

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



November 20, 2015

Ms. Shivani Ballesteros
San Diego Gas and Electric Company
8330 Century Park Court, CP31F San Diego, CA 92123

RE: Application Completeness – Permit to Construct for the Tie Line 649 Wood-to-Steel Replacement Project – Application No. A.15-08-006

Dear Ms. Ballesteros:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its review of San Diego Gas and Electric Company's (SDG&E) 10/20/15 responses to Deficiency Letter #1 for Application (A.15-08-006) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) for the Tie Line 649 Wood-to-Steel Replacement Project.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of SDG&E's responses to Deficiency Letter #1 for the Tie Line 649 Wood-to-Steel Replacement Project, the Energy Division finds that the information contained in the responses is incomplete. The attached report identifies the portions of the responses found to be deficient.

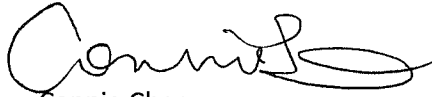
Information provided by SDG&E in response to the Energy Division's second finding of deficiency should be filed as supplements to Application A. 15-08-006. One set of responses should be sent to the Energy Division and one to our consultant Horizon Water and Environment, in both hardcopy and electronic format. We request that SDG&E respond to this table no later than January 4, 2016.

Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

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 PTC be approved.

Please direct questions related to this application to me at (415) 703-2168 or connie.chen@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Connie Chen". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Connie Chen

Infrastructure Permitting and CEQA Section
Energy Division

cc: Mary Jo Borak, Supervisor

Jack Mulligan, CPUC Attorney

Tom Engels, Project Manager, Horizon Water and Environment

DEFICIENCY REPORT #2 FOR THE SDG&E TIE LINE 649 WOOD-TO-STEEL REPLACEMENT PROJECT APPLICATION (A. 15-08-006)

CPUC Responses to SDG&E Responses to Deficiency Letter #1

November 20, 2015

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company’s (SDG&E) 10/20/15 responses to CPUC’s 9/10/15 Deficiency Report #1 regarding SDG&E’s Application (A.15-08-006) and Proponent’s Environmental Assessment (PEA) for a Permit to Construct the Tie Line 649 Wood-to-Steel Replacement Project. Deficiencies were identified using the CPUC PEA Checklist (November 2008). Deficiencies are presented in Table 1.

TABLE 1

Deficiency #	SDG&E Response to Deficiency #	CPUC Response to SDG&E Response to Deficiency Letter #1
3.4-1	Figure 3-2: Regional System Map (Confidential) has been revised to be at a larger scale. Figure 3-3: Existing and Proposed System Configuration (Confidential) has been revised to label the O’Neil Canyon tap and show TL 649 going to San Ysidro Substation. Revised versions of the figures have been included here in Attachment A: Revised Figures (Confidential).	Thank you for providing the requested information.
3.4-2	The following geographic information system (GIS) data layers for the Proposed Project will be sent separately in electronic format: <ul style="list-style-type: none"> • Power line alignment • Distribution line alignment • Access road centerlines • Trenching centerlines • Point locations for existing poles • Point locations for Proposed Project poles • Point locations for guard structures • Point locations for access road modifications • Point locations for trenching 	The project description in the PEA remains vague regarding potential areas of disturbance. SDG&E’s GIS data, which consist mostly of lines and points, provide an inadequate level of detail for evaluating potential impacts to the physical environment. Please provide <i>polygons</i> in which SDG&E anticipates any project disturbance may occur. These polygons must clarify which geographic areas are inside and outside areas of potential effect. Where there is uncertainty regarding the area of potential effect, the polygons must be expanded to the extent that areas that may be affected are within the polygons. CPUC understands that this may overstate the maximum extent of disturbance; however, it will help to ensure that the CEQA document fully discloses any

	<ul style="list-style-type: none"> • Underground to overhead conversion pulling site • Staging yards 	potential impacts of the project.
3.7.0-1	Site conditions, sensitive environmental resources, and access requirements at the time of construction may require minor adjustments to the access requirements. Potential changes to the Proposed Project may include, but are not limited to, use of additional existing access roads, access roads improvements outside the existing footprint of the roadway, shifted and/or additional overland travel routes, and changes to the number and location of turnarounds. The response to deficiency number 3.10-1 provides an explanation of the internal environmental review.	Please see Def #3.10-1 below.
3.7.4-1	Pole installation is included in the original Attachment 3-C: Construction Equipment Summary under Direct-Buried Construction and Pole Installation, and pole removal is included under Stringing Activities. Estimated hours of operation for on-road vehicles are not included in Attachment 3-C: Construction Equipment Summary because the air quality emissions are calculated based on daily vehicle miles traveled. An updated version of Attachment 3-C: Construction Equipment Summary including the anticipated number of daily trips for each on-road vehicle is provided here in Attachment B: Revised Construction Equipment Summary.	Thank you for providing the requested information.
3.7.2-2	SDG&E considers use and implementation of erosion and sediment control best management practices (BMPs) to be standard operating procedures; therefore, no applicant-proposed measures are proposed. Potential BMPs to be implemented during Proposed Project construction are included here in Attachment C: SDG&E's BMP Manual. The specific BMPs that will be installed for blasting activities will be determined by a Qualified Storm Water Pollution Prevention Plan Developer during	Thank you for providing the requested information.

	construction prior to blasting activities. Typical BMPs include, but are not limited to, silt fence, fiber rolls, erosion control blankets, and stockpile management.	
3.7.6-1	The use of the word “or” refers to the fact that SDG&E has established practices with the County of San Diego and will follow those practices unless the county requests to meet and confer. SDG&E’s established practices with the County of San Diego allow for construction activities outside of allowed hours by submitting a SDG&E Maintenance Work (Non-Standard Work Hours) notification form. For construction outside of the hours allowed by the cities of Chula Vista and San Diego, SDG&E will meet and confer with the appropriate jurisdiction to determine if a permit or exception is required.	Please note that CPUC’s CEQA document may further specify mitigation measures to reduce/minimize potential impacts.
3.7.7-1	AT&T currently has lines co-located on pole locations 108 through 117 within the Proposed Project alignment. For such co-location situations, SDG&E typically tops the existing poles above the third-party lines after the new poles are installed after which the SDG&E lines are transferred. Then, SDG&E requests the third party to transfer or “relocate” their existing lines to the new poles. Upon completion of the third-party relocation, SDG&E returns to remove the existing poles. For these specific poles, AT&T is obligated to relocate their lines but not under a specified timeframe; however, SDG&E will request that it be completed within 30 to 60 days barring any unforeseen complications.	Thank you for the clarification.
3.8.0-1	The specific BMPs to be installed will be determined based on site conditions, but typical BMPs for road maintenance include, but are not limited to, fiber rolls, sand bag barriers, diversion berms, and drainage swales, which are described and provided here in Attachment C: SDG&E BMP Manual.	Please note that CPUC’s CEQA document may further specify mitigation measures to reduce/minimize potential impacts.
3.8.2-1	The following is a list of the herbicides that SDG&E	Thank you for providing the requested information.

	<p>utilizes depending on site conditions and weed abatement requirements:</p> <ol style="list-style-type: none"> 1. Esplanade 200 SC 2. Garlon 4 Ultra 3. Pathfinder II 4. Spra-Kil SK-26 5. Landmark XP 6. Portfolio 4F California 7. Gallery 75 DF / Gallery SC 8. Rotary 2 SL 9. Rodeo 10. Roundup Pro Concentrate 11. Accord XRT II 12. Payload 13. Dimension Ultra 40/Dimension 2EW 14. Volunteer 15. Arrow 2EC 16. Milestone <p>SDG&E does not currently anticipate utilizing any additional herbicides.</p>	
3.8.4-1	<p>Section 3.8.4 Use of Helicopters is intended to provide background on SDG&E's existing use of helicopters to patrol and maintain transmission lines in SDG&E's service territory for operation and maintenance, not for construction of the Proposed Project. Therefore, no specific BMPs, flight paths, payloads, or hours of operation as it relates to construction of the Proposed Project have been included.</p>	<p>Thank you for the clarification.</p>
3.10-1	<p>Site conditions, safe access, and plan and permit requirements at the time of construction may result in the need for minor adjustments to the work areas and planned access routes. The precise location and number of temporary work areas (such as turnaround areas, stringing sites, guard structures, and overhead conversion pulling sites) may change as necessary.</p>	<p>While we understand SDG&E's proposed review process is meant to ensure that project activities will not result in significant impacts, CPUC may not delegate project applicants the authority to determine whether potential impacts are less than significant under CEQA. In addition, we do not believe SDG&E's proposed internal review process is consistent with the procedures for minor field adjustments established and</p>

	<p>SDG&E’s internal environmental review process starts with the resource monitors (biological, aquatic, and cultural/paleontological) reviewing the proposed modifications and working with the construction crews to ensure the proposed modifications avoid potentially significant impacts. The lead biologist then prepares a memorandum that documents an evaluation of biological, aquatic, and cultural/paleontological resources; and any minimization measures or resource monitoring requirements. The proposed modification as documented is reviewed by SDG&E for consistency with the significance findings in the California Environmental Quality Act (CEQA) document. After the consistency review is completed, SDG&E proceeds with construction in accordance with any necessary minimization measures and monitoring requirements.</p> <p>For pole work areas, the resource monitors (biological, aquatic, and cultural/paleontological) will assist construction crews with minor changes to the pole work areas in the field to avoid sensitive environmental resources.¹</p>	<p>approved by the CPUC for the Tie Line 637 Wood-to-Steel Project. Should project adjustments be needed at the time of construction, CPUC will comply with CEQA and established CPUC policies for reviewing such adjustments.</p> <p>Provision of the GIS data requested above (see Def #3.4-2) will help to ensure that potentially significant impacts of the proposed project are disclosed in the CEQA document.</p>
4.4.3-1	<p>SDG&E is currently conducting protocol-level surveys for special-status fairy shrimp at the Main Street Staging Yard, within the access roads and proposed work areas between pole locations 1 through 78, and within the access roads and proposed work areas between pole locations 96 through 117. USFWS critical habitat for the San Diego fairy shrimp is located between pole locations 79 and 95; therefore, protocol-level surveys for special-status fairy shrimp are not proposed in this area, and the San Diego fairy shrimp and the Riverside fairy shrimp are</p>	<p>During its CEQA analysis (and after receipt of the GIS data requested under Deficiency #3.10-1), CPUC will evaluate potential impacts to special-status fairy shrimp habitat and propose mitigation measures, as applicable.</p>

¹ The procedures for minor field adjustments were established and approved by the CPUC for the Tie Line 637 Wood-to-Steel Project. The process proposed for the Proposed Project is consistent with the procedures established for Tie Line 637.

	<p>presumed to be present along this portion of the alignment. SDG&E anticipates that during construction it will need to drive through potentially suitable special-status fairy shrimp habitat only when dry.</p>	
4.8-1	<p>SDG&E believes that a Hazardous Substance Control and Emergency Response Plan is not required since hazardous materials/waste management, spill control, and contaminated soil management are included in SDG&E's BMP Manual.</p> <p>Similarly, SDG&E does not believe that a project-specific Health and Safety Plan is required. Contractors will be required to submit a Health and Safety Plan to SDG&E prior to construction. These plans are not yet available as the contractor(s) that will perform the work have not yet been chosen. In addition, SDG&E has a company-wide Injury and Illness Prevention Plan.</p> <p>As described in PEA Section 3.10 Project Design Features and Ordinary Construction/Operating Restrictions (pages 3-31, 3-36, and 3-37), SDG&E will prepare a training program to provide information about biological resources, cultural resources, and hazardous materials. This training will address construction-related environmental requirements and incorporate the relevant Project Design Features and Ordinary Construction/Operating Restrictions and mitigation measures included in the final CEQA document. As such, the Worker Environmental Awareness Program will be prepared upon completion of the final CEQA document.</p>	Thank you for providing the additional information.
4.16.4-1	<p>The traffic control plan for the Proposed Project will be developed approximately 30 to 60 days prior to construction. An example traffic control plan has been provided here in Attachment D: Example Traffic Control</p>	Thank you for providing the additional information.

	Plan for illustrative purposes.	
4.18.6-1	The only known SDG&E project within one mile of the Proposed Project is the Pio Pico Energy Center Gas Line project, which is included in Table 4.18-1: Planned and Proposed Projects within One Mile in the PEA.	Thank you for providing the requested information.