

SYCAMORE-PENASQUITOS 230kV TRANSMISSION LINE PROJECT

Overriding Considerations

SDG&E's Proposed Project would construct a new 230kV transmission line between the existing Sycamore Canyon and Peñasquitos Substations. Draft Environmental Impact Report ("DEIR") p. 2-2. The Proposed Project would include four electric transmission segments. Segment A (Sycamore Canyon Substation to Carmel Valley Road) would involve building approximately 8.31 miles of new 230kV overhead transmission and communication lines and relocating existing transmission lines and underground connections. *Id.* Segment B (Carmel Valley Road) would involve building approximately 2.84 miles of new 230kV underground transmission lines with fiber optic cable, with a cable pole at either end of Segment B. DEIR p. 2-3. Segment C (Carmel Valley Road to Peñasquitos Junction) would involve installing approximately 2.19 miles of new 230kV overhead conductor on existing steel lattice structures, reconductoring and consolidating two existing 230kV lines on the same structures, and replacing communication line. DEIR p. 2-3. Segment D (Peñasquitos Junction to Peñasquitos Substation) would involve installing approximately 3.34 miles of new 230kV overhead conductor on existing lattice towers, reconductoring and consolidating two existing 69kV power lines onto new structures, and replacing communication line. *Id.* In addition to these transmission segments, the Proposed Project would also include modifications at five existing substations (Sycamore Canyon, Peñasquitos, Chicarita, San Luis Rey, and Mission) and minor modifications to existing transmission line facilities. DEIR p. 2-4.

The DEIR identified significant and unavoidable environmental impacts from the Proposed Project in four resource areas: aesthetics; transportation and traffic; noise; and recreation. DEIR p. 6-4. As explained in the narrative comment letter, SDG&E believes that the analysis in the DEIR should be revised to more accurately reflect the Proposed Project's potential environmental impacts. Those revisions would show that the Proposed Project would not have a significant and unavoidable environmental impact on any of those resources.

Even if the DEIR was not revised, and ultimately concluded that the Proposed Project would have those significant and unavoidable impacts, such impacts are more than significantly outweighed by the benefits associated with the Proposed Project. The Proposed Project will provide a wide range of substantial economic, legal, social, technological, and other benefits to the region, including but not limited to furthering state and federal transmission policies and goals and improving reliability in the region. *See* Proponent's Environmental Assessment Section 2.0 (Purpose and Need) (incorporated herein by reference). More specifically, these benefits include:

- Improving the reliability of the regional electric transmission system.
- Meeting the functional specifications identified by the California Independent System Operator ("CAISO") in its 2012-13 Transmission Plan.

- Reducing the risk of service interruption resulting from a transmission failure.
- Complying with North American Electric Reliability Corporation (“NERC”), Western Electricity Coordinating Council (“WECC”) and CAISO standards.
- Advancing state goals for increasing the supply of renewable energy available to meet customer load.
- Facilitating the replacement of power sources that use Once-Through-Cooling (“OTC”).
- Meeting forecasted load growth, particularly at the San Diego load center.
- Delivering energy to the load center more efficiently.
- Utilizing existing transmission and power line corridors, rights-of-way, franchise position, and utility-owned property.

In sum, the benefits of the Proposed Project far outweigh the minimal environmental impacts. The Proposed Project represents a permanent improvement to the electrical infrastructure throughout San Diego County. These benefits of the Proposed Project would extend in perpetuity. The project’s benefits outweigh the policy of reducing or avoiding significant environmental impacts of the project. Indeed, any environmental impacts would be limited, if they exist at all. The physical and geographical extent of the adverse effects would be small and several of the adverse effects would also be limited in time; they would only persist during construction of the project. DEIR p. 6-4. Furthermore, the DEIR found that the Proposed Project would have less than significant impacts within the following 11 resource areas: biological resources; cultural resources; paleontological resources; geology, soils, and mineral resources; hydrology and water resources; hazards and hazardous materials; fires and fuel management; air quality; greenhouse gases; agricultural and forestry resources; and utilities and public service systems. DEIR p. 6-4. It found that there would be no impact on land use and planning or population and housing. DEIR p. 6-4.

Similar overriding considerations would apply if the CPUC were to select any of the alternatives articulated in the DEIR and retained for analysis, including the cable pole alternatives (Alternatives 1, 2a, and 2b), Alternatives 3, 4, or 5, or the combination of Alternatives 3 and 4. According to the DEIR, each of these alternatives would create its own significant impacts. All such significant impacts would be far outweighed by the significant benefits that accrue by constructing a new 230kV transmission line between the existing Sycamore Canyon and Peñasquitos Substations.