

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 9, 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 #5 – 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 completed its review of 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).

The CPUC finds that there remains information that is required to complete the project description and the environmental resource analysis for the Environmental Impact Report (EIR). The data needed to complete the EIR is identified in Table 1, attached.

The CPUC has also determined that SDG&E's response to Item 27 of Data Request #3 was inadequate. This data request was the CPUC's second attempt to obtain a habitat assessment for the federally listed Quino checkerspot butterfly (QCB) from SDG&E, and SDG&E has twice failed to provide the requested information. Relying solely on SDG&E's HCP and stating that the habitat in the project area does not need to be assessed is not adequate for the resource analysis in the EIR as we have previously stated. The eastern portion of the project is located in the USFWS survey area for QCB. The QCB mapped areas in the HCP are out-of-date and do not include the full range of suitable habitat areas for QCB. Since this information has not been provided by SDG&E, the CPUC will prepare its own QCB habitat assessment.

The CPUC's consultant, Panorama Environmental, has preliminarily identifying and mapped 1) three likely locations within the project alignment for passing areas outside of existing access roads and work areas and 2) potential staging areas within the substations proposed by SDG&E for staging. These features are highlighted with notes in the attached map book, and require SDG&E's verification in conjunction with your review and verification of the attached draft project description for 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 January 23, 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.

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.

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Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Peter Allen, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental
Susanne Heim, Deputy Project Manager, Panorama Environmental
Darryl Gruen, Attorney for ORA
Frank Ghazzagh, ORA
Alan Colton, SDG&E Director - Major Projects

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #5 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 prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project and to define a range of 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 #5		
#	Reference Source, Page #	Data Need
Project Description		
1	N/A	Review the attached administrative draft EIR project description (Attachment A) and detailed mapbook (Attachment B) and provide track change edits and comments as necessary to address identified data needs, verify information is accurately presented, and approve these documents for use in the EIR analysis.
2	N/A	Identify the location of structures that would trigger notification of FAA under Title 14 CFR Part 77. The FAA may require lighting on structures that trigger notification under Title 14 CFR Part 77. This lighting should be considered as a visual impact in the EIR to avoid future petition for modification. To be conservative, the CPUC will consider that any structure that requires notification under 14 CFR Part 77 would require lighting.
3	Deficiency Report #1, Item 15	Provide SDG&E's methodology for defining the locations of marker balls on powerline cantenaries.
4	N/A	Provide a preliminary helicopter use plan using the template provided in Attachment C.
5	Data Request #3, Item 1	Provide location, GIS data, and supporting survey documentation for any additional staging yards that SDG&E would like included in the EIR. This information must be submitted by January 31, 2015 in order to be considered in the EIR.

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#	Reference Source, Page #	Data Need
6	Data Request #3, Item 1	Will fuels be stored onsite or delivered on trucks to individual sites when needed. If stored at staging yards, what quantities are we talking about? What type of storage containers? What type of secondary containment for leaks and spills will be provided?
7	Data Request #3, Item 26	Provide vegetation mapping for an access road in the north portion of the GIS data shown on Maps 23 and 24 of Attachment #2 to DR #3. SDG&E did not provide GIS data for an access road located in the BSA.
8	Data Request #3, Item 31	Provide updated DPR forms for previously recorded and newly recorded resources including: <ul style="list-style-type: none"> • P-37-018908 • CA-SDI-6133 • CA-SDI-6912 • Prehistoric isolates 1, 2, and 3
9	Data Request #3, Item 24	Revise the equation in the paved-road fugitive dust emission calculation worksheets. SDG&E's revised emission calculations are still based on a wrong equation both in the text and in cells of the revised spreadsheets. The following shows the comparison of EPA AP-42 equation and the wrong equation used by SDG&E. Note that the errors are shown in the highlighted areas. a. The correct equation in EPA AP-42 is $E = k(sL)^{0.91} \times (W)^{1.02}$ b. SDG&E uses: $E = k(sL/2)^{0.91} \times (W/3)^{1.02}$ Therefore; the calculations were not correctly performed for both PM ₁₀ and PM _{2.5} emissions. These errors occur in all paved-road fugitive dust emission calculation worksheets. Please review EPA AP-42 Section 13.2.1 Paved Roads published in 2011 and make sure the correct equation is used in the next revision.
10	Data Request #3, Item 36	Provide the following information to supplement the October 20, 2014, KOA Traffic Study: <ol style="list-style-type: none"> 1. Pages or Maps from the City or County General Plan showing the classification of the roads (major arterial, collector, etc.), description of the road or at least a description of the classification and the typical cross-section of each classification. 2. The basis of the capacity calculation shown in "Capacity" in Table 2. 3. Definition of LOS A, B, C, etc. from the latest Highway Capacity Manual or the City and County Traffic Standards. 4. Count sheets for the traffic, bike and pedestrian counts, peak hour and ADT. These might not be available for all locations presented but all of the counts SDG&E paid for should be available.
11	N/A	Provide a cumulative projects list of all SDG&E and Southern California Gas projects located within 10 miles of the project alignment including the following information: <ol style="list-style-type: none"> 1. Summary description of each project

Table 1: Application No. 14-04-011 Data Needs #5

#	Reference Source, Page #	Data Need
		2. Scheduled timeframe implementation of each project 3. GIS files for each project location and/or alignment.
12	N/A	Provide the EDR Radius Map report that accompanies the EDR DataMap Corridor Study in PEA Appendix 4.7-A. The EDR Radius Map report was not included in the PEA.