

Complete	Applicants to provide response	Full response expected to be provided by the Applicants in response to other CPUC or Energy Division processes
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Def #	Resource Area / Topic	Deficiency Item / Data Gap Question	Status	Clarifications 06/16/16
1.1-2.1	General	<p>Provide four flow diagrams for the SDG&E transmission system showing the daily design capacity – winter and summer – with and without the proposed Project facilities. On these diagrams, include:</p> <ul style="list-style-type: none"> – Diameter, wall thickness, and length of existing pipe and the pipe proposed to be installed as well as the diameter and wall thickness at connections. – The installed horsepower at existing compressor station(s) and the suction and discharge pressure – Size and number of compressor units. – Pressures and volumes of gas at the inlet and outlet connections of each compressor station. – Pressures and volumes at each receipt and delivery point and the pressure and volumes at the beginning and end of the proposed facilities. 	Full response expected to be provided by the Applicants in response to other CPUC or Energy Division processes.	<p><i>Missing representation of the southern portion of the SDG&E transmission system from just north of San Diego to the US-Mexican border, Lines 1601 and 2010 data, Line 1600 shows no flow, Line 3600, and any other transmission line on the SDG&E system should be reflected on the flow diagram.</i></p> <ul style="list-style-type: none"> • Capacities and pressures before and after interconnections, • Interconnect with Otay Mesa, • Pressures and volumes at delivery points, and • Pressures and volumes at the southern end of the Proposed Facilities. <p><i>Note also that the request was for design capacity, even if an interconnection was not being used. Design capacities were requested which could be greater than maximum flow.</i></p>
1.2.4-1	Purpose and Need and Land Use	On December 15, 2015, the San Diego City Council unanimously approved the Climate Action Plan that would move the city to 100% renewables by 2035. Please explain how the proposed project would be affected by the city of San Diego’s mandated shift to renewable energy.		<p><i>CPUC to meet with the City of San Diego to discuss Project consistency with the CAP.</i></p> <p><i>Applicants to provide their perspective on the Proposed Project’s consistency with the CAP and need for natural gas to support renewables and fueling of the City’s transportation fleet proposed for conversion to natural gas.</i></p>
1.3-12	Design	Discuss the impact on the proposed project and the alternatives if the North-South Project were to be denied.	Complete	
1.3-14	Schedule	Since Line 3602 would be a new pipeline, please explain why the construction is expected to take 1.5 years, and whether this schedule includes the simultaneous building of multiple spreads.	Complete	<i>Clarified on our conference call that this is the duration of construction of the proposed Project plus de-rating Line 1600.</i>

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1.4.1-3	Aesthetics	<p>Deficiency #3: CPUC has not received kmz files containing all KOP locations and points of each photograph location; provide the kmz files described.</p> <p>Three additional visual simulations were requested during a teleconference held January 21, 2016. The visual simulations were requested for the following locations : 1) Location #3, Photograph #6; 2) Location #9, Photograph #27; and 3) Location #14, Photograph #36. Simulations were requested for views from these locations showing the appearance of the proposed project at 1 year and 3 to 5 years following construction. In addition, the CPUC’s consulting aesthetic resources specialist requested that the three additional visual simulations be prepared as panorama photos to show the surrounding area as context for the proposed project. Provide the additional panorama visual simulations to the CPUC when available.</p>	Complete with additional submission.	<i>Applicants have agreed to provide simulations in 12 to 14 weeks (August 2016).</i>
1.4.5-1	Historic Properties	<p>Deficiency #3: Per the Applicants, recommendations for eligibility to the NRHP and the CRHR will be made once all surveys are complete. The lead federal agency will conduct government-to-government consultation.</p> <p>Applicants provided field methodologies and updates for both archaeological and historic structures. CPUC is assuming that standard guidelines were followed. Some clarification is needed:</p> <p>Archaeology –for the pedestrian survey, provide examples of where the contours were used instead of 15m intervals. Were artifacts collected, photographed, or otherwise documented in the field?</p> <p>Architectural history –need additional information on field methodology. For example, only an overview photograph was taken. Were views to and from project area taken? Were coordinates recorded?</p> <p>Details on the size and eligibility of the sites have been added to the report. If the condition of the site is known, please add this information, as well. In Table B2, verify that the eligibility status refers both to the state register and to the NRHP.</p> <p>Artifacts – Need the description of methodology for archaeological field collections and evaluation of artifacts (to be provided to CPUC at a later date).</p> <p>Indirect survey report – please refer to indirect APE and not indirect impact APE.</p> <p>Table 2 should list only the parcels with the buildings. If no buildings are extant on the other parcels simply state that X number were evaluated based</p>	Complete with additional submission following agency consultation.	<p>Per the Applicants, recommendations for eligibility to the NRHP and the CRHR will be made once all surveys are complete (pending selection of preferred route).</p> <p><i>Updates to the archaeological field report will be needed such as details on methodology (i.e., the testing plan), artifact collection information, condition of archaeological sites, etc. This will occur when a preferred route is selected. Similar information will need to be included in the indirect APE report. For example, field methodology for the architectural history component will need to be described in more detail once a preferred route has been selected, and further investigations are conducted.</i></p> <p><i>Additional information on consultation will be provided upon the selection of the preferred route. The lead federal agency will be responsible for conducting government-to-government consultation. When this occurs, the APE will be clarified and appropriate tables/maps may need to be amended.</i></p>

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		on X research that showed the potential for a structure. Indicate that field reconnaissance confirmed that no structure was present. Please clarify if any of these structures are recommended as potentially eligible or that the evaluation will be provided at a later date.		
4.5-2	APE	<p>Deficiency Request #3: Changes have been made to the APE; however, the APE should only include those areas where direct or indirect effects are anticipated or have the potential to occur. The area of direct impacts generally is smaller than that associated with the indirect. If it was agreed by SHPO that indirect impacts could occur within 150 feet of the areas where ground disturbance will occur, this should be the outer limit of the APE (and form the indirect APE). The 75-foot and the one-parcel boundary would not then be needed, unless the one parcel exceeded the 150 feet. The text and maps will need to be adjusted to more accurately show the APE.</p> <p>For any changes made as a result of consultation, the maps will need to be updated accordingly and provided to CPUC.</p>	Incomplete but Applicants will submit additional information.	<i>The Applicant has indicated that changes to the APE will be made after formal consultation has begun. This may require updates to both the text in the archaeological and indirect APE report and associated tables/graphics. Changes also may be required within the appendices.</i>
1.4.5-4	Correspondence	<p>Deficiency Request #3: Per Applicants, notes were added for the Pechanga. Verify the date of the meeting (text indicates the meeting was held on June 24, 2015 and the table in Appendix C indicates June 23, 2015). Additionally, it is still not clear which 7 pages of maps contain the areas of concern. The text reference indicates it is on Pages 1-7 of the proposed route maps in Appendix C, but these areas were not located.</p>	Complete with additional submission following agency consultation.	<p><i>As noted in the Applicants' response, additional information will be included as the consultation formally begins. CPUC will receive documentation, which may consist of formal letters, records of phone calls, emails, etc.</i></p> <p><i>In addition, SHPO/tribal consultation will be conducted by the CPUC and DOD.</i></p>
1.4.5-5	Distribution Systems Modifications – Cultural and Tribal Resources	<p>Full Cultural Resources Letter Report was not provided; letter report (dated March 10, 2016) for record search was provided.</p> <ul style="list-style-type: none"> - Will need to include description of planned field methodology, correspondence with agencies/tribes, discussion of previously identified resources, findings, etc. - Will need to include graphics/maps to account for the APE (and the Project area), resources, etc. <ul style="list-style-type: none"> o maps within the provided letter report are difficult to understand; the APE is only depicted with regard to the indirect APE o additional description will be needed to account for the indirect APE – as it is stated, it seems that the indirect APE is only around known above-ground features, but it is not clear what these are referring to (historic, non-historic, components of the project, etc.). 		<p>Only a Cultural Resources Letter Report has been prepared. A full report will need to be provided when available.</p> <p>APM-CUL-06 commits the Applicants to conducting cultural resources surveys and associated consultation for the Line 1600 derating.</p> <p><i>Provide the date that the report will be submitted to CPUC.</i></p>

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		- Current section (3.5) does not account for a historic structures survey or indirect impacts.		
1.4.7-7	Greenhouse Gas Emissions	Footnote 1 on page 3.7-1 of the PEA Supplement explains the calculation assumptions made to estimate GHG emissions for construction of the proposed Distribution System Modifications included in Tables 3.7-1 and Table 3.7-2. Although the methods are conservative and valid, a detailed appendix is required for final verification. Provide the calculation appendix used for estimating construction and operations GHG emissions associated with the project with Distribution System Modifications provided in Tables 3.7-1 and Table 3.7-2.	Complete	
1.4.7-8	Landslides / Alternatives	In V, B, 5 - Subpart G of the Amendment to the Application, the Applicants describe two potential landslide areas that may require reroutes or other mitigation. Provide the locations of the landslide areas and describe typical mitigation methods that a geologic investigation may recommend. Also, provide routes around the landslide areas if the investigation were to reveal that the pipeline could not be placed in these areas.	Complete	Applicants will submit additional geologic investigation results, as needed. Applicants state that any reroutes would be within the street (e.g., move to the other side of the street); therefore, existing maps for the proposed route would be sufficient.
1.5-3.1	Offshore Route Alternative	Provide a GIS shapefile of the route that includes attributes for the mileage for on-shore and off-shore segments of this route.	Complete	KMZs provided in Exhibit WW: Response to 1.5-2.
1.5-4	Existing Line 1600 Alignment Alternatives	Deficiency Request #1: Provide a map showing the probable locations of the numerous temporary lateral pipelines necessary to maintain service to the customers served by Line 1600 in the event one of the existing alignment alternatives is selected. Provide a table similar to Table 5-1 presenting data on the temporary laterals including the number and length of the laterals and the quantitative estimate of impacts on the environmental features crossed. Deficiency Request #2: Responses to Deficiency Request #1 were still under review. Deficiency Request #3: While temporary lateral pipelines may be placed within the Applicant's existing ROW, a figure showing the locations of these laterals as well as a table similar to Table 5-1 is still needed to compare environmental impacts across all alternatives. Provide a map and table.	Applicants will submit additional information. See comment clarification in 1.5-4.1.	The Applicants have agreed to respond to 1.5-4.1 by July 22, 2016.

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1.5-4.1	Clarification of 1.5-4 on May 23, 2016	<p>Deficiency Request #3:</p> <p>1. Provide the locations of any temporary lateral pipelines the Applicants would construct to maintain service to existing customers if one of the three Line 1600 In-Kind Replacement Alternatives is implemented. Include a separate analysis of each of the three construction options if the location of the temporary laterals would vary by construction technique:</p> <ul style="list-style-type: none"> a. Removal and Replacement by Segments, b. Remove then Replace Pipeline as a Whole, and c. Construct then Remove Pipeline as a Whole. <p>The analyses should identify if any lateral would be outside of the existing right-of-way. If outside of the right-of-way, include the following information so that environmental impacts can be evaluated:</p> <ul style="list-style-type: none"> a. Length (miles) of temporary pipeline laterals and the total; b. Acreage of the construction rights-of-way; c. Size and location of any non-typical work areas required; d. Number of residences within 50 feet of the edge of the construction right-of-way; e. Environmental features that would be temporarily impacted, if any. <p>2. In addition, provide the map requested in Deficiency #1.5-4 illustrating where the laterals would be located.</p>	Applicants will submit additional information.	The Applicants have agreed to respond to 1.5-4.1 by July 22, 2016.
1.5-5		<p>Deficiency Request #1: Provide a map of Line 1600 that identifies the locations of constraints along the existing right-of-way. The map should also show where expansion of the existing right-of-way for a new pipeline could address each constraint and where the constraint is severe enough to require a route deviation from the existing right-of-way. Include a table similar to Table 5-1 that presents the quantitative estimate of impacts on the environmental features crossed by the expanded right-of-way and by the route deviations.</p> <p>Deficiency Request #2: The Applicants' response to Item 1.5-5 is only partly complete. Provide a table similar to PEA Table 5-1 that presents the quantitative estimate of impacts on the environmental features crossed by the expanded right-of-way and by the route deviations. This information presents a full estimate of the potential impacts of constructing on the existing Line 1600 right-of-way. CPUC will comply with the California</p>	Applicants will submit additional information. See comment clarification in 1.5-5.1.	The Applicants have agreed to respond to 1.5-5.1 by July 22, 2016.

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		disclosure law to not show specific parcels in a public document.		
1.5-5.1	Clarification of 1.5-5 on May 23, 2016	<p>Provide environmental analyses of the alternatives identified in the PEA as the Line 1600 In-Kind Replacement Alternative and the Installation of a New 36-Inch Pipeline Parallel to Line 1600 Alternative. Include a separate analysis of each of the three construction options:</p> <ul style="list-style-type: none"> a. Removal and Replacement by Segments, b. Remove then Replace Pipeline as a Whole, and c. Construct then Remove Pipeline as a Whole. <p>The analyses should include the following information so that a quantitative comparison can be made with the proposed route:</p> <ul style="list-style-type: none"> a. Length (miles) of pipeline by segment and the total; b. Acreage of both the permanent and construction rights-of-way; c. Acreage of existing and new rights-of-way; d. Size and location of any non-typical work areas required; e. Number of residences within 50 feet of the edge of the construction right-of-way; f. Total number of residences that would need to be purchased and/or relocated (specific parcels should not be identified); g. Number of waterbodies and wetlands crossed, and the length of each crossing; and h. Acreage of riparian corridors and oak woodlands cleared. <p>Provide typical construction right-of-way cross section diagrams of each of the three Line 1600 In-Kind Replacement Alternatives and the New 36-Inch Pipeline Parallel to Line 1600 Alternative. The diagrams should show the following:</p> <ul style="list-style-type: none"> a. Existing Line 1600 right-of-way; b. The construction right-of-way of each alternative in relation to the Line 1600 right-of-way, including any overlap of the existing right-of-way; and c. The widths of the temporary and new permanent rights-of-way. <p>In addition, provide the map requested in Deficiency #1.5-5 illustrating existing Line 1600 along with the locations of any constraints that could require either a larger construction right-of-way or a route deviation from the existing pipeline right-of-way. Show the proposed route deviations on the map so the total environmental impact can be evaluated. CPUC will comply with the California disclosure law to not show specific parcels in a public</p>	Applicants will submit additional information on July 22, 2016.	The Applicants have agreed to respond to 1.5-5.1 by July 22, 2016.

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		document.		
1.5-6.1	Existing Line 1600 Alignment, Safety, and Integrity Management	Deficiency Request #3: The Applicants' Cost-effectiveness Analysis includes a brief description of the complexities of hydrotesting Line 1600; however, the Applicants did not provide the specific information requested in Deficiency Request #2.	Applicants to provide additional information.	<i>Applicants provided limited information. Will need description of TIMP and DIMP and other operations and management procedures in the EIR/EA. Requested that SDG&E provide O&M procedures for the EIR.</i>
1.5-14	Northern Baja Alternative	Deficiency Request #3: A point of contact at the parent company, Sempra, was not provided.	Complete	<i>POC provided. No further questions.</i>
1.5-14.1	Northern Baja Alternative	Deficiency Request #3: It is the CPUC's understanding that the regulations in Mexico regarding the release of subscribed capacity to the secondary market changed in 2015 per COMISION REGULADORA DE ENERGIA RESOLUCIÓN Núm. RES/684/2015. The change allows available capacity to be assigned to other users on a temporary basis or on a permanent basis through an open-season process. Please discuss the accuracy of this finding and to what extent this change in regulation would make the Northern Baja Alternative feasible.	Full response expected to be provided by the Applicants in response to other CPUC or Energy Division processes.	<i>Point of contact provided in response to 1.5-14. Response confirms that the regulatory changes in Mexico appear to allow capacity releases. Response does not address "to what extent this change in regulation would make the Northern Baja Alternative feasible."</i>
1.5-15.2	Northern Baja Alternative	Deficiency Request #3: To what extent and in what way could the additional 190,000 Dth of capacity Sempra acquired in April/May 2014 help ensure supply is available to SDG&E via Otay Mesa should SDG&E/SoCalGas obtain access to this capacity? Provide a discussion that includes the process or processes that SDG&E/SoCalGas could follow to propose to acquire this capacity from an affiliate of their parent company if ordered by the CPUC.	Complete	<i>No further questions</i>
1.5-16.1	No Project Alternative	Deficiency Request #3: Provide further discussion about the extent or range of a potential high-pressure release during hydrostatic testing of (a) water; and (b) pipeline components or other materials. Within what distance would the evacuation of nearby residences and businesses typically be required? What minimum distance must typically be maintained between facilities being tested and personnel conducting the test?	Complete	<i>No further questions</i>
1.5-23	Energy Conservation (CEQA Appendix F, Section 15126.4, Section 21100(b)(3)) / Growth Inducement	Deficiency Request #3: The California Public Utilities Code Section 1002.5 states that the Commission (i.e., the CPUC) in its review of a certificate of convenience and necessity for construction of additional pipeline capacity, "...shall consider the state's need to provide sufficient and competitively priced natural gas supplies for both present and anticipated future residential, industrial, commercial, and utility demand." SDG&E and SoCalGas state in the March 21, 2016 Amended Application at pp. 4-6, that the replacement of Line 1600 with Line 3602 is to: enhance safety, improve reliability and resiliency, and to enhance operational flexibility. The Applicants state that Lines 1600 and 3010 provide the capacity to meet	Full response expected to be provided by the Applicants in response to other CPUC or Energy Division processes.	<i>Clarified on the phone call that CPUC was looking for data to support the need for a 36-inch pipeline. Specifically, looking at the pipeline capacity and operational characteristics of that capacity necessary to meet projected hourly demand.</i>

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		<p>customer demand of 630 MMcf in the winter and 590 MMcf in the summer. The Applicants have stated that Line 1600 provides 10 percent of the system capacity which would constitute volumes between 59 MMcf and 63 MMcf of the SDG&E system capacity. Proposed Line 3602 will, according to the Applicants, raise the system transmission capacity by 200 MMcf.</p> <p>Presumably, there are adequate and competitively priced gas supplies to support the current level and types of demand. However, the Applicants have not satisfied the requirements of CPUC Section 1002.5 in that they have not provided support for the quantity of gas supplies necessary to meet the anticipated demand to be created by Line 3602.</p> <p>Provide the quantity of gas supplies needed to meet the future residential, industrial, commercial, and utility demand that would be provided by Line 3602, and discuss the nature of the increased demand. That is, will this increased demand be baseload, seasonal, peak day, or peak hour?</p>		
1.5-24.1	Otay Mesa	The Applicants stated that sufficient firm pipeline capacity may not be available on the North Baja System to reliably deliver gas to Otay Mesa. In order to understand how Otay Mesa is different from other pipeline receipt points on the Applicants' Southern System, please identify the firm transportation capacity (MMBtu/day) under contract by interstate pipeline and Applicants' receipt point.	Full response expected to be provided by the Applicants in response to other CPUC or Energy Division processes.	<i>Applicants answered with respect to SDG&E not Sempra/SoCalGas. Additional information requested to evaluate whether pipeline capacity availability to Otay Mesa is any different than firm pipeline capacity availability to other SoCalGas system receipt points that support the southern system (i.e., how different is Otay Mesa from other points on the SoCalGas system)? Is firm capacity a concern?</i>
1.5-24.2	Otay Mesa	What is the typical range in pressures and minimum contract pressure for gas delivered to each of the SoCalGas receipt points (including Otay Mesa), by pipeline?	Complete	