

2.5.2 Mailing Lists

SCE will maintain a relicensing mailing list of all interested parties including relicensing participants and Native American tribes. This list includes both standard U.S. Post Office addresses and available e-mail addresses for distributing notices and documents for public review. FERC will maintain a mailing list of potentially interested parties for the Project. SCE anticipates that once the relicensing proceeding begins, SCE's relicensing mailing list and FERC's mailing list will be consolidated into one common list. After SCE files the FLA, FERC will establish an official service list for parties who formally intervene in the proceeding. Once the service list is established, all written documents filed with FERC must be sent to the participants on the service list. A Certificate of Service must be included with the documents filed with FERC.

2.5.3 Website

SCE established a publicly-accessible website for the Project relicensing which contains information regarding past and current relicensing activities, including meeting notices and agendas, meeting summaries, documents distributed to or received from participants, reference materials, key decisions, and links to relevant information sources such as FERC's ILP regulations. The website is located at www.sce.com/bishopcreek.

2.5.4 Public Reference File

In addition to the relicensing website described in Section 2.5.3 above, SCE will maintain copies of all mailing lists, announcements, notices, communications and other documents related to the Project relicensing at the SCE corporate office at 1515 Walnut Grove Avenue, in Rosemead, California. Information will also be available at the Bishop Creek Hydro Electric Project office located at 4000 E Bishop Creek Road, Bishop.

The public reference file is a listing of important materials pertaining to the relicensing. This includes background reference material, the consultation record, all relevant studies and data collected during the development of the PAD, meeting summaries, notices, reports as well as Project documents such as the current FERC license.

For a nominal copying fee, hard copying of all public documents is available upon request. Documents are available for inspection and reproduction during regular office business hours. All communications added to the public reference file will be available consistent with the public records procedures set forth in the Freedom of Information Act (FOIA).

Additionally, public Project documents submitted to and issued by FERC are available through eLibrary under docket P-1394 (<http://www.ferc.gov/docsfilings/elibrary.asp>). These materials will be available for review and copying at the FERC offices in Washington, D.C.

Federal Energy Regulatory Commission
Public Reference Room, Room 2-A
Attn: Secretary
888 First Street, N.E.
Washington, D.C. 20426
public.referenceroom@ferc.gov
Telephone: 202-502-8371 Local
Toll-free: 1-866-208-3676

For documents issued by FERC, SCE anticipates that FERC will distribute the documents in accordance with FERC's protocols. FERC will use its mailing list for any such distributions, and those documents will be posted and publicly available in the eLibrary on the FERC website. Relicensing participants can register to receive a notice each time FERC posts a document to its website regarding the Project relicensing.

2.5.5 Restricted Documents

Certain Project-related documents are restricted from public viewing in accordance with FERC regulations. CEII (18 CFR 388.113) related to the design and safety of dams and appurtenant facilities, and that is necessary to protect national security and public safety are restricted. Anyone seeking CEII information from FERC must file a CEII request. Consult FERC's website at www.ferc.gov/help/how-to/file-ceii.asp for additional details related to CEII.

Information related to protecting sensitive archaeological, tribal, or other culturally important information is also restricted under Section 106 of the National Historic Preservation Act. In addition, information related to threatened and endangered species is protected under Section 7 of the Endangered Species Act. Anyone seeking this information from FERC must file a FOIA request. Consult FERC's website at www.ferc.gov/legal/ceii-foia/foia.asp for additional information.

2.5.6 Study Requests

In the development of the PAD and accompanying proposed Study Plans, SCE worked with interested parties and relicensing participants to identify areas where there is little or no information on issues of potential concern for Project effects to the human and natural environments. However, stakeholders may identify additional studies for consideration.

As specified by 18 CFR § 5.9, comments on the PAD and the SD1 must be filed with FERC 60 days following FERC's notice of consultation procedures, issued pursuant to 18 CFR § 5.8. As required by 18 CFR 18 § 5.9 (b), the PAD must be accompanied by any information gathering and study requests and include information and studies needed for consultation under Section 7 of the Endangered Species Act and Section 401 of the Clean Water Act. Any study request must:

- Describe the goals and objectives of each study proposal and the information to be obtained.
- If applicable, explain the relevant resource management goals of the agencies or Native American Indian tribes with jurisdiction over the resource to be studied.
- If the requestor is not a resource agency, explain any relevant public interest considerations regarding the proposed study.
- Describe existing information concerning the subject of the study proposal, and the need for additional information.
- Explain any nexus between Project operations and effects (direct, indirect, and/or cumulative) on the resource to be studied, and how the study results would inform the development of license requirements.
- Explain how any proposed study methodology (including any preferred data collection and analysis techniques, or objectively quantified information, and a schedule including appropriate filed season(s) and the duration) is consistent with generally accepted practice in the scientific community or, as appropriate, considers relevant Tribal values and knowledge.
- Describe considerations of level of effort and cost, as applicable, and why any proposed studies would not be sufficient to meet the stated information needs.
- Describe any available cost-share funds or in-kind services that the sponsor of the request may contribute towards the study effort.

Study requests must be provided in MS Word or PDF format and be uploaded to the FERC eLibrary with a copy to:

Matthew Woodhall
Project Lead
Southern California Edison
1515 Walnut Grove Ave.
Rosemead, CA 91770
Phone: 626-302-9596
matthew.woodhall@sce.com