



August 1, 2014

Ms. Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Sent via email to: commentletters@waterboards.ca.gov

RE: Utility Vault and Underground Structure NPDES Permit

Dear Ms. Townsend:

Southern California Edison (SCE) appreciates the opportunity to comment on the 2014 Draft General National Pollutant Discharge Elimination System (NPDES) Permit for Discharges from Utility Vaults and Underground Structures to Surface Waters (Draft Permit), released on July 2, 2014. In particular, SCE would like to thank you and your staff for the spirit of collaboration shown over the past two years in the development of the Draft Permit. Your staff's availability and willingness to discuss individual permitting elements has been valuable and is greatly appreciated.

Utility vaults must be dewatered to prevent safety hazards, protect equipment, and provide timely access for repair and maintenance of infrastructure necessary for the provision of critical services. It is vital for utilities to have a viable, efficient, environmentally sound, and cost-effective permitting option to allow the discharge of accumulated water from underground vaults. The Draft Permit is practical to implement in the field, provides clear monitoring and reporting requirements, and recognizes the de minimis nature (low volume, infrequent, and low potential for pollutants) of utility vault discharges. For these reasons, Southern California Edison fully supports the adoption of the Draft Permit.

Please don't hesitate to contact Hazem Gabr at (626) 462-8715 or hazem.gabr@sce.com if there is any question.

Sincerely,

A handwritten signature in black ink, appearing to read "Ken Borngrebe".

Ken Borngrebe
Principal Manager
Corporate Environmental Health and Safety
Southern California Edison