

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 10, 2011

Mr. Alan F. Colton  
Manager – Environmental Services  
Sunrise Powerlink Transmission Project  
8315 Century Park Court, CP21G  
San Diego, CA 92123-1550

RE: SDG&E Sunrise Powerlink Transmission Line Project – Variance Request #28

Dear Mr. Colton,

On October 19, 2011, San Diego Gas and Electric (SDG&E) requested a variance from the California Public Utilities Commission (CPUC) to waive certain conditions found in Mitigation Measure F-1a concerning Red Flag Warning (RFW) events as applied to the Suncrest Substation (NTP #11, Suncrest Substation), of the Sunrise Powerlink Project.

The CPUC voted on December 18, 2008 to approve the SDG&E Sunrise Powerlink Transmission Line Project ([Decision D.08-12-058](#)) and a [Notice of Determination](#) was submitted to the State Clearinghouse (SCH#2006091071). The BLM issued a [Record of Decision](#) approving the Project on January 20, 2009. The Project also crosses lands under jurisdiction of the U.S. Department of Agriculture; and Forest Service on the Cleveland National Forest; the Forest Service issued its Record of Decision and Supplemental Information Report on July 9, 2010.

The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Sunrise Powerlink Project during implementation. The MMCRP also acknowledges that temporary changes to the project, such as the need for additional workspace, are anticipated and common practice for construction efforts of this scale and that a Variance Request would be required for these activities.

Variance Request #28 to waive certain conditions found in Mitigation Measure F-1a concerning RFW events has been **denied** by CPUC for the proposed activities based on the factors described below.

**SDG&E Variance Request.** Excerpts from the SDG&E Variance Request, received October 19, 2011, are presented below (indented) with CPUC additions in parenthesis and in bold:

SDG&E is requesting a variance from certain conditions found in Mitigation Measure F-1a of the Final Environmental Impact Report/Environmental Impact Statement (FEIR/EIS) issued October 2008. Specifically, SDG&E is requesting the following variances from the mitigation measure:

- During a Red Flag Warning (RFW) event, as issued daily by the National Weather Service in State Responsibility Areas (SRAs) and Local Responsibility Areas (LRAs), construction and maintenance activities occurring on the substation pad at least 100 feet away from wildland vegetation areas be allowed to proceed.
- During a RFW event, construction traffic be permitted along the access road to the substation.
- That the work stoppage condition of Mitigation Measure F-1a not apply during RFW events based on the forecast of dry lighting.

The approximately 80-acre pad of Suncrest Substation and its associated access road (Bell Bluff Truck Trail) have been completely cleared of vegetation. These site conditions have created a defensible space around Project activities and have altered the need to cease work to prevent fires during RFW events (**in the opinion of SDG&E**). Additionally, portions of the

access road have been paved, and all sections of the access road will be paved by October 31, 2011. SDG&E requests that construction traffic also be permitted along the access road during RFW events. No construction activities would be allowed along the access road other than vehicles and equipment traveling to and from the substation pad. Blasting, welding, and grinding would continue to be prohibited on the pad and access road during a RFW event. This request would be in conformance with the Project's approved *Construction Fire Prevention Plan* dated December 1, 2009.

Lastly, SDG&E requests that the work stoppage condition of Mitigation Measure F-1a not apply for RFW events based on the forecast of dry lightning. Although this kind of weather creates the potential for fire starts from lightning strikes, it does not increase the chances of a Project-caused fire. The risk of a Project-caused fire is lower during this type of RFW event as a result of the increased relative humidity associated with dry storms.

The variance to these conditions of Mitigation measure F-1a would assist with a more timely completion of Link 3 (Suncrest Substation) construction and reduce the duration of impacts that construction activities impose on local residents and the public.

Comments/Conditions (**provided by SDG&E**):

- During a RFW event, SDG&E will not allow construction activities to proceed at the Substation within 100 feet of Wildland vegetation.
- During a RFW event, construction traffic traversing the access road to the Substation will be the only activity permitted on Bell Bluff Truck trail.
- Blasting, welding, and grinding would continue to be prohibited on the pad and access road during a RFW event.

### **CPUC Evaluation of Variance Request**

In accordance with the MMCRP, the subject variance request was reviewed by CPUC in consultation with CAL FIRE, the jurisdictional fire agency covering Project areas.

The CPUC **denies** the request based on the following:

As provided in Mitigation Measure F-1a:

At a minimum, Plan (Construction Fire Prevention Plan) contents shall include the requirements of Title 14 of the California Code of Regulations, Article 8 #918 "Fire Protection" (Refer to Section D.15.3), all components of the Sempra Utilities Wildland Fire Prevention and Fire Safety Guide (2007) in Appendix 3D, and the elements listed below:

...During Red Flag Warning events, as issued daily by the National Weather Service in SRAs and Local Responsibility Areas (LRA), and when the USFS Project Activity Level (PAL) is Very High on CNF (as appropriate), all construction and maintenance activities shall cease. Exception for transmission line testing: A transmission line may be tested, one time only, if the loss of another transmission facility could lead to system instability or cascading outages. Utility and contractor personnel shall be informed of changes to the Red Flag event status and PAL as stipulated by CAL FIRE and CNF.

SDG&E consulted with CAL FIRE and conducted a tour with the agency to areas where SDG&E requested to work during RFW events. Subsequent to the tour, CAL FIRE notified CPUC that they **did not** agree with the proposed work during RFW events anywhere on the project.

Please contact me if you have any questions or concerns.

Sincerely,

Billie Blanchard  
CPUC Environmental Project Manager  
Sunrise Powerlink Transmission Project

**Alan Colton, SDG&E**  
**Sunrise Powerlink Project**  
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cc: Daniel Steward, BLM El Centro Field Office  
Tom Zale, BLM El Centro Field Office  
Bob Hawkins, Forest Service  
Erinn Wilson, CDFG  
Susan Lee, Aspen Environmental Group  
Vida Strong, Aspen Environmental Group  
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