

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 22, 2015

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Data #17 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has reviewed San Diego Gas and Electric Company's (SDG&E) application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project) and SDG&E's responses submitted to date for Data Requests #1 through #16.

The CPUC requests additional data and clarifications to some of SDG&E's prior data request responses as indicated in the attached data needs Table 1 below. Once the requested information is provided, the CPUC will evaluate whether or not it is comfortable relying on SDG&E's Subregional NCCP to offset project-specific impacts in the EIR.

Information provided by SDG&E in response to this Request for Additional Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than July 29, 2015. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the EIR. If a conference call to clarify any of our questions is helpful, please let us know.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the Project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Billie Blanchard".

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor

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Molly Sterkel, Program Manager
Nicholas Sher, CPUC Attorney
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REQUEST FOR ADDITIONAL DATA: DATA NEEDS #17 FOR THE SYCAMORE-PEÑASQUITOS 230-KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified additional areas where more information is needed to analyze the potential environmental effects of the Proposed Project, cumulative impacts, and alternatives in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

Table 1: Application No. 14-04-011 Data Needs #17

#	Reference Source, Page #	Data Need
1	Data Request #14, Q4	Provide an estimated timeline for the construction of a new 230-kV transmission lines between the Sycamore and Mission Substations, including the re-construction/re-configuration of all of the existing power lines, as depicted in the cross-sections provided in response to DR#14, question #4. In addition, identify the length of any temporary lines (shoo-flies) that would need to be constructed, including the number of temporary structures required and their estimated spacing.
2	Data Request #14, Q1	What is the existing conductor (wire size and type) on circuits TL23001 & TL23004 south of Peñasquitos Junction? As part of the Sycamore - Peñasquitos 230-kV Transmission Project does SDG&E plan to jumper together the existing conductor on TL23001 & TL23004 south of Peñasquitos Junction and keep these wires energized?
3	Data Request #14, Q1	Provide the cross-sections for the Mission—San Luis Rey line between Miramar Wholesale Nursery and Peñasquitos Junction.
4	Data Request #16, Q2	Explain how the reconductoring and bundling of TL23001 and TL23004 proposed in Segment C meets the Proposed Project purpose and need. Based on the information SDG&E has provided thus far, there is no electrical need for the proposed reconductoring and bundling of TL23001 and TL23004 in Segment C relative to the Proposed Project purpose. Is there a future connected action that this reconductoring and bundling is intended to serve?
5	Data Request	The following issues were identified in reviewing the habitat impact

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#	Reference Source, Page #	Data Need
	#16, Q4	<p>acreage changes and rationale provided by SDG&E.</p> <p>Identify locations where access road improvements are required – SDG&E has removed access roads from the areas of disturbance associated with the Proposed Project. This does not represent the whole of the project, and is misleading regarding potential direct and indirect impacts of the project. Access roads will be shown and quantified in the EIR tables and exhibits. However, SDG&E must provide a clear and specific description for access road locations where access road “refreshing” or other improvements would be required. SDG&E previously identified the potential for habitat impacts along access roads resulting from “refreshing” activities in its PEA and prior data request responses. The CPUC applied an impact buffer area to all access roads adjacent to natural areas to account for access improvements because SDG&E was unable to provide more specific locations where access edge impacts may or may not occur. Alternatively, SDG&E can determine that no access road improvements would be needed, and the CPUC will adjust its impact analysis accordingly. Either way, the full extent of potential project impacts requires disclosure in the EIR based on the details in the project description. SDG&E needs to be very clear on its proposed project description details.</p> <p>Provide written confirm from Kilroy Realty that the Torrey Santa Fe site may be considered as a staging yard. SDG&E did not provide confirmation in its data request response that Kilroy Realty is granting permission to consider use of the Torrey Santa Fe staging yard for project construction. Written confirmation must be provided to the CPUC no later than July 29th if this site is to be included in the Draft EIR analysis. Lacking this permission, it is premature to describe the site acreage that would be needed to support project construction. If permission is granted, provide accurate information and GIS data depicting the proposed staging area boundaries. SDG&E’s data response identifies use of up to 5 acres; however, this is inconsistent with the Project Description revisions and detailed maps provided which quantify and depict 17.42 acres for staging at this site.</p> <p>Confirm project construction at Black Mountain Ranch Community Park. The mapbook provided in SDG&E’s response attachment ED16 – Q4(c) removes two segments of underground ductbank within the parking lot at the Black Mountain Ranch Community Park (refer to Attachment A). Please confirm that this is in error or provide an explanation for the change.</p> <p>Document and justify changes to baseline habitat mapping. SDG&E’s GIS response to DR#16 included changes to the baseline habitat mapping at a few project locations with no explanation (refer to Attachment B). Any changes to the existing habitats presented in the PEA biological</p>

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#	Reference Source, Page #	Data Need
		<p>technical report need to be provided in a supplemental technical report that provides an explanation for the revision and includes representative photographs of the habitat area(s) in question. Furthermore, make sure all habitat type names are consistent with the Holland nomenclature previously used. Lacking clear identification of habitat data revisions, the current baseline information that the CPUC has will form the basis for the CPUC's evaluation of habitat impacts.</p>
6	Data Request #16, Q3	<p>Provide a detailed description of how the steel H-frame pole will be removed without impacting surrounding habitats or revise Attachment ED16 – Q3(b) to accurately show the work space required for pole removal. The work space area depicted in Attachment ED16 – Q3(b) is a portion of the existing access road located roughly 30 feet away from the steel H-frame pole.</p>
7	Data Request #16, Q5	<p>Provide a wetland delineation for the Carmel Valley Road Staging Yard including the extent of the wet meadow/seep. In particular, construction staging is depicted right up to the mapped limit of this habitat; therefore, the extent of the wet meadow/seep needs to be more accurately defined if this resource is to be avoided by construction staging as proposed in SDG&E's data response.</p>