

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 8, 2015

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Follow-up Data #10 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of San Diego Gas and Electric Company's (SDG&E) application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project) and SDG&E's responses to Data Requests #1 through #9.

The CPUC requests clarifications to some of SDG&E's prior data request responses as indicated in the attached data needs Table 1, below.

Information provided by SDG&E in response to this Request for Additional Follow-up Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than **April 21, 2015**. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the EIR.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the Project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Billie Blanchard".

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Nicholas Sher, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental

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Susanne Heim, Deputy Project Manager, Panorama Environmental
Darryl Gruen, Attorney for ORA
Chris Myers, ORA
Alan Colton, SDG&E Director - Major Projects

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #10 FOR THE SYCAMORE-PEÑASQUITOS 230-KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified additional areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project and in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

Table 1: Application No. 14-04-011 Data Needs #10

#	Reference Source, Page #	Data Need
1	Data Request #3, Response #11	<p>Clarify if the existing EMF calculated values provided for TL 13811 and TL 13820 in Segment A account for the existing 69kV and 230 kV lines present in Segment A. If they do not, provide existing EMF calculated values that represent the combined existing transmission both north and south of the Chicarita Substation.</p> <p>The EMF reduction on the north side of Segment D is substantial and will likely be questioned by the public. Provide an explanation for the modeling of EMF for each Segment, including the inputs to EMF modeling such as the existing and future current amounts and direction, line phasing and height above ground.</p> <p>Also provide tabular or graphical modeling output for EMF for both the proposed project and each of the alternatives, which provides values across the entire width of the right-of-way. This should include alternative underground duct banks and Segment D without the 69 kV power line.</p>
2	N/A	<p>Provide GIS data and graphically depict the locations of all underground gas pipelines and underground utilities (including electrical distribution) in Segment B of the proposed project.</p>
3	Data Request #8, Responses #3 thru #7	<p>Provide GIS data and graphically depict the locations of underground gas pipelines and underground electrical distribution lines in proximity to the underground 230-kV and 69-kV alternatives.</p> <p>The written responses to DR #8, Q3, 4, 5, 6, and 7 indicate that the alternative underground 230-kV transmission line and 69 kV power line alignments may be infeasible due to conflicts with steel gas pipelines;</p>

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		specifically, "...steel natural gas mains are parallel with a majority of the proposed alternative miles." This comment implies that underground transmission and power lines cannot be installed parallel to steel natural gas mains. If this is the case provide information on any regulations or operating constraints that preclude such installations. Clarify if other types of conflicts would render an alternative infeasible, such as any minimum required spacing, both lateral and vertical, or any other requirement that could not be mitigated. The steel natural gas mains are not depicted on the maps showing utilities near the alternative alignments. Provide the locations of these steel natural gas mains for further analysis. Similarly, underground electrical distribution lines are not shown on the maps. Provide the locations of any other underground utilities that could conflict with the alternatives.
4	Data Request #8, Responses #4 thru #6	<p>Provide preliminary engineering for the Alternative 4, 5, and 6 Segment C overhead transmission line from SDG&E's Right-of-Way east of I-805 to Peñasquitos Substation.</p> <p>The preliminary engineering provided on March 25, 2015 only includes the area from Sycamore Substation to SDG&E's right-of-way adjacent to I-805. Preliminary engineering is required for Segment C (approximately Carroll Canyon Road to Peñasquitos Substation) to evaluate the feasibility and potential impacts of Alternatives 4, 5, and 6.</p>
5	Data Request #8, Response #10	<p>For Segment D, identify the minimum distance required between the existing H-Frame and the new double circuit 69 kV steel poles.</p> <p>The March 25, 2015, response to this data request did not specify the requested minimum distance between the existing H-Frame and the new double circuit 69 kV steel poles.</p>
6	N/A	<p>Provide the locations of existing FAA hazard marker balls and structure lighting in Segments A, C, and D. Describe the color and size of lighting that would be used where lighting may be installed on the proposed structures.</p>
7	Data Request #8, Responses #3 thru #7	<p>Provide a corrected Alternative Routes Overview Map that includes the complete Segment B alignment for Alternative 2 – Pomerado Road to Miramar Area North.</p>
8	Data Request #8, Responses #5 and #6	<p>Provide preliminary engineering for two cable poles and an overhead crossing of Interstate 15 near the Pomerado Road bridge crossing for the Pomerado Road to Miramar Road Area North and Pomerado Road to Miramar Road Alternatives.</p>
9	Data Request #8, Response #7	<p>Describe the intended future need for keeping the existing H-frame poles. Under the 69-kV underground alternative and under the proposed project segment D, these poles would be removed to reduce aesthetic impacts of the proposed project. Is SDG&E reconsidering this part of the proposed project?</p>
10	Data Request #5, Response #11	<p>Provide a detailed description of the physical components, siting requirements, and construction timeframe for the Mission-Peñasquitos 230 kV Circuit Project.</p>

Table 1: Application No. 14-04-011 Data Needs #10

#	Reference Source, Page #	Data Need
		This project was not included in the cumulative project list provided by SDG&E in response to DR #5. The CAISO 2014-2015 Transmission Plan identifies this project as including construction of "...a new 230 kV section to access Peñasquitos 230 kV substation from Peñasquitos junction" and "...using a de-energized portion of TL23001..."
11	N/A	<p>Provide the correct GIS mapping and supporting documentation for the locations of SDI- 13082 and SDI-14123.</p> <p>In our call with SDG&E on March 26, 2015 to discuss remaining cultural resource sites that required evaluation for potential eligibility on the California Register of Historic Resources, SDG&E cultural technical specialists noted that the locations of these two resources were incorrectly depicted in recorded site maps. SDG&E agreed to provide in short order documentation demonstrating that the locations of these resources do not overlap with proposed project impact areas. That documentation has not yet been provided by SDG&E.</p>
12	N/A	<p>Provide the cultural resource evaluation of SDI-18277.</p> <p>In our call with SDG&E on March 26, 2015 to discuss remaining cultural resource sites that required evaluation for potential eligibility on the California Register of Historic Resources, SDG&E stated that its own cultural resources consultant would evaluate this particular site and that the results of this evaluation would be provided in short order. This evaluation has not yet been provided by SDG&E.</p>
13	N/A	<p>Provide GIS for revised limits of work in Segments C and D.</p> <p>In our call with SDG&E on March 12, 2015 Panorama identified discrepancies in the GIS showing the limits of work within existing disturbed areas in Segments C and D; some of the areas that SDG&E defined as "existing disturbance" are mapped as habitat types in the vegetation GIS data set. Panorama also submitted a follow-up email to SDG&E identifying where these discrepancies occur. During the call, SDG&E indicated that the limits of work discrepancies would be reviewed and GIS showing corrections to the limits of work would be provided. This data set has not yet been provided by SDG&E.</p>