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Reg.12-10/A.14-04-011
SDG&E Sycamore-Penasquitos
230kV Transmission Line CPCN

Sent Via Electronic Mail Only

Billie Blanchard
Project Manager
Energy Division, CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: SXPQ ED20-SDGE Partial 2 Response: Question 2

Dear Ms. Blanchard:

Attached is SDG&E's Partial 2 Response to ED's Data Request 20, Question 2, issued on January 8, 2016. This completes the utilities' response to this data request.

If you have any questions or require additional information, please feel free to contact me by phone: (858) 636-6876 or e-mail: RGiles@semprautilities.com.

Sincerely,

Signed

Rebecca Giles
Regulatory Case Manager

Enclosures

cc:

Allen Trial – SDG&E
Elizabeth Cason - SDG&E
Bradley Carter – SDG&E
Central Files – SDG&E
Richard Raushenbush – SDG&E
Christopher Myers - ORA

Jeff Thomas – Panorama Environmental Consulting
Susanne Heim – Panorama Environmental Consulting
Mary Jo Borak – CPUC Infrastructure Permitting and CEQA
Molly Sterkel - CPUC Infrastructure Planning and Permitting
Darryl Gruen - ORA

ED20 SDGE 02/12/2016 Partial Response 2
A.14-04-011 SXPQ 230kV Transmission Line CPCN Project
Energy Division Data Request 20 Dated January 8, 2016 Q2

Partial 1: 1/25/2016 Q 1, 3-5

Q#	Reference Source, Page #	Data Need	SDG&E Response
2	FAA Advisory Circular	<p>Provide results of SDG&E’s investigation into potential need for lighted marker balls along the Proposed Project alignment as described in the recently revised FAA Advisory Circular on Obstruction Marking and Lighting.</p> <p>In December 2015, the FAA revised their Advisory Circular on Obstruction Marking and Lighting pertaining to lighting and marking of structures including transmission and power lines. The new guidance recommends the use of lighted markers for high voltage lines (69-kV or higher). The CPUC is uncertain whether lighted marker balls will be required for the Proposed Project. Please coordinate with FAA and provide information regarding the type of marker balls that you expect FAA will require for the Proposed Project.</p>	<p>On January 13, 2016 SDG&E contacted Michael Helvey, Manager, Obstruction Evaluation Group, FAA to discuss revisions contained in Advisory Circular 70/7460-1L. Mr. Helvey is the person identified in the Advisory to whom comments or questions should be directed. However, not much new information came out of the discussion. Mr. Helvey was able to clarify that FAA Determinations issued prior to the new AC taking affect would not be subject to further review under the new AC. He also noted that the marking of catenaries over canyons should only be a concern for those canyons that an aircraft could actually navigate.</p> <p>SDG&E has completed an initial review of the updated Advisory Circular 70/7460-1L (AC) which contains additional provisions for lighted marking of transmission and power lines. A change was noted in Section 3.5.1 of Chapter 3 that creates a distinction between power line voltages below 69kV and those that are 69kV and above. Chapter 3 in the previous advisory AC 70/7460-1K does not contain this distinction, and guidelines in that chapter may be applied to power lines of any voltage.</p> <p>In the past when the FAA issued a Determination to mark a catenary under the old advisory it directed SDG&E to mark the catenary in accordance with...”spherical markers - Chapter 3”. Chapter 3 of the old advisory only prescribes the use of <u>un-lighted</u> markers The revision in the new advisory that sets voltage thresholds in Chapter 3 does, by default, recommend energized lines 69kV or above to be marked in accordance with Chapters 4 and 10, which prescribe the use of lighted markers, in addition to un-lighted markers. Pursuant to Chapters 4 and 10 (and associated Figures A-1 through A-5) of the new advisory, suggest that catenary lines energized at 69kV or higher be marked with lighted markers where the wires exceed 200 feet AGL. In those cases where the energized wire is not the highest catenary (for example, the shield wire is higher than the energized conductor wires), the highest catenary would also be marked with unlighted markers. Figures A-1 through A-5 of the new advisory show that catenary markers, lighted or un-lighted, are to be installed only along the segment of the catenary that is within the “Violation Area” (i.e. above 200 feet AGL). If the “Violation Area” is negligible as few as two markers could be installed.</p> <p>To date none of the Project catenaries have been formally submitted to the FAA for review. When submittals are made and the FAA issues its Determinations, recommendations for marking and lighting will be subject to the guidelines contained</p>

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			<p>in the new Advisory 70/7460-1L. SDG&E is actively pursuing a dialogue with the FAA seeking further clarification of the guidelines in the new Advisory, and to discuss implications the new Advisory may impose upon projects that have already gone through environmental and regulatory review.</p> <p>As part of SDG&E’s review of the new FAA Advisory, SDG&E conducted updated detailed review of the current design of the Proposed Project, as well as Alternatives 3, 4, and 5, to identify catenary spans that will be subject to notice to the FAA pursuant to 14 CFR, Part 77. This review is based on the best available topographic data (such as recent LiDAR where available) and describes the maximum catenary height above ground for each span (length of suspended wire between structures). Attachment ED20 – Q2_Updated Catenary Span Review contains a summary of the results of this updated analysis and provides details for each span determined to have the potential for hazard marking under 14 CFR, Part 77. Based upon the updated review of catenary spans, SDG&E has found that two new spans may be considered for aerial marking, and three spans previously assumed to be subject to aerial marking may not ultimately trigger noticing with the FAA. Specific information for each catenary span is provided in Attachment ED20 – Q2.</p> <p>SDG&E notes that by its express terms the new Advisory issued by the FAA is a guidance document, and does not impose any mandatory actions. Furthermore, as the full intent and application of the new Advisory remains somewhat unclear, it is impossible to know the full range of implications the Advisory may or may not have on the Proposed Project or Alternatives 3, 4 or 5. CEQA only requires analysis of reasonably foreseeable environmental impacts (see Cal. Code Regs Section 15064(d)(3)), and an environmental impact that is speculative is not considered reasonably foreseeable.</p>