

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Ms. Rebecca Giles
Regulatory Case Administrator
San Diego Gas & Electric
Southern California Gas Company

December 20, 2012

(Sent via email: rgiles@semprautilities.com)

***Subject: Data Request No. 2– Completeness Review
Application No. A.12-10-009: SDG&E Master Special Use Permit and
Permit to Construct Power Line Replacement Projects***

Dear Ms. Giles:

San Diego Gas & Electric (SDG&E) submitted Application (A.12-10-009) for a Permit to Construct (PTC) the subject project to the California Public Utilities Commission (CPUC) on October 17, 2012. As part of SDG&E's PTC application submittal and in lieu of the Preliminary Environmental Assessment (PEA) typically submitted when applying for a PTC, SDG&E provided the Preliminary Plan of Development (POD) dated September 2012 in support of the Project and Master Special Use Permit (MSUP) to be issued by the U.S. Forest Service (USFS). The CPUC's Energy Division CEQA Unit completed Data Request No. 1 – Completeness/Deficiency Review on the subject application on October 30, 2012. Both the CPUC's *Information and Criteria List* and the *Working Draft PEA Checklist for Transmission Line and Substation Projects* were used as a basis for evaluating completeness and ensuring that sufficient information is available in the subject application so that the CPUC can conduct the environmental analysis required by the California Environmental Quality Act (CEQA).

SDG&E responded to the CPUC October 30, 2012 Data Request No. 1- Completeness/Deficiency Review on December 3, 2012. After completing our review of SDG&E's response to Data Request No 1, the CPUC Energy Division concludes that the PTC application and supporting documentation still requires additional information to be deemed complete. Attachment A Data Request No. 2 – Completeness Review, identifies areas that were found to be incomplete. As provided in Attachment A, subsequent to the CPUC's Data Request No. 1-Completeness Review, the USFS identified additional information required to conduct environmental analysis and initiate public scoping for this project (USFS December 7, 2012 POD Review Letter). As the POD has been submitted as part of this application, an amended POD satisfactorily responding to the USFS issues will be required in order to deem this application complete.

Within 30 days of receipt of the information requested in Attachment A, the CPUC will review and determine if it is adequate to accept the PTC application and supporting documentation as complete. At any point in this process, the CPUC reserves the right to ask for additional information.

If you have any questions regarding this letter or need additional information, please contact me at 415-703-1966 or lob@cpuc.ca.gov.

Sincerely,



Lisa Orsaba
Energy Division
California Public Utilities Commission

Attachment A: Data Request No. 2, Completeness Review for PTC Application No. A.12-10-009 Master Special Use Permit and PTC Power line Replacement Projects

cc: Bob Hawkins, Consulting Natural Resource Planner, U.S. Forest Service (rhhawkins@fs.fed.us)
Debbie Hobbs, Lands and Special Uses Program Manager, Cleveland National Forest (dshobbs@fs.fed.us)
John Porteous, Dudek (jporteous@dudek.com)

ATTACHMENT A
Data Request No. 2 – December 20, 2012
Completeness Review
Application No. A.12-10-009
SDG&E Master Special Use Permit and
PTC Power Line Replacement Projects

GENERAL

- 1) The Permit to Construct Application (PTC) Application refers to the Preliminary Plan of Development (POD). The POD title makes reference to the CNF Orange and San Diego Counties. However; there is no mention of SDG&E facilities within Orange County in the PTC application and or the 2012 SF 299 or POD. Please clarify.

PRELIMINARY PLAN OF DEVELOPMENT (POD)

General

- 1) Please provide a letter from the US Forest Service (USFS) indicating that SDG&E has satisfactorily responded to the USFS comments (dated December 7, 2012) on the Preliminary POD.
- 2) Please provide all supplementary data/information provided to the USFS in response to the USFS December 7, 2012 comment letter.

Project Description

- 1) Please consolidate all proposed APMs to minimize environmental effects into one list by resource area.

Environmental Resource Evaluation

Biological Resources

- 1) Please provide a copy of SDG&E's most recent NCCP, reflecting updates, if any.

Noise

- 1) The Noise and Vibration Technical Report was provided; however, the ftp site submittal did not include Appendices B and C to this report. Please provide these two appendices electronically.

ATTACHMENT A
Data Request 2 - Completeness Review
SDG&E Master Special Use Permit and PTC Power Line
Replacement Projects

- 2) In response to DR#1 SDG&E stated that “noise could increase due to additional transmission or distribution circuits (corona noise). However existing corona noise is not expected to double.” Please provide quantitative analysis to support this statement and compare to San Diego County Noise Ordinance.
- 3) Please quantify noise expected from helicopter use both during construction and operation/inspections and compare to the San Diego County Noise Ordinance.
- 4) In response to DR#1 SDG&E indicated that blasting and vibration were considered in the noise technical report. However review of the noise technical report does not confirm this. Please confirm that noise and vibration blasting has been included in the quantitative analysis provided in the Noise Technical Report. Alternatively, please identify potential blasting noise and vibration levels as an alternative method for steel pole installation and include a discussion of the noise and vibration impacts associated with the undergrounding (jack-and-bore or trenching construction). Compare to County’s noise limits (both Leq(8) and impulsive noise level limits) and applicable vibration thresholds.