



Shivani Ballesteros
San Diego Gas & Electric Company

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December 28, 2015

Ms. Connie Chen
Energy Division, Infrastructure Permitting and CEQA
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

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

Dear Ms. Chen:

San Diego Gas & Electric Company (SDG&E) has reviewed your letter dated November 20, 2015 regarding the application completeness determination for the Permit to Construct application (Application), including the Proponent's Environmental Assessment (PEA) for the Tie Line 649 Wood-to-Steel Replacement Project. This letter is intended to address Deficiency #3.4-2 of the Application Completeness Letter:

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 polygons 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 potential impacts of the project.

The work areas required to construct the Proposed Project are discussed in Section 3.7.1 Work Areas in Chapter 3 – Project Description in the PEA and are based on the following assumptions:

- a) each of the of the direct-bury steel poles, removal poles, and poles that require only overhead work will impact an area equivalent to an approximately 20-foot-diameter circle (approximately 314 square feet);
- b) each of the micro-pile foundation steel poles will impact an area equivalent to an approximately 40-foot-diameter circle (approximately 1,260 square feet); and
- c) each of the pier foundation steel poles will impact an area equivalent to an approximately 75-foot by 75-foot area (approximately 5,625 square feet).

The aforementioned assumptions were used to calculate the total temporary impacts utilizing an anticipated average area per pole type, not to delineate the actual work areas. An additional potential impact area of approximately 1,260 square feet was added for poles considered under item (a) to account for minor modifications made in the field during construction. Please note that SDG&E does not intend to use circular work areas at each pole, and the actual work area dimensions and locations for each pole will be determined closer to the start of construction. This is necessary because each pole site has varying environmental constraints which

could change over the time it takes to obtain Project approval from the California Public Utility Commission (CPUC).

Per the CPUC's request, SDG&E is providing a revised Attachment 3-A: Detailed Route Map showing circular work areas around each pole for impact calculations (not to depict the actual work area), as well as all other work areas described in the PEA. Additionally, a DVD containing geographic information system shapefiles of the approximate potential disturbance areas has been included for your use. Again, the circular shapes represent a conservative estimate of overall impacts that are anticipated to occur as a result of pole installation or removal – not the actual work areas that will be required to construct the Project. Immediately prior to construction, SDG&E will confirm that the total temporary impacts based on the final work area dimensions do not exceed the overall Proposed Project impacts presented in the PEA. Any changes to workspace dimensions during the final design will not result in new impacts to any sensitive resources without authorization from the corresponding resource agency. Furthermore, SDG&E will submit a Minor Project Refinement request to the CPUC should the total revised temporary impact exceed the overall Proposed Project estimate.

SDG&E would also like to provide a clarification to Deficiency #3.10-1 of the Application Completeness Letter:

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 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. 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.

The footnote is intended to refer to procedures for minor field adjustments specifically for pole work areas, which were approved by the CPUC for the Tie Line 637 Wood-to-Steel Project during construction. The same process is proposed for the Proposed Project and would be consistent with the procedures previously established on the aforementioned project. We would be happy to have a field visit of the Proposed Project with the CPUC to further discuss this proposal.

We sincerely appreciate your time, input, and guidance to date and look forward to continuing to work with you throughout the various stages of this important project.

Sincerely,

/s/Shivani Ballesteros

Shivani Ballesteros
Regulatory Case Manager

cc: Mary Jo Borak, Supervisor
Jack Mulligan, CPUC Attorney
Kenneth Schwarz, Horizon Water and Environment
Tom Engels, Horizon Water and Environment

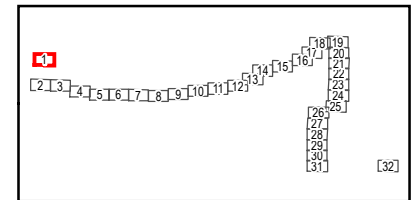
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Attachment 3-A: Detailed Route Map



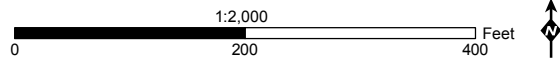
Attachment 3-A: Detailed Route Map 1 of 32

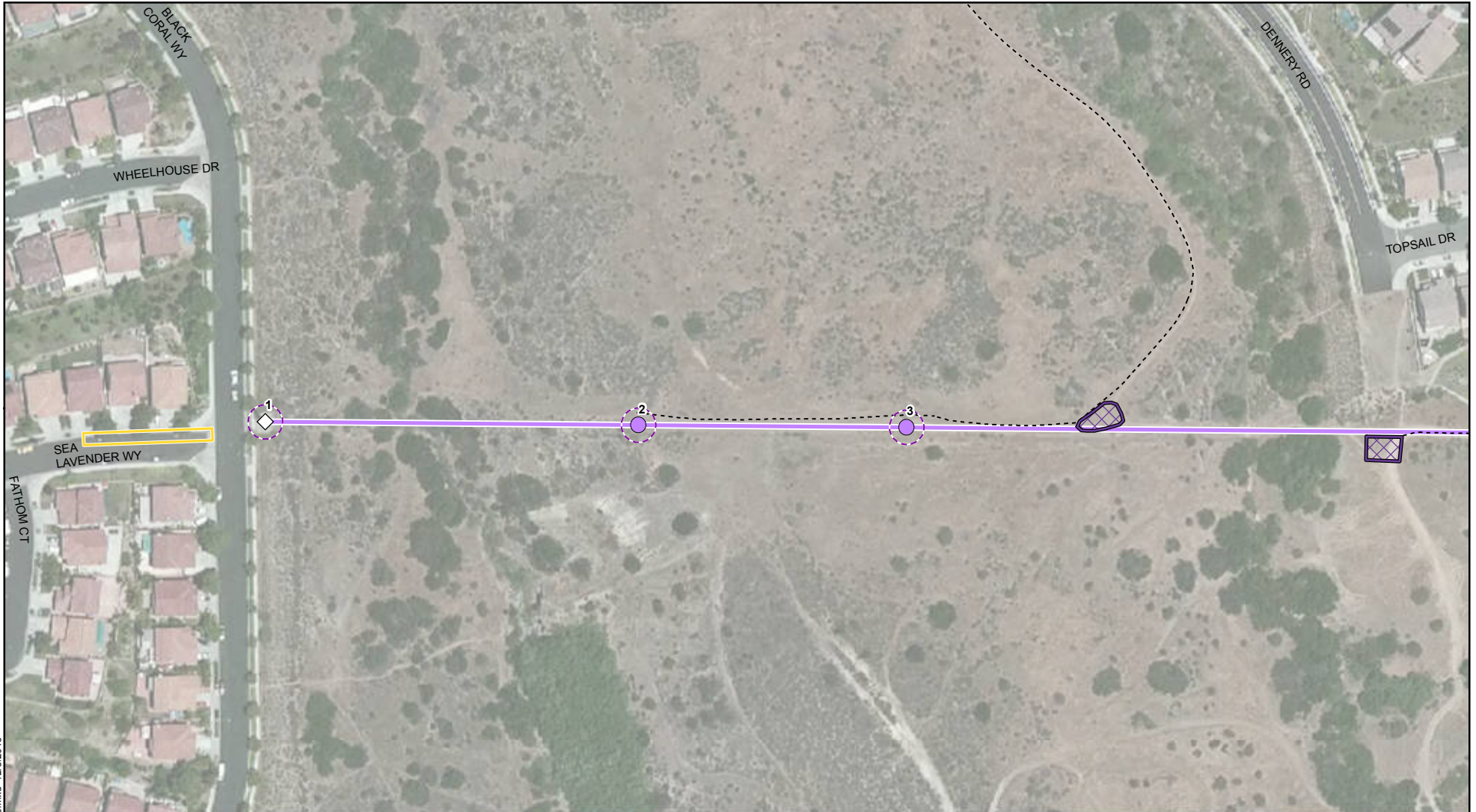
Tie Line 649 Wood-to-Steel Replacement Project

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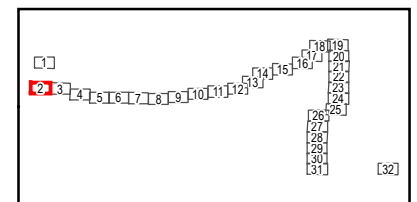




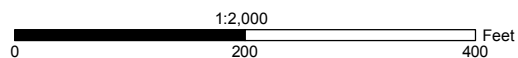
Attachment 3-A: Detailed Route Map 2 of 32

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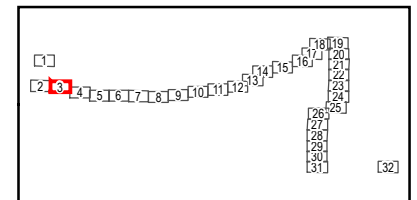




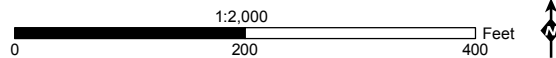
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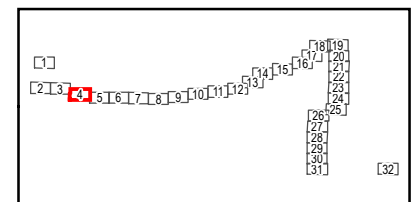




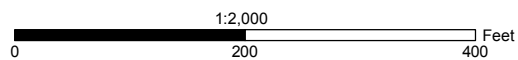
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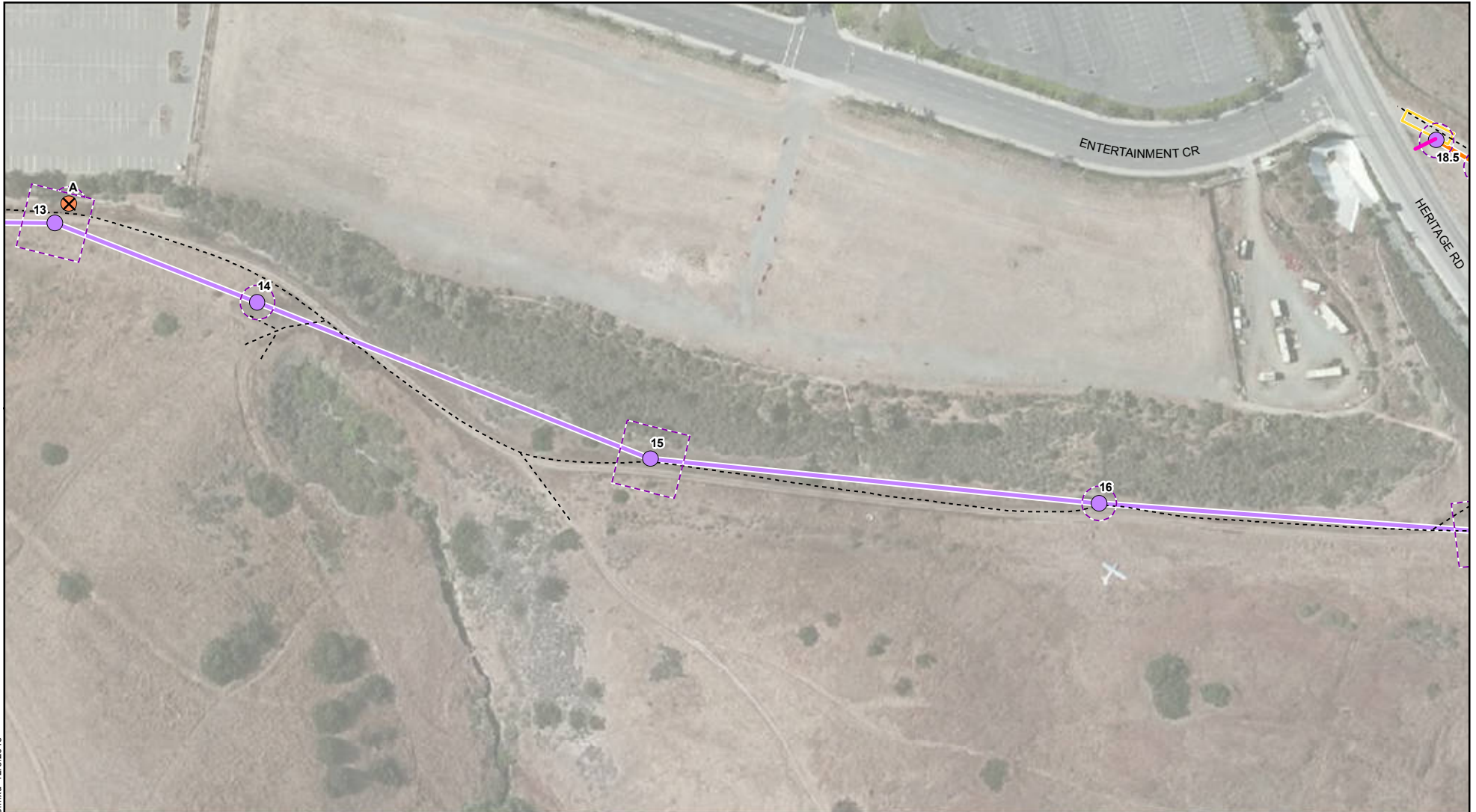
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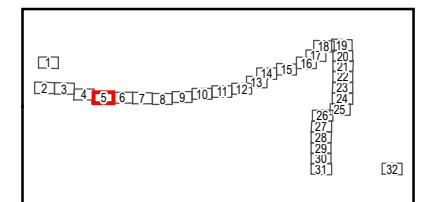




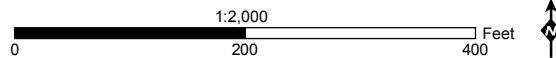
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Tie Line 649 Wood-to-Steel Replacement Project

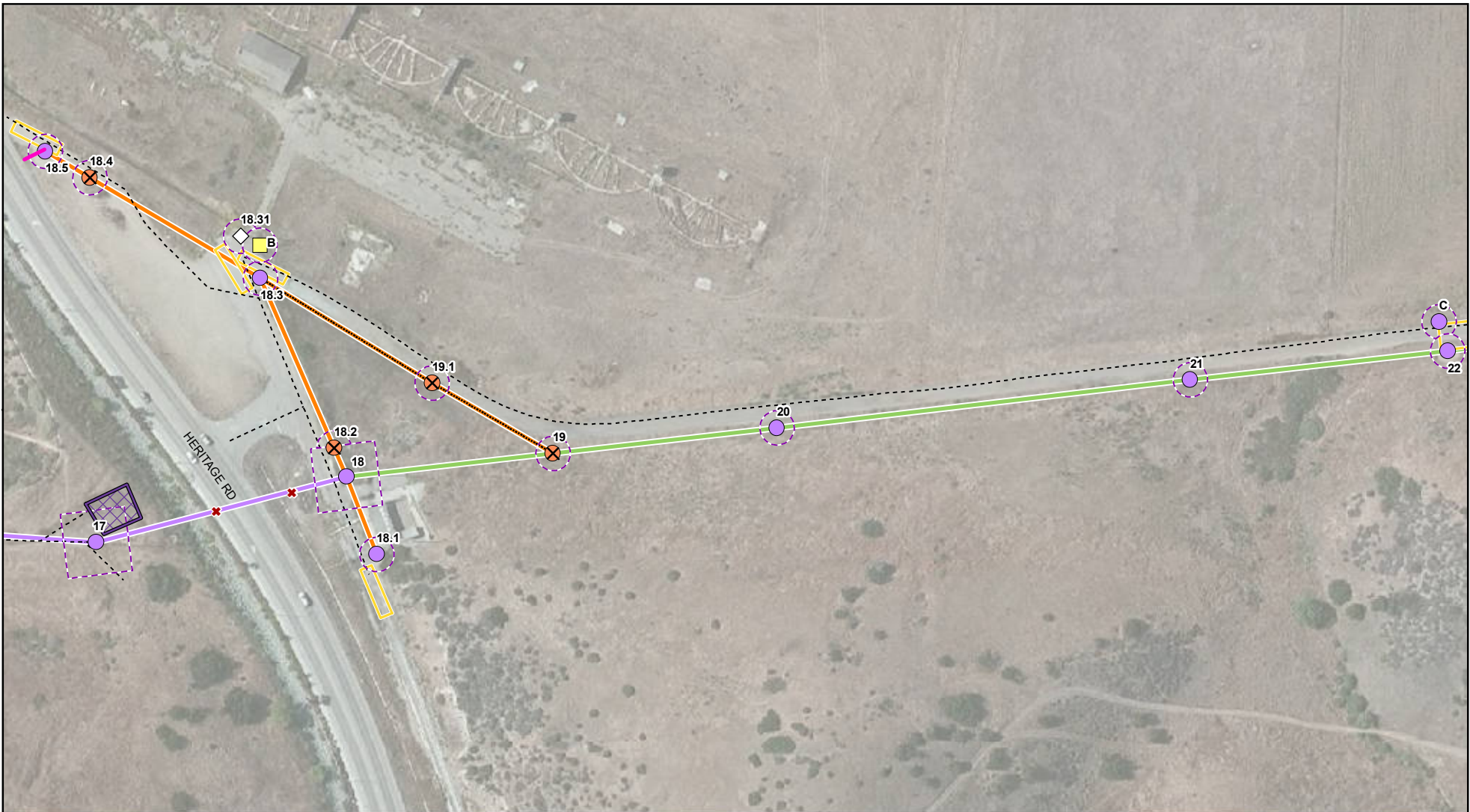
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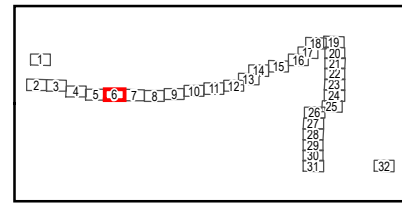
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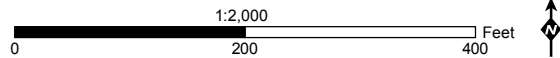
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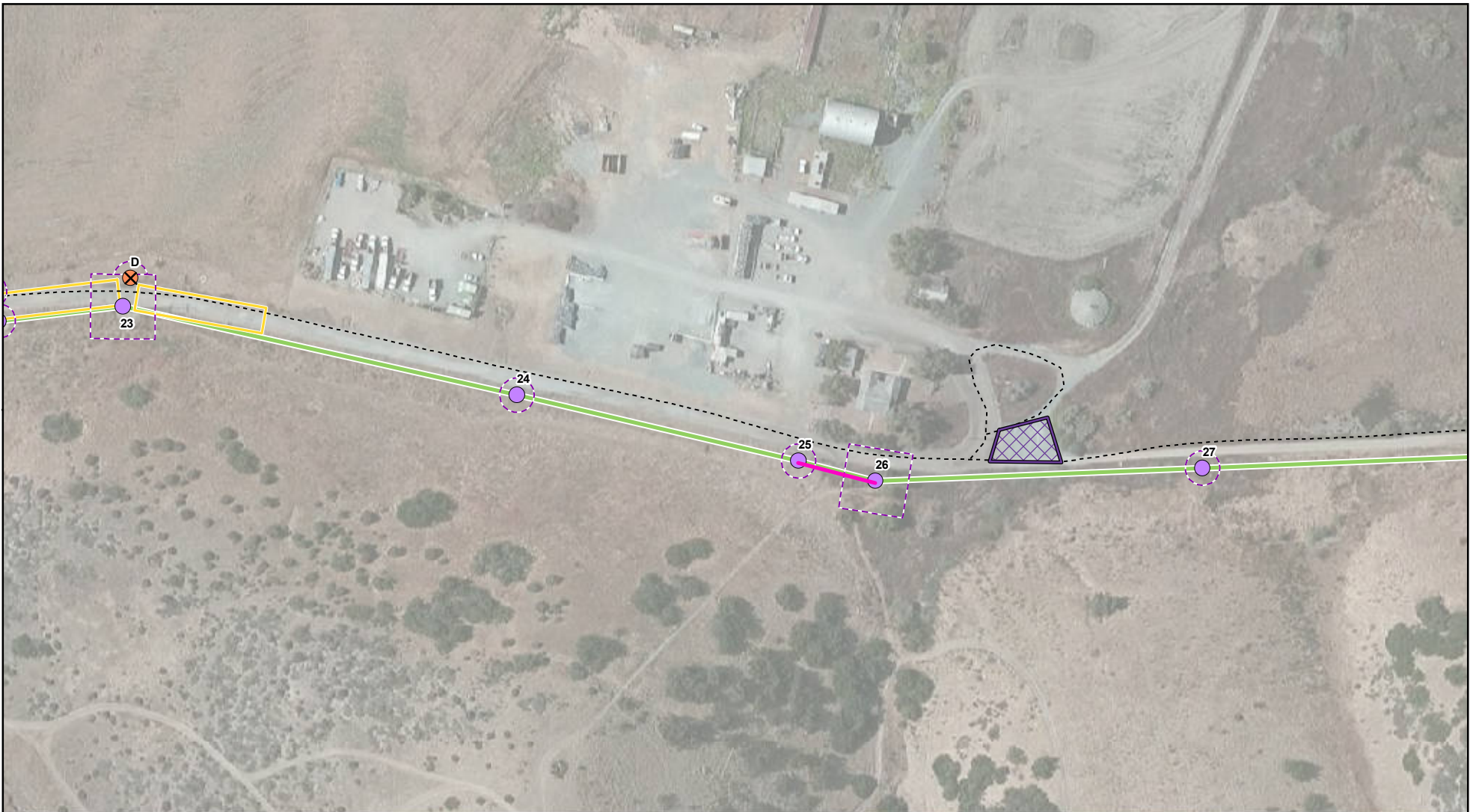
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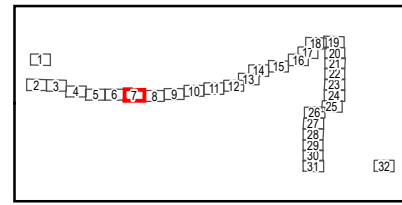
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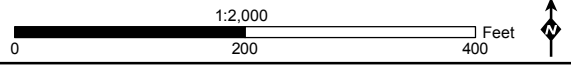
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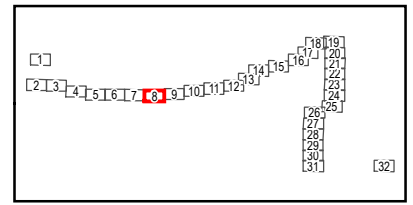
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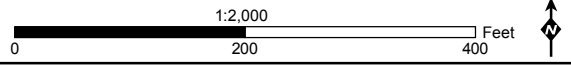
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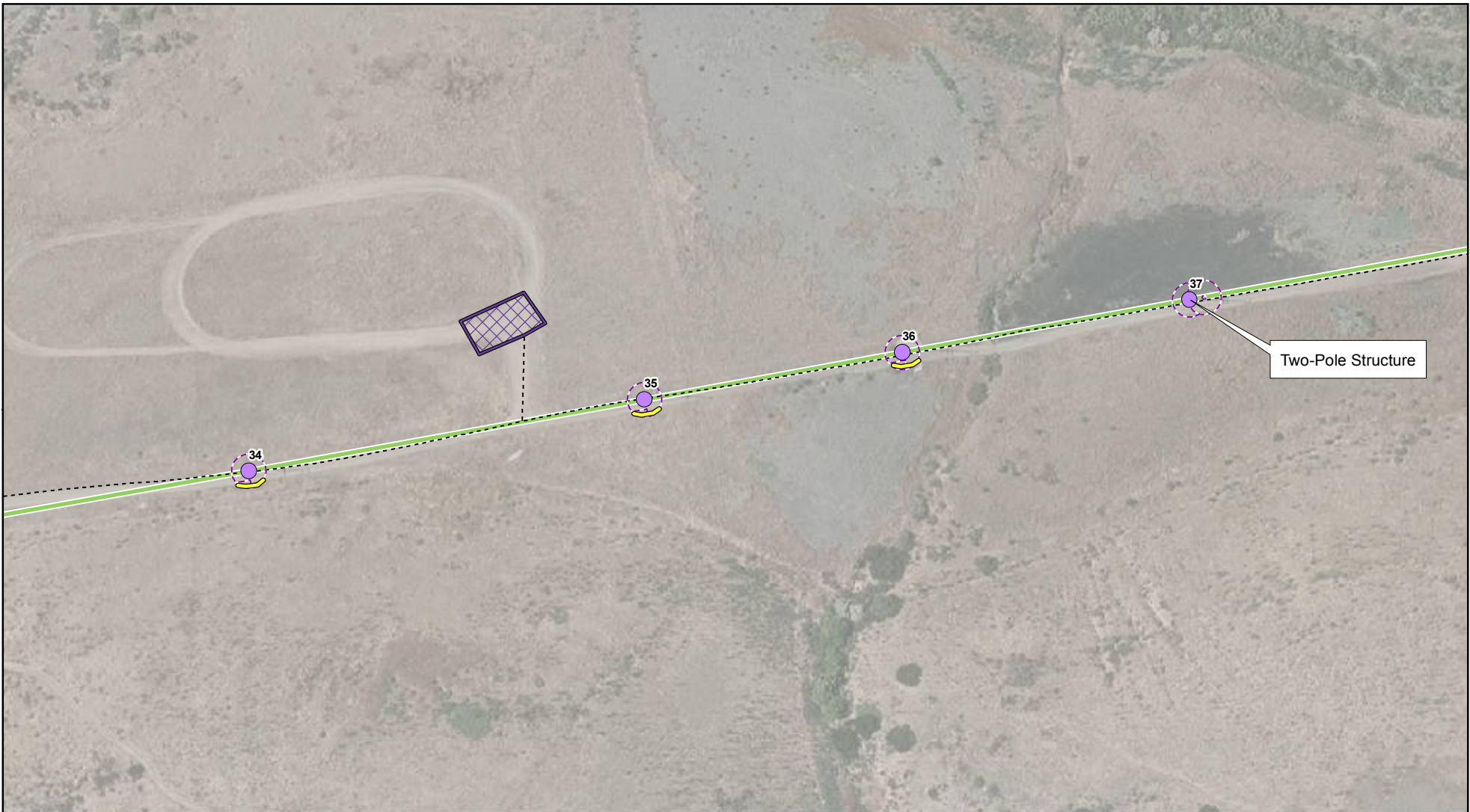
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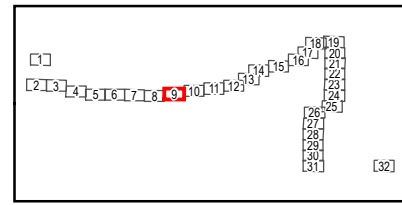
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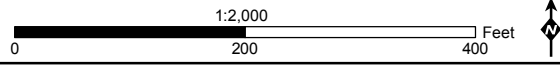
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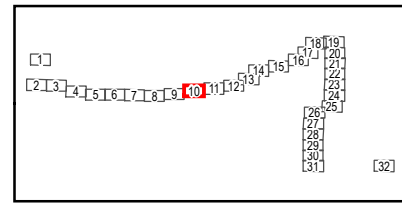
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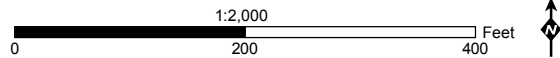
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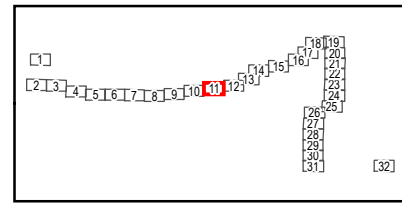
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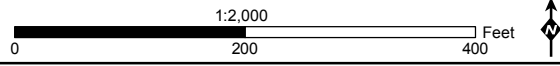
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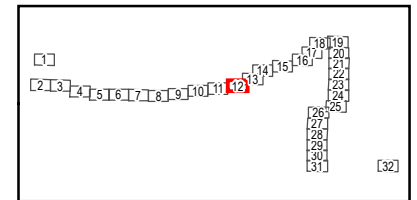




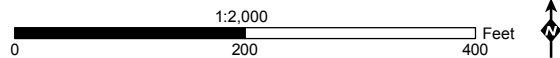
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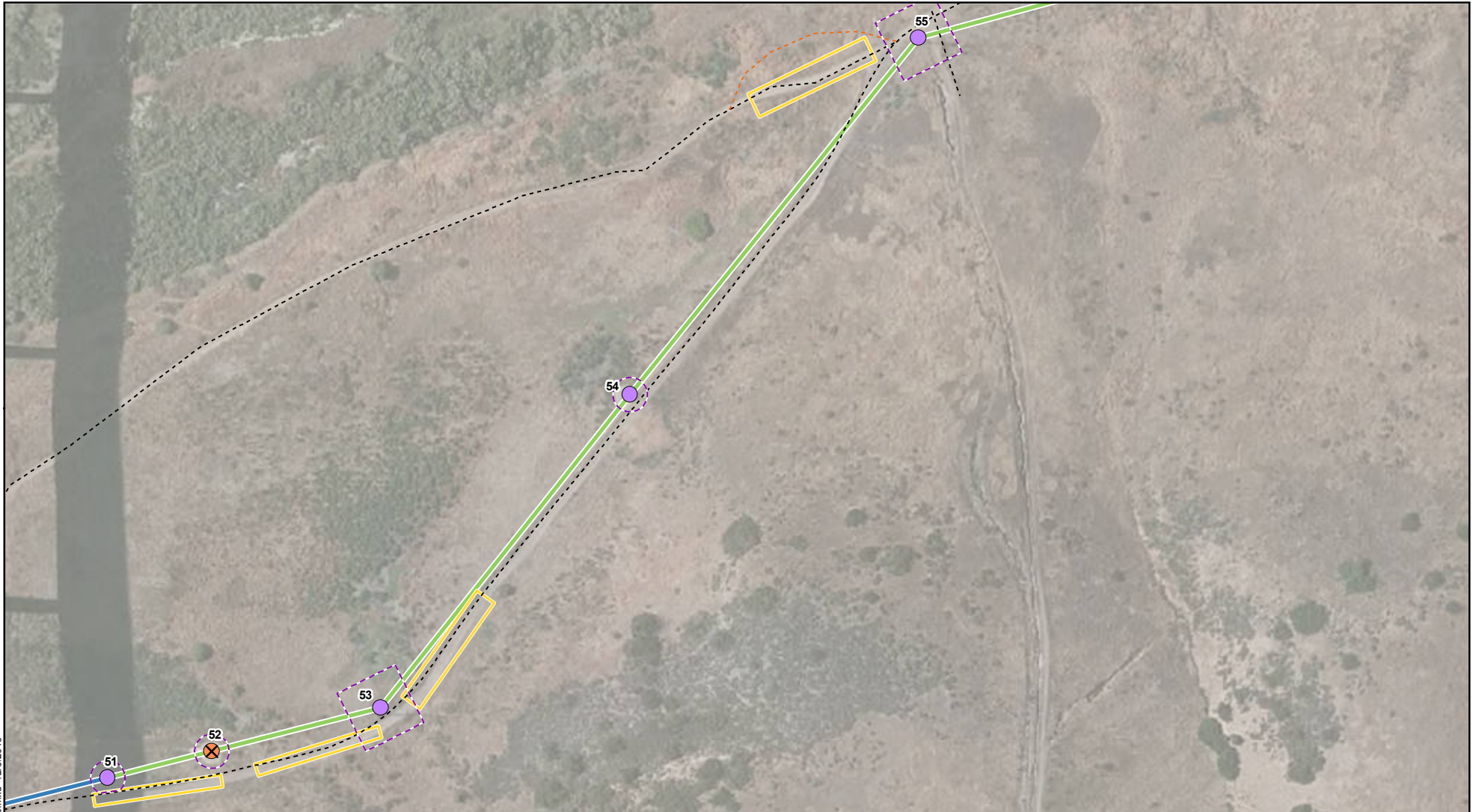
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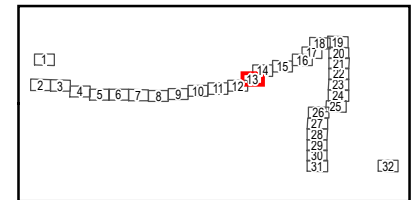
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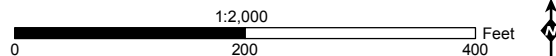
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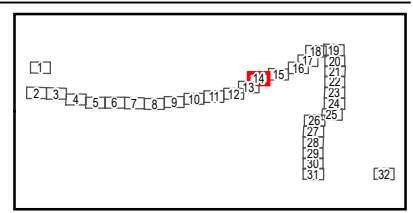
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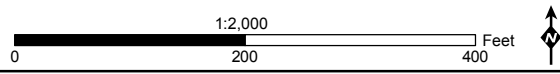
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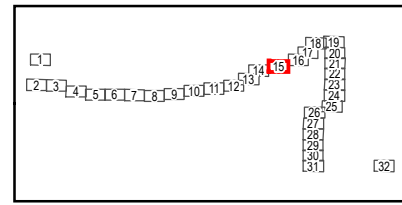
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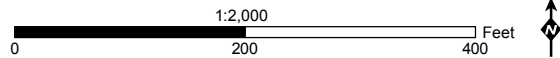
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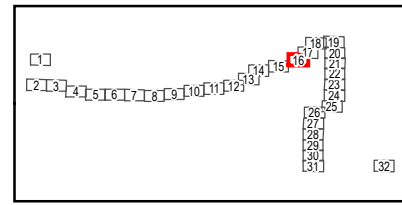
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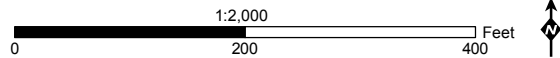
Attachment 3-A: Detailed Route Map 16 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



*Area is equivalent to the total estimated square footage of disturbance at each pole, but the actual shape of the work area will be determined during the final design.

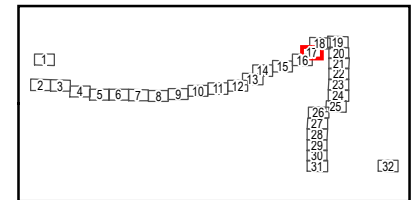




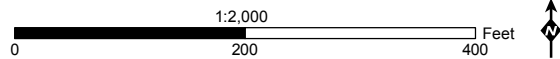
Attachment 3-A: Detailed Route Map 17 of 32

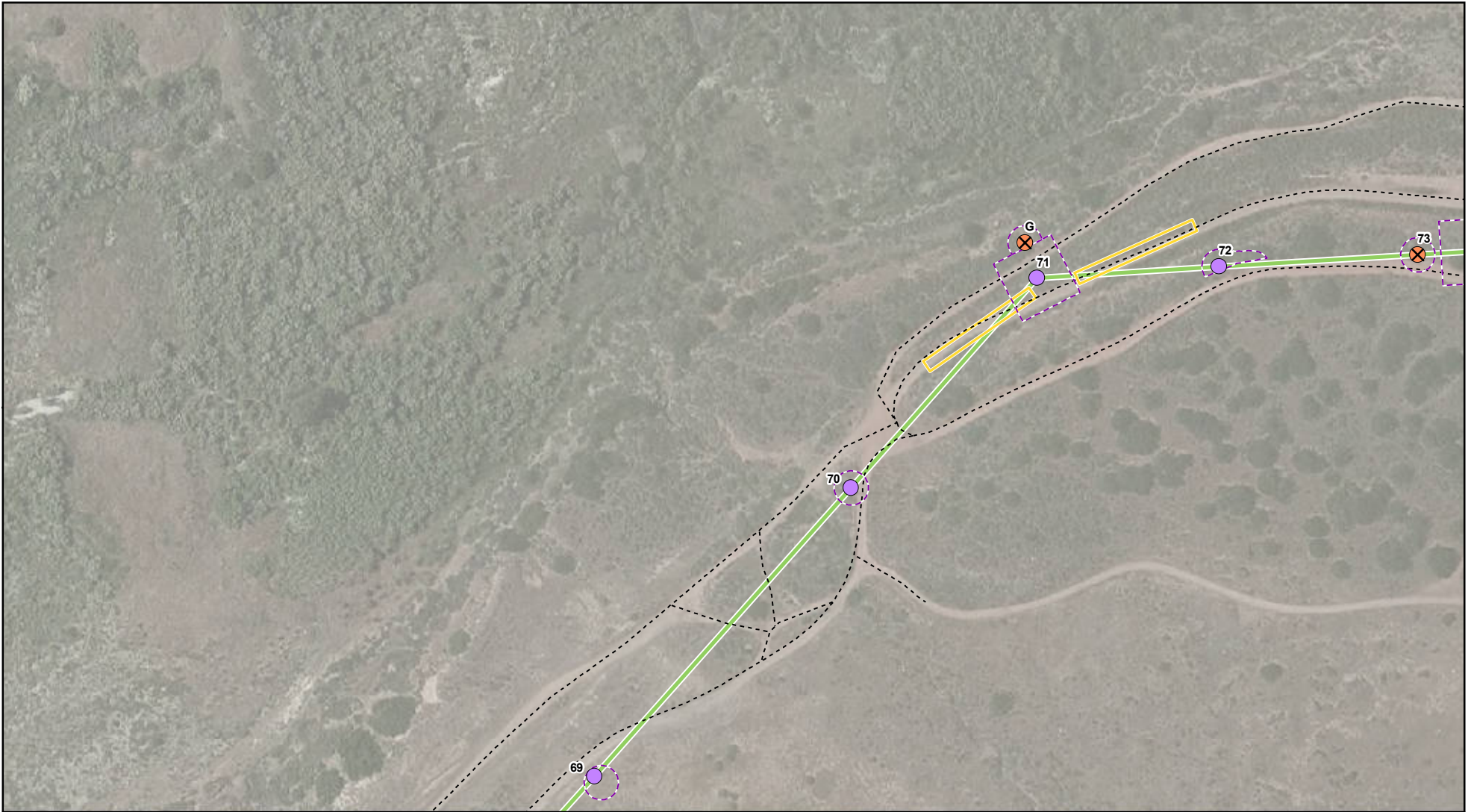
Tie Line 649 Wood-to-Steel Replacement Project

- | | | | |
|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
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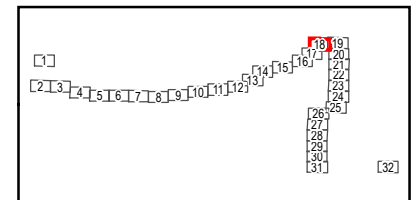




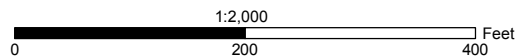
Attachment 3-A: Detailed Route Map 18 of 32

Tie Line 649 Wood-to-Steel Replacement Project

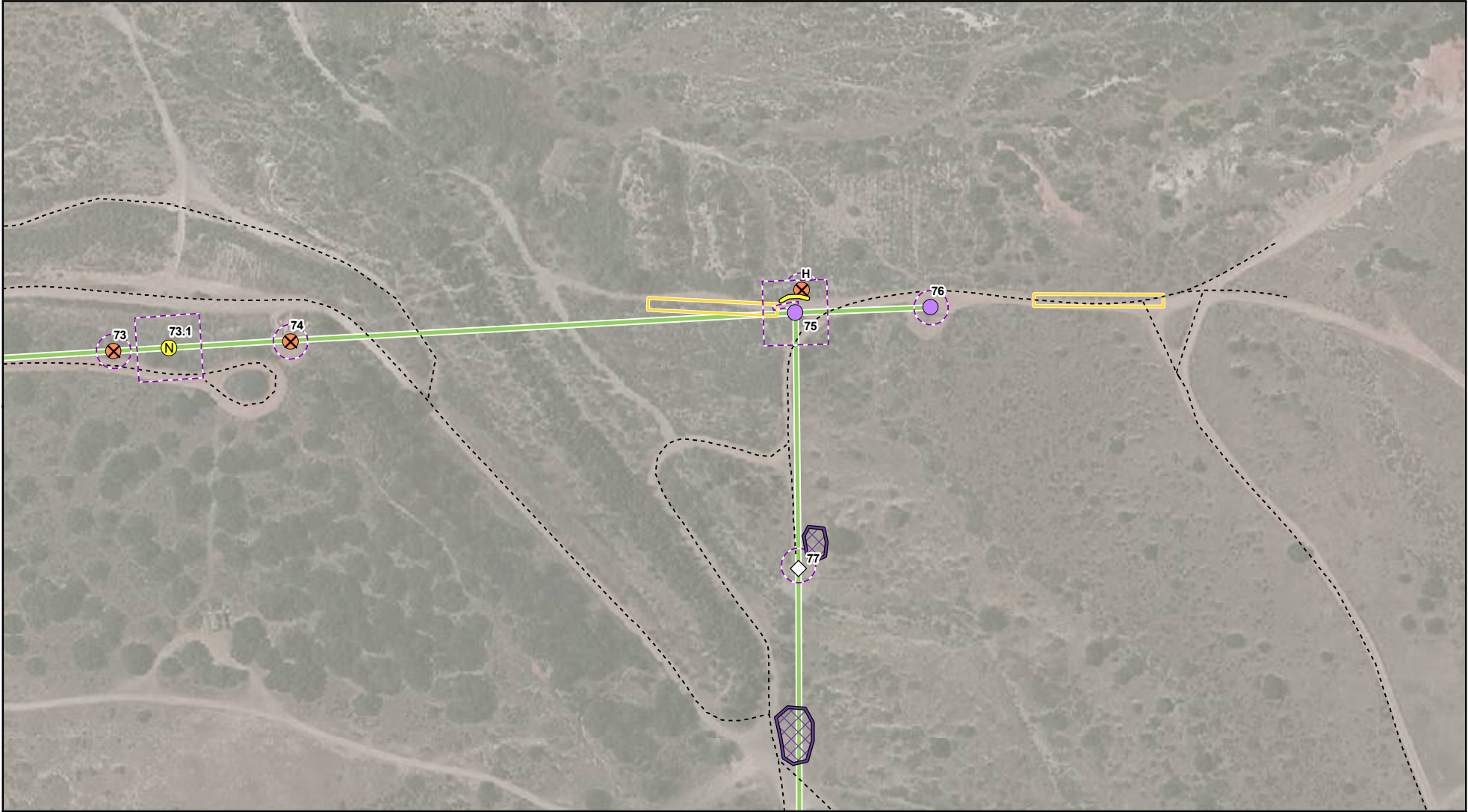
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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
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| Guard Structure | Underground Distribution Intercept | | |



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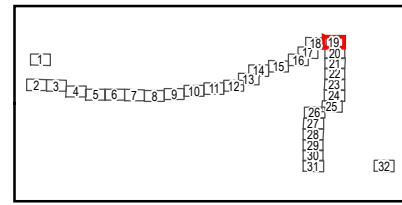
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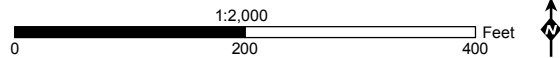
Attachment 3-A: Detailed Route Map 19 of 32

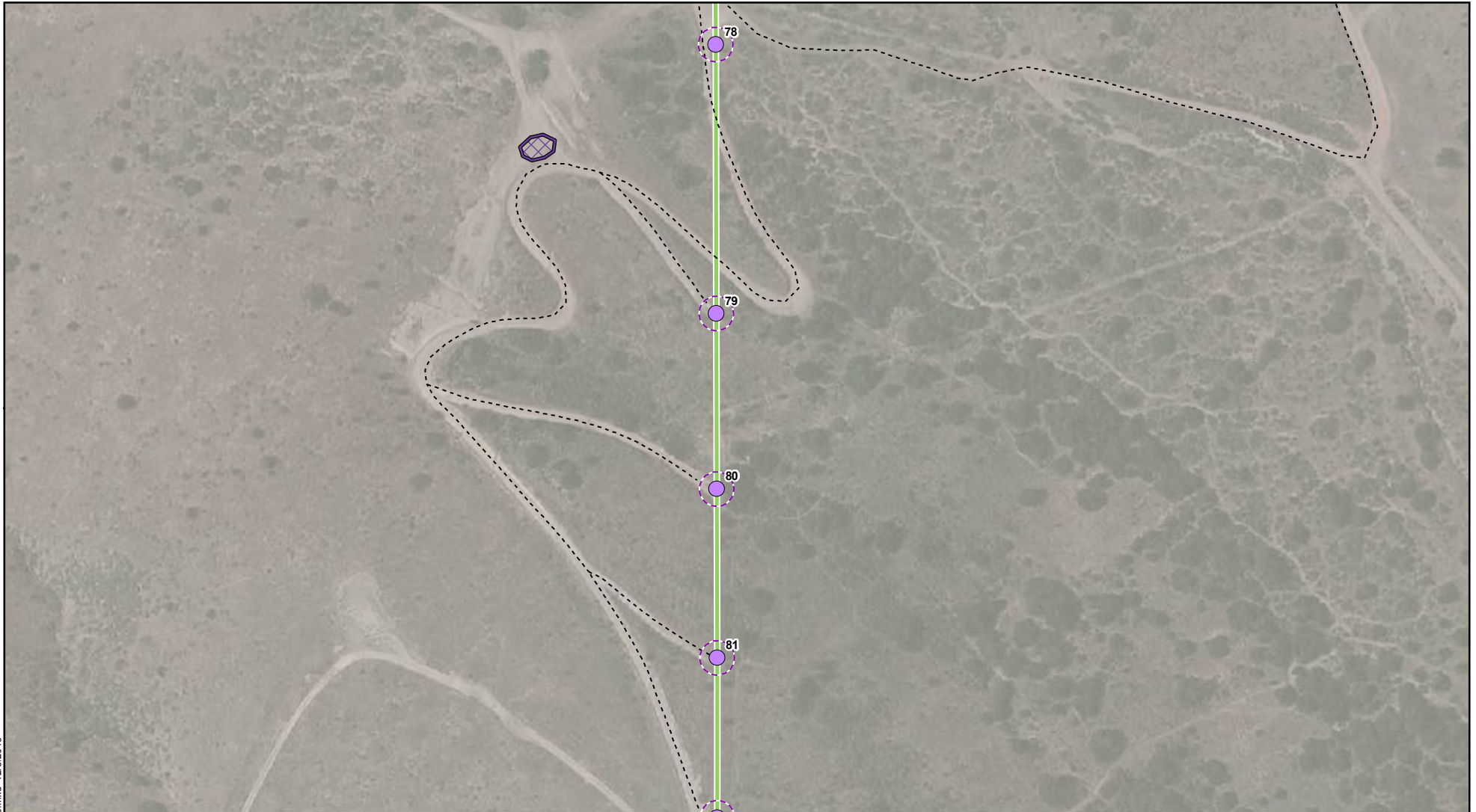
Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



*Area is equivalent to the total estimated square footage of disturbance at each pole, but the actual shape of the work area will be determined during the final design.

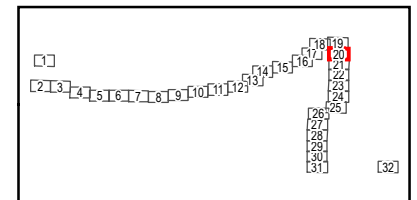




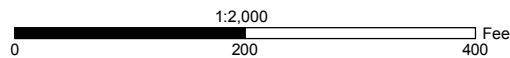
Attachment 3-A: Detailed Route Map 20 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



*Area is equivalent to the total estimated square footage of disturbance at each pole, but the actual shape of the work area will be determined during the final design.

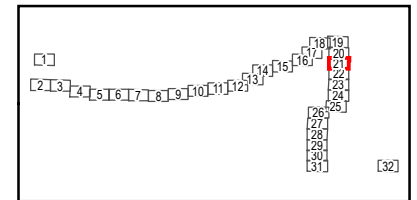




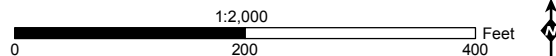
Attachment 3-A: Detailed Route Map 21 of 32

Tie Line 649 Wood-to-Steel Replacement Project

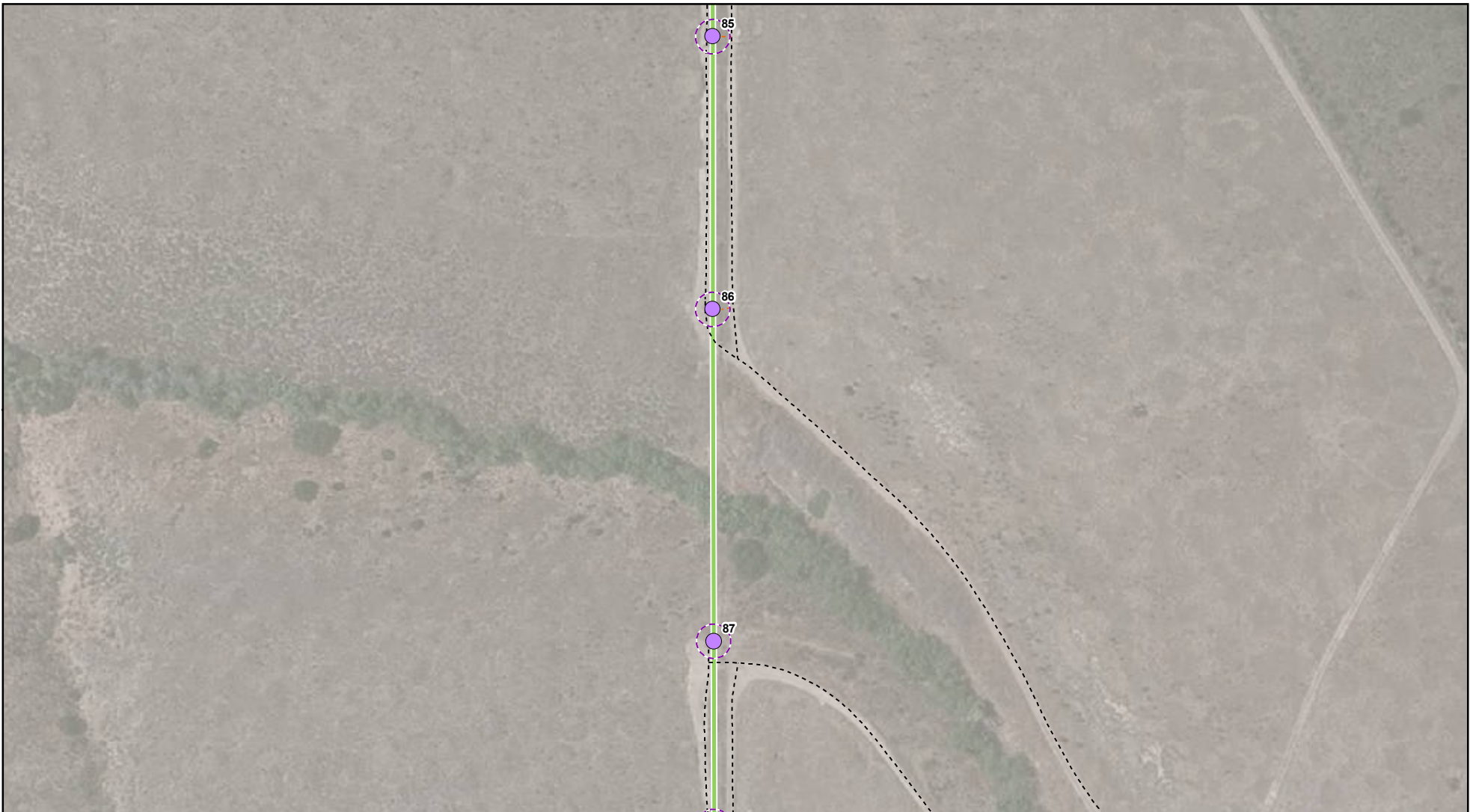
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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



*Area is equivalent to the total estimated square footage of disturbance at each pole, but the actual shape of the work area will be determined during the final design.



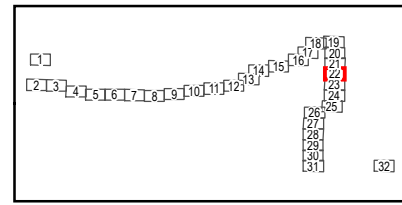
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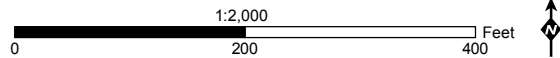
Attachment 3-A: Detailed Route Map 22 of 32

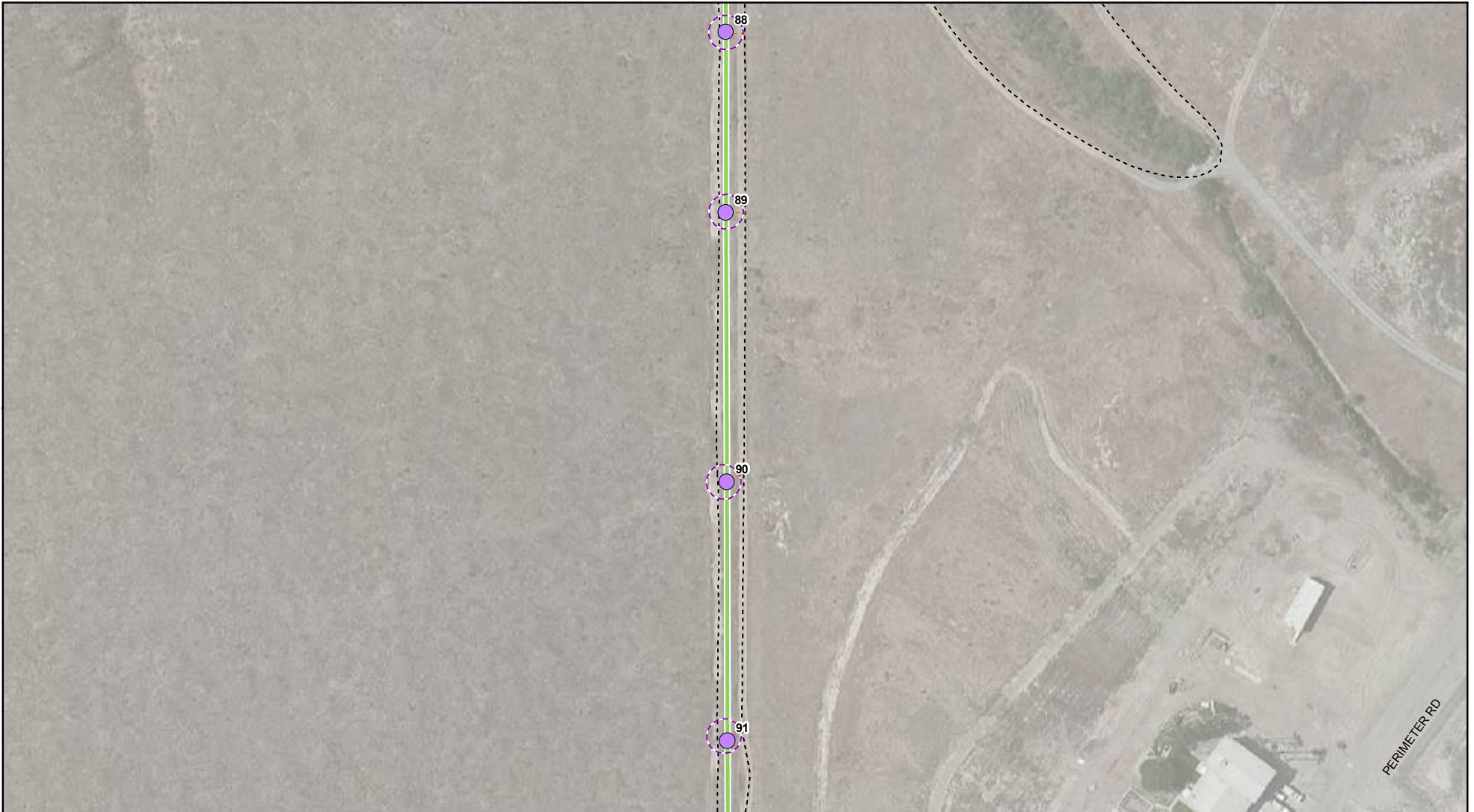
Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



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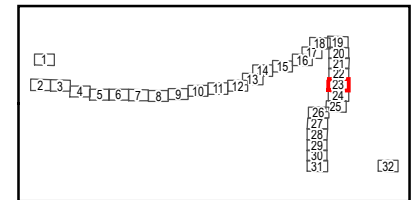




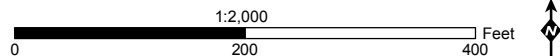
Attachment 3-A: Detailed Route Map 23 of 32

Tie Line 649 Wood-to-Steel Replacement Project

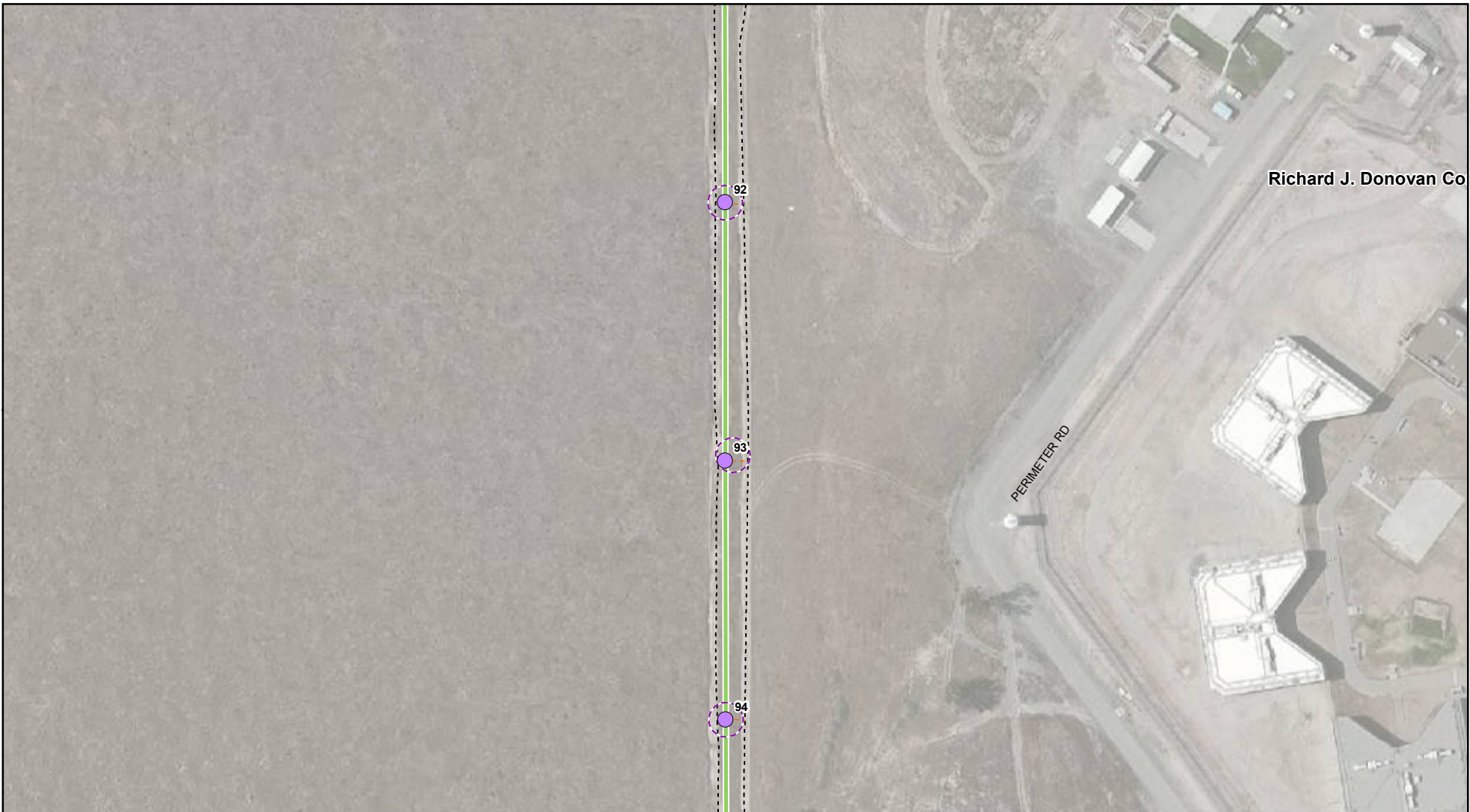
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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



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Richard J. Donovan Co

PERIMETER RD

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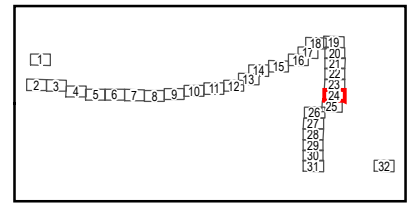
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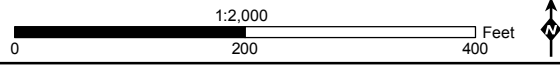
Attachment 3-A: Detailed Route Map 24 of 32

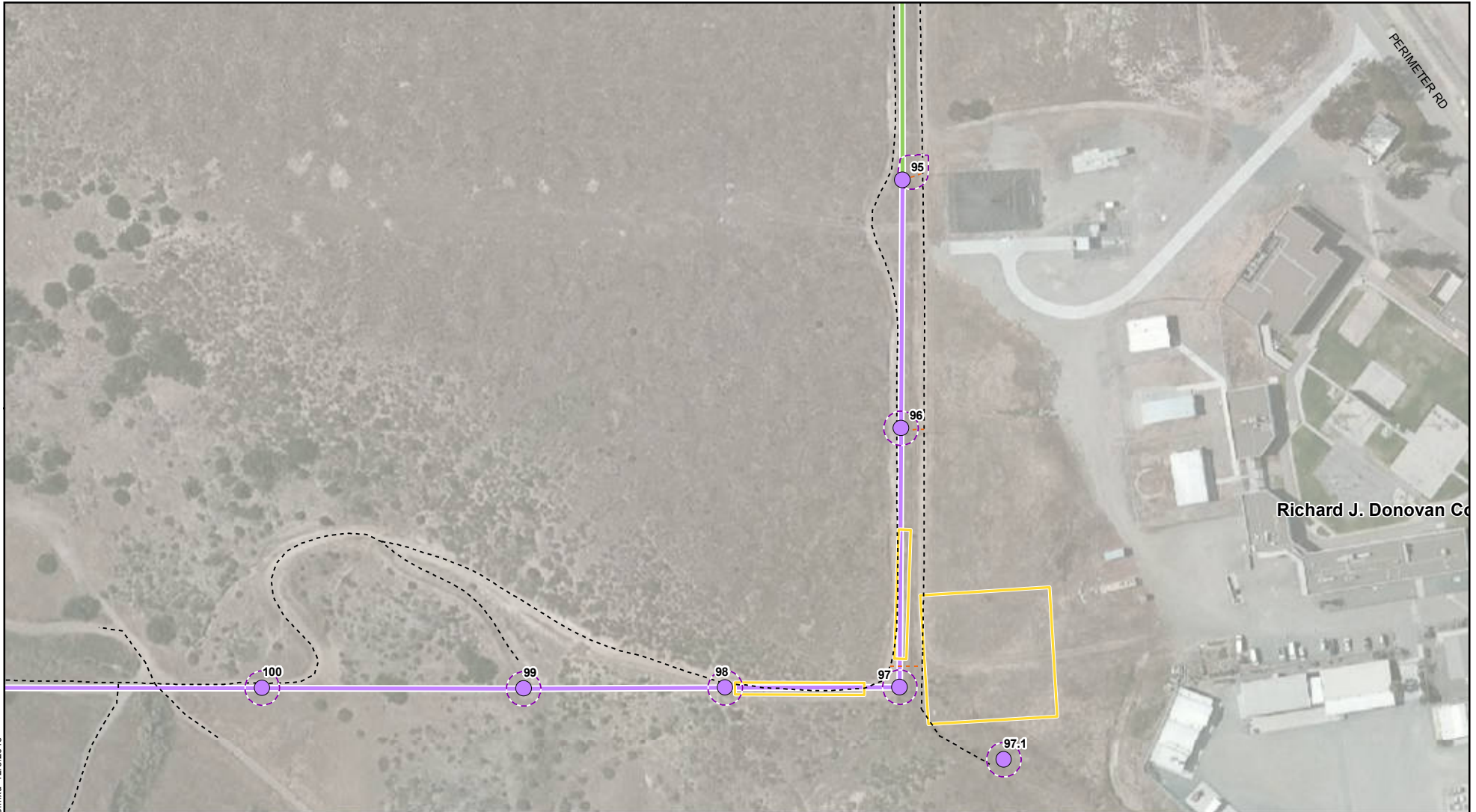
Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
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| Guard Structure | Underground Distribution Intercept | | |



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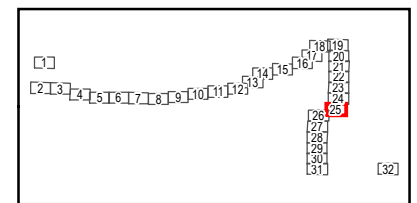




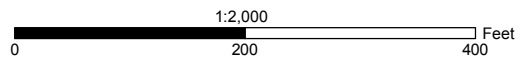
Attachment 3-A: Detailed Route Map 25 of 32

Tie Line 649 Wood-to-Steel Replacement Project

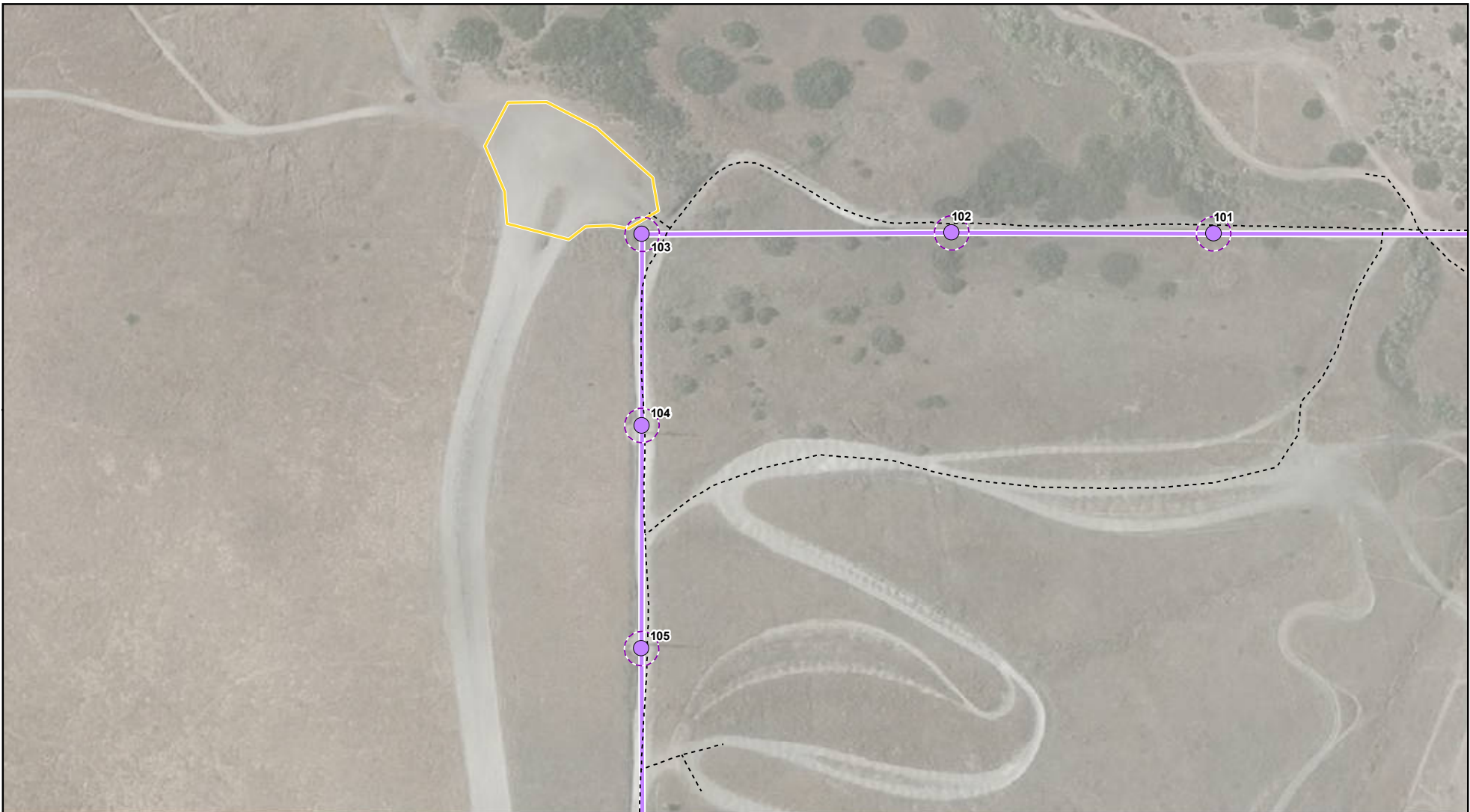
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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
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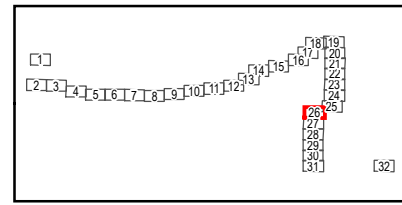
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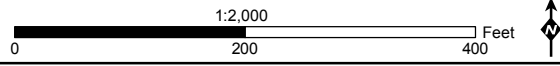
Attachment 3-A: Detailed Route Map 26 of 32

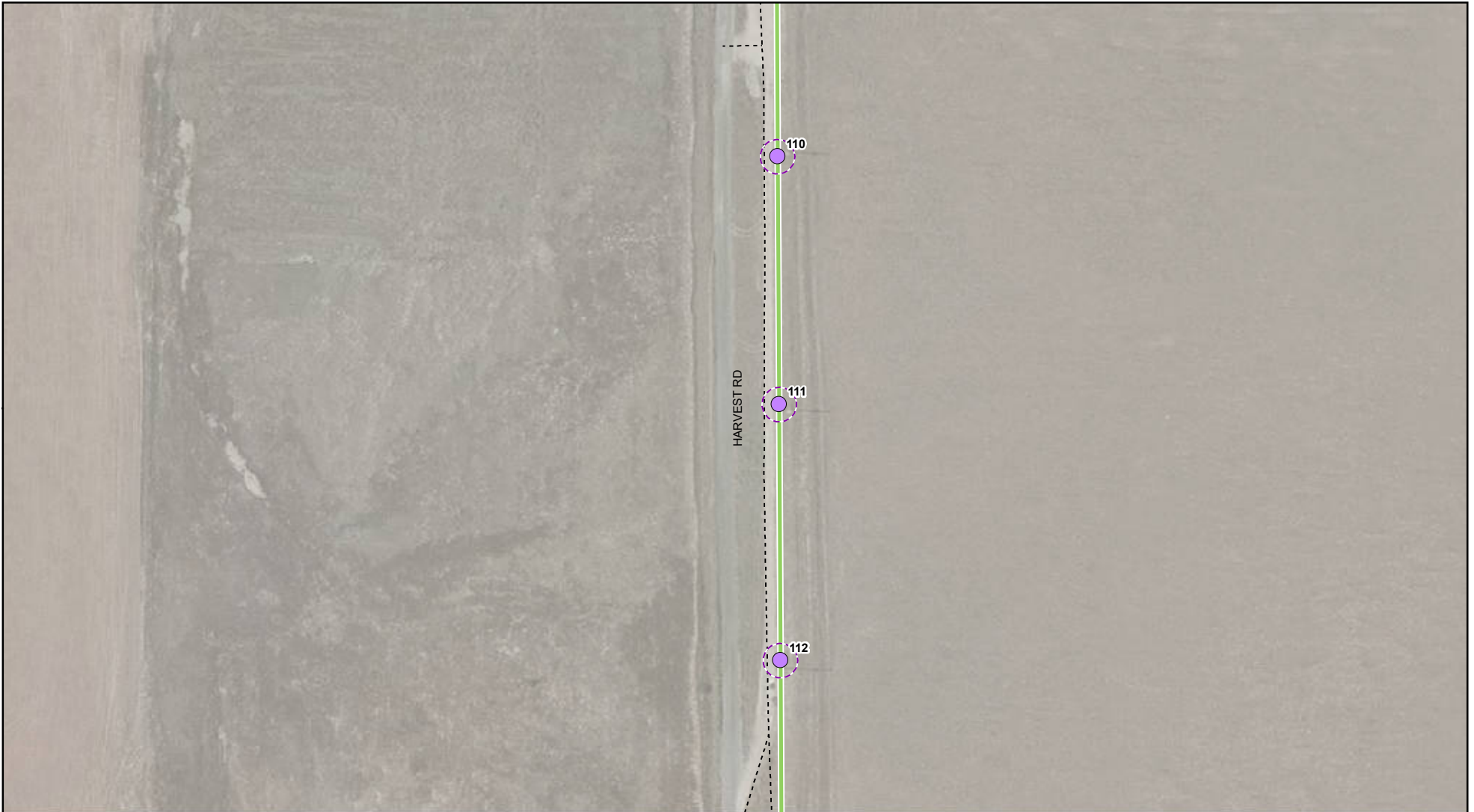
Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
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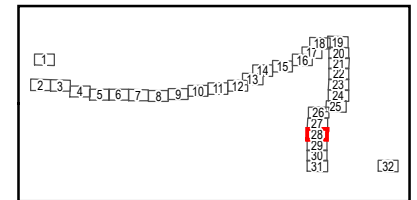




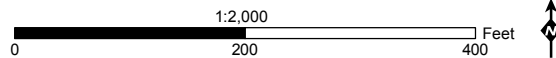
Attachment 3-A: Detailed Route Map 28 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
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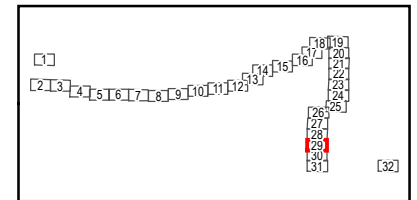




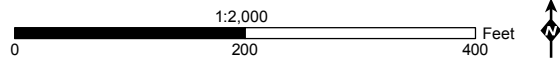
Attachment 3-A: Detailed Route Map 29 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
| Wood-to-Steel Replacement Pole | Wood-to-Steel Replacement Distribution Only | Access Road Turnaround/Staging Yard | Access Road Modification |
| Overhead Work Only | Distribution Removal | Pulling Site | |
| Pole Removal | Underground to Overhead Conversion with Distribution Underbuild | Stringing Site | |
| Guard Structure | Underground Distribution Intercept | | |



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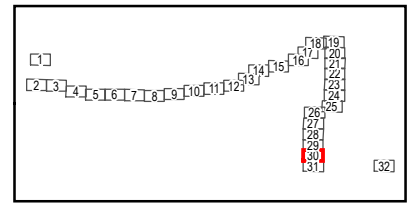




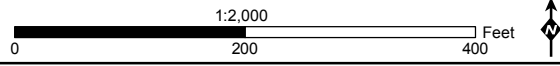
Attachment 3-A: Detailed Route Map 30 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
| New Steel Pole | Wood-to-Steel Replacement with Distribution Underbuild | Staging Yard | Overland Travel Route |
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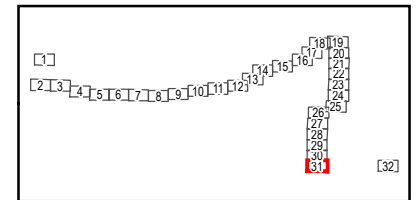




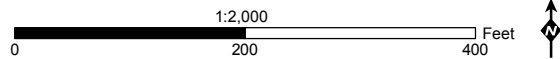
Attachment 3-A: Detailed Route Map 31 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--------------------------------|---|-------------------------------------|--------------------------|
| New Stub Pole | Wood-to-Steel Replacement | Approximate Disturbance Area* | Existing Access Road |
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| Guard Structure | Underground Distribution Intercept | | |



*Area is equivalent to the total estimated square footage of disturbance at each pole, but the actual shape of the work area will be determined during the final design.



SDG&E will only utilize approximately 4 acres within this staging yard

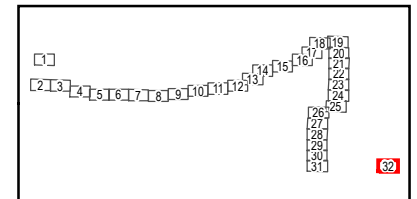
Otay Staging Yard

OTAY MESA RD

Attachment 3-A: Detailed Route Map 32 of 32

Tie Line 649 Wood-to-Steel Replacement Project

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|--|--------------------------------|--|---|--|-------------------------------------|--|--------------------------|
| | New Stub Pole | | Wood-to-Steel Replacement | | Approximate Disturbance Area* | | Existing Access Road |
| | New Steel Pole | | Wood-to-Steel Replacement with Distribution Underbuild | | Staging Yard | | Overland Travel Route |
| | Wood-to-Steel Replacement Pole | | Wood-to-Steel Replacement Distribution Only | | Access Road Turnaround/Staging Yard | | Access Road Modification |
| | Overhead Work Only | | Distribution Removal | | Pulling Site | | |
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