

SDG&E TL 6975 Escondido to San Marcos 69kV Project (A.17-11-010)
Energy Division Data Request #7 - January 4, 2019
SDG&E Response #7 - January 18, 2019

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REPORT OVERVIEW

On March 16, 2018, the CPUC deemed the application and PEA for the TL 6975 Escondido to San Marcos 69 kV Project (A.17-11-010) incomplete. The Energy Division has required additional data to prepare a complete and adequate analysis of the potential environmental effects of the Project, in accordance with the requirements of CEQA.

SDG&E TL 6975 Escondido to San Marcos 69kV Project (A.17-11-010) Data Request #7		
Request No.	DATA REQUEST	SDG&E RESPONSE
1.	Provide Attachment 1 (Fire Prevention Matrix) of PEA Appendix 4.8-B, TL 6975 Construction Fire Prevention Plan.	As requested, attached as a separate file, please find the Fire Prevention Matrix of PEA Appendix 4.8-B, TL 6975 Construction Fire Prevention Plan.
2.	Provide information on how SDG&E documents, reports, or otherwise ensures compliance of its fire prevention procedures during project construction.	Project training provides information on compliance with fire prevention requirements, including training on the Final Construction Fire Prevention Plan. Required daily tailboards reinforce training and provide daily reminders of requirements. All training will be documented by sign in sheet and maintained by the project team. Inspections of project equipment will be carried out by the project contractor to ensure compliance. In addition, the contractor that is awarded the bid will be required to have approved construction, inspection, and safety plans to be implemented throughout the life of the project.
3.	Provide information on any end-of-day or other inspections conducted during construction and maintenance activities – or other activities that ensure that project components have been installed correctly and that any ignition risks that could occur after works are minimized or eliminated.	All personnel in the field will follow the Final Construction Fire Prevention Plan during project construction. After construction has been completed for the day, visual inspections will be carried out by the project contractor as well as the SDG&E Contract Administrator (CA), to ensure that all ignition risks are minimized or eliminated. In addition, the contractor that is awarded the bid will be required to have approved construction, inspection, and safety plans to be implemented throughout the life of the project.
4.	To support the CEQA administrative record, describe any spending authorized by CPUC specifically dedicated to SDG&E’s fire prevention efforts. Describe any measures, equipment used, and/or any specific fire prevention efforts taken as a result of this spending. Identify the	SDG&E believes the scope of this request is beyond the scope of the TL 6975 Project (Project), as it requests system-wide information relating to fire prevention efforts and focuses on those efforts over the past five years, which predate and do not relate to the Project. The information requested will not inform the CEQA analysis underway for the Project, as it does not and cannot provide information on

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	<p>actual expenditures incurred by SDG&E by completing a table similar to the below example:</p> <table border="1" style="margin-left: 40px;"> <thead> <tr> <th style="text-align: left;">Program</th> <th>2013</th> <th>2014</th> <th>2015</th> <th>2016</th> <th>2017</th> </tr> </thead> <tbody> <tr> <td>Vegetation Management Tree Trimming</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Vegetation Management Pole Brushing</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Pole Replacement (wood to steel)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Fire Risk Mitigation (itemize by project)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Wildfire Mitigation Program (itemize by project)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Other</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Program	2013	2014	2015	2016	2017	Vegetation Management Tree Trimming						Vegetation Management Pole Brushing						Pole Replacement (wood to steel)						Fire Risk Mitigation (itemize by project)						Wildfire Mitigation Program (itemize by project)						Other						<p>the Project itself, information relating to significant environmental impacts associated with the Project, or effective mitigation available to lessen the impacts associated with any Project-specific significant impacts. As outlined in responses to questions 1-3, the Fire Prevention Plan for TL 6975 is comprehensive and fully mitigates any potentially significant impacts associated with wildfire to below a level of significance.</p>
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5.	Provide the annual report on risk spending and mitigation accountability for Calendar Year 2017.	SDG&E believes the scope of this request is beyond the scope of the Project, as it requests system-wide information relating to risk spending and mitigation for a time period which predates and does not relate to the Project. The information requested will not inform the CEQA analysis for the Project. Furthermore, the specific annual report requested has not been finalized yet and will not be available until February 28, 2019. SDG&E believes the information provided in response to questions 1-3, including the Fire Prevention Plan, fully informs the CEQA analysis associated with any potentially significant wildfire impacts.

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ATTACHMENT 1:

Fire Prevention Matrix of PEA Appendix 4.8-B, TL 6975 Construction Fire Prevention Plan

PROJECT ACTIVITIES		FPI		
ACTIVITY	ACTIVITY TOOLS AND EQUIP	NORMAL	ELEVATED	EXTREME and RFW
If your activity does not fall into a specific category consult the fire prevention plan, ask your CA, or call SDGE fire personnel. It is your responsibility to know what mitigation tools are required for your activity		FPI Range of 1-11	FPI Range of 12-14	FPI Range of 15-17
1 Privately Owned Vehicle (POV)	A privately owned vehicle used as transportation to a yard and parking in a POV area. (Parking areas must have adequate clearance from combustible material)	No tools required (If the vehicle is brought out to sites it must have the same tools as other project vehicles)	No tools required (If the vehicle is brought out to sites it must have the same tools as other project vehicles)	No tools required (If the vehicle is brought out to sites it must have the same tools as other project vehicles)
2 Project Vehicles	Company owned vehicles, Vehicles with company markings, and equipment (not POV's) (Parking areas must have adequate clearance from combustible material)	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump .	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump
3 Fire Box	When/Where required the minimum contents of a fire box shall be 3 shovels, 2 Pulaski's, 2 McLeods and 1 full 5 gallon backpack pump.	When/Where required the minimum contents of a fire box shall be 3 shovels, 2 Pulaski's, 2 McLeods and 1 full 5 gallon backpack pump.	When/Where required the minimum contents of a fire box shall be 3 shovels, 2 Pulaski's, 2 McLeods and 1 full 5 gallon backpack pump.	When/Where required the minimum contents of a fire box shall be 3 shovels, 2 Pulaski's, 2 McLeods and 1 full 5 gallon backpack pump.
4 Helicopter Operations	Helicopter	Helicopter staging areas will be treated similar to other staging areas with enough fire equipment for personnel on site or fire box available on major operations. On Incidental Landing Areas (ILA's) adequate firefighting equipment shall be carried on the helicopter for the number of personnel working on the ground at those sites.	Helicopter staging areas will be treated similar to other staging areas with enough fire equipment for personnel on site or fire box available on major operations. On Incidental Landing Areas (ILA's) adequate firefighting equipment shall be carried on the helicopter for the number of personnel working on the ground at those sites.	Helicopter staging areas will be treated similar to other staging areas with enough fire equipment for personnel on site or fire box available on major operations. On Incidental Landing Areas (ILA's) adequate firefighting equipment shall be carried on the helicopter for the number of personnel working on the ground at those sites.
5 Gasoline Powered hand tool use	Chain saw, Chop saw, Weed Eater,... (Spark Arrester Required)	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'. There must be one shovel or a fire extinguisher within 25'. Assign a spotter/swamper during operations	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'. There must be one shovel or a fire extinguisher within 25'. Assign a spotter/swamper during operations	Activity Not Permitted
6 Gasoline Powered Tool Fueling (Chain saw, Weed Eater, chipper, generator...)	Gas can/truck	Equipment may be refueled after cooling and in an area with a minimum of 10' of clearance, Shovel and Fire extinguisher within 25'.	Equipment may be refueled after cooling and in an area with a minimum of 10' of clearance, Shovel and Fire extinguisher within 25'.	Activity may take place only in a cleared MOW; Equipment may be refueled after cooling and in an area with a minimum of 10' of clearance, Shovel and Fire extinguisher within 25'.
7 Combustion engines	Generators, Compressors, any piece of equipment with a combustion engine	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'; While operating equipment must have 5' of clearance on all sides and no combustible material underneath; ensure equipment that requires a spark arrester has it installed properly	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'; While operating equipment must have 5' of clearance on all sides and no combustible material underneath; ensure equipment that requires a spark arrester has it installed properly	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'; While operating equipment must have 5' of clearance on all sides and no combustible material underneath; ensure equipment that requires a spark arrester has it installed properly
8 Chipping	Chippers, Grinders	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump, and A fully charged 2A:10B:C Fire Extinguisher within 50 feet	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump, A fully charged 2A:10B:C Fire Extinguisher within 50 feet, 100 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions	Activity Not Permitted
9 Hot Work: Welding or Grinding	Generators, Welder, Grinder, CAD Weld equipment, Any spark producing equipment	All welding, cutting and other hot work will follow a hot work program that will at minimum meet the standards set in NFPA 51B, CFC Chapter 35 and have 1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump within 50'; 10' of clearance, wet down surrounding area, A designated "Fire Patrol" must be present during work and 1 hour after hot work is complete (Where 10' of clearance cannot be cleared crews may wet down the area and use shields or barriers to prevent sparks from igniting surrounding fuels)	All welding, cutting and other hot work will follow a hot work program that will at minimum meet the standards set in NFPA 51B, CFC Chapter 35 and have 1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump within 50'; 10' of clearance, wet down surrounding area, A dedicated "Fire Patrol" must be present during work and 1 hour after hot work is complete (Where 10' of clearance cannot be cleared crews may wet down the area and use shields or barriers to prevent sparks from igniting surrounding fuels)	Activity Not Permitted
10 Aerial Hot work	Any hot work that occurs with the welder's feet above ground level. Hot work should not be performed with a tool over a crew members head.	A site specific plan will be discussed and implemented when hot work is required to be performed higher than 6 feet off the ground. To the best of the ability of the project personnel, hot work should be accomplished at ground level.	A site specific plan will be discussed and implemented when hot work is required to be performed higher than 6 feet off the ground. To the best of the ability of the project personnel, hot work should be accomplished at ground level.	Activity Not Permitted
11 Working on or near energized lines	Bucket truck, hot stick, grounding jumpers	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'	Activity Not Permitted
12 Removal and/or installation of fencing and/or berms	Hand tools, Loader with fence post installer/remover	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'	Activity Not Permitted
13 Removal and/or installation of fencing and/or berms	Tractor, Ditch Witch	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	Activity Not Permitted
14 Grading, Road Pioneering, Road Maintenance, Scraping and Trenching	Bulldozer, Excavator, Scraper, Heavy equipment	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50 feet, 100 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump, A fully charged 2A:10B:C Fire Extinguisher within 50 feet, 150 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions	Activity Not Permitted
15 Movement of Equipment with Steel tracks (This applies to equipment that is traveling on an access road, driveway and/or a paved road. This does not apply to equipment operating within a site/pad or MOW)	Steel Track Equipment	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'; 50 gallons of water with pump and hose; Escort in a different vehicle following the equipment	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump within 50'; 50 gallons of water with pump and hose; Escort in a different vehicle following the equipment	Activity Not Permitted
16 Foundation Drilling or Pole hole digging	Drill, Forklift, Excavator, Compressor, Digging tools	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	Activity Not Permitted
17 Structure Erection/Pole Setting	Crane, Excavator, Forklift	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	Activity Not Permitted
18 Foundation Pouring	Concrete Trucks, Generators, Hand tools, etc.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	Activity Not Permitted
19 Erosion Control (BMP)	Hand tools only	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50 feet, 100 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions, Dedicated Fire Patrol Required
20 Erosion Control	Heavy equipment	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50 feet, 100 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump within 50 feet, 150 gallons of water with pump and hose.	Activity Not Permitted
21 Pad Clearing	Bulldozer, Excavator, hand tools, Steel Track equipment	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50 feet, 100 gallons of water with pump and hose on site, Area is wet down sufficiently to prevent ignitions	1 round point shovel, 1 Pulaski, 1 (5) gallon backpack pump within 50 feet, 150 gallons of water with pump and hose.	Activity Not Permitted
22 Vegetation Clearing	Hand tools (If a chain saw or weed eater are used, see Gasoline Powered Hand Tool section)	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	Activity Not Permitted
23 General Construction activities	Hand tools only	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	See Specific activity for required mitigation measures
24 Monitoring and Assessment of: Vegetation, Wildlife, Cultural, etc.	Recording data and taking pictures	No tools required (Reminder: Project vehicles still require tools at all times); Communications must be maintained at all times	No tools required (Reminder: Project vehicles still require tools at all times); Communications must be maintained at all times	No tools required (Reminder: Project vehicles still require tools at all times); Communications must be maintained at all times
25 Dust abatement: Wetting the sites, roads or any other area on the ROW	Water Trucks	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.	1 round point shovel, 1 Pulaski, and 1 (5) gallon backpack pump within 50'.
26 Smoking	Cigarettes, Cigars (Note: Electronic Cigarettes can be used anywhere)	Smoking may take place in designated smoking areas with an ash can, 10' diameter circle of bare mineral soil	Smoking may take place in designated smoking areas with an ash can, 10' diameter circle of bare mineral soil	Activity Not Permitted
OTHER ACTIVITY/EQUIPMENT REQUIREMENTS:				
Spark Arresters: All internal combustion engines shall have approved spark arresters. Engines used to provide motive power for trucks, tractors, buses, and passenger vehicles, except motorcycles, are exempt if the exhaust system is equipped with a muffler. Turbocharged engines are exempt.				
Drive in sites: Standard fire mitigation tools on vehicles will meet the requirements. If the work site is more than 50' from the vehicle the tools will need to be moved from the vehicle to the site.				
Delivery Vehicles: Defined as vehicles that will drop off equipment or material and leave (i.e. Water tankers, postal workers...); these vehicles do not need to be equipped with fire tools but drivers need to follow all project requirements while accessing the site. If vehicle is just moving from one area of the project to another area of the project it is a project vehicle and will have the standard fire tools.				
Blasting: (or any use of explosives) requires a separate fire plan that may require additional mitigations				
IMPORTANT CONTACT NUMBERS				
Primary Emergency Number: 911 Fire Coordination: (858) 503-5152				