

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 15, 2017

Mr. Tim Lyons
Regulatory Case Manager II
San Diego Gas and Electric Company
8315 Century Park Court
San Diego, CA 92123

RE: Application Completeness – Permit To Construct Tie Line (TL) 6975 San Marcos to Escondido 69kV Project (Application 17-11-010)

Dear Mr. Lyons:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of San Diego Gas and Electric Company's (SDG&E) Application (A. 17-11-010) and related Proponent's Environmental Assessment (PEA) for a Permit To Construct the TL6975 San Marcos-Escondido 69kV Project that was filed at the CPUC on November 15, 2017.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the approval of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of SDG&E's application for the TL6975 Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that prevent preparation of an adequate environmental document in a timely manner. The attached report identifies the portions of the application found to be deficient.

CEQA staff conducted the initial review of the PEA, pending an executed contract between the CPUC and necessary consultant experts. There may be additional technical deficiencies once a contract has been approved for consultant specialists (expected in early 2018 after submittal of the contract package in April 2017).

Information provided by SDG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.17-11-010. Please send two sets of responses to the Energy Division, in both hardcopy and electronic format.

Please carefully consider the Commission's recent discussion on confidentially declarations from Decisions 16-08-024 and 17-05-035. This is the guidance the CPUC will follow- in considering whether the PEA can be deemed complete.

The CPUC requests that SDG&E respond to this report no later than January 15, 2018.

Upon receipt of this information, the CPUC will review it within 30 days and determine if it is adequate to deem the PEA and amended application complete. We will be available to meet with you at your convenience to discuss these items.

Note that that CPUC and its consultants, once in contract, may request additional information before deeming this application complete.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should SDG&E's PTC be approved.

Please direct questions related to this application to me.

Sincerely,

s/ *MJ Orsaba.*

Lisa Orsaba
Project Manager
Energy Division, CEQA Unit

Attachment – Deficiency Report # 1

cc: Lon Maier, Supervisor
Molly Sterkel, Program Manager
Geoff Dryvynsyde, Legal Division
Marcelo Poirier, Legal Division

DEFICIENCY REPORT #1 FOR THE SDG&E TIE LINE 6975 SAN-ESCONDIDO 69KV PROJECT (A.17-11- 010)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company's (SDG&E) Application (A.17-11-010) and Proponent's Environmental Assessment (PEA) for a Permit to Construct the TL 6975 Project. Deficiencies were identified using the CPUC PEA Checklist (CPUC, October 2008) and the CPUC Information and Criteria List. Deficiencies are presented (via PEA Checklist numbering) as follows:

Chapter 1 PEA Summary

The PEA Summary shall include any areas of controversy, any major issues to be resolved, description of public outreach efforts, and description of public outreach efforts. Under Section 1.7 SDG&E briefly indicates agency coordination efforts with San Diego County, City of Carlsbad, City of Escondido, City of San Marcos, and City of Vista.

Please provide a summary of meeting discussions with the cities in order to understand any issues that have been addressed or need to be addressed related to this project.

Chapter 3.4 Proposed Project

Per this PEA checklist section, please provide the GIS data layers for the proposed project preliminary engineering including estimated locations of all physical components of the proposed project as well as those related to construction. For physical components, this could include but is not limited to the existing components as well as the proposed pole locations, transmission lines, substations, etc. For elements related to construction include: proposed or likely lay down areas, work areas at pole sites, pull and tension sites, access roads, areas where special construction methods may need to be employed, areas where vegetation removal may occur, areas to be graded, etc.

Please provide the capacity increase in megawatts (MW). If the proposed project does not increase capacity, state that.

Please provide a "typical" plan and profile views of the existing substations that are included in the Proposed Project.

The proposed project anticipates the need for increased ROW to provide a 20-foot easement and accommodate new structures.

Please describe how additional ROW would be acquired.

List the properties likely to require acquisition.

In addition to providing GIS information for each type of vegetation removal, please describe how each type of vegetation removal would be accomplished.

For all trenching activities proposed, please provide the total approximate cubic yardage of material to be removed from the trench, the amount to be used as backfill and the amount subsequently to be removed/disposed of off-site.

5.1 Aesthetics

The PEA checklist requires visual simulations of prominent public view locations. Figure 4.1-2 (photos of viewpoint locations) and Figure 4.1-3 (photos of existing facilities and vicinity) are not included in Section 4.1. In addition, there are no visual simulations of the proposed project in section 4.1 or the appendices. Please provide these figures and simulations to the CPUC.

5.4 Biological Resources

The PEA checklist requires GIS data of wetland features as well as any GIS data documenting locations of special status species.

- Provide GIS data of wetland features. It should not be marked confidential.
- Provide any GIS data documenting locations of special status species. It should not be marked confidential.

5.5 Cultural Resources

The PEA checklist requires a copy of all letters and documentation of Native American consultation. Per PEA section 4.5.2.2 please provide the NAHC 3/22/2017 response to SDG&E, letters sent to all listed tribes on 3/30/2017, and the responses received from the three tribal groups.

5.6 Geology

The PEA checklist requires a copy of the geotechnical investigation, if completed. Please provide a copy of the geotechnical study prepared by Geocon (2017) as indicated by PEA on page 4.6-13.

5.9 Land Use and Planning

Please provide the GIS data of all parcels within 300 feet of the Proposed Project with the following data: APN numbers, mailing addresses, and parcel's physical address.

