

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 8, 2017

SENT BY E-MAIL

Estela de Llanos
San Diego Gas and Electric Company
Director, Major Project Development
8330 Century Park Court, CP31D
San Diego, CA 92123
edellanos@semprautilities.com

RE: Data Request for the San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600

Dear Ms. de Llanos:

Upon further review of SDG&E's and SoCalGas's Proponent's Environmental Assessment (PEA) for the Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600 Project, the Energy Division requests the information contained in Attachment 1 to this letter. One set of responses should be submitted to the Energy Division and another to Ecology and Environment in hard copy and electronic format. Please direct the hard copy for Ecology and Environment to Lara Rachowicz in San Francisco. We request that SDG&E respond to this data request by August 22, 2017. Inform us as soon as possible if you cannot provide specific responses by this date. Delays in responding to this data request may cause delays in the CEQA Review process.

Direct questions to Rob Peterson at (415) 703-2820 or by e-mail (address below). Please copy the CPUC's consultant, Laurie Weaver, Ecology & Environment, Inc., on all communications (lweaver@ene.com). Energy Division reserves the right to request additional information at any point during the proceeding and subsequently during project construction and restoration should the CPCN application be approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Peterson".

Rob Peterson
Project Manager, Energy Division, Infrastructure Permitting and CEQA
Robert.Peterson@cpuc.ca.gov

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cc:

Edalia Olivo-Gomez, project team member, SDG&E
Rich Quasarano, project team member, SDG&E
Kirstie Raagas, project team member, SDG&E
Molly Sterkel, Program Manager, Infrastructure Planning and Permitting
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA
Jonathan Koltz, CPUC Attorney
Laurie Weaver, Project Manager, Ecology and Environment, Inc.
Lara Rachowicz, Deputy Project Manager, Ecology and Environment, Inc.

Attachment 1

**Attachment 1: SDG&E and SoCalGas Pipeline Safety and Reliability Project – New Natural Gas Line 3602 and De-rating Line 1600
Data Request No. 2 Follow Up, and Data Request No. 3 (August 8, 2017)**

DG #	Resource / Topic Area	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Project Description							
DG 2-8	Project Description	PEA Section 3.5-1	Confirm that the existing rail yard in the City of Fontana is the Kaiser Railroad Yard located on Loop Road, Fontana, CA 92337.	8/8/2017			
Alternatives							
DG 3-11	Alternatives	PEA, Section 5.2.2 and 5.2.4	Provide geospatial data (GIS). Provide GIS shapefiles and/or kmzs for the Cactus to San Diego segment alternative. The previous file provided does not show a linear route at the bend near Rancho San Diego. The file appears to be corrupted. The corruption in the file appears approximately 2.5 miles from the west end of the line. Correct as appropriate.	8/8/2017			
DG 3-12	Alternatives		Provide the following information pertaining to existing Line 3010. <ol style="list-style-type: none"> 1. Current operating pressure of Line 3010. 2. MAOP and maximum design pressure of Line 3010. 3. Has the operating pressure already been reduced on L3010? 4. Arrival pressure from SoCal at the upstream of Pressure Reducing station at Rainbow. 5. Confirm that delivery pressures at City gates and other points are basically 640 psig, 400 psig, and 60 psig. If correct, please confirm that the size of the new line has been based on the lower end of the highest operating pressure possible and the highest arrival pressure at Rainbow station (P1) and delivery pressure of 640 psig (P2) downstream and max flow rate (MMCFD) required through the new line. 6. What is the max/min/normal flow rate (MMCFD) through L3010 (based on last 5-year data)? 7. What is the max/min/normal flow rate (MMCFD) through L1600 (based on last 5-year data)? 8. What is the max/min/normal delivery (MMCFD) from Rainbow station to SDG&E system (based on last 5-year data)? 	8/8/2017			
DG 3-13	Alternatives		Provide additional GIS data for Line 1600. The No Project Alternative would require the Applicants to test, and repair as necessary segments of the existing Line 1600. Provide the segments that would most likely be replaced, per the ORA testimony submitted on June 7, 2017. The ORA testimony points out that approximately 0.5 miles of Line 1600 have been identified as the “weakest sections”. This 0.5 mile of Line 1600 is described in SoCalGas/SDG&E’s records as exceeding a 20% specified yield minimum strength (SYMS) at their proposed 320 psig MAOP. Identify which segments this refers to and provide GIS data.	8/8/2017			
Aesthetics							
DG 4.1-2	Aesthetics		Provide details regarding vegetation maintenance during operation and maintenance. Provide additional detail pertaining to vegetation maintenance and management during operation and maintenance (i.e. clearing, trimming, etc.), including for access and safety, along the proposed project. What are the restrictions, if any, on restoration of cleared vegetation in the pipeline ROW and around proposed project features (e.g., MLVs, cross-ties)? For example, can trees, bushes, or	8/8/2017			

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			other vegetation be replanted within the within the pipeline ROW/adjacent ROW following construction?				
Air Quality/GHG							
DG 4.3-2	Air Quality/ GHG	PEA Attachment 4.3-A	Provide updated Attachment 4.3-A based on new CalEEMod version and current project schedule. Attachment 4.3-A provides emissions calculations based on CalEEMod version 2013.2.2 and assumes project construction would occur in years 2018 and 2019. The Applicants stated in the PEA that the analysis presented represents a conservative estimate of the potential emissions of the Proposed Project; however, the EIR will be based on year 2017 baseline conditions. Provide a revised Attachment 4.3-A based on CalEEMod version 2016.3.1 and current project construction schedule. Please provide the current construction schedule used to revise Attachment 4.3-A.	8/8/2017			
DG 4.3-3 (follow up to response to deficiency item 1.4.3-2)	Air Quality/ GHG	Response to Deficiency Item 1.4.3-2 PEA Page 3-38 PEA Attachment 4.3-A	Clarify emissions estimates for pipe truck transportation. In response to Deficiency Request #1, the Applicants stated that the Proposed Project is located entirely south of the Riverside-San Diego county line; therefore, only SDAPCD rules and regulations apply. However, PEA Page 3-38 states that the pipe will be transported by truck from an existing rail yard located in the City of Fontana, Riverside County, to one of the proposed staging areas or directly to the ROW. The City of Fontana is located approximately 61 miles from the Community of Rainbow. Distance to the Proposed Project staging areas would likely exceed 61 miles in distance. PEA Attachment 4.3-A provides a detailed list of off-road equipment and worker, vendor, and hauling trips and vehicle miles traveled (VMT) for project construction during years 2018 and 2019. Trips and VMT estimates for year 2018 include 15 vendor trips with an average distance of 40 miles during Mobilization. 1. Clarify whether the fifteen 40-mile vendor trips estimated for the 2018 Mobilization phase in Attachment 4.3-A include the pipe truck transportation from the City of Fontana to each of the staging areas/laydown yards anticipated in year 2018. 2. If the fifteen 40-mile vendor trips include pipe truck transportation and the Attachment 4.3-A analysis only covers the San Diego Air Basin (SDAB), provide the estimated vehicle emissions (CAP and GHG) that would occur within the South Coast Air Basin (SCAB). 3. If the fifteen 40-mile vendor trips do not include pipe truck transportation to staging areas, provide emissions estimates (CAP and GHG) from truck transportation in both SDAB and SCAB.	8/8/2017			
DG 4.3-4 (follow up to response to deficiency item 1.4.3-7)	Air Quality/ GHG	Pages 4.3-18/19 Response to Deficiency Item 1.4.3-7	Provide additional detail about construction work near sensitive receptors. Pages 4.3-18 and 4.3-20 of the PEA state that construction activities are anticipated to progress at a rate of approximately 200 to 300 feet per day at locations where sensitive receptors have been identified directly adjacent to the proposed project alignment; therefore, the exposure of each sensitive receptor to fugitive dust and Diesel Particulate Matter (DPM) would be limited in duration. Further, Response to Deficiency Letter #2 specifies that increased emissions will move once a section of pipe has been installed or a road or resource crossing has been completed. For each 200 to 300 feet construction segment in densely populated areas, provide the following	8/8/2017			

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			<p>information:</p> <ol style="list-style-type: none"> 1. Estimated duration (in days, or range of days) of exposure of residents and other adjacent sensitive receptors identified along the proposed project alignment. 2. Average number of pieces of off-road equipment and vehicles that would be used adjacent to sensitive receptors. 				
Biological Resources							
DG 4.4-5 Follow Up 1	Biological Resources		Provide updated information about USFWS permitting strategy. Follow up with USFWS regarding their consultation with their solicitors. Provide results from communication with USFWS including feedback on the preliminary permitting approach or any new permitting approach.	8/8/2017			
DG 4.4-7 Follow Up 1	Biological Resources		Rare Plant Survey Data. Provide rare plant data in GIS format and report once surveys are complete.	8/8/2017			
DG 4.4-8 Follow Up 1	Biological Resources		<p>Collect available data for route alternatives and non-Miramar alternatives.</p> <ul style="list-style-type: none">) Provide Quino checkerspot butterfly survey results in GIS format and report once complete.) Data provided in Exhibit R is only for vernal pools, is SDG&E assuming presence for fairy shrimp in these locations? Or will SDG&E be providing fairy shrimp presence/absence data in the follow up vernal pool data collected in the spring of 2017?) In response to Data Gap 4.4-8 the Applicants state additional data regarding vernal pools for the Miramar route segment alternatives and the non-Miramar alternatives are being collected during the spring/summer 2017 surveys. Provide these vernal pool data in GIS format and associated report for the Non-Miramar route alternative when complete. 	8/8/2017			
Cultural Resources							
DG 4.5-3 (previously Deficiency # 1.4.5-1)	Cultural Resources	<p>Cultural Resource Survey Report for the SDG&E and SoCalGas Company PSRP, San Diego County, California – September 2015 (Revised February 2016); submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1</p> <p>and</p> <p>Indirect Visual Impact Assessment Survey for the Proposed PSRP, San Diego County, California – February 12, 2016</p>	<ul style="list-style-type: none">) Provide an addendum report or letter that includes CRHR evaluation or re-evaluation of the 13 built environment resources and 33 archaeological resources) Provide at least one photo of each previously-recorded site and each newly recorded site or isolate for the 13 built environment resources and 33 archaeological resources as noted in the Indirect Visual Impact Assessment Survey for the Proposed PSRP, San Diego County, California – February 12, 2016 report.) Provide appropriate forms (DPR 523 Forms) for each new resource and for the previously recorded sites that have been re-evaluated. For example, if a standing house has been recorded already but has only a Primary Record and a Location Map, then when it is evaluated, the full site form needs to have a Primary Record, a Building, Structure, and Object Record, a Location Map, and a Continuation Sheet with additional photos of the house, if available.) Provide the DPR 523 series forms for all previously recorded sites identified within the direct and indirect (including visual impacts) areas of potential impact (API). An original site form should accompany any update to that form, as well as any updates submitted prior to the 	8/8/2017			

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			most recent update. If the site was originally recorded on a non-DPR 523 site form, that site form should be attached to an update.				
DG 4.5-4	Cultural Resources	Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California – September 2015 (Revised February 2016) submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1 and Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County, California – February 12, 2016	Confirm if a review of the Caltrans Inventory of Historic Bridges was conducted. If a review was conducted, provide results of the inventory review, or confirm no historic bridges were found. Provide a letter report to include this information. Please confirm if any bridges were identified in the field surveys conducted of the direct and indirect (including visual impacts) areas of potential impact (API). If bridges were identified, provide their CRHR/NRHP eligibility recommendation.	8/8/2017			
DG 4.5-5	Cultural Resources	Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California – September 2015 (Revised February 2016) submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1	Provide the GIS shapefiles for all previously documented archaeological sites and standing structures from the CHRIS research, as well as newly identified resources found as part of the surveys conducted.	8/8/2017			
DG 4.5-6	Cultural Resources	Exhibit LL-A Response to 1-4-5-1_APE Map (series of 58 aerial photo maps)	The aerial views included as Exhibit LL-A Response to 1-4-5-1 APE Map show standing buildings and structures within the Area of Indirect Impact and within the Area of Potential Effect. It appears from this map that structures may also be located within the Area of Direct Impact. Provide a statement based on the 2015 and/or 2016 field surveys to indicate that no historic - age buildings or structures were encountered within the Areas of Direct or Indirect Impact, or if some were found, provide appropriate DPR Forms and photographs.	8/8/2017			
DG 4.5-7	Cultural Resources	Exhibit TT-B_Response to 1-4-5-1_Indirect APE Survey_Confidential Letter Report to Rachel Ruston from Shannon Davis at ASM, February 12, 2016 (Revised May 4, 2016): Indirect Visual Impact Assessment Survey	As noted on Page 2 of this document, additional archival and research will be needed to construct a historic context for the built environment resources evaluations. Provide this information, or indicate when research will be conducted and when additional information will be provided.	8/8/2017			

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DG 4.5-8	Cultural Resources	Attachment D: Cultural Resources Letter Report from Kent Manchen and Brian Williams of ASM to Rachel Ruston of SDG&E Environmental Services, January 20, 2017 Post PEA Filing – Route Refinement	Attachment D: Cultural Resources Letter Report from January 20, 2017 indicates that no cultural resources were identified. However, in 2015/2016 reports (Exhibit LL-C-Response to 1-4-5-1 Revised Survey Report), segments of Highway 395 have been recorded as a site (P-37-033557). Is the segment of Highway 395 that appears in Figure 11 of this report considered a part of that same site? Explain why or why not. If it is, please update site form to include the referred to segment in Figure 11.	8/8/2017			
DG 4.5-9	Cultural Resources	Attachment D: Cultural Resources Letter Report from Kent Manchen and Brian Williams of ASM to Rachel Ruston of SDG&E Environmental Services, January 20, 2017 Post PEA Filing – Route Refinement	As part of the January 2017 refinements, new laydown yards (Washington, Emmanuel Church, and Alliant) were identified. It appears that standing buildings exist within the APE boundaries of these yards, but they were not recorded in the Attachment D report. Are any of these buildings historic in age? If not, provide a statement to that effect. If they are historic in age, provide information for them, indicating their APNs, their addresses, the age of structures, brief descriptions, photographs, , and if they are eligible for the California Register and under what criteria.. See Figures 16, 29, 32, and 54.	8/8/2017			
DG 4.5-10	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and Reliability Project, San Diego County, CA September 23, 2015	Section 2.2 of the September 23, 2015 report provides a discussion of the areas surveyed. Provide a map showing the areas that were surveyed as well as a description of what rock units were selected for survey and the explicit process for evaluating the sensitivity of rock units.	8/8/2017			
DG 4.5-11	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and Reliability Project, San Diego County, CA September 23, 2015	Figure 1 is difficult to see - provide a larger image or one with more clarity.	8/8/2017			
DG 4.5-12	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and Reliability Project, San Diego County, CA September 23, 2015	Rock units themselves are not paleontological resources; clarify what paleontological resources are known within each rock unit. Provide an estimate of how many fossils from the project formations are already in the collections of the San Diego Natural History Museum and what new information would be provided by collecting additional specimens.	8/8/2017			
Noise							
4.11-1	Noise		Provide ambient noise data from additional project locations. Attachment 4.12-B of the PEA (dated June 8, 2015) provides ambient noise monitoring data from SDG&E's Rainbow and Lake Hodges Facilities, located in Unincorporated San Diego County and City of Escondido, respectively. Both measurement locations are within low density residential areas. Provide ambient noise data (measured as hourly average noise level, dBA Leq) from additional measurement sites located in the vicinity of the following proposed project components: <ul style="list-style-type: none"> • MLV #6 (City of Escondido) • MLV #8 (City of Poway) • MLV# 9 (City of San Diego) 	8/8/2017			