

Comment Set B0011, cont. Utility Consumers Action Network

The DEIR endorses the Modified Route D route in part because it avoids the “scenic Cottonwood Valley” along I-8 as well as competing recreational uses such as hang gliding in the Buckman Springs area. UCAN identified a route which would also avoid the Buckman Springs area.

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b. To avoid crossing Indian lands

At the 2/25/08 all-party meeting with Commissioner Grueneich, SDG&E indicated that it thought the I-8 route would be infeasible because it passes through Indian lands, and the Campo Indians have recently expressed their opposition to a line across their land. UCAN identified a route which did not pass through any Indian lands and thus would not be subject to veto by a third party.¹⁷³

The DEIR says that the I-8 route right-of-way (RoW) , which would also be used by the UCAN route, would cross .02 miles of the Viejas reservation, or about 100 feet.¹⁷⁴ SDG&E has asserted in CPUC testimony that the I-8 route RoW would cover 0.26 acre of land owned by the Viejas Tribe, and concludes that the I-8 route is therefore “infeasible.”¹⁷⁵ However, Attachment 10-8 in its testimony shows that moving one tower 125’ would get the entire I-8 RoW out of the Viejas reservation, as already pointed out in UCAN’s opening Phase 2 testimony. SDG&E has now conceded that it believes the I-8 route can be relocated to avoid the Viejas reservation, at a “negligible” cost.¹⁷⁶ Thus the UCAN route would still be feasible.

3. Minimize underground mileage – to reduce costs

As discussed above, SDG&E estimated in Phase I that underground 230 kV lines would cost about \$20 million per circuit mile. In addition, the DEIR indicates that underground 500 kV lines may not be feasible at all, at least not for any sustained distance.¹⁷⁷ UCAN looked for a route in which any underground sections were as far west as possible (to allow more miles of 500 kV line and fewer miles of 230 kV line¹⁷⁸ and more siting options for the 500/230 kV substation) and as short as possible (to minimize costs).

¹⁷³ SDG&E asserts in its 3/7/08 response to UCAN DR26-1 that the “UCAN route” would cross “a corner of the Viejas Indian Reservation and includes an access road into the Reservation. See DEIR Fig. Ap. 11C-52. The project could not proceed on this route without the Viejas Tribe approval.” However, UCAN’s review of the cited DEIR figure does not show the route crossing any reservation lands. The figure does show access roads on reservation lands, but does not discuss whether alternative access road locations are possible, given that the transmission line itself, and all its tower pads, lie outside the reservation.

¹⁷⁴ DEIR, p. E.1.7.1.

¹⁷⁵ SDG&E, 3/12, p. 10.6.

¹⁷⁶ SDG&E, 3/26 response to UCAN DR38-3.

¹⁷⁷ The DEIR does describe the LEAPS transmission alternative as having a 1.7 mile section of underground 500 kV line.

¹⁷⁸ According to SDG&E, “ The high level design goal for the Sunrise Powerlink project is to bring a single 500 kV line as close to the SDG&E load center as is reasonably practicable, then to use 230 kV lines to distribute the power to major 230 kV load-serving substations within the San Diego load center.” SDG&E, 11/17/06, p. 8 of 17, response to ED DR set 1, DR ALT-20. UCAN sought (and found – see below) a Southern Route which would better meet this “high level design goal” than the proposed Central substation location.

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4. Take account of future expandability issues

UCAN looked for a route which would allow future interconnections to SDG&E 230 kV substations other than Sycamore Canyon in as low cost and non-disruptive a manner as possible, consistent with SDG&E's "high level design goal" for the project.¹⁷⁹

In testimony filed at the CPUC, SDG&E says the DEIR fails to treat expandability (to interconnect with SCE) as a project objective¹⁸⁰. The interesting part of this assertion is that if the DEIR did analyze the SCE interconnection, the DEIR would have to address SDG&E's claim (p. 2.37) that crossing Indian lands is a fatal flaw, since the DEIR's route from SDG&E to SCE does so. And the DEIR would also have to address the fact that, according to Attachment 6-6, the Cleveland National Forest opposes mere consideration of the Full Loop option.

The Forest's position dooms the consideration of a Full Loop as infeasible and thus not a basis for choosing one route over another. SDG&E's position (that crossing Indian lands is infeasible) dooms the particular Full Loop route described in the DEIR. Thus, the DEIR did not err by failing to make expandability a necessary condition of all project alternatives – as asserted by SDG&E – for it would have had to find that expandability made the entirety of Sunrise infeasible. If anything, the DEIR erred in not explicitly precluding expandability on the basis that it would inevitably cross Indian-owned lands.

5. Avoids Cultural or Archeologically-Sensitive Habitat

SDG&E maintains that a "prehistoric Indian village" that would be affected by the I-8 route, and cites DEIR p. E.1.7-4 as the basis for its testimony. That page of the DEIR refers to site CA-SDI-6706 as both a "prehistoric village site" and a "prehistoric archaeological site." Elsewhere, the DEIR identifies site CA-SDI-6706 as being "along the Interstate 8 Alternative in Alpine Boulevard."¹⁸¹ The DEIR also confirms that the Star Valley Option in the ESSRA would avoid site CA-SDI-6706.¹⁸² This means that the portion of site CA-SDI-6706 subject to being affected by a new transmission line must be under the easternmost portion of Alpine Boulevard, the portion that would be bypassed by the Star Valley Option.

The "UCAN route" described in UCAN's opening Phase 2 testimony would also avoid the eastern part of Alpine Boulevard, and use the Star Valley Option. Thus the "UCAN route" would bypass site CA-SDI-6706 and SDG&E's objection does not apply to the UCAN route.

¹⁷⁹ Ibid.

¹⁸⁰ Ironically, SDG&E appears to be tacitly agreeing with Powers Engineering's Phase 2 testimony that the DEIR has failed to analyze the 500 kV line to SCE properly.

¹⁸¹ DEIR, p. H-105.

¹⁸² Ibid. SDG&E also admits that the ESSRA would not impact the cite. SDG&E, 3/12, p. 6.37.

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B. UCAN's recommended southern route follows the I-8 alternative with two (or possibly three) deviations

B0011-26 cont.

Based on the above criteria, UCAN ruled out all Northern Routes (too long, too much undergrounding required to mitigate impacts), the Modified Route D alternative (too close to SWPL), the I-8 route between mileposts 43 and 57 (crosses two Indian reservations and requires undergrounding to mitigate impacts near Buckman Springs, and the I-8 route between mileposts 71 and 74 (avoidable undergrounding that increases costs unnecessarily). What was left was a Southern Route that:

1. Follows the I-8 route for the first 40 miles west from the Imperial Valley substation.
2. Follows the BCD route for 19 miles instead of the I-8 route between I-8 mileposts 40 and 58
3. Follows the I-8 route west for 13 miles from milepost 58 to milepost 71.
4. Follows the Modified Route D route south for 2 miles from Modified Route D milepost 36 to milepost 34, with a substation at the DEIR's Modified Route D substation site.
5. Follows the SVO (Star Valley Option) route for its 3 mile length.
6. Follows the I-8 route from milepost 74 on west to Sycamore Canyon.
7. If appropriate, follows CC alternative between I-8 mileposts 80 and 82.
8. Uses the RPCC alternative to avoid any further new transmission line construction west of Sycamore Canyon substation, as in the DEIR's Environmentally Superior Southern and Northern Routes.

C. The "UCAN" route is electrically equivalent to the proposed route

B0011-27

In response to a DRA data request, SDG&E has indicated that it believes both Southern and Northern Routes are equivalent to the proposed Sunrise route in terms of their impact on the SDG&E's system to import electricity under both N-0 and N-1 conditions.¹⁸³ The "UCAN route" is the same as the Environmentally Superior Southern Route for the first 40 miles and the last 27 miles, and has its 500/230 kV substation in the same place. The middle section of the "UCAN route" is shorter than the corresponding section of the Environmentally Superior

¹⁸³ SDG&E, 2/15/08 response to DRA data request 17-1a.

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Southern Route (35 miles versus 43 miles).¹⁸⁴ Thus, in electrical terms, the “UCAN Route” should be very slightly superior to the Environmentally Superior Southern Route because of its shorter length and lower line losses.

B0011-27 cont.

D. The resulting “UCAN” route should be cheaper than the proposed route

Based on SDG&E’s Phase I cost estimates, the Environmentally Superior Southern Route would cost some \$60 million less than the proposed project, even if the proposed project were modified to use the RPCC-alternative for the Coastal Link.¹⁸⁵ Specifically, the Environmentally Superior Alternative would cost about \$22 million less than Sunrise (with the RPCC alternative) for 500 kV lines,¹⁸⁶ about \$73 million less than Sunrise for overhead 230 kV lines,¹⁸⁷ about \$68 million more than Sunrise for underground 230 kV lines,¹⁸⁸ and about \$33 million less than Sunrise for underground 69 kV and 92 kV lines.¹⁸⁹

The “UCAN route” would have the same 230 kV facilities and substation as the Environmentally Superior Southern Route, but about 8 miles fewer of 500 kV line.¹⁹⁰ Using SDG&E’s Phase I cost estimates, that would make the “UCAN Route” some \$22 million cheaper than the Environmentally Superior Southern Route,¹⁹¹ and thus \$82 million cheaper than the proposed route,¹⁹² even if the proposed route were modified to use the cost-saving RPCC alternative¹⁹³ and had no extra mitigation costs. Compared to SDG&E’s Phase I proposal with a

¹⁸⁴ See Figure ES-17 on p. ES-57 of the DEIR.

¹⁸⁵ The RPCC Alternative, which is part of the Environmentally Superior Northern and Southern Alternatives, eliminates all transmission lines west of Sycamore Canyon substation.

¹⁸⁶ Ex. SD-6, table following p. V-14, pp. 3-4 of 4, showing 500 kV costs of \$155.975 million for the 84 miles of “Desert Link” line, plus 50.7 percent for contingency, AFUDC, and escalation, for a total of \$2.8 million/mile. $8 \times \$2.8 = \22.4 million.

¹⁸⁷ Ex. SD-6, table following p. V-14, pp. 3-4 of 4, showing 230 kV costs of \$50.775 million for the 21 miles of “Inland Valley” 230 kV line, plus 50.7 percent for contingency, AFUDC, and escalation, for a total of \$76.5 million. $\$76.5 \times 20/21 = \72.9 million.

¹⁸⁸ 5.9 miles of Southern Route underground double-circuit 230 kV line (DEIR, p. ES-4) vs. 4.2 miles of Sunrise project double-circuit underground line east of Sycamore valley (DEIR, p. ES-11), at \$20 million/circuit-mile. Note that if the RPCC Alternative were not adopted, the Sunrise alternative would also include over \$96 million for underground 230 kV line in the “Coastal Link” settlement (Ex. SD-6, table following p. V-14, pp. 2 and 4 of 4, showing underground 230 kV costs of \$63.983 million for the “Coastal Link” 230 kV line, plus 50.7 percent for contingency, AFUDC, and escalation, for a total of \$96.4 million).

¹⁸⁹ Ex. SD-6, table following p. V-14, pp. 1-2 and 4 of 4, showing underground 69 and 92 kV costs of \$22.092 million in ABDSP, plus 50.7 percent for contingency, AFUDC, and escalation, for a total of \$33.3 million.

¹⁹⁰ See Figure ES-17 on p. ES-57 of the DEIR.

¹⁹¹ Ex. SD-6, table following p. V-14, pp. 3-4 of 4, showing 500 kV costs of \$155.975 million for the 84 miles of “Desert Link” line, plus 50.7 percent for contingency, AFUDC, and escalation, for a total of \$2.8 million/mile. $8 \times \$2.8 = \22.4 million.

¹⁹² “UCAN route” is \$22 million less than the Environmentally Superior Southern Route, which in turn is \$60 million cheaper than the proposed route with the RPCC alternative. $\$60 + \$22 = \$82$ million.

¹⁹³ As discussed in the RPCC Phase I brief, the RPCC alternative west of Sycamore Canyon substation would save tens of millions of dollars compared to the SDG&E proposal, and quite possibly more than \$100 million. SDG&E’s preliminary numbers provided in response to UCAN DR35-12 suggest that the RPCC route would be at least \$77

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Sycamore Canyon-Penasquitos 230 kV line, and assuming mitigation costs similar to those estimated by SDG&E for the Environmentally Superior Southern Route,¹⁹⁴ the “UCAN route” would be \$211 million cheaper than SDG&E’s proposed Sunrise route.¹⁹⁵

B0011-27 cont.

E. The resulting route has expansion options that SDG&E’s Sunrise route lacks

B0011-28

1. Close to Mexican and eastern San Diego County wind resources

The “UCAN route” would pass directly by the proposed site for the Jacumba 500 kV substation to interconnect Sempra Generation windpower from Mexico.¹⁹⁶ It would pass directly by the Jacumba 230/500 kV substation site identified in the DEIR.¹⁹⁷ It would pass approximately one mile from the existing Boulevard 69 kV substation,¹⁹⁸ a likely collection point for San Diego County wind generation. Thus, unlike the proposed route and all other Northern Routes, the “UCAN route” would be ideally placed for interconnection of future Mexican and San Diego County wind resources.

2. 230 KV lines pass near (2 miles) Los Coches substation, a likely future 230 kV substation as SDG&E expands its internal grid.

SDG&E’s Los Coches substation is located on the west side of Lake Jennings in Lakeside, approximately two miles south of milepost 87 on the I-8 route.¹⁹⁹ Los Coches is currently a 69 kV and 138 kV substation, but has been suggested in the past as a potential 230 kV substation to

million cheaper than SDG&E’s own Coastal Link proposal, as calculated in a footnote above. If any new line to Sycamore Canyon from the east is going to be built, UCAN would certainly support the RPCC alternative over the SDG&E proposal for a new line west of Sycamore Canyon.

¹⁹⁴ The “UCAN route” would be identical to the Environmentally Superior Southern Route for 67 miles of its 102 mile total length, and would have the same substation site. The part of the “UCAN route” which deviates from the Environmentally Superior Southern Route would be shorter (35 miles versus 43 miles). It is thus reasonable to expect the environmental mitigation costs for the two routes to be similar.

¹⁹⁵ \$82 million cheaper based on shorter line length east of Sycamore Canyon and SDG&E’s Phase I estimates of cost per mile; \$77 million cheaper based on RPCC alternative instead of SDG&E’s proposed Sycamore Canyon-Penasquitos Coastal Link; \$52 million cheaper based on lower mitigation costs. $\$82 + \$77 + \$52 = \211 million.

¹⁹⁶ See Sempra Generation Presidential Permit Application, 12/18/07, showing the proposed 500 kV substation immediately west of the San Diego/Imperial County border, at about milepost 30 of the I-8 route (as shown on DEIR Figure ES-17, p. ES-57.

¹⁹⁷ At milepost 35 of the I-8 route.

¹⁹⁸ See DEIR, Figure ES-17 on p. ES-57, showing BCD route milepost 0.0 approximately 1 mile from the Boulevard substation.

¹⁹⁹ See DEIR, Figures D.1-13, E.1.1-2d.

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B0011-28 cont.

interconnect wind generation to the SDG&E grid. The DEIR appropriately identifies Los Coches as a prospective future 230 kV substation.²⁰⁰ Four existing 230 kV lines already pass right by Los Coches substation (and within one mile of the “UCAN route between I-8 route mileposts 87 and 88): The Otay Mesa-Sycamore line, the Miguel-Sycamore line, and the Miguel-Mission #1 and #2 lines.²⁰¹

Building the “UCAN route” (or the I-8 route, or the Environmentally Superior Southern Route) would allow for future expansion of the SDG&E grid by looping one of the proposed 230 kV lines south for two miles into Los Coches, following the existing Creelman-Los Coches 69 kV ROW. This would be far less environmentally disruptive than the 230 kV system expansion to Los Coches shown in the DEIR for the proposed project, which requires a 40.5 mile long 230 kV line from Central to Los Coches, passing through the Barona Indian Reservation.²⁰² Even if the future expansion involved a new (third) 230 kV line from the “Modified Route D Substation” to Los Coches, that would still be only an 18 mile long line, not the 40.5 miles required for a third 230 kV line out of the Central substation.²⁰³

Curiously enough, while the DEIR identifies future expansion options for the proposed project which include new 230 kV lines from Central to Escondido, Penasquitos, Sycamore Canyon, and Los Coches, it only describes expansion to Escondido for the Southern Route.²⁰⁴ The DEIR thus substantially understates the future expandability of Southern Routes in general, and the “UCAN route” in particular.

²⁰⁰ DEIR, pp. B-24., B-27, B-28, B-29.

²⁰¹ See DEIR, Figure D.1-13 showing physical line locations parallel to and south of the I-8 route between mileposts 87 and 88. See <http://www.caiso.com/1c9b/1c9bd50412490.pdf>, p. 20 of 39, for an 11/20/07 ISO presentation showing the SDG&E system schematically. The Los Coches substation is shown on the ISO schematic as the “LC” substation on the right side of the page, south of the Sycamore substation and west of the Carlton Hills (“CH”) substation

²⁰² DEIR, Figure B-12a on p. B-29. SDG&E has preliminarily asserted that construction of more than two underground 230 kV lines under Alpine Boulevard would not be feasible (SDG&E, 3/7/08 response to UCAN DR36-1), but even if this assertion turns out to be true, the ability to loop the initial two 230 kV lines into a future Los Coches 230 kV substation will meet the expandability goal of using the new 500 kV line to feed more than one 230 kV substation on the SDG&E system.

²⁰³ The distances from the “Utah route” substation to other SDG&E 230 kV substations besides Los Coches would also be shorter than the corresponding distances from SDG&E’s proposed Central substation. According to the DEIR, new 230 kV lines from Central to Mission would have to be 57 miles long, from Central to Penasquitos would be 58 miles, from Central to Sycamore Canyon would be 45 miles, and from Central to Escondido would be 64 miles by the Southern Route (the Northern Route would be “only” 47 miles but would require crossing two different Indian Reservations. See the DEIR, Figure B-12a, and text on the preceding page B-28.

²⁰⁴ DEIR, pp. E.1.1.-7 and -8. The DEIR fails to describe the option of future expansion to Los Coches for the Southern Route, even though most Southern Routes (including the I-8 route, the “UCAN route” and the Environmentally Superior Southern Route) pass within two miles of Los Coches substation.

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F. Potential for delay

The "UCAN route" would require a CNF plan amendment because it crosses the PCT and crosses 4.1 miles of BCNM land.²⁰⁵ However, February 25, 2008 statements by State Parks and Recreation's counsel indicated that the Northern Route would also require a Plan amendment. Generally, the BCD alternative crosses the second-least amount of CNF lands of any Southern Route.²⁰⁶ Thus, the "UCAN route" should not require any more licensing time than a comparable Northern Route, as proposed by SDG&E.

B0011-29

G. The BCD portion of the "UCAN route" offers some measure of fire protection

Under Santa Ana wind conditions, a fire along the BCD portion of the UCAN alternative would tend to burn southwest towards I-8, which would act as a natural firebreak, limiting the maximum area at risk to under 50,000 acres and only 16 structures.²⁰⁷ The fire risk along the BCD section (as shown in the DEIR) is considerably lower than along the Modified D portion of the Southern Route, and does not include any risk of a fire along the BCD route spreading into the SWPL right-of-way.²⁰⁸

B0011-30

H. Overall environmental comparison to the Sunrise proposal

The "UCAN route" has a comparable number of unmitigable Class I impacts to the Modified D route, and 10 percent fewer Class I impacts than the I-8 route section it would bypass.²⁰⁹ It has substantially fewer unmitigable Class I impacts than the 50 associated with SDG&E's proposed route.²¹⁰ Also, if the Campo reservation cannot be crossed, the BCD route

B0011-31

²⁰⁵ DEIR, pp. D.17-6 (plan amendments required for various alternative routes) and D.17-14 (mileage of CNF land types crossed by alternative routes). SDG&E has preliminarily identified this as a possible reason for the "UCAN route" to be infeasible (SDG&E, 3/7/08 response to UCAN DR36-1), but requiring a plan amendment is not a fatal flaw for a route (or else the proposed route through ABDSP would also be infeasible).

²⁰⁶ DEIR, p. D.17-14.

²⁰⁷ DEIR, pp. E.2.15-8 to -10; proposed mitigation would further reduce the area and structures at risk to under 10,000 acres and zero structures.

²⁰⁸ DEIR, p. E.4.15-10. SDG&E has identified fire risk in the Cleveland National Forest as a potential reason for the "UCAN route" to be infeasible (SDG&E, 3/7/08 response to UCAN DR36-1), but has not (at least to date) acknowledged the lower fire risk from the BCD route as compared to routes south of I-8.

²⁰⁹ 24 vs. 27; DEIR, p. H-92.

²¹⁰ DEIR, p. ES-4.

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becomes the only feasible Southern Route, but it **is** feasible and meets all project objectives.²¹¹ The “UCAN route” is shorter than the proposed project, and avoids “numerous direct impacts within Anza-Borrego Desert State park including de-designation of state wilderness, degradation of views and recreational opportunities, and impacts on Traditional Cultural Properties.”²¹² The “UCAN route” also avoids “severe visual impacts in Santa Ysabel Valley.”²¹³ It is environmentally superior to the proposed project, which should therefore be rejected.²¹⁴

B0011-31 cont.

²¹¹ DEIR, p. H-94.

²¹² DEIR, p. ES-4.

²¹³ Ibid.

²¹⁴ Besides other objections to the feasibility of the “UCAN route” (in its 3/7/08 response to UCAN DR36-1; see discussion and footnotes in sections IV.E, F, and G, above), SDG&E has also suggested that the “UCAN route” may be environmentally infeasible because “a large habitation site has been mapped in the Alpine area that could be significantly impacted by the same undergrounding proposed by Aspen’s Southern Route.” SDG&E, 3/7/08 response to UCAN DR36-1. SDG&E does not identify the location of site CA-SDI-1706, and the only identification of the location of this site in the DEIR describes it as being along the underground portion of the I-8 route (i.e., under Alpine Boulevard). DEIR, Appendix 9B, Table Ap. 9B-85, with the “significant” impact being the presence of human remains. But the “UCAN route” bypasses the easternmost several miles of the I-8 route underground section, so it is not even certain that the UCAN route would pass through the site referenced by SDG&E. In any case, as indicated above in the discussion of the Stirling project, the Stirling project site and the Sunrise route would each also affect sites containing human remains, so doing so is clearly not a fatal flaw.

Responses to Comment Set B0011

Utility Consumers Action Network

- B0011-1 The commenter's opposition to the Proposed Project and belief that a Southern Route or the No Action Alternative would be economically and environmentally preferable is acknowledged.
- B0011-2 The cost of the Proposed Project is not evaluated or decided within the CEQA/NEPA process. NEPA does not require an EIS to perform a monetary cost-benefit analysis. (See 40 CFR 1502.23.) Similarly, CEQA does not require consideration of economic effects that do not result in physical changes to the environment. (See CEQA Guidelines § 15131.) The CPUC Administrative Law Judge evaluates cost of the project during the CPUC General Proceeding with information presented by SDG&E, Cal ISO, and other parties, as described above. An Economic Comparison of Alternatives was presented by SDG&E in its Phase II testimony which can be found on the CPUC proceeding website listed above. UCAN and the Division of Ratepayer Advocates also addressed the cost/benefit of the Sunrise Powerlink Project in its Phase II testimony. This testimony can also be found on the proceeding website (<http://docs.cpuc.ca.gov/published/proceedings/A0608010.htm>). Please refer to General Response GR-12 (CEQA, NEPA and the Decision-Making Process) for a discussion of project costs.
- B0011-3 The eight SDG&E objectives originally set forth in the PEA were used by the CPUC and BLM to develop three basic project objectives. These three objectives provided a basis for developing alternatives to the Proposed Project. SDG&E has not requested any revision to the original objectives to include deliverability of renewable resources from Mexico. Although renewable resources in Mexico may have different benefits or cost considerations than the originally anticipated Imperial Valley renewable development, the economic aspects of delivering renewable energy are not in the scope of the EIR/EIS. The Draft EIR/EIS does include information and environmental impact analysis of connected actions, indirect effects, and cumulative projects that may include renewable resources in Mexico (Section B.6.2.1, La Rumorosa Wind). This section has been modified in the RDEIR/SDEIS to incorporate new information available from Sempra Generation's Presidential Permit Application.
- See Response to Comment B0011-2 for information on how project cost relates to the scope of the CEQA and NEPA processes. See also General Response GR-12 (CEQA, NEPA and the Decision-Making Process) for a discussion of project costs.
- B0011-4 The comment notes that the Green Path North project may be built with or without the Sunrise Powerlink Project, but it does not provide new information on whether Green Path North would improve the deliverability of power into the San Diego territory. The Green Path Coordinated Projects were considered as a potential alternative, but eliminated as shown in the Draft EIR/EIS Section C, Table C-3, and in Section 4.9.27 in Appendix 1 (Alternatives Screening Report) of Volume 6 of the Draft EIR/EIS, because it would not meet most project objectives of the

Sunrise project. The comment does not provide any new information demonstrating how Green Path North would satisfy most of the basic project objectives, as required for CEQA analysis of any alternative.

B0011-5 Similar to Green Path North (see Response to Comment B0011-4), the projects identified by the comment for the IID service territory are not considered alternatives to the Proposed Project because they would have limited ability to satisfy basic project objectives, as required for CEQA analysis of any alternative.. While the upgrades proposed by IID would improve the deliverability of renewable power from IID to the SCE territory, the IID projects would not support the other basic objectives of improving reliability or reducing the cost of energy in the San Diego territory. The IID projects would not expand the deliverability of this power to load centers in San Diego County.

B0011-6 The comment identifies a likelihood of project failure for the Stirling Energy Systems (SES) Solar Two LLC (described in Draft EIR/EIS Section B.6.1.1). The Stirling project and Sunrise Powerlink are considered to be connected because the power purchase agreement between SES and SDG&E is contingent on SDG&E gaining approval for Sunrise. However, the EIR/EIS does not presume that Stirling is automatically triggered by Sunrise or that Stirling will be successful in developing the solar project. See also General Response GR-5 (Status of Development of Renewable Generation in the Imperial Valley, Eastern San Diego County, and Northern Mexico).

B0011-7 The RDEIR/SDEIS includes the new and revised analysis for the 1,250 MW wind project in Mexico, transmission lines into the U.S., and a new substation located northeast of the town of Jacumba, in the category as a “connected action” to the Sunrise Powerlink.

Section 5.3.3 (UCAN’s Modified Southern Routes) in the RDEIR/SDEIS addresses the option of a SDG&E building a 500 kV transmission line from Jacumba to Sycamore Canyon as suggested by UCAN in this comment. The analysis of UCAN’s Modified Southern Routes concludes that additional in-area generation would be needed to maintain reliability in the delivery of power to San Diego County (Basic Project Objective No. 1). UCAN’s option of adding wind generation in Mexico along with the Jacumba to Sycamore Canyon route would function much like a variation of the New In-Area Renewable Generation Alternative evaluated in the Draft EIR/EIS, except without the solar components and with the wind location changed from the Crestwood area to Mexico. No additional analysis of UCAN’s option is needed because the New In-Area Renewable Generation Alternative in the Draft EIR/EIS is a similar, though broader alternative to the Proposed Project that would meet most objectives.

The economic performance of UCAN’s Modified Southern Routes along with the development contemplated by the application for the Sempra “Presidential Permit” is not a subject for consideration in the EIR/EIS. The updated analysis of the 1,250 MW La Rumorosa Wind Development Projects based on the Sempra Presidential

Permit and Addendum to the Presidential Permit can be found in Section 2 of the RDEIR/SDEIS. The March 19, 2008 Addendum to the Application for Presidential Permit filed by Sempra Generation states that since the time of the December filing of the Application for Presidential Permit, CAISO has indicated that the Sunrise Powerlink or other transmission upgrade would be necessary to deliver energy from the wind development in the La Rumorosa region.

- B0011-8 The Draft EIR/EIS compares the environmental impacts of the southern routes and substation alternatives, where comparable. Generally, the southern routes are found to be environmentally superior to the Proposed Project and the Environmentally Superior Northern Route, both of which could include the connected action of the 500/230 kV San Felipe Substation. The Comparison of Alternatives in Section H of the Draft EIR/EIS notes the specific alternatives where impacts caused by the connected actions might be avoided, because with some alternatives the connected actions would be less likely to be built.
- B0011-9 The comment notes that the existing SWPL could be used to achieve the Basic Project Objective of delivering renewable power. No revision is needed to the Draft EIR/EIS because it does not contradict this position. The Draft EIR/EIS includes analysis of Non-Wires Alternatives that would partially rely on the existing SWPL to deliver renewable power, where available. Other local generation of renewable energy would also be used in the Non-Wires Alternatives to supplement SDG&E's efforts to comply with the RPS.
- B0011-10 The Draft EIR/EIS considers that the Proposed Project would satisfy the three basic project objectives. The Draft EIR/EIS then considers alternatives that could accomplish "all or most" of the basic project objectives (as explained in Section C.2.1, CEQA Requirements for Alternatives.) The extent to which each alternative accomplishes the objectives, consideration of the costs and benefits, and the specific flexibility or effectiveness of each alternative, is not addressed in the EIR/EIS but will be considered in the general proceeding. Analyzing the degree to which any alternative, including the No Project/No Action Alternative, reduces energy costs is beyond the scope of the EIR/EIS. See Response to Comment B0011-2 and General Response GR-12.
- B0011-11 Implementing the identified modifications at the Miguel Substation may reduce the cost of energy delivered to the region, but this would not by itself accomplish "all or most" of the basic project objectives. Accordingly, these modifications to the Miguel Substation would not qualify as an appropriate project alternative as that term is used under CEQA and NEPA, while they could occur as part of the No Project/No Action Alternative. The comment indicates that the system protection scheme (SPS) modification could be implemented without needing to build anything, which implies that no additional environmental analysis would be needed beyond what is included in the No Project/No Action Alternative of the Draft EIR/EIS.

B0011-12 The Draft EIR/EIS considers the Proposed Project and the alternatives against SDG&E's stated objectives and CPUC's Basic Project Objectives. The need for the project is the focus of the general proceeding. Increasing import capability or generation by any specific amount (such as 1,000 MW) is not a threshold of satisfying basic project objectives. The Draft EIR/EIS considers and evaluates alternatives that could provide approximately equivalent levels of capacity, but no specific import threshold was used to screen alternatives. Relatively small upgrades that would provide incremental increases in the import capability were considered and included in the No Project/No Action Alternative of the Draft EIR/EIS (Section C.6.2 and Table C-4).

See also the Responses to Comment Set A0029 (CAISO).

B0011-13 The reasonable range of potentially feasible alternatives considered in the Draft EIR/EIS includes projects and facilities that are well-defined and that may be developed depending on decisions made by individual sponsors. New biomass or wind power purchase agreements made recently by SDG&E are evidence of the potential feasibility of the renewable projects. The Draft EIR/EIS provides decision-makers with an analysis of the environmental impacts of these components as part of Non-Wires Alternatives, but no revision is needed because the Draft EIR/EIS it is not intended for use as the CEQA or NEPA document that would allow approval of any specific biomass or wind project.

B0011-14 The comment debates the range of distributed generation (DG) that could be developed and forecasts a high deployment case of over 100 MW of additional reliable resources in excess of that expected in the Draft EIR/EIS. The level of DG shown in the Draft EIR/EIS (in the New In-Area All-Source Generation Alternative and in Section C.5.9.1) would involve many small DG projects at a pace more aggressive than what SDG&E anticipates. Whether a high deployment case of DG like that in the comment would improve the performance of the No Project/No Action Alternative is a subject of the general proceeding and beyond the scope of the EIR/EIS. Because a higher level of DG would not change the conclusion that DG alone could not provide sufficient in-area generation to satisfy the reliability objective (p. C-141), no change is needed in the analysis of the No Project/No Action Alternative in the Draft EIR/EIS. As identified in the description of the No Project/No Action Alternative (Table C-4), increased DG deployment would be expected to occur under this scenario.

B0011-15 The comment identifies varying forecasts and recent information from SDG&E on the range of solar photovoltaic generation that could be developed and describes how SDG&E has the ability to affirmatively influence whether it achieves a deployment scenario in excess of that expected in the Draft EIR/EIS. The 210 MW of nameplate capacity solar photovoltaic generation assumed in the Draft EIR/EIS (in the Non-Wires Alternatives and the No Project/No Action Alternative) is realistic, yet still very aggressive. The descriptions of the Non-Wires Alternatives (Sections C.4.10.1 and C.4.10.2 and Sections E.5 and E.6) show that 105 MW of firm

capacity is assumed achievable in the short-term, instead of the 230 MW of firm capacity that is mentioned in the comment.

Depending on development timing, the 210 MW incremental nameplate capacity would be a market penetration target on the order of five to ten percent of the technical potential for PV installation levels in San Diego County. This would be a significantly greater level of installed PV than either SDG&E or the CSI predict. The scenario described in the comment would provide higher levels later which would improve the performance of the Non-Wires Alternatives and the No Project/No Action Alternative. The performance of alternatives including solar PV is a subject of the general proceeding and beyond the scope of the EIR/EIS. The function of the EIR/EIS is to evaluate and compare the environmental impacts of the Proposed Project and its alternatives. The final determination regarding the project's and the alternatives' ability to implement project objectives is left to the Administrative Law Judge and the CPUC. As identified in the description of the No Project/No Action Alternative (Table C-4), increased photovoltaic deployment would be expected to occur under this scenario.

B0011-16 The comment debates the level of demand response and energy efficiency that is feasible. The levels of demand response and energy efficiency assumed in the Draft EIR/EIS (in Sections C.5.9.2 and C.5.9.3) are based on the overall savings goals presented in D.04-09-060 and SDG&E's baseline forecasts from 2006.. As the comment notes, a higher level of demand response and energy efficiency could be achievable. The description of the No Project/No Action Alternative in the Draft EIR/EIS (Section C.6.2.1) shows that an increase in demand-side actions could occur in the absence of the Sunrise project. The EIR/EIS needs no further quantification of load reduction forecasts because the higher levels of demand response and energy efficiency contemplated by the comment would improve the performance of the No Project/No Action Alternative. The performance of the No Project/No Action Alternative is a subject of the general proceeding and beyond the scope of the EIR/EIS. The function of the EIR/EIS is to evaluate and compare the environmental impacts of the Proposed Project and its alternatives. The final determination regarding the project's and the alternatives' ability to implement project objectives is left to the Administrative Law Judge and the CPUC.

B0011-17 The Draft EIR/EIS incorporates the Path 44 Upgrades as part of the No Project/No Action Alternative. The No Project/No Action Alternative is a viable alternative that decision-makers may select; its environmental impacts are fully analyzed in Section E.8 of the Draft EIR/EIS. The Draft EIR/EIS is in agreement with the comment that the No Project/No Action Alternative (Table C-4) with its full menu of demand-side and supply-side actions could achieve "all or most" of the basic project objectives, including reliability. Further quantifying the level of import capability that could be achieved with the Path 44 Upgrades and the level import capability that is needed for the region's future are subjects of the general proceeding and beyond the scope of the EIR/EIS. The function of the EIR/EIS is to evaluate and compare the environmental impacts of the Proposed Project and its alternatives. The final determination regarding the project's and the alternatives'

ability to implement project objectives is left to the Administrative Law Judge and the CPUC.

B0011-18 See Response B0011-17 and General Response GR-12 for information on how reliability is considered in the comparison of alternatives, including the relative reliability performance of the No Project/No Action Alternative. Increasing import capability or generation by any specific amount (such as 1,000 MW) is not a threshold of satisfying basic project objectives. The Draft EIR/EIS considers and evaluates alternatives that could provide approximately equivalent levels of capacity, but no specific import threshold was used to screen alternatives. Relatively small upgrades that would provide incremental increases in the import capability were considered and included in the No Project/No Action Alternative. The comment asserts that the No Project/No Action Alternative is a viable alternative, and the Draft EIR/EIS does not contradict this.

The environmental impacts of the No Project/No Action Alternative are fully analyzed in Section E.8 of the Draft EIR/EIS. Also, note that the Draft EIR/EIS concludes that the impacts of the No Project/No Action Alternative are comparable to those of the three highest ranked alternatives in terms of the fewest impacts.

B0011-19 The description of the No Project/No Action Alternative considers transmission projects and upgrades that are foreseeable, and the comment identifies the work that SCE and SDG&E have done that may have partially initiated the Path 44 Upgrades part of the alternative. The Draft EIR/EIS does not attempt to quantify the value of these transmission projects aside from determining that they are a predictable action under the alternative.

B0011-20 See Response to Comment E0011-11.

B0011-21 See Response to Comment E0011-16.

B0011-22 See Response to Comment E0011-15.

B0011-23 See Response to Comment E0011-14.

B0011-24 See Response to Comment E0011-13.

B0011-25 Please see General Response GR-1 (Project Objectives and Feasibility of the New In-Area All-Source Generation Alternative). As explained in that General Response, the CPUC and BLM agree that the particular scenarios defined in the non-wires alternatives are not the only possible scenario for assembling generation resources to serve the San Diego area. The resources selected for analysis were intended to demonstrate the feasibility of this alternative and to define the types of environmental impacts that result from construction and operation of generation, for comparison with transmission line impacts.

B0011-26 UCAN has presented a different way to assemble the Southern Route alternatives than the way they were assembled to create the Environmentally Superior Southern

Route identified in the Draft EIR/EIS. A description and brief analysis of UCAN's Modified Southern Routes can be found in Section 5.3.3 of the Recirculated Draft EIR/Supplemental Draft EIS. Each of UCAN's route selection points is addressed below:

- **Avoid southernmost part of Modified Route D Alternative** (potentially too close to SWPL). Separation from the SWPL in areas of high fire risk is an important goal of the Southern Alternatives. The CPUC and BLM believe that the Modified Route D Alternative has adequate separation from the SWPL; see further discussion in Section 4.8 in Appendix 1 (Alternatives Screening Report) of the Draft EIR/EIS, Responses B0037-6 and B0037-7, and General Response GR-9.
- **Avoid I-8 route through Buckman Springs area.** The U.S. Forest Service has made it clear that it would not support installation of a new transmission line in the western half of the BCD Alternative or along the Interstate 8 Alternative between Buckman Springs and the area of Descanso (see USFS comment letter dated March 12, 2008). In its comment letter on the Draft EIR/EIS, SDG&E has defined a route for the I-8 Alternative between Buckman Springs and Descanso that would be located in compatible Forest land use zones (see SDG&E comment letter dated April 11, 2008 and discussion of Pine Valley I-8 Non-Motorized Revision reroute). However, this route segment could not be reached without using the entire length of the BCD Alternative, which cannot be re-defined to avoid incompatible Forest land use zones. In addition, the Forest Service has indicated a serious concern about having a transmission line parallel to the Interstate 8 Freeway due to the large number of fires that start along the freeway and the firefighting challenges posed by a nearby transmission line.
- **Avoid crossing Indian lands.** Use of the BCD Alternative in conjunction with the BCD South Option (as modified in this Final EIR/EIS in response to comments from the U.S. Forest Service) also avoids tribal lands.
- **Minimize underground mileage.** The Environmentally Superior Southern Alternative, as defined in the Final EIR/EIS, also presents no 500 kV underground segments.
- **Take account of future expandability issues.** UCAN points out the feasibility challenges of the future transmission expansion routes, and the fact that SDG&E's suggested 500 kV expansion route passes through tribal land. Section 4.9.18 in Appendix 1 (Alternatives Screening Report) in Volume 6 of the Draft EIR/EIS acknowledged that the 500 kV Full Loop Alternative (connecting with SCE's territory) would require permitting within both the Cleveland National Forest and Indian Lands.
- **Avoids cultural or archaeologically sensitive habitat.** UCAN is correct that the Draft EIR/EIS's Environmentally Superior Southern Route would avoid the cultural site at the east end of Alpine Boulevard. As described in Section 4.1.3, research into the site descriptions and boundaries of the cultural site previously identified as being within Alpine Boulevard shows that the site does not extend south of Interstate 8, so would not be affected. Therefore, the original Modified

Route D Alternative would be used, with the 230 kV transmission line continuing north from the Modified Route D Substation, then transitioning to underground at the east end of Alpine Boulevard. As a result, the Star Valley Option, which would have significant visual impacts, as described in Section E.4.3.4 of the Draft EIR/EIS, would not be included as part of the Environmentally Superior Southern Route. However, the Star Valley Option (as modified by SDG&E reroutes described in Section 3.3.8, Star Valley Option Revision) could still be used if additional concerns about the eastern end of Alpine Boulevard are identified through any additional tribal consultation prior to construction based on preliminary cultural resources investigations. SDG&E has commented on another area of cultural sensitivity (east of Jacumba); see Responses E0004-63 through E0004-65.

- **UCAN's recommended southern route.** The route identified by UCAN has many similarities with the Environmentally Superior Southern Route identified in the Final EIR/EIS. However, as described above, the western portion of the BCD Alternative and the central portion of the Interstate 8 Alternative are not acceptable to the U.S. Forest Service, so are not included.

B0011-27 UCAN states that its recommended southern route is electrically equivalent to the proposed route. The EIR/EIS reaches the same conclusion. Regarding the cost comparisons, the EIR/EIS does not take a position because such considerations are outside the scope of the environmental analysis.

B0011-28 The advantages of the UCAN southern route stated in this comment also apply to the Environmentally Superior Southern Alternative defined in the Final EIR/EIS. The route does benefit from proximity to wind generation areas in northern Mexico and eastern San Diego County.

UCAN is correct that the Draft EIR/EIS presented future transmission system expansion primarily in terms of reaching the Escondido Substation. This was done because SDG&E had identified expansion to the North County area as important due to demand growth in that area. UCAN is also correct that the Southern Alternatives would allow future expansion to other substations like the Los Coches Substation.

B0011-29 UCAN points out that the Southern Route's requirement for a Forest Plan Amendment would impose similar time delays as would the Northern Route's requirement for a Plan Amendment to the Anza-Borrego Desert State Park Plan. This comment is acknowledged.

B0011-30 The BCD Alternative was determined to be environmentally inferior to the Interstate 8 Alternative (with the Campo North Option and the West Buckman Springs Option), which was found to be inferior to the Modified Route D Alternative, because the BCD Alternative would create significant, unavoidable impacts to bighorn sheep, golden eagles, and cultural resources. Fire risk was not the only consideration in selecting the environmentally superior route. However, the BCD Alternative Revision has been incorporated into the Final Environmentally

Superior Southern Route Alternative, because it would be legally feasible (see Section 5 of the RDEIR/SDEIS).

B0011-31 UCAN is correct in its statement that a Southern Route would have fewer impacts than the Proposed Project route through Anza-Borrego Desert State Park.