

**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses
A.15-09-013 Proposed Pipeline Safety & Reliability Project (Proposed Project)
California Public Utilities Commission (CPUC) Deficiency/Data Request 03– April 29, 2016**

Item #	Resource Area/Topic	Source/ Proponent's Environmental Assessment (PEA) Page	CPUC Request No. 1 October 30, 2015	CPUC Request No. 2 December 30, 2015	CPUC Request No. 3 April 29, 2016	Applicants' Response No. 3 May 26, 2016
1.1-2.1	General - GIS Data	--	N/A	N/A	<p>Provide four flow diagrams for the SDG&E transmission system showing the daily design capacity – winter and summer – with and without the proposed Project facilities. On these diagrams, include:</p> <ul style="list-style-type: none"> • Diameter, wall thickness, and length of existing pipe and the pipe proposed to be installed as well as the diameter and wall thickness at connections. • The installed horsepower at existing compressor station(s) and the suction and discharge pressure • Size and number of compressor units. • Pressures and volumes of gas at the inlet and outlet connections of each compressor station. <p>Pressures and volumes at each receipt and delivery point and the pressure and volumes at the beginning and end of the proposed facilities.</p>	<p>The four flow diagrams requested are provided in Exhibit SS: Response to 1.1-2.1. This exhibit contains confidential information pursuant to California Public Utilities Code (P.U. Code) Section 583 and General Order (GO) 66-C.</p>
1.1-6	Agency Involvement: Project Description / MCAS Miramar	p. 1-4, 3-68, 3-70, 3-72 (Table 3-9)	<p>Provide SDG&E/SoCalGas's anticipated timeline for MCAS Miramar management approval to act as Lead Agency under NEPA. CPUC discussions with MCAS Miramar's Antoinette Perez indicate that acceptance of the Final Tier 1 Application is anticipated to occur before the end of the year. The next step would be to seek management approval of the MOU/MOA with the CPUC for environmental document preparation. Their approval process will include MCAS Miramar management review and approval of the Tier 1 Application and MOU. It appears that this is likely to occur early 2016.</p>	<p>Acknowledge that the timeline is unknown. Need to know who the lead agency is before scoping. Lead agency also needs to review the PEA.</p>	<p>CPUC's Notes Applicants acknowledge agreement is between CPUC, MCAS Miramar and potentially Caltrans. Applicants have provided MCAS Miramar with necessary information and documentation. Anticipate an executed MOU/MOA.</p>	<p>As acknowledged here, this item does not require additional information or action on the part of SDG&E and SoCalGas (Applicants). It is the Applicants' understanding that Marine Corps Air Station (MCAS) Miramar has agreed to act as the National Environmental Protection Act (NEPA) Lead Agency, as confirmed by both MCAS Miramar and the Energy Division's California Environmental Quality Act (CEQA) Project Manager on April 11, 2016. Execution of the Memorandum of Understanding (MOU) and completion of this item is outside of the Applicants' control. However, the Applicants have engaged with MCAS Miramar and Caltrans to assist the CPUC in moving forward, including:</p> <ul style="list-style-type: none"> • The Applicants have reached out to MCAS Miramar (both Antoinette Perez and legal counsel for the Base) to provide all necessary information and encourage MCAS Miramar to sign the MOU with CPUC and Caltrans. Recent conversations with MCAS Miramar on May 3, 2016 (legal counsel) and May 9, 2016 (Antoinette Perez) have informed the Applicants that MCAS Miramar is ready to execute the MOU as soon as an outstanding and unrelated issue with SDG&E is resolved. It is anticipated that the issue will be resolved in short order and will no longer prevent MCAS Miramar from executing the MOU. • The Applicants reached out to Caltrans (Brooke Emery) to encourage Caltrans to sign the MOU and held the next

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						<p>SDG&E/SoCalGas coordination meeting with Caltrans on May 24, 2016 to continue refining the proposed design for crossings on Caltrans land. On May 4, 2016, Ms. Emery informed the Applicants that Caltrans had no issues with the MOU and on May 10, 2016, Ms. Emery stated that she planned to send comments to the CPUC on May 11, 2016. On May 23, 2016, Ms. Emery informed the Applicants that the District Director, Laurie Berman, has the authority to sign the MOU; and</p> <ul style="list-style-type: none"> The Applicants have continued coordination with MCAS Miramar (David Boyer) to schedule wetland delineation activities.
1.2.4-1	Purpose and Need and Land Use	--	N/A	N/A	<p>On December 15, 2015, the San Diego City Council unanimously approved the Climate Action Plan that would move the city to 100% renewables by 2035. Please explain how the proposed project would be affected by the city of San Diego's mandated shift to renewable energy.</p>	<p>The City of San Diego (City) Climate Action Plan (CAP) includes an emissions reduction goal that includes the emission reductions that would be achieved by moving the City to 100% renewable energy by 2035. Notably, the CAP adopts an overall emissions cap calculated on the basis of the emission reductions that could be achieved through specifically identified measures, provides for periodic review and expressly contemplates that the City "may amend the CAP when circumstances require the CAP actions to provide additional flexibility or clarity." (CAP at 29).</p> <p>By whatever means the CAP is implemented, however, the Proposed Project would not be affected by the CAP. To the contrary, the Proposed Project is an investment in the safety and reliability of the natural gas transmission system and ultimately facilitates implementation of the CAP in two significant ways: 1) by ensuring that adequate resources are available to enable the City to meet 100% of its energy needs through renewable energy by 2035, and 2) by ensuring adequate natural gas capacity exists to support the goal of converting existing waste collection trucks to compressed natural gas (CNG) or other alternative low emission fuels.</p> <p>SDG&E is a leader in the move toward renewable energy; it was the first utility in California to deliver 33 percent of its energy from renewable sources and is committed to increasing this amount to 50 percent by 2030. As the City contemplates a potential shift to 100% electricity generated from renewables, natural gas generation remains necessary to support the broader electric grid, which extends beyond the City. Renewables are intermittent, and when their generation declines but load does not, other generation sources (e.g., natural gas-fired power plants) are called upon to maintain the grid. To support the ramping up/down of natural gas-fired electric generation, the gas must be there when called upon, even if it was not scheduled in advance. (See, California Energy Commission's Assembly Bill 1257 Report at 31-32.)</p>

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						<p>The incremental capacity provided by the Proposed Project will facilitate the integration of increasing amounts of renewable energy onto the electric system by allowing more gas to be readily available in-basin, where the natural gas-fired electric generators are located; thereby safely and reliably helping the City move toward its renewable energy goals.</p> <p>Furthermore, the Proposed Project is poised to play an important role in supporting another goal of the City's Climate Action Plan—to reduce transportation-based greenhouse gas (GHG) emissions, including those associated with municipal vehicles. The Climate Action Plan seeks to reduce GHG emissions by converting municipal vehicles to CNG in the future. (See, Climate Action Plan, Appendix A, at 30 [100% conversion of city trash trucks to natural gas by 2035].) Toward that goal, the Mayor of San Diego recently announced that implementation of the Climate Action Plan will include the conversion of 20 diesel recycling and refuse trucks to CNG trucks in the year 2017. (See, Climate Action Plan Fiscal Year 2017 Funding and Implementation Report, pg. 2, May 2, 2016).</p> <p>The Proposed Project will assist the City by providing the infrastructure necessary to reduce the region's dependence on diesel fuels—one of the greatest contributors to air pollution – by replacing it with cleaner burning natural gas.</p>
1.3-12	Design	--	N/A	N/A	Discuss the impact on the proposed project and the alternatives if the North-South Project were to be denied.	<p>The need for the Proposed Project exists independently of the North-South Project and the Application and Amended Application do not assume approval of the North-South Project; therefore there is no impact on the Proposed Project or alternatives if the North-South Project is denied.</p> <p>As SoCalGas and SDG&E stated in the North-South proceeding, "There is no operational relationship between the North-South Project and Line 3602, other than the fact that both projects would be part of SoCalGas and SDG&E's integrated transmission system operated by SoCalGas' Gas Control Department (Gas Control), and that individual gas molecules could potentially flow through the North-South Project into the existing pipelines between Moreno and Rainbow, and then into Line 3602. The two projects would serve very different purposes, and they are not dependent on one another." (A.13-12-013, SoCalGas and SDG&E Answers to Questions in ALJ's Ruling at 3)</p> <p>The CPUC agreed with SDG&E and SoCalGas and found that "any other projects generally from the Rainbow region into the San Diego Gateway are distinct from [the] North-South project and any other project may properly be the subject of a separate application." (A.13-12-013, Assigned Commissioner's</p>

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						Amended Scoping Memo and Ruling at 13).
1.3-14	Schedule	--	N/A	N/A	Since Line 3602 would be a new pipeline, please explain why the construction is expected to take 1.5 years, and whether this schedule includes the simultaneous building of multiple spreads.	The pipeline is anticipated to be constructed utilizing four construction crews over three segments to complete pipeline construction in approximately 12 to 18 months. Because 87 percent of the proposed route is in franchise, the anticipated average construction rate is approximately 247 feet per day for each crew. See Prepared Direct Testimony of Neil Navin, Attachment A, Table 2.
1.4.1-3	Aesthetics	p. 4.1-8	Under the heading "Potentially Affected Public Views", the PEA states: "Because the Proposed Project is predominantly located underground, only the aboveground facility locations will be visible to the public." In addition to describing and assessing aesthetic impacts for above-ground project elements, describe the appearance and assess the aesthetic impacts of the proposed ROW for all locations where grading and vegetation removal and reclamation would occur and the ROW may be visible to viewers from parks, trails, roadways, residential areas, open space areas, and other areas accessible to the general public.	The Applicants state that the visual impact will only be temporary because the ROW restoration will be successful in 5 years. That goal is rarely achieved in arid climates. Visual simulations are required for the DEIR illustrating the view at construction, 1 year, 5 years, and 15 years.	CPUC has not received kmz files containing all KOP locations and points of each photograph location; provide the kmz files described. Three additional visual simulations were requested during a teleconference held January 21, 2016. The visual simulations were requested for the following locations : 1) Location #3, Photograph #6; 2) Location #9, Photograph #27; and 3) Location #14, Photograph #36. Simulations were requested for views from these locations showing the appearance of the proposed project at 1 year and 3 to 5 years following construction. In addition, the CPUC's consulting aesthetic resources specialist requested that the three additional visual simulations be prepared as panorama photos to show the surrounding area as context for the proposed project. Provide the additional panorama visual simulations to the CPUC when available. CPUC's Notes [Photo locations were provided on 4/14/16] Three additional visual simulations locations are acceptable.	On January 21, 2016, the Applicants, Ecology & Environment, Inc. (E&E) and their aesthetic resources specialists participated in a teleconference to review the key observation point (KOP) character photographs document, locations map, and kmz files that were provided on December 21, 2015. E&E identified the three locations where additional visual simulations will be required and requested additional existing condition panorama photographs. The Applicants submitted the requested panorama photographs of the existing conditions at each of the requested visual simulation locations, as well as the location of Mainline Valve 7, and a visual simulations template on April 14, 2016. Based on the CPUC's notes included with "Data Gap" Request 03 on April 29, 2016, it is the Applicants' understanding that the three additional visual simulation locations and panorama photographs are acceptable. As such, Insignia will move forward with preparing the additional visual simulations. As discussed during the teleconference on January 21, 2016, the visual simulations are not required for a complete application determination and will be provided to the CPUC and E&E prior to initiation of the aesthetics analysis for the Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). As stated in the Applicants' Response to the Application Completeness Determination submitted to Energy Division on November 30, 2015 (November 30 Response), the visual simulations will take approximately 12 to 14 weeks to complete.
1.4.5-1	Historic Properties	Section 4.5, Attachment 4.5-A	Recommendation for eligibility to NRHP and CRHR were not made for all of the resources. Guidance by CA SHPO indicates that this is a first step in determining the potential for impacts under CEQA. For instance, if an archaeological site, building, structure, etc. is not considered an historical resource, effects would not be considered significant. This methodology (i.e., lack of identification of historic properties) also would not satisfy the requirements of Section 106.	This comment has not been fully addressed – per the Applicants, some information is missing, as full surveys will not be completed until a preferred alternative is selected, and government-to-government consultation has begun. In order to be complete, the following still will need to be provided: 1. Description of the agreed upon APE (both for evaluating direct and indirect effects) by the SHPO, tribes, and other consulting parties. If agreed to, this will need to show	Per the Applicants, recommendations for eligibility to the NRHP and the CRHR will be made once all surveys are complete. The lead federal agency will conduct government-to-government consultation. Applicants provided field methodologies and updates for both archaeological and historic structures. CPUC is assuming that standard guidelines were followed. Some clarification is needed: Archaeology –for the pedestrian survey, provide examples of where the contours were used instead of 15m intervals. Were artifacts collected, photographed, or otherwise documented in the	Archaeology: Two examples of terrain along the Proposed Project where contour surveys were used instead of 15-meter intervals are provided in Exhibit TT-A: Response to 1.4.5-1. These maps are provided as an example to demonstrate where steep terrain is present within the area of potential effect (APE), requiring that contour surveys be utilized versus intensive interval surveys. This exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C. Architectural History: Global Positioning System (GPS) coordinates and photos were taken from/towards the historic resources from the Proposed Project area, as well as several photos of each historic resource. For purposes of illustration in

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			<p>APE does not consider indirect effects (visual, auditory, etc.). Potential for listing not evaluated. The APE was not explained with sufficient detail to understand where evaluation was conducted and why the APE was depicted as being smaller than the surveyed areas. Maps in Appendix A are not entirely clear, although APE is depicted on it. Field methodology is not specific and pertains only to archaeological remains; nothing done to evaluate potential historic structures. Methodology is missing information on collection/evaluation of artifacts, how sites were delineated, how recording accomplished, etc. A map with mileposts showing the boundaries of all survey areas was not provided. Results of the literature search were provided as tables within Appendix B. Table B2; while indicating the location of all sites, the table does not indicate eligibility or importance of the site locations. Table B3 indicates if outside the survey corridor, but does not indicate location in reference to the APE.</p> <p>To address these deficiencies:</p> <ul style="list-style-type: none"> - Explain why a survey for architectural/built/aboveground resources was not conducted concurrent with the archaeological survey. - Provide information for the NRHP-eligibility of each resource (e.g., NRHP-listed, including NR number and date listed; previously determined NRHP-eligible; previously evaluated and determined not NRHP-eligible; further evaluation or information necessary to determine NRHP-eligibility; unknown; etc.). Without this information for NRHP-eligibility, it will not be possible to suggest management options for these resources under Section 106, NEPA or CEQA. Similarly information for CRHR-eligibility and any local or civic designations (i.e., City of Escondido or City of San Diego) should also be provided. - Confirm that NPS's databases for NRHP-listed historic properties and National Historic Landmarks have been consulted for the project. Include the relevant information for NRHP-listed historic properties and/or properties designated National Historic Landmarks, such 	<ul style="list-style-type: none"> the 1-parcel boundary and the radius, as well as all other areas identified for blasting at minimum. 2. The APE was also inconsistent between information provided to respond to the deficiency request – one document indicated 70 feet and the other 75 feet for the indirect APE radius. Please reconcile difference. 3. Description of field methodology, including both archaeological and historic structures (see below regarding the historic structures report). 4. Description of methodology for archaeological field collections and evaluation of artifacts. 5. References to location of resources within the APE (not just within the survey corridor) for Tables B2 and B3. This will also apply to Table B1 (although this was not provided as a revision). 6. NRHP eligibility information was provided as part of the updated Appendix B. However, this appendix will still need to show which resources are located within the APE (direct/indirect) and not just the survey corridor. The survey corridor still is not adequately explained. 7. Table B2 should be double-checked to confirm correct information was included. Some discrepancies were noted in the explanation of resources. (i.e., in final report – P-37-014275 was noted as military property, in revision of Table B2 – noted as trash scatter). 8. Need to know more details about the sites and not just what artifacts were found, such as size of site, potential for listing, condition/state of site, etc. 9. Please make clear that National Historic Landmarks (NHLs) were also evaluated. 10. Make sure to note locations of traditional cultural properties (TCPs) on maps (already marked confidential). May also consider providing any NRHP forms or other documentation for previously identified TCPs. 11. On tables – please include header for each page. 12. The attachment provided as the historic 	<p>field?</p> <p>Architectural history –need additional information on field methodology. For example, only an overview photograph was taken. Were views to and from project area taken? Were coordinates recorded?</p> <p>Details on the size and eligibility of the sites have been added to the report. If the condition of the site is known, please add this information, as well. In Table B2, verify that the eligibility status refers both to the state register and to the NRHP.</p> <p>Artifacts – Need the description of methodology for archaeological field collections and evaluation of artifacts (to be provided to CPUC at a later date).</p> <p>Indirect survey report – please refer to indirect APE and not indirect impact APE.</p> <p>Table 2 should list only the parcels with the buildings. If no buildings are extant on the other parcels simply state that X number were evaluated based on X research that showed the potential for a structure. Indicate that field reconnaissance confirmed that no structure was present. Please clarify if any of these structures are recommended as potentially eligible or that the evaluation will be provided at a later date.</p> <p>CPUC's Notes</p> <p>As indicated by the Applicants, new information regarding correspondence (including that with regard to the APE) will be provided at a later date.</p>	<p>this constraints-level report, only one overview photo of each resource was included. The location in the Indirect APE report where the term “Indirect Impact APE” is used has been removed and the revised version is provided as Exhibit TT-B: Response to 1.4.5-1. This exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.</p> <p>Artifacts: No artifacts were collected during any surveys for the Proposed Project thus far; however, any artifacts or features encountered were photographed and the GPS coordinates were recorded using a submeter Trimble system in the field. The previously amended report includes any location where the condition of a resource was previously noted on a site record or the resource area was physically visited by the Applicants' cultural resource specialist, ASM Affiliates, Inc. (ASM). The eligibility status for each resource in Table B2 refers to both the federal, state and local listing statuses currently on record in the California Historical Resources Information System (CHRIS) database. A testing plan describing the methodology for field collections and resource/site evaluations will be provided upon selection of the preferred route.</p> <p>Indirect Survey Report: As requested in “Data Gap” Request 03, Table 2 in the Indirect APE Report has been revised to remove the parcels where no extant buildings are located, and these items are instead summarized in the discussion of the survey reconnaissance. None of these resources were previously evaluated so additional statements confirming their need for California Register of Historic Resources/National Register of Historic Places (CRHR/NRHP) evaluation once a preferred route is chosen were included in the text and table.</p>

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			<p>as NR numbers and dates listed and/or designated NHLs for management and treatment purposes under Section 106, NEPA and CEQA. For example, the second paragraph of Section 2.5.4 of the CR report suggested that the Luiseno Ancestral Origin Landscape TCP is an NRHP-listed property. A search of National Park Service's (NPS) database confirmed that it was listed in the NRHP on October 30, 2014 (NR # 14000851). Therefore, while this is a Native American resource, it is also a historic property that will need to be addressed for management and treatment purposes under Section 106, NEPA and CEQA.</p> <ul style="list-style-type: none"> - Provide revised maps that indicate the APE, the survey area, MPs, areas of prior disturbance, etc. - Recognizing that the Applicants are not a federal agency, provide documentation (correspondence, meeting minutes, etc.) that the APE was defined in consultation with the CA SHPO, such that the definition of the APE would be consistent with 36 CFR 800.4(a) (1). 	<p>structures survey report needs additional information to document the survey, including photographs, background research, research methodology, clear definitions for the contents of Table 1, findings, recommendations, etc.</p> <p>13. Maps will need to be revised as new information is acquired by SHPO, tribes, and other consulting parties. New maps will need to be provided to the tribes as part of the consultation packages to show the APE, as well.</p> <p>14. As indicated by Applicant, new information regarding correspondence will be provided in subsequent versions. As an updated cultural resource report was not provided, no comments can be made as to the recommendations for site eligibility or management options. This will need to be included in subsequent submittals to CPUC.</p>		
1.4.5-2	APE	Section 4.5	<p>The APE was not correctly defined. As stated on page 29 of the Draft CR report, "The Proposed Project's APE was delineated to ensure the identification of significant cultural resources and historic properties that may be directly or indirectly affected by the Proposed Project and that are listed in or eligible for inclusion in the NRHP, the CRHR, or any local ordinances."</p> <p>However, as stated later on page 29 of the Draft CR report, the APE is defined as "areas that could be affected by the maximum extent of the Proposed Project-related ground disturbance, including all construction, all staging areas, and any temporary construction easements."</p> <p>This appears to suggest that the APE has been defined as the areas within which physical impacts and effects as a result of construction are expected, but does not appear to address areas outside the construction footprint, within which visual or auditory impacts and effects as a result of construction or operation may occur; and does not</p>	<p>The Applicants will need to make clear what the direct and indirect APEs are. Typically, when this terminology is used, the direct APE is the survey corridor. Additional information will be needed as the consultation continues and is formalized. The APE must be clearly defined as part of the Section 106 proceedings.</p> <p>If a separate survey corridor is used, this must be clearly defined and documented both within the text and within the maps.</p>	<p>Changes have been made to the APE; however, the APE should only include those areas where direct or indirect effects are anticipated or have the potential to occur. The area of direct impacts generally is smaller than that associated with the indirect. If it was agreed by SHPO that indirect impacts could occur within 150 feet of the areas where ground disturbance will occur, this should be the outer limit of the APE (and form the indirect APE). The 75-foot and the one-parcel boundary would not then be needed, unless the one parcel exceeded the 150 feet. The text and maps will need to be adjusted to more accurately show the APE.</p> <p>For any changes made as a result of consultation, the maps will need to be updated accordingly and provided to CPUC.</p>	<p>Changes to the APE maps will be made to reconcile any areas of the indirect APE that overlap with the 150-foot buffer around the area of direct impact. However, the Applicants propose that these requested APE changes be made after consultation has been formally initiated in case any additional revisions to the APE need to be made based on comments from tribal consultation and the State Historic Preservation Officer (SHPO). If formal consultation has not been initiated, the Applicants' consultant, ASM, can provide assistance to the CPUC in this effort upon request.</p>

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			appear to address areas within which indirect and cumulative impacts and effects may occur. ^{1,2}			
1.4.5-4	Correspondence	Attachment 4.5-A	<p>Letters and documentation of Native American consultation were provided as Appendix C. Please provide the following:</p> <p>Do not see “areas of concern” from Pechanga on Pages 1-7 (see page 45 of Report/Attachment of 4.5) or any meeting notes.</p> <p>Emails noted in report, but letters are provided – are some forms missing? (e.g., Pala Band of Missouri Indian, Viejas Band of Kumeyaay, and Pauma Band of Luiseno).</p> <p>No documentation of phone calls with Pechanga Band of Luiseno Indians.</p>	<p>Per Applicants, notes were added for the Pechanga. However, as the report itself was not provided as an update, cannot confirm if the discrepancy of what was written and what was provided in the appendix has been revised.</p> <p>As noted by Applicants, additional information will be provided when formal consultations are started.</p>	<p>Per Applicants, notes were added for the Pechanga. Verify the date of the meeting (text indicates the meeting was held on June 24, 2015 and the table in Appendix C indicates June 23, 2015). Additionally, it is still not clear which 7 pages of maps contain the areas of concern. The text reference indicates it is on Pages 1-7 of the proposed route maps in Appendix C, but these areas were not located.</p>	<p>The correct date of the meeting with the Pechanga Band of Luiseño Indians (Pechanga) is June 24, 2015. Appendix C has been updated and is included as Exhibit UU: Response to 1.4.5-4. The maps are provided in the Native American Heritage Commission (NAHC) Sacred Lands Search and each individual tribal contact letter (copies of which are provided in Appendix C of the Direct APE Report). Eleven pages of maps (numbered in the key in the lower left corner of each map) were provided in the NAHC Sacred Lands Request and individual tribal contact letter. Pages 1 through 7 of 11 are areas that Pechanga identified as a potential concern. A formal consultation with Pechanga could identify more specific areas within pages 1 through 7; however, Pechanga indicated during the informal consultation that the entirety of the alignment within pages 1 through 7 is of concern to them. These maps were originally sent to all of the tribes with the sacred lands file search and they are also the maps are provided here in the updated Appendix C (Exhibit UU: Response to 1.4.5-4). This exhibit contains confidential information pursuant to P.U. Code Section 583 and GO 66-C.</p>
1.4.7-7	Greenhouse Gas Emissions	PEA Supplement p. 3.7-1	N/A	N/A	<p>Footnote 1 on page 3.7-1 of the PEA Supplement explains the calculation assumptions made to estimate GHG emissions for construction of the proposed Distribution System Modifications included in Tables 3.7-1 and Table 3.7-2. Although the methods are conservative and valid, a detailed appendix is required for final verification. Provide the calculation appendix used for estimating construction and operations GHG emissions associated with the project with Distribution System Modifications provided in Tables 3.7-1 and Table 3.7-2.</p>	<p>Exhibit VV: Response to 1.4.7-7 provides information regarding the assumptions and calculation used to estimate the GHG emissions during construction of the proposed Distribution System Modifications.</p>

¹ 36 CFR 800.2(c) is the regulatory citation that identifies the parties that have consultative roles in the Section 106 process. This is not relevant to the APE. 36 CFR 800.16(d) is the correct regulatory citation that defines “area of potential effects:” “Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

² While “cumulative effects” are not well defined in the regulations for implementing Section 106, 800.5(a)(1) states that “Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.” Additionally, the ACHP’s 2013 handbook for integrating NEPA and NHPA compliance requirements indicates that the CEQ regulation definition of cumulative impact is “analogous and instructive.”

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1.4.7-8	Landslides/Alternatives	Amendment to the Application, p. 21	N/A	N/A	<p>In V, B, 5 - Subpart G of the Amendment to the Application, the Applicants describe two potential landslide areas that may require reroutes or other mitigation. Provide the locations of the landslide areas and describe typical mitigation methods that a geologic investigation may recommend.</p> <p>Also, provide routes around the landslide areas if the investigation were to reveal that the pipeline could not be placed in these areas.</p>	<p>The two locations described in the Amended Application and in the Geologic Hazard Assessment (Attachment 4.6 of the PEA) are:</p> <ol style="list-style-type: none"> 1. Approximately 2 miles from mile post (MP) 34.2 to 36.2 (along Pomerado Road, just south of Stone Canyon Road to Twin Peaks Road), and; 2. Approximately 1.3 miles from MP 38.1 to 39.4 (along Pomerado Road, from Oak Knoll Road to just south of Scripps Poway Parkway). <p>Should there be a need for mitigation, options that address these conditions include: placing the pipeline beneath the landslide; re-grading the right of way (ROW) surface to improve site conditions; modifying local surface drainage; conveying of sub-surface drainage; modifying ROW backfill materials; placing deformable backfill in the pipeline trench; removing of unstable soil and replacing it with engineered performance materials, special pipeline coatings and protective sleeve-wraps and special pipeline design (e.g., using thicker stronger pipe and or isolation valves on each end of the hazard area); and monitoring for evidence of renewed ground movement. Structural measures are also available to address unstable slopes, such as retaining walls, soldier piles, sheet piles, wire mesh systems, mechanically stabilized earth systems and other mechanical structures. These options are typically used in combination to develop a strategy for addressing the identified hazards at any given site.</p> <p>Additionally, where the hazard area is relatively small, the pipeline can be moved from one side of the ROW or street to the opposite side where there is no hazard. For other situations where the hazard is larger or difficult to mitigate, an alternate route can be selected to avoid the hazard.</p> <p>The Geologic Hazard Assessment states that the subject areas do not show evidence of movement in the recent geologic past and do not appear to represent a high level of risk to the proposed route based on preliminary assessments. Additional geologic investigation is anticipated to confirm the preliminary assessment and further define any hazard that may exist.</p> <p>Based on the information provided above, characterizing the potential hazard at the two subject locations, any rerouting of the line – if necessary after employing any mitigation measures – would likely be limited to moving the line to the opposite side of the street to avoid the hazard. Thus, the existing maps for the proposed route included any anticipated rerouting for these areas.</p>

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1.5-2	Alternatives Initially Considered But Not Carried Forward	p. 5-6	Provide a map or maps of suitable scale that include all of the alternative alignments and sites initially considered but not carried forward as well as the proposed route. In addition, provide applicable GIS data layers for these routes and sites.	The Applicants' response to Item 1.5-2 is not sufficient. For the alternatives that were not developed to a point of identifying specific location, illustrate the general alignment.	Provide GIS data for the alternatives analyzed in the PEA, including conceptual centerlines and locations of any associated infrastructure.	<p>The Applicants submitted geographic information system (GIS) shapefiles for all alternatives fully analyzed in the PEA, including route segment alternatives, to the CPUC on September 30, 2015. Alternatives that were considered, but not carried forward were originally not mapped or analyzed in further detail because the Applicants do not believe these alternatives meet the definition of feasibility under CEQA, particularly due to site suitability and economic viability.</p> <p>Pursuant to the Joint Assigned Commissioner and Administrative Law Judge's Ruling Requiring an Amended Application on January 22, 2016, the Applicants provided additional information for several of these alternatives in the Amended Application filed on March 21, 2016 including the Offshore Alternative and the North Baja Alternative.</p> <p>The Applicants participated in a conference call with E&E on May 5, 2016 to clarify the information the CPUC is seeking beyond what was previously provided. Based on clarification provided by E&E, kmz files for conceptual alignments that represent theoretical corridors have been developed for both the Offshore Route Alternative and the Infrastructure Corridor Alternative as Exhibit WW: Response to 1.5-2. The Existing Line 1600 Alignment Alternatives are all located within or immediately adjacent to the existing Line 1600 ROW. GIS data for Line 1600 was provided to the CPUC on February 19, 2016. A theoretical location for the United States LNG Alternative was provided as Exhibit RR: Response to 1.5-7 from the Applicants' Response to the Application Completeness Determination submitted to Energy Division on February 12, 2016 (February 12 Response).</p> <p>System information for the Energía Costa Azul to Otay Mesa Liquefied Natural Gas Alternative or the North Baja Alternative can be found at: www.gasoductosarito.com/english/about-us.html and www.tcplus.com/North%20Baja.</p>
1.5-3.1	Offshore Alternative	--	N/A	N/A	Provide a GIS shapefile of the route that includes attributes for the mileage for on-shore and off-shore segments of this route.	Please see Response to Item 1.5-2
1.5-4	Existing Line 1600 Alignment Alternatives		Provide a map showing the probable locations of the numerous temporary lateral pipelines necessary to maintain service to the customers served by Line 1600 in the event one of the existing alignment alternatives is selected. Provide a table similar to Table 5-1 presenting data on the temporary laterals including the number and length of the laterals and the quantitative estimate of impacts on the environmental features crossed.	<i>The CPUC indicated that this item is under review.</i>	While temporary lateral pipelines may be placed within the Applicant's existing ROW, a figure showing the locations of these laterals as well as a table similar to Table 5-1 is still needed to compare environmental impacts across all alternatives. Provide a map and table.	<p>The Applicants participated in a conference call with E&E on May 5, 2016 to request clarification on what additional information the CPUC is seeking beyond what was previously provided for this alternative that was not carried forward in the PEA. As discussed on that call, E&E stated they would provide a written clarification of their request to the Applicants.</p> <p>On May 23, 2016, E&E requested two new items, 1.5-4.1 and 1.5-5.1. These new items request an extensive amount of information that requires the Applicants to perform additional</p>

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						design, engineering and environmental analysis to quantify impacts for an alternative that was not carried forward in the PEA. The Applicants do not believe this alternative is superior to the Proposed Project and in fact do not believe these alternatives meet the definition of "feasible" under CEQA; however, the Applicants acknowledge that this additional information may be necessary if the CPUC decides to carry this alternative forward in the EIR/EIS and the CPUC may choose to use a slightly different methodology to screen alternatives as part of their analysis. Therefore, at the request of the CPUC, the Applicants are conducting the additional analysis and will provide the information requested to avoid any delay in the preparation of the EIR/EIS. The Applicants will respond to these two new items by July 22, 2016, which is 60 days after May 23, 2016.
1.5-6.1	Existing Line 1600 Alignment, Safety, and Integrity Management	p. 5-8, Section 4.8	N/A	<p>a. Energy Division management requests a discussion about whether sections of Line 1600 would be rerouted after being de-rated to a distribution-line pressure to reduce potential safety concerns or to be in compliance with distribution-line ROW requirements. Identify applicable distribution-line ROW-width and ROW-maintenance requirements in the discussion.</p> <p>b. If the proposed project is not approved and Line 1600 remains in operation at a transmission pressure, discuss sections of Line 1600 that would be rerouted to reduce potential safety concerns or to be in compliance with transmission-line ROW requirements. Identify applicable transmission-line ROW-width and ROW-maintenance requirements in the discussion.</p> <p>c. Discuss other applicable safety programs, e.g., Gas Transmission and Distribution Integrity Management programs, that would ensure the safe operation of Line 1600 at any approved operating pressure. Discuss the status and implementation schedule for programs that are still in development.</p>	<p>The Applicants' Cost-effectiveness Analysis includes a brief description of the complexities of hydrotesting Line 1600; however, the Applicants did not provide the specific information requested in Deficiency Request #2.</p> <p>a. Energy Division management requests a discussion about whether sections of Line 1600 would be rerouted after being de-rated to a distribution-line pressure to reduce potential safety concerns or to be in compliance with distribution-line ROW requirements. Identify applicable distribution-line ROW-width and ROW-maintenance requirements in the discussion.</p> <p>b. If the proposed project is not approved and Line 1600 remains in operation at a transmission pressure, discuss sections of Line 1600 that would be rerouted to reduce potential safety concerns or to be in compliance with transmission-line ROW requirements. Identify applicable transmission-line ROW-width and ROW-maintenance requirements in the discussion.</p> <p>c. Discuss other applicable safety programs, e.g., Gas Transmission and Distribution Integrity Management programs, that would ensure the safe operation of Line 1600 at any approved operating pressure. Discuss the status and implementation schedule for programs that are still in development.</p>	<p>a. There are no re-routes required for Line 1600 when it is de-rated and operated at distribution line pressure.</p> <p>b. Line 1600 is in compliance with all ROW requirements and will remain in compliance upon completion of pressure testing. No re-alignments would be required as a result of keeping Line 1600 as a high pressure gas service.</p> <p>c. The Applicants perform a number of routine operating and maintenance activities including leak surveys, cathodic protection, pipeline patrols, valve inspections, bridge and span inspections, and damage prevention activities (e.g., locate and mark and pipeline markers). Additionally, the Transmission Integrity Management Program (TIMP) and the Distribution Integrity Management Program (DIMP) provide for additional data collection, risk evaluation, assessment, and preventative/mitigative activities for pipelines located within high consequence areas. Both the TIMP and DIMP have been fully developed and implemented.</p>

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1.5-14	Northern Baja Alternative	Ch 5., p. 5-15	Provide substantial evidence that supports SDG&E's claim that pipeline capacity is not available on the pipelines in Mexico that are operated by Sempra or its subsidiaries to supply sufficient natural gas to the Otay Mesa receipt point and serve as a feasible alternative to the proposed project. If SDG&E and SoCalGas do not have access to the required data, provide a contact at the parent company, Sempra, who could assist with this deficiency item.	<i>The CPUC indicated that this item is under review.</i>	A point of contact at the parent company, Sempra, was not provided.	For inquiries regarding Sempra, please contact: Angelica Espinosa Chief Counsel Phone: (619) 696-2932 Email: aespinosa@sempraglobal.com
1.5-14.1	Northern Baja Alternative	p. 5-15	N/A	For the following deficiency item, if SDG&E and SoCalGas do not have access to the required information or expertise due to affiliate rules, provide a contact at the parent company, Sempra/Sempra International, or at Sempra LNG/IEnova LNG or the appropriate Sempra affiliate who can respond. It is the CPUC's understanding that the regulations in Mexico regarding the release of subscribed capacity to the secondary market changed in 2015 per COMISION REGULADORA DE ENERGIA RESOLUCIÓN Núm. RES/684/2015. The change allows available capacity to be assigned to other users on a temporary basis or on a permanent basis through an open-season process. Please discuss the accuracy of this finding and to what extent this change in regulation would make the Northern Baja Alternative feasible.	It is the CPUC's understanding that the regulations in Mexico regarding the release of subscribed capacity to the secondary market changed in 2015 per COMISION REGULADORA DE ENERGIA RESOLUCIÓN Núm. RES/684/2015. The change allows available capacity to be assigned to other users on a temporary basis or on a permanent basis through an open-season process. Please discuss the accuracy of this finding and to what extent this change in regulation would make the Northern Baja Alternative feasible.	The Applicants have reviewed RES/684/2015 and it does appear to define a process to allow available pipeline and storage capacity to be assigned to other users on a permanent basis through an open-season process.
1.5-15.2	Northern Baja Alternative	p. 5-15	N/A	Background: The data available from IEnova's GR pipeline website indicate that Sempra LNG/IEnova LNG acquired an additional 190,000 Decatherms (Dth) in April/May 2014 of capacity on the GR pipeline. The acquisition occurred just two quarters prior to its subsidiaries (SDG&E/SoCalGas) began pre-filing discussions with Energy Division for the Proposed Project. This acquisition brought Sempra's capacity holdings to 400,000 Dth through 2022. As shown in Deficiency Item, 1.5-15.1, as of 11/29/15, 268,836 Dth of capacity remained unused on the GR pipeline. Sempra (IEnova LNG) already owned 540,000 Dth of capacity on the TGN line through 2022 according to data available from IEnova's TGN pipeline website at the time of the April/May 2014 GR pipeline capacity acquisition. On 11/29/15, 462,596 Dth of capacity remained unused on the TGN	To what extent and in what way could the additional 190,000 Dth of capacity Sempra acquired in April/May 2014 help ensure supply is available to SDG&E via Otay Mesa should SDG&E/SoCalGas obtain access to this capacity? Provide a discussion that includes the process or processes that SDG&E/SoCalGas could follow to propose to acquire this capacity from an affiliate of their parent company if ordered by the CPUC.	The Applicants can only access the 190,000 Dth of firm capacity on the Gasoducto Rosarito system currently owned by Sempra LNG Mexico through either the capacity release process described in CRE RES/684/2015 or by purchasing firm supply transported using this capacity from Sempra LNG Mexico at the Otay Mesa receipt point. The Applicants have determined that further analysis of this option or a higher capacity option that better matches the overall capacity of the Proposed Project would require a non-binding request from the Applicants to the three pipelines (North Baja Pipeline, GR and TGN) firm delivery capacity at Otay Mesa for a 20-year term beginning in the fourth quarter 2020. The Applicants also believe that in order to get the required authority to receive an assignment of GR capacity, the Applicants would have to work with the CPUC to develop a stakeholder process similar to that developed by SoCalGas and the CPUC to facilitate the acquisition and approval of contracts for firm interstate transportation service by the SoCalGas Gas Acquisition Department.

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				<p>pipeline.</p> <p>Data retrieved from TransCanada's North Baja Pipeline website on 12/10/15 show that 185,200 Dth of unsubscribed firm capacity is available. Hence, the only limitation to the capacity required for the Northern Baja Alternative to be feasible appears to be on the GR pipeline and that limitation appears to be in place because a Sempra affiliate company is holding the required capacity.</p> <p>Question: To what extent and in what way could the additional 190,000 Dth of capacity Sempra acquired in April/May 2014 help ensure supply is available to SDG&E via Otay Mesa should SDG&E/SoCalGas obtain access to this capacity? Provide a detailed discussion that includes the process or processes that SDG&E/SoCalGas could follow to propose to acquire this capacity from an affiliate of their parent company if ordered by the CPUC.</p> <p>See http://www.gasoductosarito.com/english/information.aspx and http://www.tgndebajacalifornia.com/english/information.aspx and http://www.tcplus.com/North%20Baja/UnsubscribedCapacity</p>		
1.5-16.1	No Project Alternative	p. 5-35	N/A	<p>Provide further discussion about the extent or range of a potential high-pressure release during hydrostatic testing of (a) water; and (b) pipeline components or other materials. Within what distance would the evacuation of nearby residences and businesses typically be required? What minimum distance must typically be maintained between facilities being tested and personnel conducting the test?</p>	<p>Provide further discussion about the extent or range of a potential high-pressure release during hydrostatic testing of (a) water; and (b) pipeline components or other materials. Within what distance would the evacuation of nearby residences and businesses typically be required? What minimum distance must typically be maintained between facilities being tested and personnel conducting the test?</p>	<p>a. The potential of a high-pressure release during testing for both water and pipeline components is rather small, and is generally attributed to minor leaks such as plugs, and consequently have a very small impact. The use of water for pressure testing reduces the impact from a rupture, since water is incompressible.</p> <p>b. Each hydrotest procedure takes into consideration site-specific conditions, but the minimum distance required between facilities being exposed to higher hydrotest pressures and humans per typical hydrotest procedures is 50 feet. Certain personnel facilitating the test may get closer to the facilities being tested to facilitate the test, for example to service a pump, but this is limited and subject to the discretion of the Company test director on site. Evacuation of nearby residences and businesses would be evaluated in the event facilities being tested were within this 50 foot area.</p>

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1.5-23	Energy Conservation (CEQA Appendix F, Section 15126.4, Section 21100(b)(3)) / Growth Inducement	Ch. 5	<p>Growth Inducement: The potential for a substantial increase in natural gas supply must be discussed with respect to the potential for inducing future growth in residential, industrial, and other sectors.</p> <p>SDG&E staff and the PEA indicate that the need for additional capacity, on its own, is not sufficient justification for the proposed 36-inch diameter pipeline. Indeed, the CEC's final July 2014 gas demand outlooks report does not indicate gas demand will increase on an annual basis in the next 10 years. The demand shown is relatively flat. CEC data since the 1990s indicates that gas demand has dropped considerably through 2013 in SDG&E's service area. See Attachment 3. See also SDG&E's Gas Capacity Planning filings to the CPUC in 2014 and 2015 (attached).</p> <p>Because of the CEC data, which were provided to SDG&E/SoCalGas by the CPUC, the respective project objective was adjusted between the draft and final PEA submittals to indicate that the increase of 200 MMcfd would be a product of a new 36-inch pipeline's installation and that the specific increase of 200 MMcfd is not in itself a project objective.</p> <p>The draft objective was stated as, "Increase the capacity of SDG&E's natural gas transmission system by approximately 200 MMcfd. The final objective now reads, "Simultaneously increase the transmission capacity of the Gas System in San Diego County by approximately 200 million cubic feet per day (MMcfd) as a result of the PSEP replacement line being 36 inches in diameter."</p> <p>One justification for such a large, new gas pipeline in terms of increased capacity explained by SDG&E staff is the ability to pack the line and store natural gas. This explanation, however, fails to take into account possible future adjustments to the compression system to make full use of the additional pipeline capacity rather than for simply packing the line.</p>	<p><i>The CPUC indicated that this item is under review.</i></p>	<p>The California Public Utilities Code Section 1002.5 states that the Commission (i.e., the CPUC) in its review of a certificate of convenience and necessity for construction of additional pipeline capacity, "...shall consider the state's need to provide sufficient and competitively priced natural gas supplies for both present and anticipated future residential, industrial, commercial, and utility demand."</p> <p>SDG&E and SoCalGas state in the March 21, 2016 Amended Application at pp. 4-6, that the replacement of Line 1600 with Line 3602 is to: enhance safety, improve reliability and resiliency, and to enhance operational flexibility. The Applicants state that Lines 1600 and 3010 provide the capacity to meet customer demand of 630 MMcfd in the winter and 590 MMcfd in the summer. The Applicants have stated that Line 1600 provides 10 percent of the system capacity which would constitute volumes between 59 MMcfd and 63 MMcfd of the SDG&E system capacity. Proposed Line 3602 will, according to the Applicants, raise the system transmission capacity by 200 MMcfd.</p> <p>Presumably, there are adequate and competitively priced gas supplies to support the current level and types of demand. However, the Applicants have not satisfied the requirements of CPUC Section 1002.5 in that they have not provided support for the quantity of gas supplies necessary to meet the anticipated demand to be created by Line 3602.</p> <p>Provide the quantity of gas supplies needed to meet the future residential, industrial, commercial, and utility demand that would be provided by Line 3602, and discuss the nature of the increased demand. That is, will this increased demand be baseload, seasonal, peak day, or peak hour?</p>	<p>Although the Proposed Project will add necessary capacity to the SDG&E system, such capacity will not create a significant "growth inducing" impact under CEQA. CEQA case law recognizes that there is a distinction between increased pipeline capacity which induces new growth versus pipeline capacity which merely accommodates growth for which a city has already planned. (<i>Clover Valley Foundation v. City of Rocklin</i> (2011) 197 Cal. App. 4th 200, 226 [finding no significant growth inducing impacts where the "contemplated impact on growth is indirect" because although a pipeline would provide essential capacity for additional housing, such pipeline removed only one of potentially numerous obstacles and approval requirements for developing the additional housing.]) Here, the Proposed Project's increased capacity will not induce new population growth or development and will not increase use of natural gas. Instead, the Proposed Project is needed to meet current demands. It is designed to provide safety, reliability, resiliency, and operational flexibility to the San Diego region. Currently, the connected natural gas load in San Diego far exceeds the capacity of SDG&E's infrastructure. During peak gas demand periods on not just a daily but an hourly basis, SDG&E has already experienced calls for conservation, curtailments, and near misses. Additionally, San Diego is a growing population with anticipated corresponding growth in infrastructure and improvements, which all require additional natural gas and electricity. The Proposed Project removes only one of numerous obstacles and approvals for the City's additional growth.</p>
1.5-24.1	Otay Mesa	---	N/A	N/A	<p>The Applicants stated that sufficient firm pipeline capacity may not be available on the North Baja System to reliably deliver gas to Otay Mesa. In order to understand how Otay Mesa is different from other pipeline receipt points on the Applicants' Southern System, please identify the firm transportation capacity (MMBtu/day) under contract by interstate pipeline and Applicants' receipt point.</p>	<p>The list of North Baja shippers holding contracts for firm transportation service from Ehrenberg to the Mexican Border; list of Gasoducto Rosarito shippers (no path specified); and list of TGN shippers (no path specified) are provided in Exhibit XX: Response to 1.5-24.1.</p>

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1.5-24.2	Otay Mesa	--	N/A	N/A	<p>What is the typical range in pressures and minimum contract pressure for gas delivered to each of the SoCalGas receipt points (including Otay Mesa), by pipeline?</p>	<p>SDG&E receives almost all of its gas supply from SoCalGas at the Rainbow Metering Station customer meter and is capable of receiving gas supply from the TGN pipeline at Otay Mesa; therefore, these are the only two relevant supply locations for this Application.</p> <p>Typical delivery pressures from SoCalGas at the Rainbow Metering Station range from 550 to 750 psig. Typical delivery pressures on the TGN pipeline at Otay Mesa range from 300 to 900 psig. There is no minimum contractual delivery pressure from SoCalGas to the SDG&E customer meter at Rainbow Metering Station. The Interconnect and Operational Balancing Agreement with TGN requires deliveries at Otay Mesa to meet the prevailing pressure on the SDG&E system at that location, up to and including the current Maximum Allowable Operating Pressure (MAOP) of SDG&E's facilities.</p>