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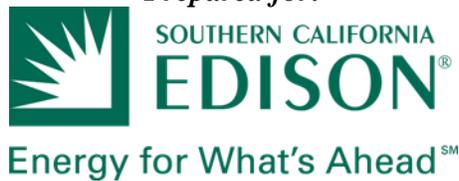
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DRAFT

NATIVE AMERICAN TRADITIONAL CULTURAL PROPERTIES STUDY PLAN

**BISHOP CREEK HYDROELECTRIC PROJECT
(FERC PROJECT NO. 1394)**

Prepared for:



Bishop, California

Prepared by:

Kleinschmidt

Portland, Oregon
www.KleinschmidtGroup.com

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SOUTHERN CALIFORNIA EDISON

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**DRAFT NATIVE AMERICAN TRADITIONAL CULTURAL PROPERTIES
STUDY PLAN**

**BISHOP CREEK HYDROELECTRIC PROJECT
(FERC No. 1394)**

SOUTHERN CALIFORNIA EDISON

1.0 INTRODUCTION

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). The Project is located on Bishop Creek in Inyo County, California, approximately 5 miles (mi) southwest of the city of Bishop (Figure 1-1), on lands managed by the Inyo National Forest (INF), the Bureau of Land Management (BLM), Bishop Field Office and lands owned by SCE. The licensee operates the Project under a 30-year license issued by FERC on July 19, 1994. As the current license is due to expire on June 30, 2024, SCE has initiated the formal relicensing process utilizing the Integrated Licensing Process (ILP) by filing the Notification of Intent (NOI) and Pre-Application Document (PAD) with FERC on XXXX.

In advance of filing the NOI and PAD, SCE worked with stakeholders to identify necessary studies, with the goal of accelerating FERC's ability to issue a Study Plan Determination. Efforts began over one year prior to the formal initiation of the process with FERC, through a series of Technical Working Group (TWG) meetings held in Bishop, California.

During these TWG meetings, stakeholders identified the need to conduct a Traditional Cultural Properties Study. This Study Plan details the study objectives, study area, methods, and schedule for the study. Appendix A is a consultation summary of discussions specific to this Study Plan, along with a table that summarizing stakeholders' comments on previously reviewed versions, and how SCE addressed those comments. If SCE does not incorporate a comment or request, SCE will provide rationale based on Project specific information and FERC ILP Study Plan criteria.

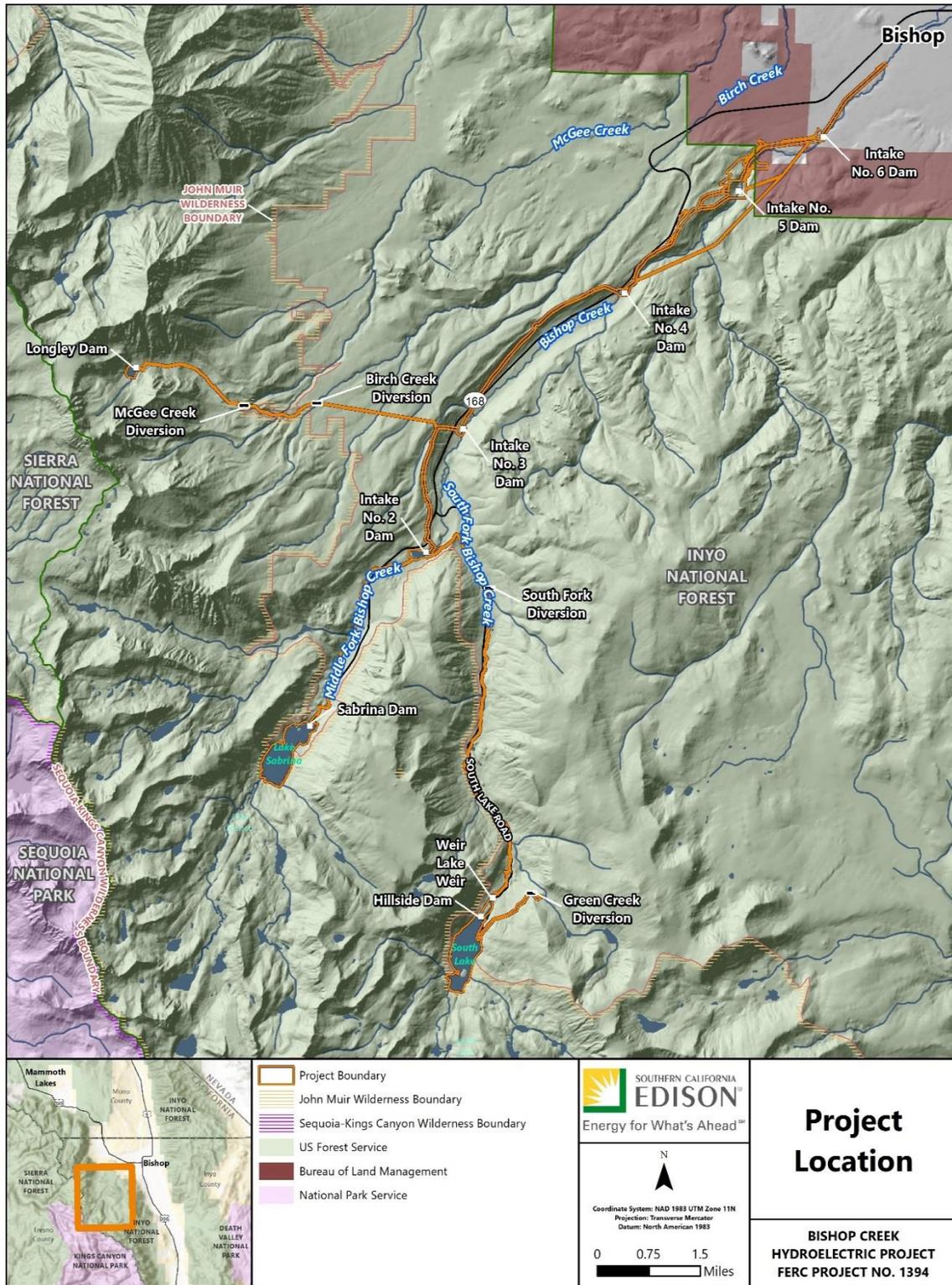


FIGURE 1-1 PROJECT LOCATION MAP

2.0 PROJECT NEXUS

Continued Project operation and maintenance (O&M) and other activities, including public recreation activities, may have an adverse effect on historic properties. The effect may be direct (e.g., result of ground-disturbing activities), indirect (e.g., public access to Project areas), or cumulative (e.g., caused by a Project activity or public access in combination with other past, present and reasonably foreseeable future projects). This study focuses on these potential Project effects to historic properties. Several terms used throughout this Study Plan warrant definition at the outset.

- ***Historic Property(ies)***, as defined under 36 Code of Federal Regulation (CFR) § 800.16(l) (1) are prehistoric or historic sites, buildings, structures, objects, districts, or traditional cultural properties (TCPs) included in, or eligible for inclusion in, the National Register of Historic Places (NRHP). Historic properties are identified through a process of evaluation against specific NRHP criteria in 36 CFR § 60.4.
- ***Traditional Cultural Property(ies)***, as defined under 36 CFR § 800.16(l) (1), are prehistoric or historic archaeological sites, buildings, structures, objects, districts, or TCPs that are included in, or eligible for inclusion in, the NRHP 36 CFR § 60.04.

For the purpose of this study, a TCP is a type of historic property that may be eligible (or has not been evaluated) for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that: 1) are rooted in that community's history; or 2) are important in maintain the continuing cultural identity of the community. The National Register Bulletin 38:1, defines TCPs as:

- Locations associated with the traditional beliefs of a Native American aboriginal/indigenous group about its origins, its cultural history, or the nature of the world and cultural landscapes.
- A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices.
- Locations where Native American religious practitioners have historically gone and are known or thought to go to today, to perform ceremonial cultural rules of practice.
- Locations where a community has traditionally carried out economic, artistic or other cultural practices important in maintaining its historic identity.

- **Cultural Resource(s)**, for the purpose of this document, is used to discuss any prehistoric or historic district, site, building, structure, object, landscape, or TCP, regardless of its National Register eligibility.

Licensing of the Project is a federal undertaking; therefore, compliance with the National Historic Preservation Act (NHPA) is required. For historic properties, appropriate study areas are defined by regulations under 36 CFR § 800 as the area of potential effects (APE). The APE for the Project is further defined in Section 4 of this Study Plan.

3.0 STUDY GOALS AND OBJECTIVES

One of the Project goals is to assist FERC in meeting its compliance requirements under Section 106 of the NHPA, as amended, by determining if licensing of the Project will have an adverse effect upon historic properties. The objective of this particular study is to identify TCPs that may potentially be affected by Project O&M, evaluate their eligibility to the NRHP, and identify Project-related effects on TCPs, other Tribal interests, or traditional interests of other groups within the APE.

TCP is a relatively new term and historic studies, oral traditions and other background materials may not use this term specifically, although in principal may address what is now understood to be a “TCP.” Working with indigenous/aboriginal people and gathering any pertinent studies, information or reports that are used to identify significant indigenous/aboriginal sites will contribute to the understanding of TCP’s as required in FERC relicensing guidelines. In addition to the tribal consultation process described more fully in 6.2.2 below of this TCP study proposal, significant, relevant studies conducted by ethnographers, graduate students, cultural journalists, and oral historians that are archived in public and private libraries, must be reviewed and the relevant data included in this study in order to ensure that the spirit and integrity of the FERC relicensing regulation process are met.

In addition to these goals, the Licensee acknowledges that any Native American Tribes and Tribal or cultural stakeholders may submit other goals to the FERC in the future as a part of the comment process, outside of FERC consultation.

4.0 AREA OF POTENTIAL EFFECTS AND STUDY AREA

Under 36 CFR 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historical properties, if any such properties exist.” For TCPs, the Project boundary will serve as the APE (Figure 4-1); however, the APE may be amended based on resource agency and or Tribal consultation.

It is possible that current recreation, road, or other studies implemented as part of the relicensing process may identify areas outside the FERC Project boundary that have potential to affect historic properties. It is also possible that the licensee may propose Project improvements that are outside the FERC Project boundary. If such areas are identified by these studies or as Project improvements, the licensee will expand the APE in accordance with 36 CFR 800.4(a)(1) in consultation with the INF and Bureau of Land Management (BLM), as appropriate, State Historic Preservation Office (OHP), other appropriate agencies, Tribes, and interested parties. Appropriate TCP studies will be completed as part of this study if the APE is expanded. As provided for in 18 CFR § 5.5(e), the licensee, under separate cover, has requested FERC to designate the licensee as FERC’s non-federal representatives for purposes of initiating consultation under Section 106 of the NHPA and the implementing regulations of 36 CFR § 800.2(c)(4).

The ethnographic study area encompasses the Owens Valley and the slopes of the Sierra Nevada and White Mountains which surround the APE (Figure 4-2). The background research will include the study area to facilitate our knowledge about past settlement and subsistence practices, as well as past land use. This information will provide insight as to what types of TCPs may be present in the APE and will help formulate a sound strategy for conducting fieldwork and interviews.

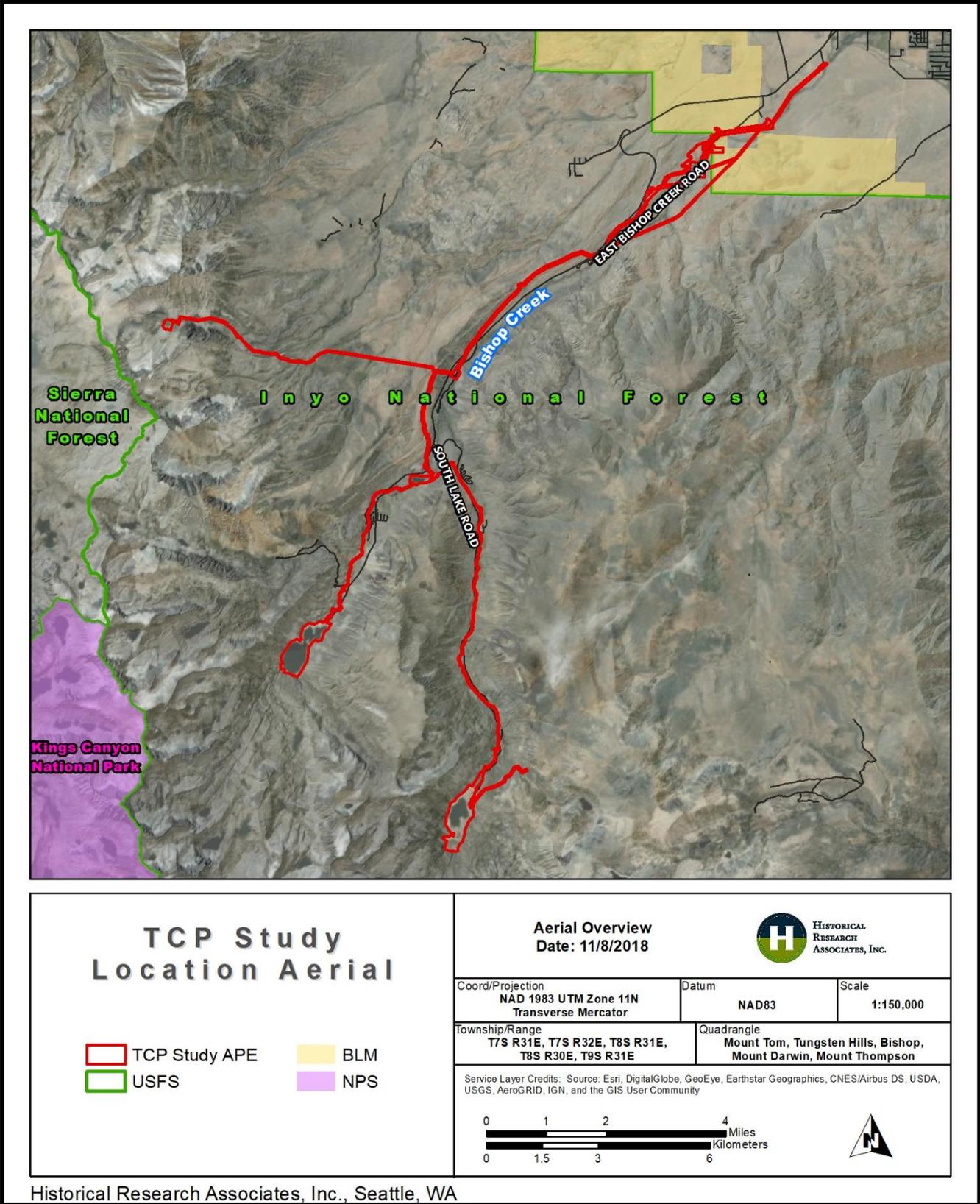


FIGURE 4-1 PROPOSED APE

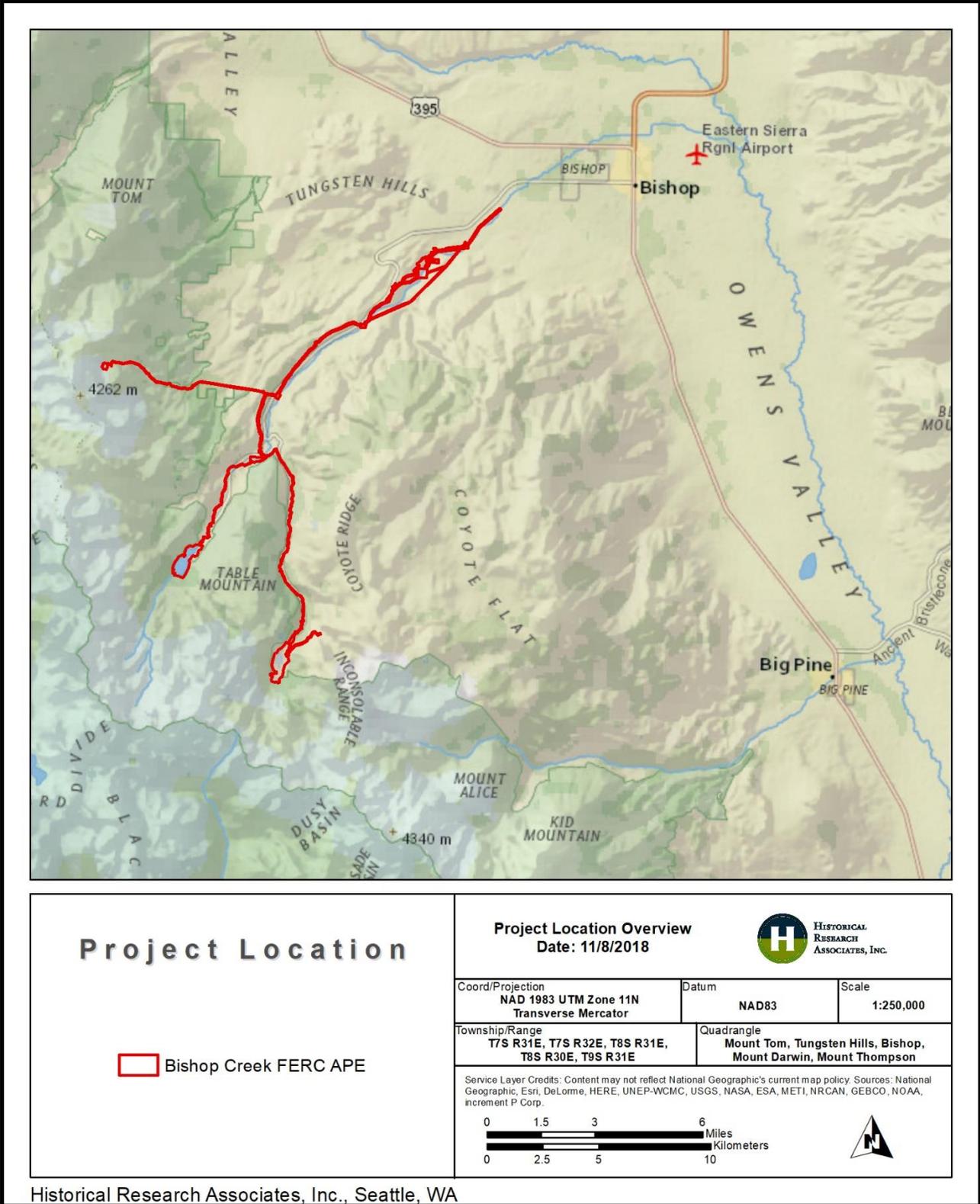


FIGURE 4-2 PROPOSED ETHNOGRAPHIC STUDY AREA

5.0 EXISTING INFORMATION AND NEED FOR ADDITIONAL INFORMATION

5.1 SUMMARY OF RECORD SEARCHES ARCHIVAL RESEARCH

The licensee conducted an initial search of records and maps on file at SCE archives, the INF, BLM and the Eastern Information Center (EIC) of the California Historical Resources Information Center at University of California, Riverside. They also requested a search of the Sacred Land Files on file at the California State Native American Heritage Commission (NAHC) and requested a list of Native American contacts who may have an interest in any portion of the project area. Once the list of Native American contacts was obtained, the Licensee sent a notification letter to the Tribes (Appendix A) letting them know about the pending relicensing and requesting information. A brief review of the ethnographic literature was also conducted. The purpose of this research search was to gather existing information regarding previously recorded TCPs within the APE. The records searches included all lands within the FERC boundary.

5.2 INITIAL RECORD SEARCH RESULTS

SCE, INF, BLM and the EIC had no information about TCP's located within the APE. The NAHC also had no information. To date the Bishop Creek Paiute have participated in one TWG meeting, but none of the Tribes contacted have provided any information about TCPs within the study area.

A review of the ethnographic literature indicates that Bishop Creek and the surrounding areas were inhabited by Paiute Tribal members throughout time. The Bishop Creek area was utilized for habitation and subsistence, as well as irrigation (Steward 1933:243, 247, 327). Map 2 of Julian Stewards 1933 Ethnography depicts several places that were utilized within and near the APE. This utilization was further confirmed during a study of Owens Valley irrigation and agriculture conducted by Harry Lawton, Philip Wilke, Mary DeDeker and William Mason in 1976. The information contained in just these two documents indicate that there is a high likelihood that there are TCPs within the APE.

6.0 STUDY METHODS AND ANALYSIS

6.1 GENERAL CONCEPTS

- Personal Safety is an important consideration of each fieldwork team. If the Licensee determine the information cannot be collected in a safe manner, the Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.
- The Licensee shall obtain permission to access private property where needed will in advance of performance of the study. If access is not granted, or if it is not feasible or safe, the Licensees will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.
- Field crews may make minor modifications to the study proposal in the field to accommodate actual field conditions and unforeseen problems. When modifications are made, the Licensee's field crew will follow the protocols in this study plan. If minor modifications are made the Licensee will notify FERC and Relicensing Participants as soon as possible via email to discuss alternative approaches to perform the study.
- The Licensee's performance of the study does not presume the Licensee are responsible as in whole or in part for resource management measures that may arise from that study.
- The estimated level of effort and cost is not a firm commitment by the Licensee to expend all funds. If the study costs more, the Licensee is committed to completing the study. If the study costs less, the Licensee is not committed to expending the remaining funds on other Relicensing studies or resource management measures.
- Detailed information that is developed through this study, especially information that identifies the location of sacred sites, TCPs, and other culturally sensitive resources, will be documented in a confidential technical report that will only be submitted to select Tribal representatives and resource agencies.

6.2 STUDY METHODS

In order to facilitate the TCP study the Licensee intends to retain a qualified, professional ethnographer(s) who meets the standards for ethnography as defined in Appendix II of National

Register Bulletin No. 38. The Licensee will coordinate the selection of the ethnographer(s) with the assistance of affected Tribes and other interested cultural/Tribal stakeholders. If the ethnographer(s) and the Tribal representatives determine it will be necessary or useful, a monitor chosen by the aboriginal descendants will facilitate clear communication between the ethnographer and Tribal participants and/or Tribal Interviewees who may have knowledge of special interest areas or traditional cultural practices within the Project APE.

Study methods are described in the following subsections.

6.2.1 ARCHIVAL RESEARCH

Obtain, compile, review, and summarize existing ethnographic information available for the Bishop Creek Watershed, including:

- Ethnographic field notes from previous studies, as available;
- Published ethnographic literature;
- Ethnographic information held at various tribal repositories;
- Archival and historic photographs; and
- Other repositories as necessary.

Conduct a Sacred Lands File search with the Native American Heritage Commission to determine if any known places of importance to Native American groups are present within the APE or study area. Ethnographic information developed through this effort will be used to develop background and contextual information.

6.2.2 TRIBAL CONSULTATION AND IDENTIFICATION OF RESOURCES

In conjunction with the Archival Research, the Licensee's Ethnographer will consult with appropriate Tribal elders and other Tribal representatives to identify properties, plants and other resources of traditional cultural or religious importance to Native Americans (including TCPs as discussed in National Register Bulletin No. 38) that may be present in the APE. This consultation effort will be limited to Tribes and Tribal members with direct Ancestral and/or historical ties to the lands located within the APE. Consultation may include a combination of written correspondence and follow up interviews by a qualified ethnographer, depending upon

the results of the initial literature review and research efforts. Oral histories obtained during the interviews will be included in the documentation of each TCP.

The ethnographer, in consultation with Tribal representatives, will determine the scope and breadth of interviews. The ethnographer will then contact the appropriate Tribe(s) and interested/Tribal/cultural stakeholders to arrange for interviews at a time and location acceptable to those Tribal Interviewees. Tribal Interviewees and the ethnographer may need to visit the APE together to accurately define potential TCPs. If necessary, Licensees will arrange for an initial introductory meeting between the Licensees, Tribal representatives and the ethnographer. Interviews may be conducted on a “one-on-one” basis with the ethnographer. The oral traditions and information collected during the interviews will be used to help define potential TCPs in the APE and to assist in making sound judgments and management decisions in Project planning. All information gathered will be kept confidential and respectfully documented by the ethnographer, as described more fully in Section 6.4.

If participating Indian Tribes do not wish to disclose the locations of any potential TCPs, Licensees shall instead work with the Tribes to identify the general issues and concerns that the Tribe(s) may have regarding potential impacts of the Project upon resources known to the Tribe(s) and work with the Tribes and appropriate land management agencies to develop agreeable measures to address these concerns.

Interviews conducted with reasonably available Tribal representatives will be considered similar to other consultant services, and Tribal Interviewees will be compensated for their time spent during the interviews. Compensation will follow the Advisory Council on Historic Preservation’s guidelines regarding these fees (ACHP April 26, 2002). Compensation should be appropriate for the level of professional services provided from within the Tribe or interested cultural/Tribal stakeholders.

In order to protect confidentiality of disclosed locations, the Licensees and the ethnographer shall agree not to disclose TCPs to any parties other than federal land management agencies, FERC, and/or SHPO. If the participating Tribes instruct Licensees in writing, Licensees and/or the ethnographer may disclose TCP information to the ECIC

6.2.3 ARCHAEOLOGICAL SITE VISIT

Tribal Interviewees or a physically capable Tribal representative and the ethnographer may want to visit archaeological sites identified during the Archaeological and Architectural Resources Study Proposal field work. The purpose of the visit would be to provide Tribal representatives the opportunity to examine Native American archaeological sites encountered during the study and for the ethnographer to obtain additional information on potential TCPs. After the site visit/s Tribal representatives may choose to share additional TCP information. If an archeological site visit is located on land owned or managed by a resource agency, then a representative of that agency will be invited to participate in the site visit.

6.2.4 NATIONAL REGISTER OF HISTORIC PLACES EVALUATION

The licensee shall utilize the results of the inventories to prepare, in collaboration with the INF, BLM, Tribes, and other relicensing participants, a plan to evaluate the eligibility of potential historic properties for the NRHP. The Study Plan will include an assessment of past, present, and reasonably foreseeable Project effects on potential historic properties and detail the methods of evaluation to be implemented. The evaluation plan will be provided to the INF, BLM, Tribes, and other relicensing participants for review 30 days prior to submitting to OHP.

National Register Criteria for Evaluation

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and:

- a. are associated with events that have made a significant contribution to the broad pattern of American history;
- b. are associated with the lives of persons significant in America's past;
- c. that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; and
- d. that have yielded, or may be likely to yield, information important to prehistory or history (NPS 1997:2).

In addition to the criteria set forth at 36 CFR § 60.4, properties can have other cultural values that should be considered. Amendments to the National Historic Preservation Act in 1992 [§101(d) (6) (A)] specify that properties of traditional religious and cultural importance to an Indian Tribe may be determined eligible for inclusion in the NRHP because of their “association with cultural practices or beliefs of a living community that are: 1) rooted in that community’s history; and 2) are important in maintaining the continuing cultural identity of the community.” Therefore, a property may also be significant if it has traditional or ethnographic significance because of its ties to the cultural past of Native Americans. Formal evaluations will be submitted to the SHPO for concurrence.

6.2.5 IDENTIFY AND ASSESS POTENTIAL PROJECT EFFECTS ON NATIONAL REGISTER-ELIGIBLE TCPS

As required under 36 CFR § 800.5, Licensees will identify and assess, in consultation with the SHPO, USFS, BLM, and potentially affected Indian Tribes, any adverse effects on historic properties resulting from Project O&M. Adverse Effects are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative (36 CFR § 800.5(a) (1)).

6.2.6 REPORTING AND HISTORIC PROPERTIES MANAGEMENT PLAN

The results of the Study Plan will be reported in Exhibit E of the License Application, which will include a summary of the information and findings of the Study Plan. Figures and other pertinent data supporting the summary in Exhibit E will be appended to the License Application. The documentation of TCPS and other sensitive information will be included in a confidential appendix withheld from public disclosure, in accordance with Section 304 (16 U.S.C. 4702-3) of the NHPA.

SCE anticipates FERC will enter into a programmatic agreement (PA) with the Advisory Council on Historic Preservation (ACHP), OHP and any other agencies or entities FERC elects to include. One of the PA stipulations will be the completion and implementation of a HPMP to be included with the license application.

The HPMP to be included in the final license application will require avoidance and protection of specified NRHP listed or eligible TCPs, wherever possible. Processes and procedures will be developed for general and site-specific treatment measures, including minimization and mitigation measures to be taken should license implementation create unavoidable adverse effects to historic properties.

6.2.7 COORDINATION WITH OTHER STUDIES

To the extent feasible, SCE will coordinate TCP field studies with other Project-related environmental studies (e.g., Archaeological and Architectural surveys) and conduct them in a manner that does not affect other sensitive natural resources. When conducting TCP or other investigations, Project sponsors and/or their contractors should not violate other federal or state laws or regulations protecting natural resources including but not limited to the Endangered Species Act and Clean Water Act. Project sponsors should consider that Tribes may utilize natural resources for subsistence or specific ceremonial uses and should avoid affecting those uses or events while conducting studies.

6.2.8 CONSISTENCY OF METHODS WITH GENERALLY ACCEPTED SCIENTIFIC PRACTICES

The proposed study methods discussed in this document are consistent with the study methods followed in several recent relicensing projects. These methods have been accepted by the participating Indian Tribes, agencies, and other interested parties associate with those projects. The methods presented in the study plan are consistent with the Advisory Council on Historic Preservation's guidelines for compliance with the requirements of Section 106 of the NHPA found in 36 CFR § 800.

7.0 SCHEDULE AND REPORTING

The anticipated Study Plan development and implementation schedule is identified in Table 8-1.

TABLE 8-1 ANTICIPATED POST PAD/NOI STUDY PLAN DEVELOPMENT MILESTONES AND FERC PROCESS THROUGH STUDY PLAN DETERMINATION

TASK	RESPONSIBLE ENTITY	SCHEDULE MILESTONES
Archival research and records search	SCE	Fall, 2018
File NOI/PAD with FERC along with Final Study Plans	SCE	03/29/19
FERC Holds Scoping and Site Visit	FERC	05/30/19 – 06/29/19
FERC Director’s Study Plan Determination	FERC	01/10/20 - 02/09/20
First Field Season	SCE	2020
Initial Study Report (adjust as necessary in consultation with TWGs)	SCE	01/10/21 - 02/09/21
Second Field Season (as necessary)	SCE	2021
Final Study Report	SCE	2022
License Application	SCE	June, 2022

8.0 REFERENCES

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APPENDIX A: Study Plan Consultation Record

Appendix A

Study Plan Consultation Record

This Study Plan was developed in consultation with the Bishop Creek Cultural Resources Technical Working Group (TWG). The intent of the consultation process is to achieve consensus, to the degree possible, on the need for specific studies, the key resource questions to be addressed by the studies, and the appropriate methodology and level of effort for the study.

This appendix summarizes the key consultation milestones for each Study Plan (Table A-1), and how Southern California Edison Company (SCE) addressed comments received through the consultation process. Table A-2 is a Response to Comments Table for comments received from stakeholders, and how comments were addressed in the final Study Plan. Where stakeholder comments requests have not been incorporated, Table A-2 provides a rationale based on Project specific information and Federal Energy Regulatory Commission's (FERC) Study Plan Criteria (18 Code of Federal Regulation [CFR] § 5.9).

**TABLE A-1 KEY STUDY PLAN DEVELOPMENT MILESTONES
AND TECHNICAL WORKING GROUP PLANNING SCHEDULE**

DELIVERABLE	MATERIAL DISTRIBUTED	MEETING TYPE	TWG MEETING DATES	PROPOSED DATES FOR COMMENTS
Project Description	5/25/2018	TWG	6/4/2018, 6/5/2018, and 6/7/2018	7/9/2018
Annotated Study Plans, Goals, Objectives	7/26/2018	TWG	8/14/2018 and 8/15/2018	8/31/2018
Draft Study Plans	9/17/2018	TWG	10/9/2018 to 10/11/2018	10/26/2018
Final Study Plans	11/15/2018	TWG	12/4/2018 to 12/6/2018	1/7/2019

Table A-2 SCE RESPONSES TO COMMENTS RECEIVED ON STUDY PLANS

COMMENT NO.	DATE OF TWG MEETING	ENTITY	COMMENT	SCE RESPONSE