

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 20, 2007

Mr. Kevin O'Beirne
San Diego Gas & Electric Company
8830 Century Park Court – CP32D
San Diego, CA. 92123

**Re: Data Request #19 for the SDG&E Sunrise Powerlink Transmission Project,
Application No. 06-08-010**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed the documents and materials that SDG&E has provided including the Proponent's Environmental Assessment (dated August 4, 2006), the Application Supplement Materials (dated September 1, 2006), and SDG&E's Responses to Data Requests No. 1 through 16 (some responses to DR 17 and DR 18 are still pending). During the analysis of the aforementioned materials and in our preparation of EIR/EIS sections, we have identified additional items that require information from SDG&E. Additional data requests may be necessary to address alternatives and other CEQA/NEPA topics. This letter constitutes Data Request No. 19.

We would appreciate your response to the two items included in this request by August 31, 2007.

Please submit one set of responses to me and one to Susan Lee at Aspen in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit

cc: Sean Gallagher, CPUC Energy Division Director
Ken Lewis, CPUC Program Manager
Steve Weissman, ALJ
Traci Bone, Advisor to Commissioner Grueneich
Nicholas Sher/Jason Reiger, CPUC Legal Division
Lynda Kastoll, BLM
Susan Lee, Aspen Environmental Group

Sunrise Powerlink Transmission Line Project

Data Request No. 19

Project Description

PD-31 **Connected Actions.** This data request is a follow up to DR 17, Item PD-24. We are developing a list of projects in the area that could be considered under CEQA or NEPA as “connected” or “indirect” actions, or “cumulative projects.” As defined in NEPA (40 C.F.R. 1508.25(a)(1)), actions which are considered "connected actions" are the following

- (i) are automatically triggered by the proposed action,
- (ii) cannot or will not proceed unless the proposed action occurs first or simultaneously, or
- (iii) are interdependent parts of a larger action and depend upon the larger action for their justification.

We are considering a range of projects that may need to be analyzed as connected actions as a result of facts disclosed in SDG&E’s testimony. The two major categories of projects under consideration as connected are:

- New generation projects anticipated by SDG&E as part of the Purpose and Need for the Sunrise Powerlink and CPCN Application (up to 900 MW solar thermal and 1,000 MW geothermal anticipated by 2015 in Table IV-14 of the Purpose and Need);
- Other generation projects that have contracts to provide power that are contingent upon SDG&E obtaining approval for and being able to license and construct a new 500 kV line from Imperial Valley to the San Diego area. The Stirling solar project selected by SDG&E as a result of the 2004 Renewable Portfolio Standard (RPS) solicitation and other projects selected in later RPS solicitations fall into this category.

Other possibly connected actions include Imperial Irrigation District (IID) transmission upgrades that would occur with Sunrise as a result of the SDG&E’s Memorandum of Agreement with IID. Table PD-25 shows the range of possible connected actions under consideration.

Table PD-31 Range of Possible Connected Actions

Origin of Possible Connected Action	Developer	Location	Technology	Capacity
SDG&E's 2004 RPS Solicitation (CPUC Resolution E-3965)	Stirling Energy Sys. Solar Two	Imperial Valley	Solar Thermal	900 MW
SDG&E's 2005 RPS Solicitation (Advice Letter 1845-E)	Bethel Solar 1 & 2	Imperial Valley	Solar Thermal	49.4 + 49.4 MW
SDG&E's 2005 RPS Solicitation (Advice Letter 1845-E)	Esmeralda-San Felipe	Imperial Valley	Geothermal	20 MW
SDG&E's 2006 RPS Solicitation (under negotiation)	Unknown		See Request Below	
SDG&E's 2007 RPS Solicitation (shortlist only)	Unknown		See Request Below	
SCE's 2006 RPS Solicitation (SCE Advice Letter 2143-E)	Baja Wind US	La Rumorosa, Mexico	Wind	200 to 250 MW
Substation and transmission in IID (IID Memorandum of Agreement and May 14, 2007 response to Data Request)	IID or SDG&E	San Felipe 500/230 kV Substation and New 230 kV lines into San Felipe Substation		

a. SDG&E's response to DR-24(a) identifies new renewable generation in eastern San Diego County that SDG&E plans to accommodate with the new 500 kV substation on the Southwest Power Link and new lines to Boulevard Substation.

Describe the renewable generation under consideration for contracts from the 2006 Renewable Portfolio Standard (RPS) solicitation. Advice Letters of proposed contracts were due to the CPUC in December 2006. Please provide copies of all relevant Advice Letters under the 2006 RPS solicitation as soon as possible, and describe the projects [generation capacity (MW), technology, and location/point of interconnection] providing as much detail as possible. Please also provide contact information for each of the developers with projects under consideration.

b. Please describe in as much detail as possible the location, capacity, and types of renewable generation under consideration for contracts from the 2007 RPS solicitation. The final short list of successful projects was due to the CPUC in mid-July 2007. Please describe whether projects are under consideration in the Imperial Valley or Mexico area and whether the contracts for the projects are likely to be contingent upon SDG&E obtaining approval for and being able to license and construct a new 500 kV line from Imperial Valley to the San Diego area.

c. SDG&E's response to DR-24(b) indicates that only a limited amount (approximately 300 MW) of anticipated new generation could be characterized as "deliverable" absent a new 500 kV line from the Imperial Valley area to San Diego. SDG&E's economic analysis assumes 1,900 MW of theoretical new generation (up to 900 MW solar thermal and 1,000 MW geothermal anticipated by 2015), and the Imperial Valley Study Group (IVSG) contemplated a level of 2,200 MW of new generation. What is the maximum level of new generation that would become "deliverable" with the Sunrise Powerlink in its proposed configuration?

d. Please consider each "possible connected action" listed in Table PD-31 and identified by SDG&E in response to questions (a) and (b), and describe the likelihood of each one

proceeding in the event that the SDG&E is unable to successfully license a new 500 kV line from the Imperial Valley area to San Diego.

Alternatives

ALT-93 **Non-Wires Alternatives -- Results of Peaker RFO and Capacity RFO and procurement efforts.** Please provide copies of Advice Letters or evidence of definitive power purchase agreements for new generation resulting from the October 17, 2006 New Local Capacity RFO (a.k.a. 2008 Peaker RFO) and the March 9, 2007 Supply Resources RFO (a.k.a. 2010-2012 Capacity RFO) procurement efforts. If definitive agreements are not yet available, please describe the schedule for such agreements, and describe the projects on the shortlist [generation capacity (MW), technology, and location/point of interconnection] providing as much detail as possible. Please also provide contact information for each of the developers with successful projects.