

PUBLIC UTILITIES COMMISSION

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September 25, 2020

Advice Letter 5-E

Alona Sias
Director, Strategy & Business Development
Horizon West Transmission/NextEra Energy Resources
One California Street, Suite 1600
San Francisco, California 94111

Subject: Approval of Notice of Construction and Compliance Pursuant to General Order 131-D for 230-kV Transmission Line Undergrounding Work Planned by Horizon West Transmission

Dear Alona Sias,

Advice Letter (AL) 5-E (filed July 10, 2020) is approved and effective today. With AL 5-E, Horizon West Transmission, LLC (U222-E) (HWT) filed a notice of construction to convert an overhead 230-kV transmission line segment (115 feet long) to an underground position (275 feet long).

Background

The existing, overhead 230-kV segment was first energized on February 29, 2020. It was built as part of HWT's Suncrest Dynamic Reactive Power Support Project.¹ The entirety of the Suncrest Dynamic Reactive Power Support Project was evaluated pursuant to General Order (GO) 131-D and CEQA with the Final EIR certified on October 2, 2018 by decision D.18-09-030 for proceeding A.15-08-027. The underground conversion work described in AL 5-E was identified in HWT's 2020 Wildfire Mitigation Plan (WMP) submitted on February 7, 2020. Their WMP was ratified by Wildfire Safety Division Resolution WSD-009 on June 11, 2020. The Resolution stated that costs attributable to the WMP were not approved and must be sought separately.

Existing Overhead and Proposed Underground Alignment Details

The existing, overhead segment was constructed on land owned by San Diego Gas and Electric Company (SDG&E) and connects to SDG&E's Suncrest Substation. HWT's 230-kV line was built pursuant an easement agreement between SDG&E and HWT. The easement agreement was filed in SDG&E AL 3405-E and approved by the Commission on August 19, 2019. The approval authorized SDG&E to convey the required easements to HWT pursuant to PU Code Section 851.

In AL 5-E, HWT states that the converted underground transmission line segment would be constructed on "a same legal parcel as the existing overhead transmission line segment." HWT also states that HWT and SDG&E have agreed to amend their easement agreement to adjust the easement boundaries so that they encompass the area where the underground line

¹ For project details, see <https://www.cpuc.ca.gov/environment/info/horizonh2o/suncrest/index.html>.

would be installed. Under the amendment, HWT would relinquish a portion of the easement area where the overhead transmission line was built once the conversion is complete. The net result of these boundary adjustments would be to reduce HWT's total easement area by 0.078 acres. The total approximate new disturbance associated with the conversion of the 115 feet of overhead transmission line to underground would be 0.85 acres, comprised of 0.9 acres of temporary disturbance and 0.01 acres of permanent disturbance. These are worst-case estimates, states HWT.

Comment Received

The County of San Diego filed a comment about AL 5-E on July 29, 2020 regarding the need for proper handling of construction-related hazardous waste and potential need for a permit for the accumulation and storage of such waste.

Discussion

GO 131-D

HWT states that even if newly built, the underground segment will be approximately 275 feet long and does not constitute a "major" transmission line facility that would require a GO 131-D application and cites to Commission decision D.11-07-020.²

PU Code Section 851

According to HWT, "no further approval should be required under PU Code Section 851."³ They state that the converted underground transmission line segment would be installed on the same legal parcel as the existing overhead transmission line segment. The amendment to the existing easement agreement, "merely adjusts the boundaries of the easement previously granted by SDG&E and approved by the Commission, but does not involve any new or different legal parcels, and results in a net decrease in the total acreage encompassed by Horizon West's easement."

This letter disposes of HWT's GO 131-D Notice of Construction. The issue of whether SDG&E needs to submit an Advice Letter pursuant to PU Code Section 851 cannot be decided by Commission staff in a GO 131-D disposition on an HWT filing.

Disposition

AL 5-E complies with GO 131-D and is approved. HWT must ensure that all required permits and approvals are received prior to start of construction. Costs associated with work attributable to AL 5-E are not within the scope of this approval and must be sought separately through the appropriate cost recovery processes.

² Decision Granting Southern California Edison Company a Permit to Construct the Red Bluff Substation Project, D.11.07-020, A.10-11-012, July 22, 2011.

³ HWT AL 5-E at page 3.

Please contact Rob Peterson in the Energy Division at rp3@cpuc.ca.gov for further information.

Sincerely,

Handwritten signature of Edward Randolph, with the initials "(for)" written next to it.

Edward Randolph
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

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Service list copied for A.15-08-027.