

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



April 21, 2008

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

**Re: Data Request #27 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 and its consultant team are currently preparing the Final EIR/EIS for the Sunrise Powerlink Project. We have received SDG&E's Responses to Data Requests No. 1 through 26. During the analysis of comments on the Draft EIR/EIS or of Testimony in Phase 2 of the ALJ's proceeding, we have identified additional items that require information from SDG&E; these items are detailed in the attachment to this letter.

This letter constitutes Data Request No. 27. Additional data requests may be necessary as we review additional comments and as Phase 2 testimony continues. We would appreciate receiving your response to this request by May 1, 2008.

**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 Data Request 27

## 27-1 Helicopter Construction

**A. Anza-Borrego Desert State Park.** Please clarify SDG&E's plans for construction through Anza-Borrego Desert State Park. The shapefiles provided for both the Proposed Project and the 100-Foot ROW Alternative show numerous new access roads in the Grapevine Canyon segment of the route, but the Project Description (from the PEA Supplement) indicates that 41 towers in Grapevine Canyon would be constructed by helicopter. Please describe:

A1. Specifically what work would be done via helicopter and what work would be done using ground-based equipment.

A2. Specifically what the access roads would be used for, and whether each one is proposed as a temporary (construction only) or permanent access road.

**B. Moretti Property.** In response to Data Request 24, SDG&E explained that the access roads across the Moretti property would be need to provide a continuous road system from the first structure south of Highway 76/79 to Mesa Grande Road and to minimize construction traffic along Hwy 79, and to avoid a long travel route between Structures 64 and 65.

Please explain how the need for access roads is affected by the proposed helicopter construction of towers in this route segment. The Moretti access roads seem to exceed that required for periodic maintenance access.

**27-2 USFS Avoidance Reroute.** The reroute suggested in Comment Letter #3 (March 18, 2007) called "USFS Avoidance" relocates a single tower just west of the intersection of Big Potrero Truck Trail and Lake Morena Road. The relocated tower moves the tower about 800 feet closer to the road and the more developed portions of the valley. The Forest Service land could be avoided with a smaller relocation (about 200 feet). Please revise this reroute to keep Tower MD2030 as close as possible to the Forest boundary.

**27-3 Grapevine Canyon Reroutes.** Two different revisions of the private land portion of the Grapevine Canyon Reroute have been provided to us, one with Comment Letter #3 and one with Comment Letter #4. The titles of these reroutes are:

- "Grapevine Canyon Modification" (Letter #3, Sheets GV01 to GV06). As an example of difference, see southern portion of map GV05 and compare to map set below.
- "Grapevine Canyon – North End Revision" (Letter #4, Sheets GV1 to GV4). As an example of the difference, see center/southern portion of map GV3 and compare to map set above.

Please reconcile these different sets of maps and provide us with a single set of maps showing the reroute that SDG&E is proposing. If there is a reason for both sets of reroutes to be considered, please explain.

**27-4 Reroute SWPPL Archaeological Site.** Our archaeologists have checked this reroute and believe that Tower SWA8 needs to be relocated about another 50 or 100 feet to the east

to completely avoid the site. Please verify and provide us with revised shapefiles and maps.

**27-5 500 kV Full Loop (Future Expansion).** As you are aware, several parties<sup>1</sup> have provided written comments suggesting the infeasibility of the 500 kV Full Loop segment that follows Highway 76. We understand that SDG&E may have identified other potential 500 kV expansion routes from the Central East Substation to the SCE transmission system. Please provide maps and descriptions of these other routes.

**27-6 GHG Mitigation.** SDG&E's comment letter on the Draft EIR/EIS illustrates the difficulty that may exist in verifying accurate counting of GHG reductions. SDG&E says that the Climate Action Registry (CCAR) "... verified that 77,000 tons/year of CO2 offsets were available at the Garcia River Forest to offset any net GHG emissions from Sunrise's construction" (SDG&E's April 11, 2008 comment letter, p.61). However, carbon storage in the Garcia River Forest as a mitigation strategy may not be available to SDG&E if another entity creates and utilizes the reduction. Pacific Gas and Electric Company purchased 200,000 metric tons of GHG reductions from the Garcia River Forest (PG&E press release February 26, 2008).<sup>2</sup> Without additional information from SDG&E, it is not clear if SDG&E is proposing to use the same reductions to offset the emissions of Sunrise construction.

Please provide any available information supporting SDG&E's claim of available GHG emission reduction programs and specify how the programs could be used to minimize the project's GHG construction emissions. SDG&E should specifically identify any GHG reduction measures that it currently proposes to use to offset the construction GHG emissions.

**27-7 General Conformity Demonstrations.** SDG&E says that "correspondence with the SDAPCD" indicates a likelihood of compliance with General Conformity requirements in San Diego County (SDG&E's April 11, 2008 comment letter, p. 68), but SDG&E provides no evidence of any local air district determining compliance with General Conformity requirements. Please provide copies of its communications with local air district staff on the likelihood of impacts and need for mitigation.

**27-8 Chicarita Cable Pole Revision.** Our initial review of this change to the Proposed Project, suggested by SDG&E in Comment Letter #4, indicates that this change could create a new significant visual impact. The new location of the cable pole would be in a location that would be immediately adjacent to homes, and highly visible to residences and from Rancho Peñasquitos Drive. Further analysis will be carried out by our visual specialist. Please explain whether this revision is considered essential by SDG&E for engineering reasons or if it was specifically proposed to reduce land use impacts (proximity to residences), as described in the letter.

---

<sup>1</sup> La Jolla and Rincon Bands, Cleveland National Forest. All letters are available on CPUC CEQA project website at: <http://www.cpuc.ca.gov/Environment/info/aspen/sunrise/sunrise.htm>

<sup>2</sup> [http://www.pge.com/about/news/mediarelations/newsreleases/q1\\_2008/080226.shtml](http://www.pge.com/about/news/mediarelations/newsreleases/q1_2008/080226.shtml)

**27-9 IID Comment regarding 92 kV ROW.** IID’s April 11, 2008 comment letter on the Draft EIR/EIS (see Attachment 1) states that IID has not agreed to relocation of its existing 92 kV transmission line within its existing right-of-way both east of and within Anza-Borrego Desert State Park. Given this statement by IID, please explain the viability of the Proposed Route where SDG&E has proposed to use the existing IID ROW. If IID does not agree to relocation of its 92 kV line, does the definition of SDG&E’s proposed project have to be revised?

**27-9 Difficult Construction.** SDG&E’s Phase 2 testimony includes numerous references to the greater difficulty of construction of the Southern Alternatives in comparison to the Northern Alternatives.

a. First, please define characteristics of difficult construction areas.

Second, please define the specific areas (by milepost) along the SDG&E Modified Southern Route and the Enhanced Northern Route where:

b. Construction is considered “difficult”.

c. Helicopter construction would likely be required due to terrain issues.

d. Helicopter construction would likely be required due to Forest Service requirements.

**27-10 Sempra’s Presidential Permit.** Several commenters on the Draft EIR/EIS have suggested that it is appropriate for this document to evaluate the impacts of Sempra Generation’s proposed cross-border transmission line and wind project in Mexico (Federal Register 73 FR 9782, February 22, 2008 on Presidential Permit Application). Given the congestion on the SWPL, it seems unlikely that the generation from this project of “up to 1250 MW” could be imported without construction of Sunrise. In addition, SDG&E’s personnel have publicly spoken about the need for Sunrise to import renewable generation from the Imperial Valley and Mexico.

Is Sunrise needed in order for the Sempra wind project to have adequate transmission capacity? If Sunrise or a similar 500 kV line from the Imperial Valley area to San Diego is approved and built, what modifications would be needed to SWPL to accommodate Sempra's project? In the event that SDG&E is unable to successfully license a new 500 kV line from the Imperial Valley area to San Diego, what modifications would be needed to accommodate Sempra's project?

With respect to the Northern Routes, IID submits that SDGE faces even greater obstacles. SDGE contends that the proposed Northern Routes are feasible because it could use an existing right-of-way (RoW) through Anza-Borrego Desert State Park (ABDSP). This is not correct. A brief history of the existing 92 kV line that runs through ABDSP is helpful in understanding the issue. The existing 92 kV transmission line, known as the "RINCON" line occupies both private and public RoWs that were originally acquired by purchase or prescriptive rights by the original builder and user of the RINCON line. The utility that originally constructed and owned the RINCON line was Southern Sierras Pacific Power Company (Southern Sierras). Southern Sierras obtained the original RoW through what is now ABDSP from the federal government. On October 12, 1943, the license for the RINCON line was transferred to IID by Order of the Federal Power Commission.<sup>7</sup> IID therefore became the successor in interest to Southern Sierra with respect to that RoW. At some time prior to 1957, IID sold to SDGE the portion of the RINCON line west of the Narrows Substation. At all times since acquiring the line, IID has owned, operated and maintained the portion of the RINCON line from the Narrows Substation east through ABDSP to IID's San Felipe Substation. IID and SDGE both have competing requests to the BLM for the renewal of the existing federal RoW through the ABDSP.

Additionally, private RoWs for the RINCON line were assumed by IID. IID has not been asked nor has it agreed to the relocation of any of its transmission lines to allow the SPL to utilize IID's RoW. Therefore, the level of uncertainty about SDGE's ability to obtain a RoW through ABDSP is even greater than any of the uncertainties about obtaining a RoW along the Southern

Route. The Draft EIR/EIS recognizes the uncertainty surrounding the RoW through the ABDSP:

The statutory or recorded easement through the majority of ABDSP is 100 feet, but may be narrower or even non-existent in several areas ... The width and continuity of the existing easement through the Park is contested and under discussion between SDG&E and State Parks.<sup>7</sup>

Therefore, the Northern Routes face significant uncertainty regarding the RoW through ABDSP.