September 27, 2011

Mr. Patrick T. Lee  
Vice President  
Sunrise Powerlink Transmission Project  
8315 Century Park Court, CP 33A  
San Diego, CA 92123

RE: SDG&E Sunrise Powerlink Transmission Line Project – Stop Work Order for Helicopter Operations

Dear Mr. Lee:

As you know, recently there have been numerous incidents involving helicopters, apparently caused by pilot errors and mechanical and rigging failures. The frequency of such incidents seems to be increasing. The incidents CPUC staff are aware of include:

- February 12, 2011 – Rotor strike (pilot error)
- June 7, 2011 – Sky crane drop of a lattice structure (mechanical failure)
- June 10, 2011 – Second sky crane drop of a lattice structure (mechanical failure)
- August 4, 2011 – Air compressor drop (rigging failure)
- August 23, 2011 – Rotor strike (pilot error)
- September 19, 2011 – Micropile pipe drop (rigging failure)
- September 22, 2011 – Plywood drop (rigging failure)
- September 26, 2011 – Straw wattle drop (rigging failure)

The CPUC voted on December 18, 2008 to approve the SDG&E Sunrise Powerlink Transmission Line Project (Decision D.08-12-058). The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during its implementation. Section 4.1 of the MMCRP stipulates that:

“Based on the severity of a given infraction or pattern of non-compliance activity, the CPUC Project Manager has the authority to shut down project construction activities. If a shutdown of construction activity occurs, construction shall not resume until the CPUC Project Manager authorizes it to do so.”
The pattern of Sunrise Project helicopter incidents is troubling to the CPUC and is of serious concern due to the safety risks such incidents impose on the residents of Imperial and San Diego Counties and project personnel. Therefore, effective immediately, CPUC is shutting down all helicopter operations related to the Sunrise Powerlink Project, except those necessary to position the aircraft at secure locations. Helicopter operations may resume only upon CPUC's concurrence that the following remedial actions have been successfully implemented:

1. **Safety Stand Down:** A Safety Stand Down to review helicopter operations and safety shall be performed with ALL pilots and ALL ground personnel present, including riggers, personnel working in yards, people at TSAPs, and people likely to be transported by a helicopter. Communication from SDG&E or its contractors shall cover standard operating procedures, signals, daily checklists, and any other relevant topics. In addition, for conditions deemed hazardous or nearing hazardous to helicopter operations, appropriate actions shall be reviewed in the training.

   - A dated sign-in sheet recording the names of all individuals who are present at stand down sessions shall be submitted to CPUC.

   - A list of all topics covered shall be submitted to CPUC.

   - SDG&E shall positively affirm that all appropriate staff members have been included in the safety review.

2. **Rigging Training** session or sessions based on the Apprentice Program for Linemen shall be developed and implemented, and shall address appropriate rigging practices, pilot communications, and procedures, whenever there is a change in personnel (pilot and/or rigging). On-the-ground rigging shall be performed only by a certified lineman, an apprentice with a certified lineman present, or an individual who has been trained through the approved rigging class.

   - A dated sign-in sheet recording the names of all individuals who are present at training sessions shall be submitted to CPUC.

   - A list of all topics covered shall be submitted to CPUC.

   - SDG&E shall positively affirm that all appropriate staff members have been included in the training session(s).
3. Outside of tower assembly and wire operations, helicopter operations shall be restricted to sites that have been designated as helicopter-access only. If there is an access road that has been designated to a site, all operations except tower assembly and wire operations shall be conducted by vehicle access.

- SDG&E shall submit documentation stipulating that helicopter operations will be limited as described here.

4. Proposed Incident Reporting Procedures shall be submitted to CPUC for review and approval. Upon approval, these will be incorporated into the MMCRP.

The CPUC may add to or update any of the remedial actions set forth above. If any updates or additions are required, the CPUC will provide them to SDG&E in writing by October 4, 2011. If the CPUC does not require any further updates or additions, SDG&E may continue to use helicopters as soon as SDG&E has demonstrated compliance with the four remedial actions listed above.

Please contact me or Billie Blanchard at (415) 703-2068, the Sunrise Project Manager, if you have any questions.

Sincerely,

Julie A. Fitch
Director, Energy Division

cc: Daniel Steward, BLM El Centro Field Office
    Tom Zale, BLM El Centro Field Office
    Bob Hawkins, Forest Service
    Susan Lee, Aspen Environmental Group
    Vida Strong, Aspen Environmental Group
    Anne Coronado, Aspen Environmental Group
    Fritts Golden, Aspen Environmental Group
    Alan Colton, SDG&E
    Billie Blanchard, CPUC Project Manager
    Mary Jo Borak, CPUC Supervisor
    Ken Lewis, CPUC Acting Program Manager
    Supervisor Diane Jacob, San Diego County
    Laura McDonald, SDG&E
    Todd Voorhees, SDG&E
    Jason Reiger, CPUC attorney
    Nicholas Sher, CPUC attorney
    Arocles Aguilar, CPUC attorney
    Paul Clanon, CPUC Executive Director