

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 6, 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: Data Request 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 April 21, 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:

Bertha Phimmason, Asset Management Branch, USMC Air Station Miramar

Edalia Olivo-Gomez, project team member, SDG&E

Rich Quasarano, project team member, SDG&E

Kirstie Raagas, project team member, SDG&E

Molly Sterkel, Program Manager, Infrastructure Planning and Permitting

Mary Jo Borak, 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: 2017_04-06 Data Request.pdf

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
Project Purpose and Need							
DG 1-1 (previously Deficiency 1.2.4-1)	Purpose and Need and Land Use		On December 15, 2015, the San Diego City Council unanimously approved the Climate Action Plan that would move the city to 100% renewables by 2035. Please explain how the proposed project would be affected by the city of San Diego’s mandated shift to renewable energy.	4/29/2016; 4/6/2017	5/26/2016; 7/22/2016	Incomplete	
Project Description							
DG 2-1	Project Description	PEA pages 3-41, 3-47 and 3-48; PEA Figures 3-5, 3-6, 3-12 and 3-13; GIS shapefiles with Design Refinements submitted 1/31/2017	<p>Define the proposed construction methods in more detail.</p> <p>Based on review of the centerline and workspaces dated 1/31/2017, construction appears to occur in roads, road shoulders, areas adjacent to road shoulders, and in cross-country areas. To enhance understanding and establish consistency, please address the following:</p> <ul style="list-style-type: none"> • How was “road shoulder” defined? • Provide a table with mileposts (MPs) that indicates where construction will occur: <ul style="list-style-type: none"> ○ 1) entirely within the road/road shoulder (as depicted in Figures 3-5 and 3-12), ○ 2) within “available temporary work area adjacent to the roadway” and “ROW adjacent to the road shoulder” will be used, and ○ 3) in cross-country areas (as depicted in Figure 3-6 and 3-13). • Provide workspace shapefiles broken into the workspace scenarios described above. • Provide a figure similar to Figure 3-5 that shows construction extending beyond the road shoulder in “ROW adjacent to the road shoulder” or where “available temporary work area adjacent to the roadway” will be used. • The first paragraph of Section 3.6.2 provides a detailed description of how efforts would be made to preserve trees in urban areas. The second paragraph, discussing methods in cross-country areas, only discusses removal of brush and topsoil – no mention of how trees would be handled in cross-country areas. Please provide more information about the approach to pipeline construction in cross-country treed areas. Would all trees and woody vegetation be cleared for the width of the right-of-way (ROW)? • Identify by MP where construction will block one lane of traffic, where it will block more than one, and where it will require temporary road closure. • Where construction occurs within roads and road shoulders: <ul style="list-style-type: none"> ○ What is the maximum length of trench that will be opened at any one time? ○ Will any ditch be left open overnight? ○ Will safe access to other roads, parking lots, and driveways be assured through steel plating or other means? 	4/6/2017			

Attachment 1: San Diego Gas & Electric Company (SDG&E) and Southern California Gas Company (SoCalGas) Pipeline Safety and Reliability Project (PSRP) – New Natural Gas Line 3602 and De-rating Line 1600 Data Request No. 1 (April 6, 2017)

DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
DG 2-2	Project Description	PEA page 3-37	Define “commerce impacts” as used in describing the Fiber Optic Intrusion and Leak Detection System Associated with Line 3602	4/6/2017			
DG 2-3	Project Description	Supplemental PEA page 2-5	Describe the location and provide a shapefile of the existing Kearny Villa Pressure-Limiting Station.	4/6/2017			
DG 2-4	Project Description	PEA page 3-41	Clarify terms. Define and describe “all known underground facilities” and what is meant by “other facilities.” Define and describe substructure.	4/6/2017			
DG 2-5	Project Description		Provide a typical for each wetland and waterbody crossing method that may be used during construction.	4/6/2017			
DG 2-6	Project Description		Update the southern terminus of the proposed route. In their March 20, 2017 letter to the Applicants, MCAS Miramar expressed that they do not want the project to cross the aqueduct road. Given that MCAS Miramar does not object to the change in the proposed project to terminate at Line 2010, as requested by the Applicants, please provide an update to the PEA that identifies the new terminus location and include updated GIS. Updated GIS should include: <ul style="list-style-type: none"> • MPs of the proposed new terminus • The alternative terminus appears to consist of two pipelines; confirm this or send a new centerline • Shapefile for the proposed facility at MP 46 • Confirm that other than the proposed facility at MP 46, all aboveground facilities, laydown areas, and bore pits would remain the same. Confirm that the proposed project will remain on the east side of the aqueduct road with the change in terminus.	4/6/2017			
Alternatives							
DG 3-1	Alternatives / Applicant Proposed Project	PEA, Figure 5-2 (map 3 of 3)	Provide additional information about proposed project on MCAS Miramar. Provide updated correspondence between the Applicants and the San Diego County Water Authority about the Authority’s future plans along the aqueduct road on Miramar. Discuss if and how the proposed route is being designed to prevent future conflicts with the water authority. Describe steps the Applicants are taking to analyze both sides of the aqueduct to allow for flexibility as plans develop. Does the route have to cross from the east to the west side of the road? If yes, explain why.	4/6/2017			

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DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
DG 3-2	Alternatives / Rainbow to Santee Non-Miramar Alternative	PEA, page 5-25	<p>Provide additional information about the Rainbow to Santee Non-Miramar Alternative.</p> <p>The PEA indicates that the Rainbow to Santee Non-Miramar Alternative could potentially be infeasible. Please provide an update to the PEA with a revised Rainbow to Santee Non-Miramar Alternative route that is consistent with the modifications discussed on a phone call between the Applicants and the California Public Utilities Commission (CPUC) on March 29, 2017, including updated GIS files. Discuss in detail any concerns with the feasibility of the revised Rainbow to Santee Non-Miramar Alternative route. Indicate whether route variations or mitigation can be developed to avoid or minimize any impacts that may make feasibility a concern.</p>	4/6/2017			
DG 3-3	Alternatives / Rainbow to Santee Non-Miramar Alternative	PEA, page 5-25	If the revised Rainbow to Santee Non-Miramar Alternative route would not tie in to Line 2010, explain why.	4/6/2017			
DG 3-4	Alternatives / Spring Canyon Road Route Segment Alternative	PEA, page 5-49	<p>Rename and provide additional information about the Spring Canyon Road Route Segment Alternative.</p> <p>The alternative route segment labeled Spring Canyon Road Route Segment Alternative follows a fuel break rather than a road. Please rename this to clarify. Discuss whether or not the pipeline could withstand use of the unimproved firebreak by heavy equipment conducting operations, including tanks. Also confirm that the pipeline could withstand maintenance activities along the break, including controlled burns.</p>	4/6/2017			
DG 3-5	Alternatives / Kearny Villa Road Route Segment Alternative	PEA, page 5-50	<p>Provide additional information about the Kearny Villa Road Route Segment Alternative.</p> <ol style="list-style-type: none"> 1. Confirm that this alternative segment contemplates the pipeline entering the Kearny Villa Road easement north of the MCAS Miramar boundary and stays within the road easement until the crossing of SDG&E Line 2010. If it does not, explain why. 2. Identify the easement holder(s) of Kearny Villa Road. Provide correspondence or supporting documentation from consultation with the appropriate easement holder(s) regarding the concept of placing the pipeline in the easement and describe any legal or practical limitations with this co-location. Clarify which sections along Kearny Villa Road are under California Department of Transportation authority and which are under City of San Diego or local authority. 3. Discuss whether or not the segment could interconnect with Line 2010 near the point of intersection with Kearny Villa Road. If the interconnection must be outside of the existing road easement, identify the minimum distance required with supporting information. 4. Explain why the additional 2 miles of pipeline east of the Kearny Villa Road intersection is part of the Kearny Villa Road Segment. This segment appears to be in new pipeline ROW. Provide a version of this alternative that avoids the additional 2 miles. Identify one or more reasonable locations near the Kearny Villa Road/Line 2010 intersection point for the required interconnection facility for Line 3602 and Line 2010. In addition, explain why the existing Line 1600/2010 interconnection facility would not be feasible (i.e., impossible) to use. 	4/6/2017			

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DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
DG 3-6	Alternatives / Spring Canyon Road Route Segment and Kearny Villa Road Route Segment Alternative	PEA, page 5-49 to 5-50	<p>Provide survey information for the Kearny Villa Road and Spring Canyon Road Route Segment Alternatives.</p> <p>During a phone call between the applicants and the CPUC on March 29, 2017, the applicants said that they had done field surveys of the Kearny Villa Road and Spring Canyon Road Route Segment Alternatives. Provide reports of these surveys and associated GIS files.</p>	4/6/2017			
DG 3-7	Alternatives / MCAS Miramar		<p>Provide on-base infrastructure map and GIS data</p> <p>Provide complete SDG&E on-base infrastructure map in legible electronic format /pdf. Provide all associated GIS data for on-base infrastructure. If not available, explain why.</p>	4/6/2017			
Environmental Impact Analysis							
Aesthetics							
DG 4.1-1 (Previously Deficiency 1.4.1-3)	Aesthetics	PEA, page 4.1-8	<p>Provide kmz files containing all KOP locations and points of each photograph location. Three additional visual simulations were requested during a teleconference held January 21, 2016. The visual simulations were requested for the following locations : 1) Location #3, Photograph #6; 2) Location #9, Photograph #27; and 3) Location #14, Photograph #36. Simulations were requested for views from these locations showing the anticipated appearance of the proposed project at 1 year following construction and at a period of 3 to 5 years following construction. In addition, the CPUC's consulting aesthetic resources specialist requested that the three additional visual simulations be prepared as panorama photos to show the surrounding area as context for the proposed project. Provide the additional panorama visual simulations to the CPUC.</p>	4/29/2016; 4/6/2017	6/16/2016; 7/22/2016	Incomplete	
Air Quality							
DG 4.3-1	Air Quality / GHG	Attachment A: Minor Design Refinements submitted 1/31/2017	<p>Provide air quality and greenhouse gas (GHG) data for minor design refinements.</p> <p>Minor design refinements listed in Attachment A include eight new laydown yards, temporary workspace reconfigurations, and additional design modifications that imply changes in temporary disturbance acreage and potentially in the construction equipment and vehicle use required during construction.</p> <ul style="list-style-type: none"> • Provide revised fugitive dust emissions estimates associated with the proposed minor design refinements. • Clarify whether the proposed minor design refinements would require additional or less criteria air pollutant sources (i.e., construction equipment and vehicles), compared to as those assumed in the PEA and Supplemental PEA submittals. • Provide revised GHG estimates associated with the proposed minor design refinements. Clarify whether the proposed minor design refinements would require additional or less GHG direct emission sources (i.e., construction 	4/6/2017			

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DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
			equipment and vehicles) compared to those assumed in the PEA and Supplemental PEA submittals.				
Biological Resources							
DG 4.4-1	Biological Resources	Wetlands Delineation Report submitted 2/10/17	Clarify delineation reporting. The PRSP Wetlands Delineation Report only includes those features classified as wetlands. Provide documentation of drainage delineations or a schedule for these delineations and submittal of related report(s).	4/6/2017			
DG 4.4-2	Biological Resources	Biological Resources Technical Report (BRTR) Addendum Section 3.1	Clarify whether wetland features were included in the BRTR Addendum. There are no wetland features mentioned in the BRTR Addendum. Section 3.1 “Hydrologic Features” states that “No drainages were documented within the 2016 survey area.” Provide justification as to why only drainages were mentioned and not wetlands.	4/6/2017			
DG 4.4-3	Biological Resources	Wetlands Delineation Report, Section 4.2, and Preliminary Wetlands and Waters Assessment, Appendix E	Provide explanation and/or justification for the change in potentially jurisdictional wetlands assessed during 2015 wetlands assessments and 2016 jurisdictional delineations. A comparison of “Table 1: 2016 Wetland Delineation Summary” (from 2017 Wetland Delineation Report) and “Table E-2: Wetland Features” (from Attachment C, of Wetlands and Waters Assessment, 2015) shows that there are 8 wetland features assessed during 2016 delineations that were not included in the list of 17 potentially jurisdictional features to be temporarily impacted by the project during the initial “Wetland and Waters Assessment (2015)”. Provide justification of this change in potentially jurisdictional wetlands and whether or not it is simply due to route adjustments.	4/6/2017			
Geology, Soils, and Mineral Resources							
DG 4.6-1	Geology	PEA page 4.6-6 and 4.6-19, Attachment A: Minor Design Refinements submitted 1/31/2017	Update Tables 4.6-1 and 4.6-4. To account for changes from the refined project alignment, update the MPs designations in Tables 4.6-1 and 4.6-4 that relate to locations of particular geologic formations and soil types.	4/6/2017			
DG 4.6-2	Geology	PEA page 4.6-6 and 4.6-19, Attachment A:	Update Tables 4.6-1 and 4.6-4 Update tables 4.6-1 and 4.6-4 to provide geology and soils data for all proposed laydown yards and permanent patrol	4/6/2017			

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DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
		Minor Design Refinements submitted 1/31/2017	roads described in the minor design refinement.				
DG 4.6-3	Geology	PEA Attachment 4_6-A, Attachment A: Minor Design Refinements submitted 1/31/2017	Update Geologic Hazard Assessment. Update Geologic Hazard Assessment (PEA Attachment 4_6-A) text, tables, maps, and mileposts to include analysis and mapping of the eight new laydown yards and the two new permanent patrol roads as well as to reflect the refined project alignment MPs.	4/6/2017			
Hazards and Hazardous Materials							
DG 4.8-1	Hazards and Hazardous Materials	PEA page 4.8-15, Attachment A: Minor Design Refinements submitted 1/31/2017	Update Table 4.8-1 to be consistent with revised project. Update nearest MP and distance to project component in Table 4.8-1 to reflect the addition of eight new laydown yards and two permanent patrol roads identified in the refined alignment.	4/6/2017			
DG 4.8-2	Hazards and Hazardous Materials	PEA page 4.8-28, Attachment A: Minor Design Refinements submitted 1/31/2017	Update Table 4.8-2 to be consistent with revised project. In Table 4.8-2, update MPs and distances from project components to reflect the refined alignment.	4/6/2017			
Hydrology and Water Quality							
DG 4.9-1	Hydrology and Water Quality	PEA Section 4.9-2; Attachment C Preliminary Wetlands and Waters	Include information about the number and type of drainages crossed by the proposed project as surveyed in the Preliminary Wetlands and Waters Assessment. While surface waterbodies in “Table 4.9-2. USGS Blue Line Hydrologic Features Crossed by the Proposed Project” are the largest and most significant, Attachment C indicates 145 drainages were identified that are potentially jurisdictional. Please update Table C-1 with new MPs to reflect the refined alignment and the new proposed endpoint. If the updates result in a change to acreage and/or linear feet crossed, update Table 3 as well.	4/6/2017			

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DG #	Resource Area / Topic	Source / PEA Page	Deficiency Item / Data Gap Question	Request Date	Reply Date	Status	Notes
Data Request No. 1							
		Assessment					
DG 4.9-2	Hydrology and Water Quality	PEA Section 4.9.2, Table 4.9-2	<p>Please confirm that the Blue Line Hydrologic Features data source is equivalent to the National Hydrography Dataset.</p> <p>The National Hydrography Dataset is a commonly used source for identifying surface water features. Our understanding is that the Blue Line Hydrologic Features represents surface water features that are mapped on United States Geological Survey (USGS) Quad maps. If the data sets are not equivalent, please send us the Blue Line Hydrologic data set.</p>	4/6/2017			
Population and Housing							
DG 4.12-1	Population/Housing	PEA Section 3.6.20	<p>Estimated average/peak construction workforce and duration of peak construction periods.</p> <p>Additional information needed to assess potential population/housing impacts and cumulative impacts:</p> <ul style="list-style-type: none"> - The PEA describes workforce as “125 to 150 construction personnel per construction segment will work daily, with a peak of approximately 600 workers.” It goes on to describe three crew types. Please clarify how many construction segments there will be. Please clarify if the peak of 600 workers is a peak per construction segment or a total of all construction segments. - estimated duration of peak construction periods, if known - average and peak workforces for connected projects, if any (#) 	4/6/2017			