

**San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Responses  
A.15-09-013 Pipeline Safety & Reliability Project (PSRP or Proposed Project)  
California Public Utilities Commission (CPUC) Data Request No. 03 – August 22, 2017**

DG#	Resource Area/Topic	Source/Proponent's Environmental Assessment (PEA) Page	Data Gap (DG) Question	CPUC's Notes	Response
<b>Project Description</b>					
2-8	Project Description	PEA Section 3.5-1	Confirm that the existing rail yard in the City of Fontana is the Kaiser Railroad Yard located on Loop Road, Fontana, CA 92337.		<p>Delivery of the pipe to a rail yard in the City of Fontana, as mentioned in the PEA was assumed for purposes of estimating the cost of acquiring the materials. SDG&amp;E and SoCalGas (together, Applicants) cannot confirm the location for delivery of the pipes at this time because the shipping and delivery of the pipe will depend on the bidding and contracting process for the acquisition of the materials, which has not been conducted yet. This will be done once the Applicants know the details of the approved project.</p> <p>For purposes of the Environmental Impact Report's (EIR) analysis, the Applicants estimate that the pipe will be delivered to the project at each of the four largest staging yards identified by the Applicants in their Post-PEA Minor Design Refinements provided to Energy Division on January 31, 2017, which are Boulder Knolls Road Yard, Lake Hodges West Yard, Rainbow Creek Road Yard, and Montiel Yard. Alternatively, some pipe may be delivered directly to the project alignment. All five locations are likely to be used for delivery (four staging yards as well as project alignment) in order to avoid double handling of the pipe.</p>
<b>Alternatives</b>					
3-11	Alternatives	PEA, Section 5.2.2 and 5.2.4	<p>Provide geospatial data (GIS).</p> <p>Provide GIS shapefiles and/or kmzs for the Cactus to San Diego segment alternative. The previous file provided does not show a linear route at the bend near Rancho San Diego. The file appears to be corrupted. The corruption in the file appears approximately 2.5 miles from the west end of the line. Correct as appropriate.</p>		<p>An updated geographic information system (GIS) shapefile of the Cactus City to San Diego Segment Alternative is provided in Confidential Exhibit T: Cactus City to San Diego Segment Alternative Shapefile, which <b>contains confidential information provided pursuant to California Public Utilities Code (P.U. Code) § 583, General Order (G.O.) 66-C, Decision (D.) 16-08-024, and the accompanying declaration.</b></p>
3-12	Alternatives		<p>Provide the following information pertaining to existing Line 3010.</p> <ol style="list-style-type: none"> <li>1. Current operating pressure of Line 3010.</li> <li>2. MAOP and maximum design pressure of Line 3010.</li> <li>3. Has the operating pressure already been reduced on L3010?</li> <li>4. Arrival pressure from SoCal at the upstream of Pressure Reducing station at Rainbow.</li> <li>5. Confirm that delivery pressures at City gates and other points are basically 640 psig, 400 psig, and 60 psig. If correct, please confirm that the size of the new line has been based on the lower end of the highest operating pressure possible and the highest arrival pressure at Rainbow station (P1) and delivery pressure of 640 psig (P2) downstream and max flow rate (MMCFD) required through the new line.</li> <li>6. What is the max/min/normal flow rate (MMCFD) through L3010 (based on last 5-year data)?</li> <li>7. What is the max/min/normal flow rate (MMCFD) through L1600 (based on last 5-year data)?</li> <li>8. What is the max/min/normal delivery (MMCFD) from Rainbow station to SDG&amp;E system (based on last 5-year data)?</li> </ol>		<p><b>This response contains confidential information (shaded in gray) provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></p> <ol style="list-style-type: none"> <li>1. The operating pressure on Line 3010 varies between [REDACTED] and [REDACTED] psig.</li> <li>2. The maximum allowable operating pressure (MAOP) on Line 3010 varies between [REDACTED] and [REDACTED] psig. The design level varies between [REDACTED] and [REDACTED] psig.</li> <li>3. The Applicants have no plans to reduce the operating pressure of Line 3010.</li> <li>4. The pressure upstream of the Rainbow Metering Station has historically varied between [REDACTED] and [REDACTED] psig, however, the upstream pipelines may operate between their minimum operating pressure (MinOP) and MAOP of [REDACTED] and [REDACTED] psig, respectively, at this location.</li> <li>5. The Applicants object to this question as vague and ambiguous. Subject to and without waiving this objection, the Applicants respond as follows. The delivery pressures at SDG&amp;E's city gates vary but are not less than the supplying pipeline MinOP. The Applicants cannot respond with respect to "other points" because the Applicants do not know which "points" are being referenced. The proposed Line 3602 was sized to provide the benefits described in the Applicants' testimony, namely improved reliability, flexibility, and safety for the SDG&amp;E system, while operating within the integrated natural gas transmission system. See SDGE-1 Prepared Direct Testimony of Douglas M. Schneider, SDGE-3-R Updated Prepared Direct Testimony of David M. Bisi, SDGE-4-R Updated Prepared Direct Testimony of S. Ali Yari, and SDGE-5 Prepared Direct Testimony of Jani Kikuts.</li> <li>6. Please refer to Exhibit U: Daily Flow Data for Line 1600 and Line 3010.</li> <li>7. Please refer to Exhibit U: Daily Flow Data for Line 1600 and Line 3010.</li> <li>8. Please refer to Exhibit U: Daily Flow Data for Line 1600 and Line 3010.</li> </ol>

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3-13	Alternatives		<p>Provide additional GIS data for Line 1600.</p> <p>The No Project Alternative would require the Applicants to test, and repair as necessary segments of the existing Line 1600. Provide the segments that would most likely be replaced, per the ORA testimony submitted on June 7, 2017. The ORA testimony points out that approximately 0.5 miles of Line 1600 have been identified as the "weakest sections". This 0.5 mile of Line 1600 is described in SoCalGas/SDG&amp;E's records as exceeding a 20% specified yield minimum strength (SYMS) at their proposed 320 psig MAOP. Identify which segments this refers to and provide GIS data.</p>		<p>This question is conflating two separate issues. Under the No Project Alternative, the Applicants would hydrotest Line 1600 at pressures of at least 1.5 times the desired MAOP to comply with P.U. Code Section 958. During the course of the hydrotest, it is possible that the pipeline may leak or rupture at one or more locations. The Applicants cannot predict where such failures may occur if any such failures in fact occur. Accordingly, the Applicants cannot identify the segments that would most likely be replaced.</p> <p>This question also references the Office of Ratepayer Advocates (ORA) testimony submitted on June 7, 2017 (Amended ORA-2) and allegedly "weakest segments" of Line 1600. ORA's original April 17, 2017 testimony asserted that certain Line 1600 segments would be at or above 20% of their specified minimum yield strength (SMYS) at a MAOP of 320 psig, and thus Line 1600 would remain a transmission line under 49 Code of Federal Regulations (CFR) § 192.3. As set forth in Applicants' June 12, 2017 Rebuttal Testimony at pages 6-17, 39-41, ORA mistakenly relied upon certain information provided in May 2016 that subsequently was updated in July and August 2016. While Amended ORA-2 is confusing by its continued reference to the May 2016 data, the Applicants provided ORA with documentation regarding six of the seven allegedly "weak" segments in response to ORA Data Request 84. In response to SDG&amp;E Data Request 12, Questions 1-6, ORA stated: "it does appear that the additional documentation located in response to ORA and SED [Safety and Enforcement Division] discovery, and provided in response to ORA data request 84, support that these segments have strength equal to, if not greater than the majority of Line 1600 where segments have a joint efficiency factor of 1.0." The seventh segment was replaced in October 2016 pursuant to CPUC Resolution No. SED-1, as ORA was informed by Applicants' November 30, 2016 response to ORA Data Request 51, Question 3. In response to SDG&amp;E Data Request 12, Question 7, ORA stated: "ORA intends to update its testimony during hearings to indicate that the short segment of Line 1600, covering engineering stations 17-131 has been addressed by the replacement of that segment."</p> <p>In sum, there are no Line 1600 segments that would exceed 20% of their SMYS at a 320 psig MAOP; thus, there are no GIS positional information available to provide.</p>
<b>Environmental Impact Assessment</b>					
<b>Aesthetics</b>					
4.1-2	Aesthetics		<p>Provide details regarding vegetation maintenance during operation and maintenance. Provide additional detail pertaining to vegetation maintenance and management during operation and maintenance (i.e. clearing, trimming, etc.), including for access and safety, along the proposed project. What are the restrictions, if any, on restoration of cleared vegetation in the pipeline ROW and around proposed project features (e.g., MLVs, cross-ties)? For example, can trees, bushes, or other vegetation be replanted within the within the pipeline ROW/adjacent ROW following construction?</p>		<p>In order to perform compliance pipeline maintenance SDG&amp;E needs to maintain access to its facilities. Pipeline roads need to be clear of vegetation to provide safe passage and accessibility. As part of SDG&amp;E's pipeline patrols, employees report on any need for vegetation management. SDG&amp;E then determines and executes the proper corrective action.</p> <p>SDG&amp;E intends to maintain a five-foot buffer around valve stations to protect them from damage. Vegetation inhibiting access to valve facilities or causing employee safety concerns may need to be removed or trimmed.</p> <p>SDG&amp;E's Transmission Pipeline Encroachment Procedures do not allow for trees that have the potential to impact the pipeline to be planted within its right-of-way. Tree roots are a concern due to the possibility that roots may cause coating damage. Vegetation and/or shrubbery adjacent to the right-of-way is generally not an issue if the width of the right-of-way provides sufficient separation. Sufficient separation would depend on the size and projected growth of the vegetation. SDG&amp;E's Land Department performs review of proposed work in a right-of-way to verify the work does not violate the right-of-way agreement.</p> <p>SDG&amp;E is required to install and maintain pipeline markers and cathodic protection test stations along the pipeline route. At times, SDG&amp;E may need to clear or trim vegetation to maintain visible pipeline markers.</p> <p>Vegetation maintenance on SDG&amp;E right-of-ways is reviewed by SDG&amp;E's Land Department, SDG&amp;E's Environmental Services Department, and applicable outside agencies to verify proposed activities comply with right-of-way agreements, environmental laws and regulations.</p>
<b>Air Quality</b>					
4.3-2	Air Quality/GHG	PEA Attachment 4.3-A	<p>Provide updated Attachment 4.3-A based on new CalEEMod version and current project schedule. Attachment 4.3-A provides emissions calculations based on CalEEMod version 2013.2.2 and assumes project construction would occur in years 2018 and 2019. The Applicants stated in the PEA that the analysis presented represents a conservative estimate of the potential emissions of the Proposed Project; however, the EIR will be based on year 2017 baseline conditions. Provide a revised Attachment 4.3-A based on CalEEMod</p>		<p>The Applicants sought clarification on this question via email on August 17, 2017 and received the requested clarification from Energy Division on August 22, 2017, the day this data request response is due. With receipt of the clarification, the Applicants will provide a full response to this question within approximately 2 weeks, which is the amount of time it will take to run a revised CalEEMod version 2016.3.1 model. Per the clarification given, the Applicants will use the current construction schedule set forth in SDGE-8-R Updated Prepared Direct Testimony of Norm G. Kohls.</p>

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			version 2016.3.1 and current project construction schedule. Please provide the current construction schedule used to revise Attachment 4.3-A.		
4.3-3	Air Quality/GHG	Response to Deficiency Item 1.4.3-2  PEA Page 3-38  PEA Attachment 4.3-A	<p>Clarify emissions estimates for pipe truck transportation. In response to Deficiency Request #1, the Applicants stated that the Proposed Project is located entirely south of the Riverside-San Diego county line; therefore, only SDAPCD rules and regulations apply. However, PEA Page 3-38 states that the pipe will be transported by truck from an existing rail yard located in the City of Fontana, Riverside County, to one of the proposed staging areas or directly to the ROW. The City of Fontana is located approximately 61 miles from the Community of Rainbow. Distance to the Proposed Project staging areas would likely exceed 61 miles in distance. PEA Attachment 4.3-A provides a detailed list of off-road equipment and worker, vendor, and hauling trips and vehicle miles traveled (VMT) for project construction during years 2018 and 2019. Trips and VMT estimates for year 2018 include 15 vendor trips with an average distance of 40 miles during Mobilization.</p> <ol style="list-style-type: none"> <li>1. Clarify whether the fifteen 40-mile vendor trips estimated for the 2018 Mobilization phase in Attachment 4.3-A include the pipe truck transportation from the City of Fontana to each of the staging areas/laydown yards anticipated in year 2018.</li> <li>2. If the fifteen 40-mile vendor trips include pipe truck transportation and the Attachment 4.3-A analysis only covers the San Diego Air Basin (SDAB), provide the estimated vehicle emissions (CAP and GHG) that would occur within the South Coast Air Basin (SCAB).</li> <li>3. If the fifteen 40-mile vendor trips do not include pipe truck transportation to staging areas, provide emissions estimates (CAP and GHG) from truck transportation in both SDAB and SCAB.</li> </ol>		<p>The analysis in the PEA does not include truck trips associated with transportation of the pipe from Fontana to the staging yards. The shipping and delivery of the pipes will depend on the bidding and contracting process for materials acquisition, which has not been conducted yet. The Applicants have not yet selected a pipeline supplier or a yard to receive the pipes. The Fontana rail yard was included in the PEA as a conservative, reasonable approximation to assist in developing a budget for the Proposed Project. However, actual bidding and contracting for pipe supply will not be made until the Applicants know what type of project has been approved – e.g., the diameter of the pipe and the length of the route. The Applicants estimate this could be more than a year away based on the schedule set forth in the November 4, 2016 Scoping Memo and Ruling of Assigned Commissioner (Scoping Memo), as amended by the December 22, 2016 Assigned Commissioner and Administrative Law Judge's Ruling Modifying Schedule and Adding Scoping Memo Questions (Amended Scoping Memo). The Applicants will consider all options available for delivery of the pipe to the project site. Therefore the plans for acquiring the pipe, which yard will receive the pipe from the supplier, and the transport plan are unknown at this time.</p> <p>Accordingly, the impacts of any truck trips associated with transporting the pipe to the staging yards are too speculative for evaluation. The California Environmental Quality Act (CEQA) does not require such an analysis. A lead agency need not discuss impacts that are too speculative for evaluation. (14 California Code of Regulations (CCR) § 15145; <i>Coalition for Reasonable Regulation of Naturally Occurring Substances v. California Air Resources Bd.</i> (2004) 122 Cal. App. 4th 1249, 1253 [finding that the environmental effect from the transportation of alternative materials was too speculative for evaluation and therefore not required]; <i>Friends of the Eel River v. Sonoma County Water Agency</i> (2003) 108 Cal. App. 4th 859, 876 [“There is no requirement that an EIR analyze speculative impacts.”].)</p> <p>In addition, transport from a rail yard to a project staging yard or project alignment is part of the construction material distribution and should not be included in the CEQA analysis. For example, in several recent CPUC-approved projects, these impacts had not been analyzed in the final EIR. See, e.g., SDG&amp;E South Orange County Reliability Project, EIR at 4.7-9, “. . . estimates do not include emissions from indirect sources that would be accounted for in a life-cycle analysis. Life-cycle analyses include emissions associated with all stages of development, including, for example, materials manufacturing and distribution.” See also, SDG&amp;E Master Special Use Permit and Permit to Construct Power Line Replacement Projects, A.12-10-009, Final EIR available at: <a href="http://www.cpuc.ca.gov/environment/info/dudek/CNF/Final-EIR-EIS.htm">http://www.cpuc.ca.gov/environment/info/dudek/CNF/Final-EIR-EIS.htm</a> and</p> <p>SDG&amp;E's Sycamore to Penasquitos 230-kV Transmission Line Project, A.14-04-011, Final EIR available at: <a href="http://www.cpuc.ca.gov/Environment/info/panoramaenv/Sycamore_Penasquitos/FEIR.html">http://www.cpuc.ca.gov/Environment/info/panoramaenv/Sycamore_Penasquitos/FEIR.html</a></p> <p>For the purposes of CEQA, in the PEA the Applicants modeled truck trips as the average distance from staging yards to the right-of-way.</p>
4.3-4	Air Quality/GHG	Pages 4.3-18/19  Response to Deficiency Item 1.4.3-7	<p>Provide additional detail about construction work near sensitive receptors. Pages 4.3-18 and 4.3-20 of the PEA state that construction activities are anticipated to progress at a rate of approximately 200 to 300 feet per day at locations where sensitive receptors have been identified directly adjacent to the proposed project alignment; therefore, the exposure of each sensitive receptor to fugitive dust and Diesel Particulate Matter (DPM) would be limited in duration. Further, Response to Deficiency Letter #2 specifies that increased emissions will move once a section of pipe has been installed or a road or resource crossing has been completed.</p> <p>For each 200 to 300 feet construction segment in densely populated areas, provide the following information:</p>		<ol style="list-style-type: none"> <li>1. The estimated duration of construction for each 200-300 foot segment would be approximately 10-15 days.</li> <li>2. The average number of pieces of off-road equipment and vehicles that would be used concurrently adjacent to sensitive receptors would be between 5 and 6.</li> </ol>

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			1. Estimated duration (in days, or range of days) of exposure of residents and other adjacent sensitive receptors identified along the proposed project alignment. 2. Average number of pieces of off-road equipment and vehicles that would be used adjacent to sensitive receptors.		
<b>Biological Resources</b>					
4.4-5	Biological Resources		Provide updated information about USFWS permitting strategy. Follow up with USFWS regarding their consultation with their solicitors. Provide results from communication with USFWS including feedback on the preliminary permitting approach or any new permitting approach.		<p>As previously discussed with Energy Division, E&amp;E, the U.S. Fish and Wildlife Service (USFWS), and the California Department of Fish and Wildlife (CDFW), SDG&amp;E has proposed two potential methods for Endangered Species Act (ESA) compliance on the Proposed Project.</p> <p>The first method involves a traditional ESA permitting approach in which the Applicants will pursue a Section 7 consultation for federally listed species (coastal California gnatcatcher) that occur within Marine Corps Air Station (MCAS) Miramar boundaries, and a Section 10 Habitat Conservation Plan (HCP)/Incidental Take Permit (ITP) for those federally listed species that occur on non-federal lands (coastal California gnatcatcher, arroyo toad, least Bell's vireo, and southwestern willow flycatcher). Alternatively, the Applicants could pursue a Section 10 HCP/ITP for all four federally listed species that have the potential to be impacted by the Proposed Project if this approach is deemed to be more efficient.</p> <p>The second method for ESA compliance involves the Applicants relying on their existing Natural Communities Conservation Plan (NCCP)/HCP for coverage of three federally listed species (arroyo toad, least Bell's vireo, and southwestern willow flycatcher), and a separate Section 10 HCP for one federally listed species (coastal California gnatcatcher). The potential impact to habitat for arroyo toad, least Bell's vireo, and southwestern willow flycatcher from the Proposed Project are limited, and are currently expected to be approximately 1.5 acres in total. Based on the current alignment and proposed temporary workspaces, no listed species are anticipated to be adversely affected in U.S. Army Corps of Engineers (USACE)-jurisdictional areas temporarily impacted by the Proposed Project. The potential impact to habitat for coastal California gnatcatcher from the Proposed Project are approximately 60 acres in total. The Applicants would rely on their existing Cielo Mitigation Bank to support the Section 10 HCP for coastal California gnatcatcher.</p> <p>On May 10, 2017, the Applicants participated in a coordination meeting with the CPUC, USFWS, and CDFW to discuss strategy for compliance with the federal and state ESA. During the meeting, the Applicants presented for initial discussion and feedback, the above option that would utilize the NCCP to comply with federal ESA and California ESA. USFWS indicated that they would reach out to their solicitor regarding this approach.</p> <p>As explained in Applicants' response to Energy Division's PEA Data Request No. 2 dated June 23, 2017, since the May 10 meeting, the Applicants have had one communication with USFWS. USFWS inquired whether the Applicants have decided how they wanted to proceed with ESA permitting for the Proposed Project. The Applicants clarified that the meeting on May 10 was a preliminary discussion and that additional coordination with the USFWS will occur. It is the Applicants' understanding that USFWS are consulting with their solicitors.</p> <p>On August 9, 2017, the Applicants reached out to the USFWS to determine if they had discussed the above approach with their solicitor. The USFWS responded that they had not yet discussed the above NCCP permitting approach with their solicitor, but would be doing so.</p>
4.4-7	Biological Resources		Rare Plant Survey Data. Provide rare plant data in GIS format and report once surveys are complete.		Two rounds of rare plant surveys were conducted in 2017 for the Post-PEA Minor Design Refinement areas, Rainbow to Santee Non-Miramar Alternative, and route segment alternatives located on MCAS Miramar. The second round of surveys was completed in July 2017. The field data is currently being processed and summarized in an addendum to the Special-Status Plant Species Survey Report dated September 2015. The addendum and associated GIS data will be submitted to the CPUC upon completion, which is currently scheduled for mid-September.

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4.4-8	Biological Resources		<p>Collect available data for route alternatives and non-Miramar alternatives.</p> <ul style="list-style-type: none"> <li>Provide Quino checkerspot butterfly survey results in GIS format and report once complete.</li> <li>Data provided in Exhibit R is only for vernal pools, is SDG&amp;E assuming presence for fairy shrimp in these locations? Or will SDG&amp;E be providing fairy shrimp presence/absence data in the follow up vernal pool data collected in the spring of 2017?</li> <li>In response to Data Gap 4.4-8 the Applicants state additional data regarding vernal pools for the Miramar route segment alternatives and the non-Miramar alternatives are being collected during the spring/summer 2017 surveys. Provide these vernal pool data in GIS format and associated report for the Non-Miramar route alternative when complete.</li> </ul>		<p>The Chambers Group completed Quino checkerspot butterfly surveys in the spring of the 2017 on Tie Lines (TLs) 636 and 639 and are currently summarizing the results in a report. TLs 636 and 639 overlap or are in close proximity to the Spring Canyon Fire Break route segment alternative. The report and GIS data will be provided to the CPUC upon completion, which is anticipated for mid-September.</p> <p>SDG&amp;E did not conduct protocol-level presence/absence surveys for San Diego or Riverside fairy shrimp on any of the alternatives being evaluated during the CEQA process and should be considered present in vernal pools for planning purposes.</p> <p>The Applicants completed field surveys to identify jurisdictional drainages, potential wetlands, and vernal pool features in July 2017 for the Rainbow to Santee Non-Miramar Alternative, and route segment alternatives located on MCAS Miramar. The field data is currently being processed and summarized in an addendum to the Preliminary Wetland and Waters Assessment dated September 2015. The addendum and associated GIS data will be submitted to the CPUC upon completion, which is currently scheduled for mid-September.</p>
<b>Cultural Resources</b>					
4.5-3	Cultural Resources	<p>Cultural Resource Survey Report for the SDG&amp;E and SoCalGas Company PSRP, San Diego County, California – September 2015 (Revised February 2016); submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1 and Indirect Visual Impact Assessment Survey for the Proposed PSRP, San Diego County, California – February 12, 2016</p>	<ul style="list-style-type: none"> <li>Provide an addendum report or letter that includes CRHR evaluation or re-evaluation of the 13 built environment resources and 33 archaeological resources</li> <li>Provide at least one photo of each previously-recorded site and each newly recorded site or isolate for the 13 built environment resources and 33 archaeological resources as noted in the Indirect Visual Impact Assessment Survey for the Proposed PSRP, San Diego County, California – February 12, 2016 report.</li> <li>Provide appropriate forms (DPR 523 Forms) for each new resource and for the previously recorded sites that have been re-evaluated. For example, if a standing house has been recorded already but has only a Primary Record and a Location Map, then when it is evaluated, the full site form needs to have a Primary Record, a Building, Structure, and Object Record, a Location Map, and a Continuation Sheet with additional photos of the house, if available.</li> <li>Provide the DPR 523 series forms for all previously recorded sites identified within the direct and indirect (including visual impacts) areas of potential impact (API). An original site form should accompany any update to that form, as well as any updates submitted prior to the most recent update. If the site was originally recorded on a non-DPR 523 site form, that site form should be attached to an update.</li> </ul>		<ul style="list-style-type: none"> <li>Completing these studies prior to a preferred project alignment would be premature as the route and project may change, resulting in unnecessary disturbance to existing sites. As described previously in the Applicants' Deficiency Responses 01 and 02, once a preferred project alignment is chosen, formal evaluations (<i>i.e.</i>, excavations) will be conducted to determine if any of the 33 archaeological resources in the direct area of potential effect (APE) are eligible historic properties and would be potentially impacted by the Proposed Project. Once a preferred project alignment is chosen, formal National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR) and/or Local Listing eligibility will need to be conducted. Methodology for field collections and evaluation of artifacts will be included in future testing and work plans when those tasks are justified and when the resources requiring evaluation are known. Sampling techniques, in this regard, will be tailored specifically to each resource being reviewed. For the 13 built environment resources, because the formal NRHP, CRHR and/or Local Listing eligibility evaluations for these resources is non-invasive, a formal evaluation is currently underway to determine the resource's significance and potential impacts by the Proposed Project. This evaluation will be submitted as an addendum study for the Proposed Project, which is anticipated to be completed before the end of 2017.</li> <li>Photos of each built environment resource will be included in the addendum report being prepared for their formal evaluation. A photo contact sheet for the 33 archaeological resources is included in this response as Confidential Exhibit V: Archaeological Resources Photo Contact Sheet, which <b>contains confidential information provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></li> <li>Updated Department of Parks and Recreation (DPR) 523 forms for the built environment resources will be included in the addendum evaluation report being prepared and will included the listed information/pages. Similar DPR 523 forms for 33 archaeological resources would be prepared if the preferred route is chosen and after formal evaluations had been completed at those locations. The required field work and associated addendum evaluation report are anticipated to be completed before the end of 2017.</li> <li>A package of the previously recorded original/updated DPR forms is included in this response as Confidential Exhibit W: Department of Parks and Recreation 523 Forms, which <b>contains confidential information provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b></li> </ul>
4.5-4	Cultural Resources	<p>Cultural Resource Survey Report for the San Diego Gas &amp; Electric Company and Southern California Gas</p>	<p>Confirm if a review of the Caltrans Inventory of Historic Bridges was conducted. If a review was conducted, provide results of the inventory review, or confirm no historic bridges were found. Provide a letter report to include this information. Please confirm if any bridges were identified in the field surveys conducted of the direct and indirect (including visual impacts)</p>		<p>A review of the Caltrans Inventory of Historic Bridges was not previously conducted as no bridges were identified as needing to be impacted. Moreover, most Caltrans jurisdiction on the Proposed Project includes Interstate 15, which is not old enough to be considered a historic-era resource. However, to ensure thoroughness, the Caltrans Inventory of Historic Bridges will be reviewed and any findings will be included in the addendum report being prepared for built environment resources evaluation. The addendum report is anticipated to be completed before the end of 2017.</p>

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		Company Pipeline Safety & Reliability Project, San Diego County, California – September 2015 (Revised February 2016) submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1 and Indirect Visual Impact Assessment Survey for the Proposed Pipeline Safety and Reliability Project, San Diego County, California – February 12, 2016	areas of potential impact (API). If bridges were identified, provide their CRHR/NRHP eligibility recommendation.		
4.5-5	Cultural Resources	Cultural Resource Survey Report for the San Diego Gas & Electric Company and Southern California Gas Company Pipeline Safety & Reliability Project, San Diego County, California – September 2015 (Revised February 2016) submitted as Exhibit LL-C, Response to Deficiency 1.4.5-1	Provide the GIS shapefiles for all previously documented archaeological sites and standing structures from the CHRIS research, as well as newly identified resources found as part of the surveys conducted.		Per SDG&E's California Historical Resources Information System Information Access and Use Agreement, the requested shapefiles will be provided directly to E&E's archeologist. As such, please provide the contact information for E&E's archeologist and the Applicants' archeologist will provide Confidential Exhibit X: Archaeological Resource Shapefiles, which <b>contains confidential information provided pursuant to P.U. Code § 583, G.O. 66-C, D.16-08-024, and the accompanying declaration.</b>
4.5-6	Cultural Resources	Exhibit LL-A Response to 1-4-5-1_APE Map (series of 58 aerial photo maps)	The aerial views included as Exhibit LL-A Response to 1-4-5-1 APE Map show standing buildings and structures within the Area of Indirect Impact and within the Area of Potential Effect. It appears from this map that structures may also be located within the Area of Direct Impact.  Provide a statement based on the 2015 and/or 2016 field surveys to indicate that no historic - age buildings or structures were encountered within the Areas of Direct or Indirect Impact, or if		As discussed in PEA Chapter 4.13 Population and Housing, page 4.13-7, the Proposed Project is within existing roads and undeveloped areas and as currently designed will not displace any existing housing units. Similarly, the Proposed Project will not displace commercial buildings. As such, no structures within the Area of Direct Impact (ADI) should be directly impacted. A statement regarding the presence/absence of historic-era structures in the Areas of Direct or Indirect Impact as well as DPR forms and updates will be included in the addendum report being prepared for built environment resources evaluation. The addendum report is anticipated to be completed before the end of 2017.

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			some were found, provide appropriate DPR Forms and photographs.		
4.5-7	Cultural Resources	Exhibit TT-B Response to 1-4-5-1_Indirect APE Survey_Confidential  Letter Report to Rachel Ruston from Shannon Davis at ASM, February 12, 2016 (Revised May 4, 2016): Indirect Visual Impact Assessment Survey	As noted on Page 2 of this document, additional archival and research will be needed to construct a historic context for the built environment resources evaluations. Provide this information, or indicate when research will be conducted and when additional information will be provided.		A historic context for the built environment resources will be prepared and included in the addendum report being prepared for the built environment resources evaluation. The addendum report is anticipated to be completed before the end of 2017.
4.5-8	Cultural Resources	Attachment D: Cultural Resources Letter Report from Kent Manchen and Brian Williams of ASM to Rachel Ruston of SDG&E Environmental Services, January 20, 2017  Post PEA Filing – Route Refinement	Attachment D: Cultural Resources Letter Report from January 20, 2017 indicates that no cultural resources were identified. However, in 2015/2016 reports (Exhibit LL-C-Response to 1-4-5-1 Revised Survey Report), segments of Highway 395 have been recorded as a site (P-37-033557). Is the segment of Highway 395 that appears in Figure 11 of this report considered a part of that same site? Explain why or why not. If it is, please update site form to include the referred to segment in Figure 11.		Previous studies have separated the various ruined sections and history-era alignments of Highway 395. This resource will be included in the addendum report being prepared for built environment resources evaluation and the various records for the road will be reconciled to create one contiguous record. The addendum report is anticipated to be completed before the end of 2017.
4.5-9	Cultural Resources	Attachment D: Cultural Resources Letter Report from Kent Manchen and Brian Williams of ASM to Rachel Ruston of SDG&E Environmental Services, January 20, 2017  Post PEA Filing – Route Refinement	As part of the January 2017 refinements, new laydown yards (Washington, Emmanuel Church, and Alliant) were identified. It appears that standing buildings exist within the APE boundaries of these yards, but they were not recorded in the Attachment D report. Are any of these buildings historic in age? If not, provide a statement to that effect. If they are historic in age, provide information for them, indicating their APNs, their addresses, the age of structures, brief descriptions, photographs, , and if they are eligible for the California Register and under what criteria.. See Figures 16, 29, 32, and 54.		As discussed in PEA Chapter 4.13 Population and Housing, page 4.13-7, the Proposed Project is within existing roads and undeveloped areas and will not displace any existing housing units. Similarly, the Proposed Project will not displace commercial buildings. As such, no structures within the ADI should be directly impacted. A statement regarding the presence/absence of historic-era structures in the Areas of Direct or Indirect Impact as well as DPR forms and updates will be include in the addendum report being prepared for built environment resources evaluation. The addendum report is anticipated to be completed before the end of 2017.
4.5-10	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and	Section 2.2 of the September 23, 2015 report provides a discussion of the areas surveyed. Provide a map showing the areas that were surveyed as well as a description of what rock units were selected for survey and the explicit process for evaluating the sensitivity of rock units.		The northern portion of the proposed alignment is underlain by plutonic igneous and metavolcanic rocks that are not expected to yield any fossils. Therefore, the northern portion of the proposed alignment was not surveyed for paleontological resources. A revised map showing the areas that were surveyed is provided in Exhibit Y: Geology and Areas Surveyed Map. A list of rock units that were surveyed include: <ul style="list-style-type: none"> <li>• Holocene alluvial deposits (Qya),</li> <li>• Lindavista Formation (Qvop2-4),</li> </ul>

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		Reliability Project, San Diego County, CA September 23, 2015			<ul style="list-style-type: none"> <li>• Mission Valley Formation (Tmv, and areas mapped as the Torrey Sandstone [Tt] by Kennedy and Tan, 2008),</li> <li>• Stadium Conglomerate (Tst),</li> <li>• Friars Formation (Tf), and</li> <li>• Mesozoic Metasedimentary and Metavolcanic rocks (Mzu).</li> </ul> <p>The criteria for evaluating paleontological potential of rock units is discussed in Section 2.3 Evaluation of Paleontological Potential of the Paleontological Resources Technical Report (PRTR).</p>
4.5-11	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and Reliability Project, San Diego County, CA September 23, 2015	Figure 1 is difficult to see - provide a larger image or one with more clarity.		A revised Figure 1 that repositions and increases the size of both images is provided in Exhibit Z: Revised Figure 1.
4.5-12	Cultural Resources	Paleontological Resources Technical Report San Diego Gas and Electric Company Pipeline Safety and Reliability Project, San Diego County, CA September 23, 2015	Rock units themselves are not paleontological resources; clarify what paleontological resources are known within each rock unit. Provide an estimate of how many fossils from the project formations are already in the collections of the San Diego Natural History Museum and what new information would be provided by collecting additional specimens.		<p>From an operational standpoint, rock units (formations) are considered to be paleontological resources according to the guidelines established by Caltrans (see <a href="http://www.dot.ca.gov/ser/vol1/sec3/physical/Ch08Paleo/chap08paleo.htm">http://www.dot.ca.gov/ser/vol1/sec3/physical/Ch08Paleo/chap08paleo.htm</a>), and the Society of Vertebrate Paleontology (see <a href="http://vertpaleo.org/The-Society/Governance-Documents/SVP_Impact_Mitigation_Guidelines.aspx">http://vertpaleo.org/The-Society/Governance-Documents/SVP_Impact_Mitigation_Guidelines.aspx</a>).</p> <p>The general types of paleontological resources known from each rock unit along the Proposed Project are summarized in Section 4.0 Paleontological Resource Assessment of the PRTR.</p> <p>Considering that many of the rock units have a relatively broad geographic distribution in coastal San Diego County, it is unclear what the value is in providing the number of fossils known from each rock unit that occurs along the Proposed Project, but there are surely numerous fossils specimens at the San Diego Natural History Museum that could be similar to what is anticipated to be potentially uncovered during construction. The collection of additional fossil specimens during construction of the Proposed Project will provide new information in the form of:</p> <ul style="list-style-type: none"> <li>• specimens that represent new species;</li> <li>• specimens that represent more anatomically complete examples of known species;</li> <li>• specimens that document new assemblages of species;</li> <li>• specimens that illustrate new modes of fossilization;</li> <li>• specimens that demonstrate important paleontological or evolutionary principles (<i>e.g.</i>, faunal succession; plant or animal relationships);</li> <li>• specimens that provide a critical piece of paleobiological data (such as illustrating a portion of geologic history or providing evolutionary, paleoclimatic, paleoecological, paleoenvironmental, or biochronological data);</li> <li>• specimens that occupy a unique position stratigraphically within a formation; or</li> <li>• specimens that document a new depositional environment.</li> </ul> <p>Institutional fossil collections are not based on having one example of each specimen. Instead, institutional fossil collections serve as archives of the history of life on Earth and include specimens (and associated contextual data) that document past biodiversity and biogeography, patterns of extinction and evolution, ecological structure of habitats and communities, changes in local environment and climate, etc. Each new fossil discovery has the potential to contribute to the growing body of knowledge.</p>
<b>Noise</b>					
4.11-1	Noise		Provide ambient noise data from additional project locations. Attachment 4.12-B of the PEA (dated June 8, 2015) provides ambient noise monitoring data from SDG&E's Rainbow and Lake Hodges Facilities, located in Unincorporated San Diego County		For the PEA, SDG&E completed ambient noise monitoring at the only two locations along the route where permanent future facilities could create noise. The methodology section of the PEA, as described in CEQA threshold Question 4.12a – Noise in Excess of Standards, states: “The only Proposed Project components that generate noise during operation are the above-ground facilities—specifically, pressure-limiting stations and metering stations.” The three mainline valve (MLV) locations requested in

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			<p>and City of Escondido, respectively. Both measurement locations are within low density residential areas. Provide ambient noise data (measured as hourly average noise level, dBA Leq) from additional measurement sites located in the vicinity of the following proposed project components:</p> <ul style="list-style-type: none"> <li>• MLV #6 (City of Escondido)</li> <li>• MLV #8 (City of Poway)</li> <li>• MLV# 9 (City of San Diego)</li> </ul>		<p>this question are not anticipated to generate any noise and therefore the ambient noise levels prior to construction compared to post construction would not change.</p> <p>The Applicants sought clarification on this question and per the clarification provided by Energy Division on August 16, 2017 and August 22, 2017, the Applicants will complete ambient noise studies at the proposed blowdown stack location for MLV #6. This additional study will take approximately four to six weeks to complete and may require approval from the landowners to mount the noise monitoring equipment in a secure place. As such, a response to this question will be provided in approximately four to six weeks.</p> <p>The clarification provided by Energy Division on August 22, 2017 also included a request to “provide shapefiles for the new stack location.” The GIS shapefiles for the proposed blowdown stack location for MLV #6 was previously provided in Confidential Exhibit M: Updated Project Shapefiles of the Applicants’ June 23, 2017 response to PEA Data Request No. 02.</p>