

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 18, 2019

San Diego Gas and Electric Company
Attn. Eden Nguyen Kilberg
Environmental Project Manager
8315 Century Park Ct.
San Diego, CA 92123

cc. Rebecca Giles, Regulatory Administrator
Julie Watson, Project Manager ESA

RE: Notice to Proceed (NTP) Request for the Artesian 230/60 kV Substation Expansion Project (Project)

Dear Ms. Nguyen Kilberg:

On July 25, 2019 San Diego Gas and Electric Company (SDG&E) submitted a formal Notice to Proceed (NTP) Request to the California Public Utilities Commission (CPUC) seeking the authority to proceed with construction of the Artesian 230kV Substation Expansion Project (Project). CPUC evaluated the Project in accordance with the California Environmental Quality Act (CEQA) via the preparation of an Initial Study Mitigated Negative Declaration (IS/MND) (State Clearinghouse Number 2018101027, March 2019). A Permit to Construct (PTC) for the Project was granted by the CPUC on July 15, 2019 (Decision 19-07-007). The NTP Request seeks permission for SDG&E to begin the construction of the entire permitted Project, with minor Project updates for the localized use of the Carmel Valley Staging Yard, consistent with descriptions in the IS/MND and further clarified below.

The Project is located between Rancho Santa Fe (to the west) and Poway (to the southeast), in the western portion of San Diego County, with elements in the City of San Diego and in unincorporated County of San Diego, California. SDG&E's stated purpose for the Project is to construct a new substation to (1) meet the mandatory North American Electric Reliability Corporation (NERC) reliability criteria and mitigate existing NERC thermal violations identified in the Poway Area Load Pocket; (2) alleviate existing 69kV congestion at the Sycamore Canyon 230/138/69kV Substation; and (3) locate proposed facilities within existing transmission corridors, SDG&E Rights of Way (ROW), and utility-owned property.

The NTP Request addresses proposed construction of all components of the Project [as described in further detail in the IS/MND, Appendix A, Section 2 (Project Description)] and summarized below:

- Construction and operation of a dedicated temporary material storage and staging yard (the Carmel Valley Road Staging Yard) located on private property. The specific boundary for the staging area consists of approximately five acres along the south-west corner of the property as shown on Figure 3 of the NTP Request submitted by SDG&E;
- Use of two existing material storage yards owned by SDG&E (Kearny Mesa Yard and Northeast Annex Yard);
- Within SDG&E's existing property, expansion and rebuilding of the Artesian Substation to include a new 230 kV substation yard and additional 69kV connections;

- Connection of an existing 230kV transmission line into the new 230kV substation yard at Artesian Substation and construction of new 69kV and 12kV underground getaways;
- Expansion of the existing retention basin located at the Artesian Substation site;
- Minor modifications at the existing Bernardo and Rancho Carmel substations within the existing substation footprints;
- Reconductoring of an existing double circuit 69kV power line located between the Artesian and Bernardo substations, including the replacement of existing wood poles with new steel pole structures, and removal of certain existing pole structures from use.

SDG&E submitted the following items in accordance with Applicant Proposed Measures (APM's) and mitigation measures as described in the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP) included in the IS/MND, for actions proposed under the NTP Request:

Applicant Proposed Measure / Mitigation Measure(s)	Implementing Actions	Status/Determination
MM HAZ-2 Construction Fire Prevention Plan	Prepare and implement a project-specific Construction Fire Prevention Plan (CFPP) in consultation with appropriate fire departments, as described in MM HAZ-2	The CFPP and supplemental information including documentation of fire department consultation was submitted to CPUC and determined to be complete.
MM AIR-1; MM HAZ-1 Use of Tier-4 Engines Diesel Equipment Tracking Plan	Submit equipment list to CPUC prior to start of construction at Artesian Substation site	Plan submitted and determined to be complete.
APM BIO-2; APM BIO-4; APM BIO-5; MM BIO-1; MM BIO-3 Pre-Activity Survey Reports	Submit Pre-Activity Survey Reports to wildlife agencies prior to construction	Submitted. Verification survey to be completed by SDG&E within 30 days of the start of construction.
MM NV-2 Construction Noise Reduction Plan (CNRP)	Implementation of the CNRP including mailed notification to residents within 100-feet of construction.	The CNRP was submitted to CPUC and determined to be adequate. Notification to affected residents is pending, to be sent 1-week to 10 days prior to start of construction at applicable sites in proximity to residences or sensitive receptors.
APM BIO-7 Pre-construction Biological Resources Surveys	Complete pre-construction biological resource surveys for all construction locations immediately prior to construction.	To be completed immediately prior to construction. Additional surveys to be conducted in new work areas prior to commencing work in those areas.
MM US-1 Preliminary Construction and Demolition Debris Register	Prepare and Submit CDDR to CPUC for review. The preliminary CDDR documents how the project will achieve waste diversion percentages.	The CDDR was submitted to CPUC and determined to be adequate.

SDG&E is authorized to proceed with Project construction provided that:

- 1) All construction activities are carried out in accordance with the methods and conditions described in the NTP, and all APMs, mitigation measures, compliance plans, and permit conditions described in the MMRCP are implemented. Some measures are on-going and/or have time-sensitive requirements and shall be implemented prior to and during construction, as applicable. A copy of the MMRCP and the NTP shall be maintained on site for the duration of construction at the Project site, and;
- 2) The following implementing actions are undertaken and, as applicable, completed by SDG&E prior to the start of construction:
 - a) Maintain copies of all permits, compliance plans (e.g., Storm Water Pollution Prevention Plan, Construction Fire Prevention Plan, Water Reclamation and Recycling Permit etc.) on-site for the duration of the construction activities.
 - b) Provide Worker Environmental Awareness Training to all Project personnel, including construction and monitoring personnel. SDG&E will maintain training logs at the construction site and make those available to the CPUC or designated compliance monitor upon request. Although not specified as part of the APM BIO-6, MM CUL-2, MM CUL-7, and MM HAZ-2, the CPUC requests the opportunity to review the Worker Environmental Awareness Training materials as soon as these are available.
 - c) In accordance with MM NV-1, provide confirmation if whether a variance from City or the County of San Diego will be required to construct any portion of the Project. If a variance request has been submitted, provide a copy/copies to the CPUC.
 - d) In accordance with MM NV-2, and MM NV-5, provide proof of notification that SDG&E has informed residences (and other noise-sensitive receptors) within 100 feet of construction areas, (or 500 feet from residents impacted by MM NV-5 in the event of nighttime noise) prior to the start of construction. The CPUC requests documentation/notification include the noise complaint hotline (telephone number) the schedule for activities potentially affecting receptors and a basic outline potential nuisance issues.
 - e) In accordance with MM NV-3, and MM NV-4, confirm if blasting is anticipated to be required for the Project's construction. If so, provide documentation of efforts to notify of impacted property owners.

Sincerely,



Andrew Barnsdale
CPUC Environmental Project Manager

cc: Julie Watson, ESA

