

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 9, 2015

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

RE: Request for Additional Data #14 – 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 reviewed 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 #13.

The CPUC requests additional data and clarifications to some of SDG&E's prior data request responses, particularly with respect to cumulative projects and alternatives, 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 **June 23, 2015**, and respond to Item #3 by June 11, 2015. Please let us know if you cannot provide the information by these dates. 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. If a conference call to clarify any of our questions is helpful, please let us know.

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

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Nicholas Sher, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental
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 #14 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 analyze the potential environmental effects of the Proposed Project, cumulative impacts, and alternatives 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 #14

#	Reference Source, Page #	Data Need
1	Data Request #10, Q10; California ISO response to Data Request (see attached)	<p>Provide (i) preliminary engineering for the Mission—Peñasquitos 230 kV Transmission Line with the Proposed Project and (ii) preliminary engineering and construction methods for the Mission—Peñasquitos 230 kV Transmission Line in the absence of the Proposed Project.</p> <p>The CPUC requested information about the location and construction methods for the Mission—Peñasquitos 230 kV Project in Data Request #10 dated April 8, 2015. This information was requested specifically to evaluate the relationship between the potential impacts of the Proposed Project and the future Mission—Peñasquitos Project. SDG&E provided the following response to this data request:</p> <p><i>"The CAISO just approved the Mission-Penasquitos 230 kV Project in March 2015, in its final 2014-15 Transmission Plan. As such, this future project has not been evaluated by SDG&E and no design information is available.</i></p> <p><i>As part of SDG&E's evaluation in the future of the proposed project, SDG&E would determine project feasibility, construction timing and potential design alternatives."</i></p> <p>Subsequent to SDG&E's response, the CPUC requested information from California Independent System Operator Corporation (CAISO) on the location of the Mission—Peñasquitos 230 kV transmission line, as evaluated in the 2014-15 Transmission Plan. CAISO's response is provided as an attachment to this Data Request. CAISO's response clarified that it approved creation of a new Mission- Peñasquitos 230 kV circuit by building a new 230 kV section to access Peñasquitos 230 kV substation</p>

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

#	Reference Source, Page #	Data Need
		<p>from Peñasquitos Junction and by using the 10-mile Southern portion of TL23001 from Mission Substation to Peñasquitos Junction. CAISO’s response explained that an important factor in its selection of this project was “ the opportunity to reconfigure the 10-mile southern section of TL23001 from Mission Substation to Peñasquitos, which becomes possible after the CAISO’s previously approved Sycamore Canyon- Peñasquitos 230 kV project is placed in service in 2017.”</p> <p>The response also states:</p> <p><i>“ Use of the 10-mile portion of TL23001 in the Mission-Penasquitos Project is enabled by the reconfiguration of the line as a part of the Sycamore Canyon-Pensaquitos 230 kV project. SDG&E’s design for the ultimate buildout of the Sycamore-Penasquitos project included segmenting the 35-mile 230 kV Mission-San Luis Rey line (TL23001) into three portions (Northern/Central/Southern).”</i></p> <p>Please clarify whether the Mission—Peñasquitos 230 kV Project, including reconfiguration of the 10-mile southern section of TL23001, would be possible absent construction of the Sycamore Canyon- Peñasquitos 230 kV project. Assuming the Mission—Peñasquitos 230 kV Project would be possible, describe and provide preliminary engineering to show how SDG&E would construct the Mission—Peñasquitos 230 kV Project in the absence of the Proposed Project. Could the Mission—Peñasquitos 230 kV line be located on existing structures in a different transmission corridor, such as the 23013 transmission line corridor as described in response to Data Request 10? Also provide preliminary engineering to show how SDG&E would construct the Mission—Peñasquitos 230 kV Project with the Proposed Project in service.</p>
2	Data Request #10, Q10	When does SDG&E expect to file a CPCN Application with the CPUC for the Mission—Peñasquitos 230 kV Project? Provide all documentation submitted by SDG&E to CAISO on the Mission—Peñasquitos Project.
3	System Alternative	Provide a copy of SDG&E’s easement with MCAS Miramar for the Sycamore—Mission transmission corridor. Describe the operating and physical restrictions of the easement (i.e., pole heights, width of easement). Provide the easement and summary of restrictions by Thursday, June 11, 2015.
4	System Alternative	Assess the feasibility of (i) adding a structure with a 230 kV circuit to the existing Sycamore—Mission easement with MCAS Miramar and (ii) rebuilding the wood structures on the eastern side of the easement with 230 kV structures supporting a new 230 kV line and the existing power lines. If it is not feasible to either rebuild the existing line or construct a new 230 kV line on new structures, provide drawings and information to support SDG&E’s feasibility assessment. If it is feasible to either add a new 230 kV circuit within the easement or to rebuild the existing wood poles with a 230 kV structure in the easement, provide preliminary engineering for the feasible option of adding a Sycamore—Mission 230 kV line. If both options for a Sycamore—Mission 230 kV line are determined to be feasible, provide preliminary for a rebuilt Sycamore—Mission 230 kV line. At a minimum, the preliminary engineering will need to include a typical

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

#	Reference Source, Page #	Data Need
		structure type and heights, conductor type and size as well as expected pole locations.
5	System Alternative	Provide information on the existing pole/structure types and transmission and power lines located in the Sycamore—Mission corridor. What are the heights of the existing structures and poles?
6	Data Request #2 and #3	Provide an update on coordination with Kilroy Development, including any records of correspondence, regarding use of the Torrey Santa Fe staging yard.
7	System Alternative	Provide preliminary engineering for a single loop-in of a Mission—San Luis Rey 230 kV Line from Peñasquitos Junction to Peñasquitos Substation as an alternative to the Proposed Project.
8	System Alternative	Provide preliminary engineering for one loop-in of a Mission—San Luis Rey Line from Peñasquitos Junction to Peñasquitos Substation as an alternative to the Proposed Project, and a new Mission—Peñasquitos 230 kV Line in the configuration described by the CAISO (from Peñasquitos Junction to Peñasquitos Substation).

VIA ELECTRONIC MAIL

May 27, 2015

Billie Blanchard
Project Manager
California Public Utilities Commission
Energy Division CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102
bcb@cpuc.ca.gov

Jeff Thomas
Panorama Environmental
One Embarcadero Center, #740
San Francisco, CA 94111
jeff.thomas@panoramaenv.com

Re: ISO Response to the First Set of Data Requests submitted by the California Public Utilities Commission – Energy Division in Docket No. A.14-04-011

Dear Ms. Blanchard and Mr. Thomas:

Enclosed please find the California Independent System Operator's response to the first set of data requests served by the California Public Utilities Commission – Energy Division regarding the San Diego Gas & Electric Company's Application for the Sycamore-Penasquitos 230 kV Transmission Line Project.

If you have any questions, I can be reached at 916.351.4429 or jpinyuv@caiso.com.

Sincerely,

/s/ Jordan Pinjuv

Jordan Pinjuv
Counsel
California Independent System
Operator Corporation

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

**In the Matter of the Application of San Diego
Gas & Electric Company (U902E) for a
Certificate of Public Convenience and Necessity
for the Sycamore-Penasquitos 230 Kilovolt
Transmission Line Project**

A.14-04-011

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR CORPORATION
TO THE FIRST SET OF DATA REQUESTS OF
THE CALIFORNIA PUBLIC UTILITIES COMMISSION – ENERGY DIVISION**

Request No. 1.

In a recent data request to SDG&E, the CPUC asked for a detailed description of the physical components, siting requirements, and construction timeframe for the Mission-Peñasquitos 230 kV Circuit Project. The California ISO 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..." SDG&E responded by stating that this future project has not been internally evaluated and that no design information is currently available. The CPUC needs to better understand the potential details of this future project in order to complete the cumulative and alternatives analyses in the EIR. Therefore, we request a copy of any supporting background information or project details that the California ISO had available regarding the Mission-Peñasquitos 230 kV Circuit Project at the time it was approved.

ISO RESPONSE TO No. 1.

Background information on the Mission – Penasquitos 230 kV Circuit project

A thermal overload concern on TL13810 Friars-Doublet Tap 138 kV line under an L-1-1 contingency was identified in the ISO 2014-2015 transmission planning process. The limiting component for TL13810 is a two-mile section out of the existing 12.6-mile line. Two alternatives were investigated as mitigation for the violation.

- *Alternative 1: Upgrading the two-mile section on TL13810 to increase the line rating to 204 MVA from the current 150 MVA rating, with a preliminary cost range between \$4.1 and \$4.5 Million.*

- *Alternative 2: Creating a new Mission-Penasquitos 230 kV circuit (about 14 miles in length) by building a new 230 kV section (approximately 3.4 miles) to access Penasquitos 230 kV substation from Penasquitos Junction and by using the 10-mile Southern portion of TL23001 from Mission Substation to Penasquitos Junction. This project had a preliminary cost range between \$22 and \$25 million.¹*

The CAISO approved Alternative 2 because of the long-term benefits of the project, which are explained in detail below. One important factor in the CAISO's selection of Alternative 2 was the opportunity to reconfigure the 10-mile southern section of TL23001 from Mission Substation to Penasquitos, which becomes possible after the CAISO's previously approved Sycamore Canyon-Pensaquitos 230 kV project is placed in service in 2017.

CAISO Evaluation of the Mission-Penasquitos 230 kV Project

*The CAISO evaluated and compared the long-term cost effectiveness of the two alternatives in 2014-2015 transmission planning process, and approved the Mission-Penasquitos 230 kV circuit project. Both alternatives addressed the overload on TL13810 transmission line. However, the CAISO approved the Mission-Penasquitos project because it provided other long-term benefits. In particular, the Mission-Penasquitos 230 kV project will address future overloads on TL23027 Mission – Old Town, TL23028 Mission – Old Town Tap 230 kV and the TL6916 Sycamore-Scripps 69 kV lines that would be loaded as high as 99.9%, 94.2% and 95% of their emergency ratings respectively by the year of 2024 under various Category C outages. Based on these already high loadings, the CAISO expects these transmission facilities to be overloaded in the future (e.g. 2030) without the new Mission – Penasquitos 230 kV line. Upgrading the 2-mile section of TL13810 Friars – Doublet 138 kV line and building additional upgrades would not address these additional future problems and therefore is not a comparable alternative to the Mission – Penasquitos 230 kV circuit project. To achieve the same mitigation as provided by the Mission-Penasquitos Project would require other significant 230 kV upgrades to the bulk power system, such as installing a **second** Sycamore Canyon – Penasquitos 230 kV project, which would have an estimated capital cost of \$111-211 million, or a second Penasquitos-Old Town 230 kV line.*

¹ A new 230 kV bay position is needed in the 230 kV Penasquitos Substation to accommodate the new Mission-Penasquitos 230 kV line, but the existing 230 kV bay of the existing TL23001 in the 230 kV Mission Substation will be used to accommodate the new Mission-Penasquitos 230 kV circuit. The mitigation is proposed to be in service by June 1, 2019.

Relationship between the Sycamore-Penasquitos Project and the Mission-Penasquitos Project

Use of the 10-mile portion of TL23001 in the Mission-Penasquitos Project is enabled by the reconfiguration of the line as a part of the Sycamore Canyon-Pensaquitos 230 kV project. SDG&E's design for the ultimate buildout of the Sycamore-Penasquitos project included segmenting the 35-mile 230 kV Mission-San Luis Rey line (TL23001) into three portions (Northern/Central/Southern). This was done in order to minimize the environmental impact of the project, optimize the use of existing rights of way, structures, and conductors, and minimize ratepayer cost. The CAISO's review of the SDG&E plan of service concluded that it met the technical specifications of the Sycamore-Penasquitos project and SDG&E was ultimately selected as the approved project sponsor for the Sycamore-Penasquitos project in a competitive solicitation process.

Once the Sycamore-Penasquitos project goes into service in 2017, the 10-mile Southern portion of TL23001 can then be reconfigured again to form part of the Mission-Penasquitos line in 2019.²

Note that the Mission-Penasquitos Project is not intended as a substitute for the Sycamore-Penasquitos Project – both projects are necessary to obtain the required level of system reliability.

² The Northern portion is about 7 miles in length and intended to be used to eliminate the Encina Tap on the three-terminal 230 kV Encina-Palomar-San Luis Rey line creating a 2nd 230 kV line from Encina to San Luis Rey and a new 230 kV line from Palomar to San Luis Rey. The Central portion is about 2.2 miles in length and intended to be used as part of the new Sycamore Canyon-Pensaquitos 230 kV circuit. All segments of TL23001, both before and after the Sycamore-Penasquitos and Mission-Penasquitos projects, will be energized and serving load.