

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 29, 2017

SENT BY E-MAIL

Estela de Llanos
San Diego Gas and Electric Company
Director, Major Project Development
8330 Century Park Court, CP31D
San Diego, CA 92123
edellanos@semprautilities.com

RE: CEQA Data Request No. 4 for the San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600

Dear Ms. de Llanos:

Upon further review of SDG&E's and SoCalGas's Proponent's Environmental Assessment (PEA) for the Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-Rating Line 1600 Project, the Energy Division requests the information contained in Attachment 1 to this letter. One set of responses should be submitted to the Energy Division and another to Ecology and Environment in hard copy and electronic format. Please direct the hard copy for Ecology and Environment to Lara Rachowicz in San Francisco. We request that SDG&E respond to this data request by *September 12, 2017*. Inform us as soon as possible if you cannot provide specific responses by this date. Delays in responding to this data request may cause delays in the CEQA Review process.

Direct questions to Rob Peterson at (415) 703-2820 or by e-mail (address below). Please copy the CPUC's consultant, Laurie Weaver, Ecology & Environment, Inc., on all communications (lweaver@ene.com). Energy Division reserves the right to request additional information at any point during the proceeding and subsequently during project construction and restoration should the CPCN application be approved.

Sincerely,

A handwritten signature in black ink that reads "Rob Peterson".

Rob Peterson
Project Manager, Energy Division, Infrastructure Permitting and CEQA
Robert.Peterson@cpuc.ca.gov

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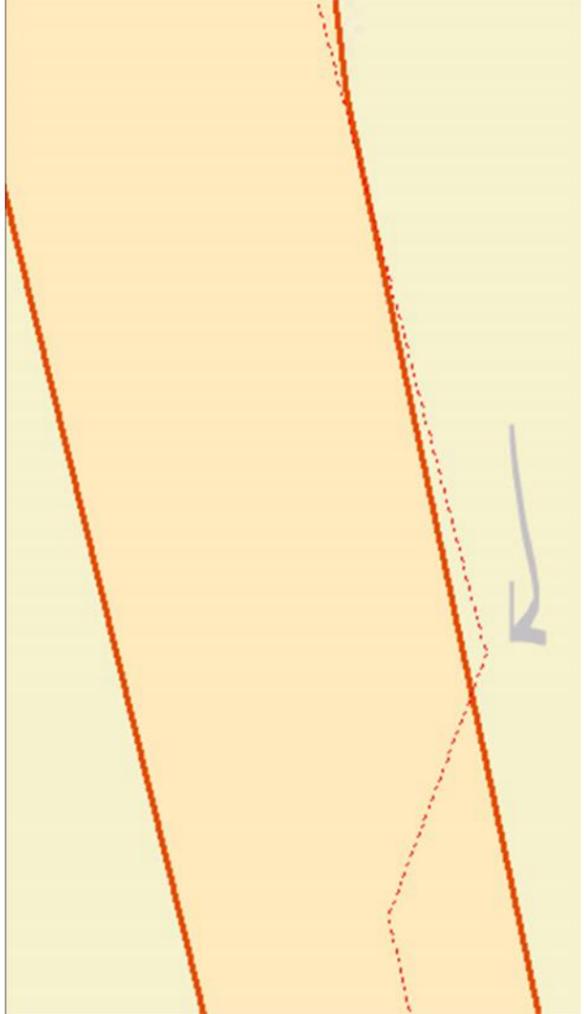


cc:

Edalia Olivo-Gomez, project team member, SDG&E
Rich Quasarano, project team member, SDG&E
Kirstie Raagas, project team member, SDG&E
Yvonne Mejia Peña, project team member, SoCalGas and SDG&E
Erica Martin, SoCalGas and SDG&E attorney
Molly Sterkel, Program Manager, Infrastructure Planning and Permitting
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA
Jonathan Koltz, CPUC attorney
Laurie Weaver, Project Manager, Ecology and Environment, Inc.
Lara Rachowicz, Deputy Project Manager, Ecology and Environment, Inc.

Attachment 1

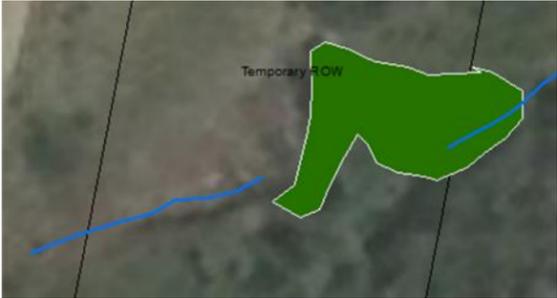
**Attachment 1: SDG&E and SoCalGas Pipeline Safety and Reliability Project – New Natural Gas Line 3602 and De-rating Line 1600
Data Request No. 4 (August 29, 2017)**

DG #	Resource / Topic Area	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Project Description							
DG 2-7 Follow Up 1	Project Description	Project description data included in the 6-23-2017 "PSRP_Facilities" and the 6-23-2017 "PSRP_ImpactLayer" layers	<p>At MP27.5, the centerline of L3602 (dotted red line) appears to leave the construction workspace (temporary ROW) (solid red line) as shown below.</p> <p>1) confirm if this is correct and explain why temporary workspace would not be needed around the centerline at this MP, or</p> <p>2) provide an updated centerline and/or impacts file to correct this.</p> 	8/29/2017			

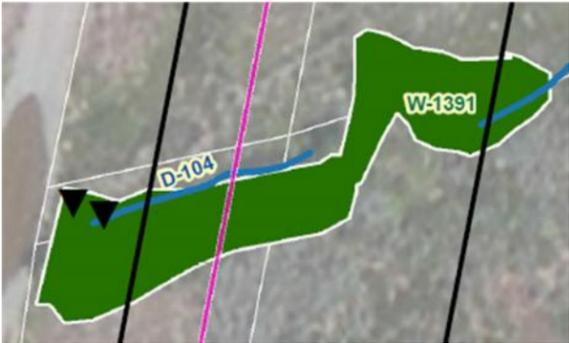
**Attachment 1: SDG&E and SoCalGas Pipeline Safety and Reliability Project – New Natural Gas Line 3602 and De-rating Line 1600
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DG #	Resource / Topic Area	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
DG 2-9	Project Description	PEA, Project Description, Section 3.6.19 Night Work	Description of construction activities occurring at night does not include any work at staging/laydown yards. Is it correct to assume no work will occur in staging/laydown areas at night? If this assumption is not correct, describe the activities that would occur and their expected frequency	8/29/2017			
Alternatives							
DG 3-14	Alternatives	No Project Alternative	<p>Status Report on Line 1600 and the Southernmost 4.7 Miles of Line 1600 (South of Kearney Station [3011/2010 Crosstie] within MCAS Miramar)</p> <ol style="list-style-type: none"> 1. What is the current MAOP of Line 1600 (all 49.7 miles)? <ol style="list-style-type: none"> i. If the Applicants believe that the current MAOP for all 49.7 miles of Line 1600 is greater than 512 PSIG, please explain with reference to Resolution SED-1 and provide all written communications with the CPUC’s Safety Enforcement Division about this matter. See also the attached letter from the Applicants to the CPUC Executive Director at p. 2, “SDG&E will follow up with SED to discuss the calculation and the establishment of MAOP. The Maximum Operating Pressure (MOP) has been reduced to 512 psig. 2. Explain why the southernmost 4.7 miles of Line 1600 are not part of the proposed PSRP (Proposed Project) with reference in the discussion to the overall safety of Line 1600 in its entirety. 3. Provide a status report for the 4.7 miles of Line 1600 that are not part of the Proposed Project. Within the report, describe the following, at minimum: <ol style="list-style-type: none"> a. Has the 4.7 mile segment (a) been pressure tested, or (b) will it be pressure tested and when (month and year estimate). We assume that SDG&E/SoCalGas will comply with their adopted Pipeline Safety Enhance Plan as soon as practicable. Explain why full compliance is or is not immediately achievable for the 4.7 miles in the coming months. Explain why compliance has not already been achieved for the 4.7-mile segment. b. What is the current MOP of the 4.7-mile segment? c. What is the current MAOP of the 4.7-mile segment? d. When did SDG&E/SoCalGas last inspect the entire 4.7-mile segment and with what methods? e. Describe any safety issues based on the most recent inspections. <p>NOTE: If the responses to any of these questions is considered confidential by the Applicants, provide both redacted and confidential versions of the response, and explain why the information was marked confidential.</p>	8/29/2017			See also attached letter from the Applicants to the CPUC Executive Director (7/14/16)
DG 3-15	Alternatives	Amended Application, VII. Procedural Requirements	Are there alternatives that would allow SDG&E and SoCalGas to meet the Commission-mandated design standards for reliability (1-in-10 year cold day) until 2023, if Line 1600 was de-rated now? If so, provide a list and description of these alternatives.	8/29/2017			
DG 3-16	Alternatives		<p>Provide all anticipated tie-in locations for each of these alternatives:</p> <ol style="list-style-type: none"> 1. Blythe to Santee Alternative 1 2. Blythe to Santee Alternative 2 3. Cactus City to San Diego 4. South Orange County Coastal <p>) Provide shapefiles for all tie-in locations for each alternative and the additional routing that</p>	8/29/2017			

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			would be needed to reach the associated tie-in locations. J Include the system, pipeline name, and diameter of the infrastructure that the routes would tie-into.				
Aesthetics							
DG 4.1-2 Follow Up			Based on this response, it's our understanding that small to medium height shrubs (up to about 4-6 feet height) would be permissible to plant and maintain within the ROW in overland areas provided two-track access for maintenance vehicles within or adjacent to the ROW is maintained; the five-foot buffers around valve stations can contain vegetation, providing the vegetation does not inhibit access to valve facilities or cause employee safety concerns; and SDG&E may occasionally clear or trim vegetation to maintain visible pipeline markers along the ROW. Confirm that our understanding of this response is correct or further clarify constraints pertaining to vegetation maintenance and management in the pipeline ROW and around valve facilities during operation and maintenance. In addition, we understand that no trees would be planted or allowed to grow within the pipeline ROW due to the potential for tree roots to cause coating damage. However, the visual simulation for Avenue of Nations (KOP 4) appears to show trees growing in the ROW three to five years after completion of construction and Item 1.4.1-3 of Request No. 3, dated Aug 11, 2016, describes "eucalyptus saplings" growing in the ROW. Confirm that it would not be permissible for the trees as shown and described to be growing in the ROW. Provide a revised description of the ROW in the vicinity of Avenue of Nations three to five years after construction that correctly describes the character and appearance of vegetation that would occur and the presence of a two-track road. Provide a revised visual simulation that more accurately depicts the character and appearance of vegetation and the two-track access road that would occur in the ROW three to five years after construction.	8/29/2017			
Biological Resources							
DG 4.4-1 Follow Up	Biological Resources	Wetlands Delineation Report submitted 2/10/17	Please provide GIS data for formal wetland delineation. The GIS data provided in October of 2015 does not match the figures attached to the 2017 Wetland Delineation Report. See screenshots below. The first image represents the wetland data that was submitted 10-1-2015, in the "Wetlands_Waters.shp" file. The second image is from the February 2017 Wetland Delineation Report. 	8/29/2017			

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DG 4.4-10	Biological Resources		<p>Provide updated vegetation data for the current route. Vegetation data provided in January 2017 did not account for route changes. The Biological Resources Survey Area (BRSA) as defined in the PEA includes all proposed project components, plus approximately 150-foot buffer on each side of these components. When the current workspace is buffered by 150 feet, 74.8 acres of survey area are not accounted for. Workspace area that will be impacted has 5.4 acres of unaccounted for vegetation data. See screenshot below for an example of this situation. The dashed, black and white line represents the BRSA (150 foot buffer of the workspace).</p> 	8/29/2017			