
From: kathleen Petersen <ktpetersen@msn.com>
Sent: Saturday, September 05, 2015 12:22 PM
To: SOCRE CEQA
Cc: kathleen Petersen
Subject: SDG&E substation enhancement

Follow Up Flag:
Flag Status:

CA Public Utilities Commission
RE: SDG&E Enhancement and Reliability project

Once again, thank you for providing a new alternative for this most important issue for our Las Brisas aka Caistrano Garden Homes 2 homeowners and all residents of North San Juan Capistrano.

Since my last correspondence to you we have lost 2 long time residents to pancreatic cancer and one of their wives has brain cancer. The husband and wife mentioned have lived near the lines for 40 plus years We recognize that the EMF issue is not yet supported by science. We also remember that smoking cigarettes was not recognized as causing cancer for many years.

We continue to have faith in our public officials from the PUC in that this project will NOT happen in our North San Juan neighborhoods.

I have long advocated for SDG&E to be moved out of population centers into the industrial areas or the unpopulated ravines etc. of South Orange County. Thank you for this new alternative to do just that.

Kathleen Petersen
HOA President Las Brisa aka Capo Gardens 2

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RANCHO MISSION VIEJO

September 8, 2015

California Public Utilities Commission (CPUC)

RE: SOCRE PROJECT

c/o Ecology and Environment, Inc.

505 Sansome Street, Suite #300

San Francisco, CA 94111

Reference: Recirculated Draft Environmental Impact Report for SDG&E's SOCRE Project ("DEIR")

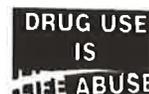
Subject: Rancho Mission Viejo Comments

Dear Commissioners:

Thank you for providing Rancho Mission Viejo, LLC ("RMV") with the opportunity to review and comment on the referenced recirculated DEIR. We are supportive of SDG&E's goals to improved safety, reliability and increased capacity in the south Orange County power system. RMV has reviewed the recirculated DEIR and offers the following comments for your consideration.

RMV and an affiliated entity, The Reserve at Rancho Mission Viejo, have previously provided comments on the Notice of Preparation (NOP) and DEIR for the proposed SOCRE project which set forth our collective concerns regarding the potential impacts associated with Alternative F. These concerns included the potential impacts of Alternative F on the function and value of Southern Subregion Habitat Reserve and it's Covered Species. We also agreed with the conclusions reached in the DEIR that Alternative F would have localized traffic impacts in and around the Rancho Mission Viejo substation, and greater impacts on agricultural, biological and cultural resources, as well as geology and soils.

The recirculated DEIR updates certain information relative to consistency with the Southern Subregion Habitat Conservation Plan (SSHCP), namely the significant impacts to an as yet unrecorded Talega Conservation Easement and the recorded Prima Deshecha Landfill Conservation Easement, based on conversations with USFWS. However, the recirculated DEIR continues to defer development of measures to avoid, minimize and mitigate potentially significant impacts to less than significant levels until additional information is gathered and further coordination with USFWS occurs. While we continue



to have significant reservations about this approach, we want to continue to keep you informed of the location and status of RMV habitat reserve lands. We have attached for your use and information is an exhibit showing the current RMV Habitat Reserve lands. You will note that in addition to a recorded conservation easement over the Richard and Donna O'Neill Conservancy, irrevocable covenants are in place for reserve lands in the vicinity of the Rancho Mission Viejo substation. Alternative F has the potential to impacts these covenant lands, thereby impacting the function and value of the RMV habitat reserve lands, and the Covered Species which occupy these lands.

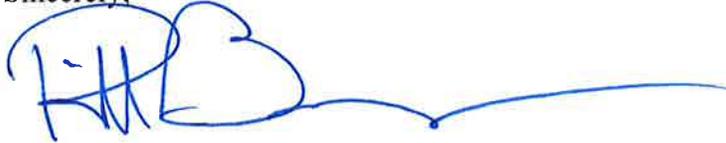
In Section 5.0 Comparison of Alternatives, the recirculated DEIR states the following regarding Land Use and Planning impacts *“Alternative F does not include the expansion of the existing Capistrano Substation. Therefore, the construction of 45- to 50-foot-tall buildings to house new 138-kV and 230-kV equipment as described for the proposed project would not occur, and conflicts with local zoning height restriction would not result. Alternative F would substantially reduce impacts on land use and planning when compared to the proposed project. However, as discussed above under “Biological Resources,” this alternative may have significant impacts from the conflicts with applicable NCCPs and HCPs in the area. Therefore, impacts on land use under Alternative F would remain significant.”* (DEIR, Page 2-167).

We agree with the conclusion reached in the recirculated DEIR regarding potential impacts on HCP's, however, we wish to note that the Rancho Mission Viejo substation is located within the village of “Esencia” (formerly known as Planning Area 2) the first phase of which is scheduled to open in late September of this year. We anticipate resident move-ins by December of this year. At build-out we anticipate construction of approximately 2,700 homes within Esencia. As described in the DEIR, under Alternative F *“the 138/12-kV Rancho Mission Viejo Substation would be expanded to a 230/138/12-kV substation with specifications comparable to those of the proposed project's new San Juan Capistrano Substation. To bring a new 230-kV source into the South Orange County service area, a new, double-circuit 230-kV Talega–Rancho Mission Viejo line would be constructed along the Eastern Talega 230-kV Transmission Line Route described in the PEA.”* (DEIR, Page 2-21). As you are aware, all of RMV is zoned as Planned Community, and as such, is subject to certain land use standards including building heights, setbacks and the like. We believe that the improvements to the Rancho Mission Viejo Substation and the addition of a new double circuit 230-kV transmission line would not be compatible with the village of Esencia and inconsistent with the RMV Planned Community Regulations adopted by the County of Orange.

We continue to request that the CPUC reject Alternative F from further consideration.

Again, thank you for the opportunity to provide these comments. Should you have any questions regarding this response, please feel free to contact me at (949) 240-3363.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Broming', followed by a long horizontal flourish.

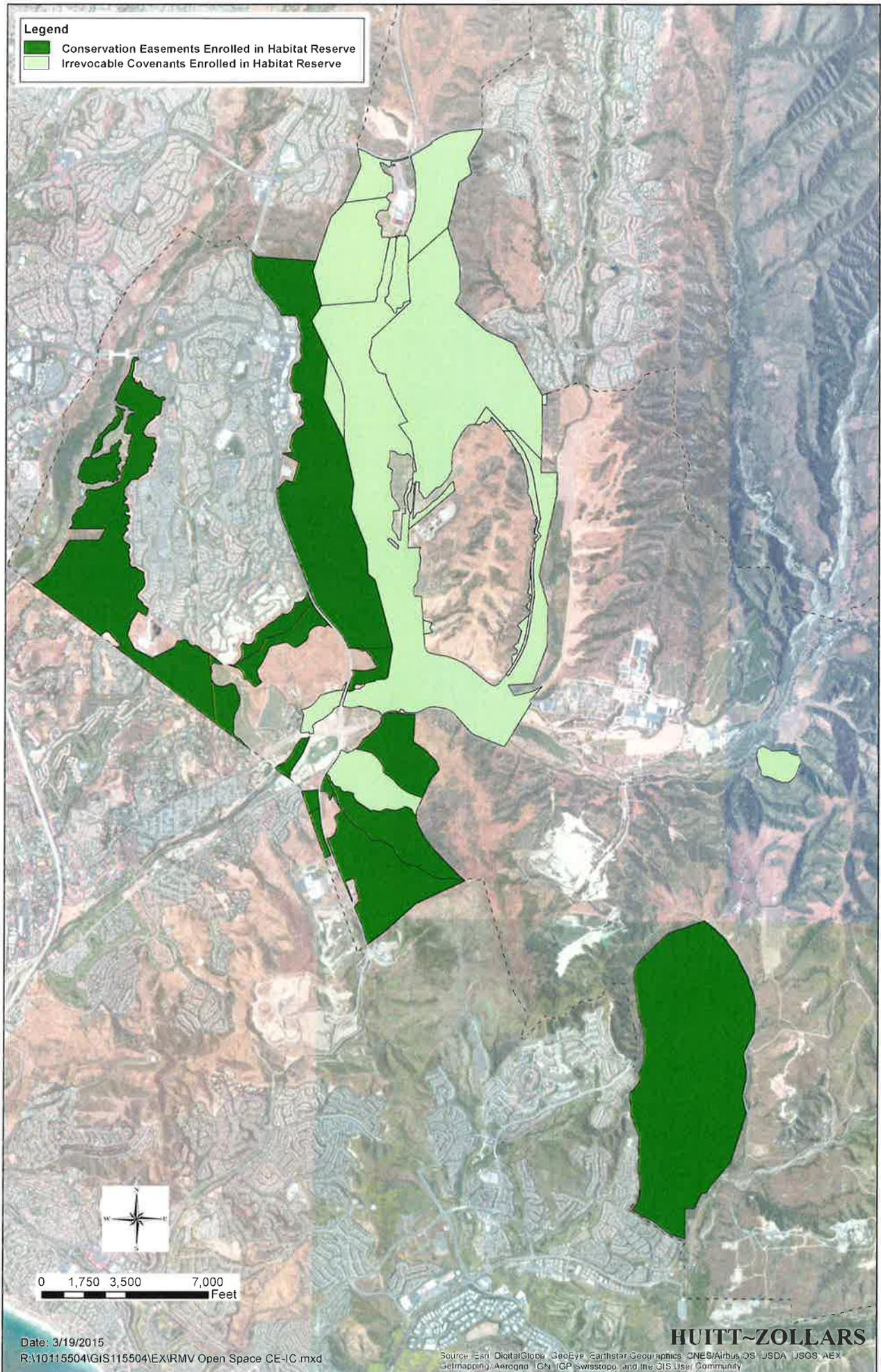
Richard M. Broming
Senior Vice President, Planning & Entitlement

Attachment

Cc: Jonathan Snyder, USFWS
Laura Coley Eisenberg, The Reserve at Rancho Mission Viejo

EXHIBIT A

Legend
■ Conservation Easements Enrolled in Habitat Reserve
■ Irrevocable Covenants Enrolled in Habitat Reserve



Date: 3/19/2015
R:\10115504\GIS\115504\EXIRMV Open Space CE-IC.mxd

HUITT-ZOLLARS
Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus/OS, USDA, USGS, AeroX,
GeoMapping, AeroGRID, IGN, IGP, Swisstopo, and the GIS User Community

From: chkim@cantsky.com
Sent: Wednesday, September 09, 2015 11:14 AM
To: SOCRE CEQA
Subject: Please do not add any structures within our community!

Follow Up Flag:
Flag Status:

Dear whom it may concern,

My name is Chong Kim, a home owner of address 27462 Paseo Arco Clave, San Juan Capistrano, CA 92675.
Please do not add any structures within our community!
It will ruin our community as well as value of our home!
My lawyer will follow up with a separate email as well.

Thank you!

Kind Regards,

Chong Kim

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From: Joseph Pride <joseph.pride@prideindustrial.com>
Sent: Thursday, September 10, 2015 11:58 AM
To: SOCRE CEQA
Cc: 'Dick Spencer'
Subject: re high tension wires planning and relocation in Rancho Madrina San Juan Capistrano

Follow Up Flag:
Flag Status:

To Whom it may concern

I am a Rancho Madrina resident, at 27452 Paseo Arco Clave, San Juan Capistrano, Ca 92675. Across from our property we have existing high tension wires that are already affecting our properties value negatively, adding any electrical pole in front of my or my neighbor's homes to elevate the wires higher in the air, will absolutely bring horrific devaluation to our home, it is 0 benefit and we won't be able to sell it for anywhere half of what we paid for it. Having the pole is just the last nail in the coffin.

I understand you are taking new plans to deal with the wires; I want to send the strongest assurances that I and our neighbors will fight this to the end just in case there is any plan to worsen this problem by adding any poles in front of our homes; this is totally unacceptable and will fight it no matter how far and how long and how much it costs.

We wish the right thing will be done which is to bury the wires underground, or re-route them much further away, but absolutely no new poles or new wires. My attorney will be the next to correspond on this; I will not hesitate to have the media film and document and publicize any action that is simply inconsiderate to us and will destroy our property values by several million dollars.

I wish it will never come to that and I appreciate that it won't.

Best

**Joseph Habbouch
27452 Paseo Arco Clave
San Juan Capistrano, Ca 92675**

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ORA

Office of Ratepayer Advocates
California Public Utilities Commission

505 Van Ness Avenue
San Francisco, California 94102
Tel: 415-703-2381
Fax: 415-703-2057
<http://ora.ca.gov>

JOSEPH P. COMO
Acting Director

September 11, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Subject: Office of Ratepayer Advocates Comments on the Recirculated Draft
Environmental Impact Report Issued regarding the South Orange County
Reliability Enhancement Project.

Reference: Recirculated Draft Environmental Impact Report, SCH No. 2013011011,
California Public Utilities Commission Proceeding Application 12-05-020.

The Office of Ratepayer Advocates (“ORA”) submits the following comments on the Recirculated Draft Environmental Impact Report (“RDEIR”) that was issued by the Energy Division of the California Public Utilities Commission (“Commission”) regarding the South Orange County Reliability Enhancement Project (“SOCREP”) proposed by San Diego Gas & Electric Company (“SDG&E”) in Application 12-05-020.

The RDEIR concludes that:

“Alternative J is potentially feasible, would meet all of the basic project objectives, and would reduce each of the potentially significant effects of the proposed project. Therefore, this alternative is retained for further consideration in the EIR. In addition, this alternative would add a second source of 230-kV power into the South Orange County 138-kV System, allowing for increased flexibility to dispatch power.”¹

ORA concurs with the RDEIR that Alternative J (the SCE 230 kV “loop-in” at the Trabuco Substation) is the “Environmentally Superior” SOCREP alternative.

Sincerely,

/s/ Charles Mee, P.E.

Charles Mee, P.E.
Senior Utilities Engineer – Specialist
Charles.mee@cpuc.ca.gov

¹ Recirculated Draft EIR at 2-23.



September 11, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

Also via email at socre.ceqa@ene.com

RE: South Orange County Reliability Enhancement
Recirculated Draft EIR

To Whom It May Concern:

The South Orange County Economic Coalition (SOCEC) is the voice for the business community in the South Orange County region. We support infrastructure projects that will help support the business community, create jobs and enhance economic growth. Reliable power is critical to economic health and SOCEC wrote and testified in support of San Diego Gas & Electric's (SDG&E) South Orange County Reliability Enhancement (SOCRE) project as proposed. The proposed project has several benefits including being located in the heart of the SDG&E Orange County service territory and having the property available to enhance and improve the substation at San Juan Capistrano.

The recently and some might say hastily proposed Alternative J is inadequate to meet the purpose and need of the project, which is to ensure electric reliability for the region in a timely fashion. Alternative J, which suggests expanding the Trabuco substation onto property SDG&E does not currently own, would delay this needed project for years or even decades. The California Public Utilities Commission (CPUC) staff suggests that SDG&E enter into an interconnection agreement with Southern California Edison (SCE) to tie into SCE lines. However, because the location is at the end of the SCE service territory, SCE faces the threat of low voltage issues today in this location. Adding an SDG&E tie-in would only exacerbate the problem and certainly not enhance reliability – in fact, it could jeopardize reliability for SCE customers.

Additionally, the property the CPUC staff is suggesting expanding to is currently owned and occupied by AT&T for its regional service center. AT&T has indicated it cannot operate out of its service center if the CPUC forces SDG&E to condemn half of AT&T's property. The impact to South Orange County's AT&T customers would be significant.



Finally, the cost of the SDG&E SOCRE project under Alternative J would be far greater than the project as proposed. Not only would the mitigation, design and construction costs be the same, but expanding the Trabuco substation would require the ratepayers to pay for property SDG&E does not currently own.

To summarize, the SDG&E SOCRE project as proposed would be less costly to the ratepayers, be located entirely on SDG&E property, be located in the load center of the service territory and not be reliant on a piggyback plan with Southern California Edison.

The South Orange County Economic Coalition encourages the CPUC to reject Alternative J and approve the project as proposed by SDG&E.

Sincerely,

A handwritten signature in black ink that reads "Woodfill". The signature is written in a cursive, flowing style.

Peter Woodfill
Chairman
South Orange County Economic Coalition

We Mean Business!



Laguna Niguel Chamber of Commerce
30111 Crown Valley Parkway, Suite A
Laguna Niguel, CA 92677
Phone: 949-363-0136 Fax: 949-363-9026
Email: LNCC@LNChamber.com
Website: www.LNChamber.com

September 14, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

RE: South Orange County Reliability Enhancement
Recirculated Draft EIR

To Whom It May Concern:

The Laguna Niguel Chamber of Commerce participated in the public review process for the Draft Environmental Impact Report (DEIR) of San Diego Gas & Electric's (SDG&E) South Orange County Reliability Enhancement (SOCRE) project. We submitted a letter of support of SDG&E's proposed SOCRE project to the California Public Utilities Commission (CPUC) and testified at the public hearing that was held in San Clemente earlier this year.

We understand that the CPUC decided to recirculate its DEIR with a new alternative (Alternative J) that CPUC staff is recommending. Alternative J suggests that instead of SDG&E building the project on property it currently owns, that it condemn private property next to its Trabuco Substation in Laguna Niguel at what will likely be a significant cost to the ratepayers and expand the substation there.

The Recirculated DEIR does not address the significant impacts to the Laguna Niguel community that would force the regional AT&T service center out of our City. Nor does the document address the impacts an expanded substation would have on the City's plans of high-end live-work apartments and the potential of a new auto mall.

The incompatibility of the Alternative J substation expansion project on the Gateway of our community cannot be understated. Additionally, there is no analysis or recognition of the significant cost differential of Alternative J compared to SDG&E's proposed project. This cost impact would be passed on to our business and residential ratepayers.

Instead of condemning private property, driving a large business out of our city and building in a business district at a cost that would be significantly more than the proposed project, our chamber board encourages you to approve the project as SDG&E proposed, which would be built on property that they own.

Sincerely,

Debbie Newman

Debbie Newman
President and CEO
Laguna Niguel Chamber of Commerce



Community Development Department
30111 Crown Valley Parkway • Laguna Niguel, California 92677
Phone/949 • 362 • 4360 Fax/949 • 362 • 4369

Laurie Davies
Elaine Gennawey
Jerry McCloskey
Fred Minagar
Jerry Slusiewicz

Sent Via US Mail & Email (SOCRE.CEQA@ene.com)

September 16, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Subject: Comments on San Diego Gas and Electric Company (SDG&E) South Orange County Reliability Enhancement Project (SOCRE) Recirculated Draft Environmental Impact Report (DEIR)

To Whom It May Concern:

Thank you for the opportunity to review and comment on the Recirculated Draft Environmental Impact Report (DEIR) prepared by Ecology and Environmental, Inc. for the proposed SOCRE Project. In addition, to the review of the DEIR, the City of Laguna Niguel (City) has reviewed CAISO's and SDG&E's June 24, 2015, Rebuttal Testimony before the PUC of California, which discusses an interconnection with SCE at a rebuilt Trabuco Substation (DEIR - Alternative J). The Recirculated DEIR does not address many of the issues raised in CAISO's and SDG&E's Rebuttal Testimony. In response to the Recirculated DEIR, the City has the following comments and concerns:

Pages - 2-22 thru 2-23

3.2.12 Alternative J – SCE 230-KV Loop in to Trabuco Substation:

- The City is concerned that the Trabuco Alternative J has been presented at the end of the CEQA process, long after the CEQA public scoping process in early 2013. The City does not believe that many of the businesses and residents that would be affected by the Trabuco Alternative J are aware of it, and thus have had an adequate opportunity to comment on it;
- SDG&E describes the process required for an interconnection with SCE under SCE's Transmission Owner Tariff and further CAISO and WECC review. It appears that the process for studying an interconnection and addressing any impacts alone will take years, in addition to the need to implement any necessary projects, all of which must happen before an interconnection will be allowed. Both SDG&E and CAISO have identified problems that will arise from an SCE

interconnection. As described by both SDG&E and CAISO, the Trabuco Alternative J results in residents and businesses in all of southern Orange County losing electric service under circumstances that they would not with SDG&E's proposed project;

- Although the Recirculated DEIR provides a “conceptual site plan” for an expanded Trabuco Substation that only expands two (2) acres north to the adjacent AT&T parking lot, SDG&E's testimony describes a need for approximately six (6) to seven (7) acres and acquisition of business property to both the north and south of the existing Trabuco Substation. SDG&E has provided considerable detail to support its view while the Recirculated DEIR does not. The City is concerned about the impact upon the adjacent businesses and the under-estimate of the environmental impacts of the Trabuco Alternative J; and,
- The Recirculated DEIR states that the Trabuco Alternative J is superior to SDG&E's proposed project. However, the proposed project does not require an SCE interconnection and thus avoids its delays and added costs. As described by both SDG&E and CAISO, the Capistrano Substation is near the load center for all of southern Orange County, and thus is the proper place for adding a source of 230 kV power that serves all of southern Orange County. As described by both SDG&E and CAISO, the Trabuco Alternative J results in residents and businesses in southern Orange County losing electric service under circumstances that they would not with SDG&E's proposed project. SDG&E owns the Capistrano Substation property and there is more room there to add a second 230 kV source serving all of south Orange County. SDG&E has stated that the Capistrano Substation is going to be rebuilt in any event because of its age. Therefore, there would be less environmental impact under one construction project at the Capistrano Substation rather than construction projects at both Capistrano and Trabuco Substations.

Page 2-171 thru 2-173

5.2.12 Alternative J – SCE 230-KV Loop in to Trabuco Substation:

- Although the Recirculated DEIR provides a “conceptual site plan” for an expanded Trabuco Substation that only expands two (2) acres to the adjacent AT&T parking lot, SDG&E's testimony describes a need for approximately six (6) to seven (7) acres and acquisition of business property to both the north and south of the existing substation. The City is concerned about the impact upon the adjacent businesses of the Trabuco Alternative J. The under-estimate of the size and scale of the physical footprint of the proposed Trabuco Alternative J directly results in an inaccurate and under-estimate of the environmental impacts associated with Trabuco Alternative J, including Air Quality, Biological, Cultural Resources, Land Use Planning, and Transportation and Traffic; and,
- SDG&E describes a lengthy construction project to convert the existing Trabuco Substation to a 230/138/12 kV Substation, including not only work on the existing site and land acquired to the north and south of it, but also along and under Camino Capistrano. According to SDG&E, the work will require moving 16 existing 12 kV distribution circuits and three 138 kV transmission lines along Camino Capistrano, and then installing new 230 kV transmission lines and new 138 kV transmission lines under Camino Capistrano. While the Recirculated DEIR asserts that it will not be necessary to relocate any 138 kV transmission lines or distribution circuits (page 2-22), it provides no support for its statement. The City is very concerned that portions of Camino

Capistrano, or lanes on Camino Capistrano, could be closed for long periods of construction, impacting businesses along that road as well as residents and businesses that use that road. Construction traffic itself will have an impact on the City's roadways. The under-estimate of the size and scale of the physical footprint of the undergrounding of the 230/138kV lines proposed with Trabuco Alternative J, directly results in an inaccurate and under-estimate of the environmental impacts associated with Trabuco Alternative J, including Transportation and Traffic, Noise and Air Quality impacts resulting from the undergrounding of 230 kV lines in Camino Capistrano.

Page 2-172

Land Use and Planning:

- This section of the Alternatives Analysis incorrectly evaluated the land use and zoning regulations applicable to the Trabuco Substation project site on Camino Capistrano. The City of Laguna Niguel Zoning Code, Section 9-1-42, Table 4.1 (Permitted Nonresidential Uses) and Section 9-1-43.1, Table 4.2 (Nonresidential Development Standards) are not the correct land use and development standards for the Trabuco Substation project site. The Laguna Niguel Gateway Specific Plan, adopted in December 2011, is the Land Use Plan that is applicable to properties on Camino Capistrano, Forbes Road, Cabot Road and Crown Valley Parkway at the eastern edge of the City of Laguna Niguel. The goals, policies and development plans in the Gateway Specific Plan are intended to assist in the physical revitalization of this area, which was originally developed in the late 1960's and has seen some physical decline over the years. Trabuco Alternative J would result in a substantial expansion of the existing Trabuco Substation on Camino Capistrano, resulting in the removal of viable commercial properties to the north and south of the Substation, which is in direct conflict with the goals and policies of the Specific Plan to provide for the physical revitalization of the planning area to promote the development of a diverse mix of uses within the district neighborhoods.

The Laguna Niguel Gateway Specific Plan also allows for the development of mixed use commercial and residential projects along Cabot Road and Forbes Road, which is directly west of the alternative project site on Camino Capistrano. There are currently four new residential/mixed-use development projects under construction or in the planning stages along the north end of Forbes Road and Cabot Road, west of the Trabuco Substation site on Camino Capistrano. Substantial expansion of the Trabuco Substation, in close proximity to this residential development, would create the potential for significant environmental impacts on land use planning, noise, air quality, and visual aesthetics, that have not been adequately analyzed in the Alternative Section of the Recirculated DEIR, since the incorrect land use plan was utilized in the environmental evaluation of Trabuco Alternative J.

Again, thank you for the opportunity to review and comment on the SOCRE DEIR. Please keep us informed on any future public documents related to this project, including any Final EIR and Response to Comments when made available. Please contact me at (949) 362-4323 or by email at jgibson@cityoflagunaniguel.org if you have any questions, if you would like to discuss any of our comments, or if we can be of assistance.

Sincerely,
COMMUNITY DEVELOPMENT DEPARTMENT

A handwritten signature in black ink, appearing to read "Jeff Gibson". The signature is written in a cursive style with a horizontal line underneath it.

Jeff Gibson, Community Development Director

cc: Rod Foster, City Manager
Duane Cave, External Relations Manager, SDG&E (sent email)
Brian Lochrie, Communications Lab (sent email)

From: Tammy Suits <telemahi@hotmail.com>
Sent: Saturday, September 19, 2015 2:45 PM
To: SOCRE CEQA
Subject: RE: SOCRE Project

To Whom It May Concern:

I wanted to thank you on behalf of myself, my family, close friends and neighbors for reconsidering the location for the new reliability enhancement project from my neighborhood in San Juan Capistrano (SJC) to the Trabuco substation in Laguna Niguel instead. This is a much better choice than the previous plan in the middle of such a densely populated area in SJC; not to mention the historic value that SJC has to Southern California being the oldest city in Orange County and home to the Jewel of the California Missions. I live in SJC with my husband and 3 small boys ages 6, 5 and 2. Many of my neighbors are also young families. We are all extremely concerned about the negative impacts, especially health issues, that this project would bring to our children's backyard. We are in high hopes that the Laguna Niguel relocation will be set in stone and are forever grateful for this change.

Sincerely,

Tammy Suits

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FRONTLINES

FOREST RESIDENTS OPPOSING NEW TRANSMISSION LINES

California Public Utilities Commission

September 21, 2015

RE: SOCRE Project

c/o Ecology and Environment, Inc.

505 Sansome Street, Suite #300

San Francisco, CA 94111

SOCRE.CEQA@ene.com

Electronic transmission of three (3) pages.

Subject: Comments on the Recirculated Draft Environmental Impact Report Issued for the Proposed South Orange County Reliability Enhancement Project.

Reference: California Public Utilities Commission Proceeding A.12-05-020.

Dear Commissioners;

Forest Residents Opposing New Transmission Lines (“FRONTLINES”) submits the following comments on the recirculated Draft Environmental Impact Report (“RDEIR”) that was issued by the Energy Division of the California Public Utilities Commission (“Commission”) pursuant to the South Orange County Reliability Enhancement Project (“SOCREP”) proposed by San Diego Gas & Electric Company (“SDGE”) [A.12-05-020].

FRONTLINES generally concurs with the RDEIR conclusion that Alternative J (the SCE 230 kV “loop-in” at the Trabuco substation) is the “Environmentally Superior” SOCRE Project alternative because it addresses SDGE’s NERC reliability compliance concerns AND it provides a second 230 kV source to provide power to South Orange County (“SOC”) in the event that the Talega substation is removed from service.

ENVIRONMENTAL IMPACTS

The RDEIR concludes that, with the implementation of Alternative J, “Potentially significant impacts on biological resources, air quality, traffic and transportation, cultural resources, and land use would be avoided or reduced” and “Impacts on all other resource areas may also be reduced, in large part because the size of the project area and total area of construction disturbance would be reduced” FRONTLINES agrees with this conclusion, and points out that running the 230 kV conduit underground along Camino Capistrano will confine construction activities to an established “Commercial Business Park” development area¹, therefore it should not cause any significant land disturbances. Additionally,

¹ See Laguna Niguel Zoning Map at: <http://www.cityoflagunaniguel.org/DocumentCenter/Home/View/702> and Mission Viejo Zoning Map at: <http://maps.digitalmapcentral.com/production/VECommunityView/cities/Missionviejo/index.aspx>

FRONTLINES notes that this alternative will limit much of the construction activities to the extreme northern end of Camino Capistrano, which is an area that has generally low traffic loads because it is a “dead-end” street.

A SCENARIO THAT ADDRESSES SDGE’S OBJECTION TO AN SCE INTERCONNECTION

Based on recent testimony submitted in Proceeding A.12.05-020, it appears that SDGE does not support a SOCREP alternative that connects SOC load to transmission infrastructure owned by Southern California Edison (“SCE”)². Therefore, FRONTLINES presumes that SDGE will object to Alternative J. In particular, it appears that SDGE is concerned that it may take many years to connect SOC load to SCE transmission infrastructure, and in the meantime, SOC load remains vulnerable to potential transmission system failures³. To address this concern, FRONTLINES offers the following alternative course of action that could be taken immediately to address SDGE’s NERC reliability compliance concerns in South Orange County:

1. Remove Talega Transformer Bank 62 (which is only 150 MVA and nearly 50 years old). With the removal of Bank 62, three functioning transformers remain to ensure compliance with the NERC TPL-002-0b standard.
2. Install new transformer (≥ 392 MVA) at Talega in the general location of Bank 62.
3. Remove Talega Transformer Bank 60.
4. Using the two vacant 138 kV line positions and the one vacant 230 kV line position at Talega, add circuit breakers and reconfigure Talega banks 63 and 50 into a “breaker and a half” configuration.
5. Talega Transformer Bank 61 connections can be reconfigured that they do not terminate in Bay 4 or Bay 5, which will increase system flexibility.
6. Reconductor TL13835 with “Linnet” ACSS/AW conductor, which should increase the transmission capacity of TL13835 to ≥ 230 MVA. Note: **THIS SHOULD NOT REQUIRE STRUCTURE REPLACEMENT**. The diameter of the “Linnet” ACSS/AW conductor is 336 kcmil, which is *identical to the conductor that is currently in place*. The weight/length of the “Linnet” ACSS/AW conductor is also *identical to the conductor that is currently in place*. Therefore, the entire length of TL13835 conductor can be simply replaced without any major reconstruction effort.
7. Replace the current transformers, jumpers, and other infrastructure at Capistrano which limit the transmission capacity of TL TL13834 and TL13816.

² SDGE Supplemental Testimony Chapter 5 (April 7, 2015); SDG Rebuttal Testimony Chapter 9 (June 24, 2015).

³ SDGE Supplemental Testimony Chapter 5 Section 3 (April 7, 2015) - and in particular page 105 at 3.

Completing these steps should address SDGE's compliance concerns regarding NERC reliability standards within a 10 year planning horizon, and it should also provide SDGE with the "breathing room" needed to properly plan for, and implement, Alternative J. FRONTLINES estimates the cost to replace the Talega transformers and reconductor TL13835 with "Linnet" ACSS/AW is less than \$55 million.⁴ The recommended modifications to the San Juan Capistrano substation can be completed when SDGE updates the substation and replaces obsolete and outdated equipment.

Regards

/S/ Jacqueline Ayer

On behalf of FRONTLINES

⁴ See Page 20 of FRONTLINES Reply Testimony Dated May 26, 2015.