

**SDG&E 5/20/10 Supplemental Response
A.09-08-003 East County Substation (ECO) PTC
Energy Division Data Request 8 Dated May 10, 2010
SDGE-ED-008: Q1-5**

Question 1:

Cumulative Projects

1. We are required to assess the cumulative effects of the following wind generation projects:
 - a) Campo Wind Project
 - b) Manzanita Wind Project
 - c) Jordan Wind Project

In order to fully assess the cumulative effect of these projects we need to understand SDG&E's involvement with the above projects. To evaluate each project successfully please provide SDG&E's role and responsibilities in the following areas for each project: SDG&E is at an early stage in each project, exploring the feasibility and structuring commercial arrangements. These arrangements are subject to change.

- a) construction of the generation facility;
- b) operation and maintenance of the facility;
- c) purchase of generated electricity from the facility;
- d) interconnection to the primary transmission grid.

SDG&E's Response to Question 1:

A) Campo Wind Project:

- a) Construction of the generation facility;

SDG&E will likely partner with Invenergy in development of the project.

- b) Operation and maintenance of the facility ;

SDG&E will most likely not be the O&M provider.

- c) Purchase of generated electricity from the facility;

SDG&E plans to be the offtaker of power in each project, either as an owner or under a longterm PPA.

- d) Interconnection to the primary transmission grid;

The Campo Wind project occupies the California Independent System Operator (CAISO) queue position Q106A. SDG&E received an interconnection request from the CAISO for Campo Wind on May 1, 2006. It is a 160 MW project proposed to interconnect at Boulevard 138 kV. It has

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been studied under the Large Generator Interconnection Procedure (LGIP) serial study process and is currently in the latter stages of the Large Generator Interconnection Agreement (LGIA) negotiation.

B) Manzanita Wind Project

- a) Construction of the generation facility;

SDG&E has a land access agreement that allows access to conduct wind testing and environmental studies. Prior to any construction a land lease agreement would need to be negotiated. It is too early to determine what role SDG&E will have related to construction

- b) Operation and maintenance of the facility ;

It is too early to determine who would provide O&M for the facility, if constructed.

- c) Purchase of generated electricity from the facility;

SDG&E is likely to be the offtaker of power in each project, either as an owner or under a longterm PPA.

- d) Interconnection to the primary transmission grid;

The Manzanita Wind project occupies the CAISO queue position 583 in Cluster 2. SDG&E Project Development filed an interconnection request on behalf of the project on January 29, 2010, and entered into an interconnection study agreement with the CAISO for Manzanita Wind on April 15, 2010. SDG&E Transmission Planning received an interconnection request from the CAISO for the Manzanita Wind Project. It is for up to 57.5 MW, project proposed to interconnect at Boulevard 138 kV. Currently it is going through the Phase I studies under the LGIP cluster study process. Preliminary studies are scheduled to be completed by October 28, 2010.

C) Jordan Wind Project

- a) Construction of the generation facility;

SDG&E has no involvement with this project.

- b) Operation and maintenance of the facility ;

SDG&E will not be the O&M provider.

- c) Purchase of generated electricity from the facility;

SDG&E does not have any information as who will be the purchasing entity for the output of this project.

- d) Interconnection to the primary transmission grid;

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The Jordan Wind project occupies the CAISO queue position 555 in Cluster 2. SDG&E received an interconnection request from the California Independent System Operator (CAISO) for the Jordan Wind project on January 26, 2010. Currently it is going through the Phase I studies under the LGIP cluster study process. Preliminary studies are scheduled to be completed by October 28, 2010.

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Question 2:

Please provide information regarding the project status of SDG&E's plans to replace poles in Eastern San Diego County from wood to steel poles. If an active project, please provide project phasing information (i.e. location) of where pole replacements will take place and timing of the work.

SDG&E's Response to Question 2:

Several individual tie line (TL) projects are currently in the preliminary design phase. There are currently no projects in East San Diego County that are expected to be completed with construction by August 2011. After that point, we are looking to complete several Wood to Steel projects, such as TL 6931, 6914 and all of the TLs located within Cleveland National Forest. Due to various approval uncertainties, it is difficult to accurately forecast a timeline for completion of these projects, at this time.

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138 kV Transmission Line Undergrounding Alternatives
Regarding SDG&E's Response to Data Request 6

Question 3:

SDG&E indicated that the maximum allowable slope for undergrounding transmission lines is 12%. Please clarify if this is 12% or 12 degrees (21.25% slope).

SDG&E's Response to Question 3:

SDG&E's standard allowable slope for undergrounding transmission lines is 12%.

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Undergrounding from Milepost 9 to Boulevard Substation

Question 4:

We are also evaluating an alternative to underground an approximately 4-mile long portion of the proposed 138 kV transmission line between the SWPL and Boulevard Substation (from milepost 9 to Boulevard Substation). Please provide information regarding the technical feasibility of this alternative in this location.

SDG&E's Response to Question 4:

From a preliminary review of aerial photographs and topographic maps, it appears to be technically feasible to underground the transmission line from MP9 to the Boulevard Substation. However, the route would need to be adjusted from the proposed overhead route to follow along existing access roads to minimize potential environmental impacts and steep grade changes, and SDG&E would need to confirm the topography along the new route would not exceed a 12% slope. At some locations the access road/route may require grading to meet the maximum 12% slope requirement and to repair inadequate structural sections of the road.

Along the entire access road/route, the surface would need to be upgraded with an all-weather surfacing such as a Class II type material to provide safe and timely access to the vaults for maintenance. Vaults would be required approximately every 1,800 feet, are approximately 16-feet wide by 30-feet long by 10-feet deep, and a permanent maintenance pad of approximately 150-feet by 50-feet would be required at each vault.

For the line rating required for this project, our standards require minimum 20-foot spacing between the center to center of duct packages and center of duct packages to the edge of the ROW. The trenching for the initial underground run would probably fit within the edges of the access roads, but the ROW required would extend outside the edges of the access roads, as well as, the ultimate designed, trenching for the second underground run. To mitigate future costs and environmental impacts based on the significantly longer length of the proposed undergrounding, SDG&E would prefer to install the ultimate duct bank package at the same time as the initial duct bank package.

Several drainage areas will be crossed by the duct packages along the route. These and other potentially environmentally sensitive areas will need to be evaluated for impacts. Mitigation of these impacts may require the duct packages to be jack and bored or use horizontal directional drilling (HDD) across portions of the route in lieu of trenching.

Additionally, the cost to underground the transmission line at this location would substantially increase the cost of the project. We would recommend beginning the underground lines north of the railroad tracks and MP10. This would still limit the visual impacts to the residences along the route and partially offset the increased costs of undergrounding the lines.

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Removal of White Star Communication Facility from ECO Substation Project Description

Question 5:

Please provide further detail on the scope of activity that will now take place as part of the Sunrise Project construction regarding the White Star Communication Facility. Describe how this differs from the action currently in the project description for ECO Substation project.

SDG&E's Response to Question 5:

The White Star facility is owned and operated by SDG&E and is located in an easement adjacent to the existing White Star communication facility (owned by San Diego County). At the White Star facility, two existing 75-foot wood poles will be removed and replaced with one new 75-foot steel monopole. Three new microwave antennae will then be mounted on the new steel pole. The existing shelter at the site will remain, and the interior will be modified to house the microwave communications equipment. The existing propane tank at the site will be replaced. The existing back-up generator will be retained. This facility is located south of the FESSR in the Jacumba area on a ridge where the equipment can intercept microwave signals from multiple locations. Installation of this new communications equipment at the Tierra del Sol facility was analyzed in Section 2 of the October 2008 Recirculated Draft EIR/Supplemental Draft EIS for the Project and referred to as both the SDG&E Communication Facility and the White Star Communication Facility.

The differences between the actions proposed at the White Star facility, as part of the Sunrise Powerlink Project, and what is proposed as part of the East County Substation Project are:

- The existing shelter will not be replaced with a new pre-fabricated building, as proposed in the ECO PEA. Instead, the interior of the existing building will be modified to accommodate new microwave communication equipment. In addition, the installation of a chain-link fence, as described in the ECO PEA, will not be required.
- Three new microwave dishes will be installed instead of one.
- As part of the Sunrise Powerlink Project, the existing propane tank will be replaced; this was not described in the ECO PEA.
- As part of the Sunrise Powerlink Project, the installation of a new back-up generator will not be required because the existing generator will be utilized.