

**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses
A.15-09-013 Pipeline Safety & Reliability Project (PSRP or Proposed Project)
California Public Utilities Commission (CPUC) Data Request No. 02 – June 23, 2017**

DG#	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	Data Gap (DG) Question	CPUC's Notes	Response
Project Description					
2-7	Project Description	Geographic Information System (GIS)	<p>GIS clarifications; provide a complete workspace layer that assigns temporary and permanent impacts to each space.</p> <ol style="list-style-type: none"> 1. Does the 4-21-17 file 'PSRP_Facilities' miscategorize the outer Line 1601 Cross-tie boundary as a permanent fence? It seems like it should be a vegetation maintenance buffer, temporary impact, based on the other facilities. 2. Should the file PSRP_Facilities be used to append permanent fence areas into the file PSRP_Workspace to include the aboveground facility footprints as permanent impacts? 3. Workspaces for distribution system modifications were initially provided 4-1-16. These workspaces are not separated into permanent and temporary workspaces, and additionally overlap the 4-21-17 file PSRP_Workspace. Provide a new workspace file that incorporates Line 3602 workspace and Line 1600 distribution system modifications workspace and clearly delineates temporary and permanent workspace without overlap between temporary and permanent workspace and describes the type of workspace (e.g., Temporary ROW, Temporary Laydown Area, Permanent MLV, Temporary Access Road, Permanent Patrol Road, etc.). Please also eliminate overlap between Line 3602 and Line 1600 workspace except where impacts may need to overlap to account for repeated impact at different times. 4. There are multiple spots where workspaces overlap within the file PSRP_Workspace sent on 4-21-17. There should be no overlaps, in order to prevent double counting impacts. Of particular concern are spaces where temporary impacts overlap permanent impacts (described below). Should we remove these, giving permanent impacts preference? <ol style="list-style-type: none"> a. Permanent Patrol Road near 6" KV-MM Extension Section 2 Permanent Impacts over Temporary Impacts (ROW limits) b. Permanent Patrol road south of the 6" KV-MM Extension Section 2 towards MLV 10 over Temporary Impacts (ROW Limits) c. 6 crossings of Permanent Patrol Road between MP 3 and 4 over Temporary Impacts (ROW limits) 		<p>In September 2015, SDG&E and SoCalGas (together, Applicants) provided GIS shapefiles for all workspaces described in the PEA for construction of the Proposed Project. The shapefiles also included aboveground structures (i.e., valves, pressure-limiting, and metering equipment) that will result in permanent impacts. Additional GIS shapefiles were provided in April 2016 for data associated with the PEA Supplement and in January 2017 for data associated with the Post-PEA Minor Design Refinements. Specific information regarding each question is as follows:</p> <ol style="list-style-type: none"> 1. As described in Applicants' January 2017 Post-PEA Minor Design Refinements on page A-1 of Attachment A: Minor Design Refinements, approximately five feet of additional permanent easement were added around the perimeter of each mainline valve (MLV), the new Rainbow Pressure-Limiting Station, the Line 1601 Cross-Tie, and the Line 2010 Cross-Tie to provide a small buffer around the enclosure, and to facilitate maintenance during the operation and maintenance phase of the Proposed Project. Therefore, approximately five feet beyond each facility perimeter wall (i.e., fence in the attribute) are intended to be a vegetation maintenance buffer and were considered a permanent impact during the analyses of impacts. The outer Line 1601 Cross-Tie boundary in the PSRP_Facilities shapefile, which was provided in response to PEA Data Request No. 1 on April 21, 2017, was incorrectly attributed as "Permanent Fence." This polygon should be categorized as "Vegetation Maintenance Buffer." The vegetation maintenance buffers were also incorrectly attributed as "temporary" impacts in the PEA Data Request No. 1 April 21, 2017 response. A revised dataset with the correct attributes are provided here as Confidential Exhibit M: Updated Project Shapefiles, which contains confidential information provided pursuant to P.U. Code Section 583, G.O. 66-C, D.16-08-024 and the accompanying declaration, to reflect what was used to determine impacts in Attachment A: Minor Design Refinements. 2. The polygons provided in the April 21, 2017 PSRP_Facilities shapefile can be appended to the polygons in the April 21, 2017 PSRP_Workspace shapefile to develop an impact layer without overlap. A revised shapefile (PSRP_ImpactLayer) is provided as part of Confidential Exhibit M: Updated Project Shapefiles. This shapefile combines the PSRP_Facilities and PSRP_Workspace polygons, removes the overlap, and incorporates all changes documented in this data request. 3. Shapefiles for the distribution system modifications described in the PEA Supplement were provided in April 2016. Table 2-4: Temporary and Permanent Land Requirements in Chapter 2 – Project Description of the PEA Supplement lists the permanent impacts associated with each new regulator station (i.e., A, B, and C). The permanent footprint of each station is approximately seven feet by 19 feet. The location of each regulator station was provided in the GIS data that was submitted in March 2016 with the PEA Supplement. To facilitate future impact analyses, the distribution system modifications are included with the revised GIS data provided in Confidential Exhibit M: Updated Project Shapefiles. 4. As described previously, Applicants reviewed the most recent PSRP_Facilities and PSRP_Workspace datasets, which were provided on April 21, 2017. An impact layer, which removes the overlap in the identified areas, has been created and is included in Confidential Exhibit M: Updated Project Shapefiles. 5. The laydown areas should be considered temporary impacts. They have been incorporated into the impact layer, as described previously, and included as Confidential Exhibit M: Updated Project Shapefiles. 6. Because these regulator stations result in small permanent impacts (i.e., less than 0.01 acre) within SDG&E's existing easement, they were not included as separate polygons within the April 21, 2017 PSRP_Workspace shapefile. Instead, the anticipated impacts were manually calculated and incorporated into the impact calculations

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			<p>5. Should laydown areas be included as temporary impacts in the workspace file? Presently, they are not there, they also overlap workspaces, including permanent workspace (MLV 2).</p> <p>6. Proposed Regulator Station A, B, C footprints are not appropriately incorporated into PSRP_Workspace (they are either missing or temporary impacts), should these be permanent since they are the proposed footprints?</p> <p>The field delineated vegetation data (Insignia_Vegetation received 1-31-17) does not provide full coverage of the workspace file (PSRP_Workspace received 4-21-17) because it omits certain patrol roads. Provide vegetation data with full coverage of the updated workspace file, to facilitate our impact analysis.</p>		<p>that were reported. To develop a complete impact layer, the regulator station footprints have been incorporated into the data supplied in Confidential Exhibit M: Updated Project Shapefiles.</p> <p>Proposed patrol roads located outside of the biological resources survey corridor have not been surveyed, and therefore no field data exists. Potential patrol roads were generally sited along existing, maintained farm roads or within the proposed construction right-of-way. In response to this question, existing farm roads have been attributed as existing, unimproved roads in Confidential Exhibit M: Updated Project Shapefiles.</p>
Alternatives					
3-8	Alternatives	PEA, Section 5.2.2 and 5.2.4	<p>Provide geospatial data (GIS). Provide GIS shapefiles and/or kmzs for the following route segments/alternatives:</p> <ul style="list-style-type: none"> • Infrastructure Corridor. • Northern Baja. • Otay Mesa Alternatives. • Offshore Route. • United States LNG. • Kearny Villa Road alternative layout that ends at Line 2010, as previously described under the Applicants' response to DG 3-5. <p>West side of the aqueduct road.</p>		<p>The Applicants' Response to the Application Completeness Determination submitted to the CPUC on May 26, 2016 provided KMZ files for the Offshore Route Alternative and the Infrastructure Corridor Alternative as Exhibit WW: Response to 1.5-2. However, the Applicants later discovered the KMZ file for the Infrastructure Corridor Alternative only included the segment that deviates from the proposed route. Thus, the Applicants' Response to the Application Completeness Determination submitted to the CPUC on July 22, 2016 provided updated KMZ files for the Offshore Route Alternative and the Infrastructure Corridor Alternative as Exhibit WW: Response to 1.5-2.</p> <p>Because the United States LNG Alternative is considered a theoretical alternative, the Applicants did not provide GIS shapefiles or KMZ files for this alternative. However, Exhibit RR: Response to 1.5-7 from the Applicants' Response to the Application Completeness Determination submitted to the CPUC on February 12, 2016 depicted the theoretical location for the United States LNG Alternative.</p> <p>In addition, because the pipelines included in the Otay Mesa Alternatives (which includes the Northern Baja Alternative) are located outside of the Applicants' system and, in part, in a foreign country, the Applicants do not have KMZ files for these Alternatives. The Applicants' Response to the Application Completeness Determination submitted to the CPUC on May 26, 2016 listed websites that provide additional information (see www.tcplus.com/North%20Baja for the North Baja Pipeline and www.gasoductorosarito.com/english/aboutus.html for the Gasoducto Rosarito Pipeline).</p> <p>GIS shapefiles for the Kearny Villa Road alternative that ends at Line 2010 and GIS shapefiles for the west side of the aqueduct road are provided in Confidential Exhibit M: Updated Project Shapefiles.</p>

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3-9	Alternatives / land use descriptions	PEA, Section 5.2.3 and 5.2.4 Pages: 5-24, 5-30, 5-31, 5-32, 5-33, 5-37, 5-49	<p>Several alternatives refer to “undeveloped land” as a reason that the alternative was written off or not preferred – what definition did SDG&E use for “undeveloped land” and was that definition applied globally for each alternative where used? If not, is this specific based on potential resources within an alternative that was analyzed, and thus may vary? It appears “undeveloped land” was used interchangeably with “cross-country”, or does the latter have a different meaning? Examples include:</p> <ul style="list-style-type: none"> • Rainbow – El Norte Parkway – Santee Alternative Valley Center Alternative. 		<p>As used in the PEA, undeveloped land refers to San Diego Association of Governments data categorized as vacant or open space. Each alternative was analyzed using the same GIS datasets; therefore, undeveloped land was consistently used across alternatives.</p> <p>Cross-country refers to the construction methodology that is anticipated to be used and does not necessarily correlate to the undeveloped land category. In general, where the centerline of the pipeline is not within an existing road, cross-country construction techniques were assumed. Cross-country construction is described in more detail in Chapter 3 – Project Description and depicted in Figure 3-13: Typical Cross-Country Construction Sequence of the PEA.</p>
3-10	Alternatives		<p>Provide GIS data for all segments along Line 1600 that have been repaired or replaced since Line 1600 first went into service or as far back as the Applicants’ maintenance records for Line 1600 go. Include GIS attribute data that identifies the length and date of each repair or replacement and a brief description of the work done.</p>		<p>GIS shapefiles for all Line 1600 cylindrical replacement repairs and replacement segments where the original 1949 vintage pipe has been replaced are provided as Confidential Exhibit N: Line 1600 Repair and Replace Shapefiles, which contains confidential information provided pursuant to P.U. Code Section 583, G.O. 66-C, D.16-08-024 and the accompanying declaration. The shapefiles do not include information related to routine maintenance activities, such as grinding out a gouge or welding on a reinforcement sleeve where the original 1949 vintage pipe is still in place. As requested, attribute data includes the length and date of each repair/replacement. A brief description of the work performed is also included. The information provided in this response covers the entire approximately 50 mile length of Line 1600 and is based on information in the Applicants’ High Pressure Database as of June 12, 2017.</p>
Environmental Impact Assessment					
Biological Resources					
4.4-4	Biological Resources		<p>Clarify mitigation parcel.</p> <p>What is the name of the 114 acre high quality habitat parcel potentially available to the Applicants for mitigation of coastal California gnatcatcher, where is it located, and what species can it cover? Has it already been purchased? If so, when was it purchased and how many acres of mitigation remain?</p>		<p>In 2015, SDG&E contributed funds toward the acquisition of the Cielo B property. In exchange for this contribution, the United States (U.S.) Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) granted 114 acres of mitigation credits to SDG&E, which may be utilized by SDG&E as a part of the 1995 Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP) or for other mitigation requirements. Similar to the existing banked credits under the SDG&E Subregional NCCP, the Cielo del Norte property supports high-quality habitat and is important to meeting regional conservation goals. In accordance with the SDG&E Subregional NCCP, these mitigation credits will serve as mitigation for both in-kind and out-of-kind covered species and habitat impacts, without regard to the type of habitat and the biological value of the habitat impacted, except with regard to wetlands falling within the jurisdiction of the U.S. Army Corps of Engineers (USACE). The parcel contains excellent quality coastal sage scrub habitat and supports coastal California gnatcatcher. As of June 8, 2017, SDG&E has not utilized any of these mitigation credits, and still has the entire 114 acres available for use. Exhibit O: Cielo B Mitigation Parcel Map provides a map of the location of the Cielo B mitigation parcel.</p> <p>While the Cielo B mitigation parcel may not be used to satisfy mitigation requirements for impacts to lands falling within the jurisdiction of the USACE (pursuant to Section 10 of the Rivers and Harbors Appropriation Act and Sections 403 and 404 of the Clean Water Act), the project as currently proposed will not impact USACE jurisdictional habitat. Additional information is provided in the response to DG#4.4-6 below.</p>

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4.4-5	Biological Resources		Provide updated information about USFWS permitting strategy. Provide results from follow-up communication with the USFWS after they receive additional input from their solicitors about the possibility of using a combined approach for permitting (i.e., SDG&E's NCCP for riparian species and a new HCP for coastal California gnatcatcher).		On May 10, 2017, the Applicants participated in a coordination meeting with the CPUC, USFWS, and CDFW to discuss strategy for compliance with the federal and state Endangered Species Act (ESA). During the meeting, the Applicants presented for initial discussion and feedback, various options that would utilize the NCCP to comply with FESA and CESA. Since the May 10 meeting, the Applicants have had one communication with USFWS. USFWS inquired whether the Applicants have decided how they wanted to proceed with ESA permitting for the Proposed Project. The Applicants clarified that the meeting on May 10 was a preliminary discussion and that additional coordination with the USFWS will occur. As of the date of this response, no additional conversations with USFWS have occurred as it is the Applicants' understanding that they are consulting with their solicitors.
4.4-6	Biological Resources		Provide updated information about impacts on species listed under the federal ESA in areas where the USACE is likely to take jurisdiction for the proposed project. As stated by USFWS on May 10, 2017, impacts on habitat for listed species in likely USACE-jurisdictional areas are not covered under SDG&E's NCCP. Provide an update on the temporary and/or permanent impacts to listed species habitat proposed in likely USACE-jurisdictional area.		Based on the current alignment and proposed temporary workspaces, no listed species are anticipated to be adversely affected in USACE-jurisdictional areas temporarily impacted by the Proposed Project. One federally listed species, the least Bell's vireo (LBV), was identified during field surveys within or adjacent to areas under the jurisdiction of the USACE and within the Biological Resources Survey Area. The LBV was documented during protocol-level surveys in 2015 near the Proposed Project at the San Luis Rey River, Moosa Creek, Lake Hodges, and Carrol Canyon. None of the observations were within the Proposed Project work limits. However, because they were observed upstream or downstream of the Proposed Project, it was assumed that there was a potential to impact the species during construction. No LBV habitat will be temporarily or permanently impacted at the San Luis Rey River or Lake Hodges as those crossings are planned for horizontal directional drilling. The Proposed Project will cross Moosa Creek within Old Highway 395, and therefore will not result in temporary or permanent impacts to LBV habitat. The crossing of Carroll Canyon Creek will result in approximately 0.4 acre of USACE-jurisdictional waters; however, the riparian vegetation that supports LBV is on the east side of Avenue of the Nations. The USACE-jurisdictional area that will be impacted by the Proposed Project is on the west side of Avenue of the Nations within a eucalyptus woodland, and therefore will not impact LBV habitat. Exhibit P: Riparian Vegetation and Jurisdictional Waters Map shows riparian areas that could potentially support LBV that intersect proposed workspaces, as well as USACE-jurisdictional waters.
4.4-7	Biological Resources		Rare Plant Survey Data. As suggested by USFWS and CDFW: <ul style="list-style-type: none"> Provide 2017 survey results for rare plants for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602, Kearny Villa Road, west side of aqueduct road, and Spring Canyon Fuel Break. Provide updated 2017 survey results for <i>Brodiaea filifolia</i> (surveys of clay soil areas) for the proposed project.		The first round of rare plant surveys for 2017 commenced in early May 2017. The second round of rare plant surveys is anticipated to begin mid-to-late June 2017. Once the surveys are complete, the data will be processed and summarized in a report. The report is anticipated to be completed in August and will be provided to the CPUC at that time.
4.4-8	Biological Resources		Collect available data for route alternatives and non-Miramar alternatives. Provide surveys results if available, and GIS shapefiles if available: <ul style="list-style-type: none"> Provide available survey data from Stephens' kangaroo rat. Provide available data from recent Quino checkerspot butterfly surveys of route segment alternatives (e.g., near Spring Canyon Fuel Break). Would SDG&E's HCP be utilized for this species? Provide available recent data for vernal pools, fairy shrimp habitat, and fairy shrimp presence/absence for the non- Miramar alternative, as suggested by USFWS and CDFW (e.g., from Fanita Ranch, city of San Diego)		SDG&E compiled the available data for the route alternatives and non-Miramar alternatives that were used during the environmental review and refinements to the PEA. This data was gathered from publicly available sources and is included as Exhibit R: Publicly Available Biological Resources Data. The Applicants have not conducted any surveys for Stephens' kangaroo rat (SKR) along the route segment alternatives and are not aware of any existing data. Similarly, no surveys for SKR are known to have been conducted for the non-Miramar alternatives; however, these routes are outside the known range for SKR, and existing survey data does not likely exist. Exhibit Q: Stephens' Kangaroo Rat Occurrences Map depicts known occurrences of SKR with distances to the nearest route segment alternative based on publicly available data from the California Natural Diversity Database. The Applicants are currently post-processing survey data for Quino checkerspot butterfly surveys that were conducted in the vicinity of the Spring Canyon Fuel Break and will provide that data to the CPUC once it has been finalized. The associated USFWS 45-day report is anticipated to be complete by mid-July and will be provided to the CPUC at that time. If the route selected has the potential to impact QCB, the Applicants could use their existing QCB HCP for incidental take coverage. Available vernal pool data are provided as Exhibit R: Publicly Available Biological Resources Data. Additional data

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					regarding vernal pools for the Miramar route segment alternatives and the non-Miramar alternatives are being collected during the spring/summer 2017 surveys.
4.4-9	Biological Resources		Provide an update on the status of all biological surveys along the Rainbow to Santee non-Miramar alternative. Describe any access problems. If access problems exist, discuss whether a letter from the CPUC would help with obtaining access if access is being restricted by a public agency.		Rare plant surveys began in May 2017 and are anticipated to be complete by the end of June 2017. A habitat assessment is scheduled for late June 2017, followed by drainage mapping. The Applicants appreciate the Commission's offer to assist with access. To date, the Applicants have been able to access the Sycamore Canyon Preserve/Goodan Ranch property.
Cultural Resources					
4.5-1	Cultural Resources		Provide updated shapefiles for cultural resources. Provide shapefiles that clearly show the limits of the areas surveyed to date for cultural resources. Provide shapefiles that clearly delineate the area of direct impact and the area of indirect effect.		The requested shapefiles for cultural resources are provided in Exhibit S: Cultural Resources Shapefiles.
4.5-2	Cultural Resources		Complete an archeological field Investigation and provide results, within the survey corridor and APE for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602. Complete a paleontological field investigation and provide results for the segment of the Rainbow to Santee non-Miramar alternative that diverts from the proposed Line 3602.		In response to this request, the Applicants are in the process of conducting an archaeological field investigation and paleontological field investigation for the Rainbow to Santee Non-Miramar Alternative and will provide the results upon completion. The field work is anticipated to start on June 23, 2017 and take approximately six days (not including weekends) to complete. The results of the literature search and pedestrian surveys will be summarized in a report and submitted to the CPUC within approximately six weeks of completing the field work.