



Rebecca Giles  
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San Diego Gas and Electric Company  
8330 Century Park Court  
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October 31, 2014

Reg.12-10/A.14-04-011  
SDG&E Sycamore-Penasquitos  
230kV Transmission Line CPCN

Sent Via Sempra EDT System

Billie Blanchard  
Project Manager  
Energy Division, CEQA Unit  
505 Van Ness Avenue  
San Francisco, CA 94102-3298

**Re: SXPQ ED02-SDGE Partial Response No. 2**

Dear Ms. Blanchard:

Attached please find SDG&E's partial response to ED's Data Request 2 issued on October 6, 2014.

Included in this submittal are responses to **Questions 2, 3, 6, 9, 10, 11, 14, 16, 17, 23, 84, 85, 103, 104, and 107.** **Please note that attachment DR2-Q9(b) contains information considered confidential under the provisions of PUC Section 583 and General Order 66-C as well as under the North American Electric Reliability Corporation's Rules of Procedure, Section 1500 et seq. and other applicable Federal and State Laws and Regulations.** These documents were appropriately marked confidential and should be treated as such.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 636-6876 or e-mail: [RGiles@semprautilities.com](mailto:RGiles@semprautilities.com).

Sincerely,

**Signed**

Rebecca Giles  
Regulatory Case Manager

Enclosures

cc:

Allen Trial – SDG&E  
Elizabeth Cason – SDG&E  
Bradley Carter – SDG&E  
Central Files – SDG&E  
Peter Allen – CPUC

Jeff Thomas – Panorama Environmental Consulting  
Susanne Heim – Panorama Environmental Consulting  
May Jo Borak – CPUC Infrastructure Permitting and CEQA  
Molly Sterkel - CPUC Infrastructure Planning and Permitting  
Christine Hammond – Advisor to Commissioner Picker – CPUC  
Charlotte Terkeurst – CPUC Inter Chief of Staff

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**ED02 Questions 2, 3, 6, 9, 10, 11, 14, 16, 17, 23, 84, 85, 103, 104 and 107**

Q#	Data Needs Sections	Summary of SDG&E Response Submittals	Q#	Data Needs Sections	Summary of SDG&E Response Submittals
Q1-28	Project Description	10/24/14 Submittal 1: Q4, 5, 8, 18, 24 & 28 10/31/14 Submittal 2: Q2,3,6,9,10,11,14,16,17,23	Q102-108	Biological Resources	10/31/14 Submittal 2: Q 103, 104, 107
Q29-81	Detailed Route Maps	10/24/14 Submittal 1: Q64	Q109-112	Cultural Resources	
Q82-86	Overview Maps	10/31/14 Submittal 2: Q84, 85	Q113-115	Noise	
Q87-90	Aesthetics	10/24/14 Submittal 1: Q88, 89 (Updated) & 90	Q116	Recreation	
Q91-101	Air Quality/GHG Emissions		Q117-121	Traffic	

**CONFIDENTIAL ATTACHMENTS: Q9**

#	Ref	Question Description	SDGE Response
2	Data Request #1, Item 7	<p><b>Provide GIS polygon data and acreage of proposed staging areas within Sycamore Canyon Substation, Peñasquitos Substation, Chicarita Substation, Mission Substation, and San Luis Rey Substation and substation access roads.</b></p> <p>Partial data response no. 3 states any of these substations and their access roads may be used for storing equipment. Show the areas that would be used for staging at the substations and the road segments that would be used for staging. The majority of these substation yards are built out and are not available for staging. Staging within the substation access road may restrict substation access. Describe how access to the substation will be maintained if the access road is used for staging.</p>	Any unused portions of the existing substations may be used for temporary materials laydown/storage during construction. Any of the identified and mapped substations (and surrounding roads) could be used. All temporary use of the existing substations and access roads would be approved by SDG&E substation operations and maintenance staff to ensure Project-related use of open areas and roads would not adversely affect continued substation operations and/or access.
3	Data Request #1, Item 4	<p><b>Clarify the location of the cable pole at the west end of the Segment B underground alignment. Identify the dimensions and locations of new right-of-way or</b></p>	The new cable pole located at the intersection of Proposed Project Segments B and C is proposed to be located approximately 100 feet south of the Carmel Valley Road ROW. The GIS data has been updated accordingly.

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	and 57	<p><b>easement that SDG&amp;E needs to acquire in Segment B for the underground line proposed for Carmel Valley Road.</b></p> <p>The preliminary engineering for the underground alignment shows a cable pole south of Carmel Valley Road at the west end of Segment B. The cable pole was previously proposed north of Carmel Valley Road within a new easement. Please clarify the location of the underground line and cable pole at the west end of the alignment and provide updated GIS accordingly. Please also clarify whether any new easements are required for the underground alignment and the dimensions and locations of the new easements.</p>	<p>No new ROW is required, the existing easement was amended (already complete) to include underground rights between the new cable pole location and the edge of the Carmel Valley Road ROW. The area of amended easement is approximately 0.28 acre (125 feet long by the width of the existing SDG&amp;E ROW [100 feet]).</p> <p>A polygon representing the area of amended ROW easement has also been added to the GIS data.</p>
4	N/A	<p><b>Provide representative photographs of the concrete pier and concrete micropile foundations proposed for the Project. The representative photographs need to be taken at close range to visually depict the types of foundation that SDG&amp;E has proposed for this Project.</b></p>	Submitted in Partial Response 1 dated 10/24/14
5	N/A	<p><b>Provide a representative photograph of a bundled 230-kV line. The representative photograph need to be taken at close range to visually depict a bundled line with parallel wires spaced approximately 18 inches apart.</b></p>	Submitted in Partial Response 1 dated 10/24/14
6	N/A	<p><b>Provide schematics for a 69-kV steel cable pole, a 138-kV tubular steel pole (TSP), and a typical splice vault.</b></p>	Refer to attachments DR2 – Q6(a), -Q6(b), and -Q6(c) for the requested typical diagrams.
8	N/A	<p><b>Confirm that the existing 230-kV transmission line is being moved from E3 to P1 and P2 near Sycamore Canyon Substation.</b></p>	Submitted in Partial Response 1 dated 10/24/14
9	Data Request #1, Item #1	<p><b>Provide additional detail on the proposed modifications of the Sycamore Canyon, Peñasquitos, Chicarita, San Luis Rey, and Mission Substations.</b></p> <p>Additional detail is needed to define the proposed modifications at the Sycamore Canyon, Peñasquitos, Chicarita,</p>	Refer to attached updated substation work description and sketch of the Sycamore Substation (Attachments DR2 – Q9(a) and Q9(b). <b>Note that Attachment DR2 – Q9(b) contains information considered confidential under the provisions of PUC Section 583 and General Order 66-C as well as under the North American Electric Reliability Corporation's</b>

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		San Luis Rey, and Mission Substations. What specifically will be occurring at these substations? Provide a detailed description of the activities involved in constructing the proposed modifications at each of the five substations.	<b>Rules of Procedure, Section 1500 et seq. and other applicable Federal and State Laws and Regulations.</b>
10	N/A	<b>Identify any areas that may be used for material laydown during construction.</b>  The PEA does not identify any areas for material laydown. Does SDG&E proposed to use access roads, pole work areas, or other areas for material laydown? Please define temporary laydown areas, materials that could be staged in the laydown areas, and duration of use for laydown areas.	Temporary material laydown could occur at any identified temporary work space, including staging yards, structure temporary work areas, access roads, substations, and stringing sites. For example, structure segments or other structure components (such as arms) are often placed within the structure work area during the immediate duration of construction (i.e. the day before or day of structure erection).
11	N/A	<b>Confirm that helicopter refueling would not be conducted at any of the proposed work areas.</b>  Limiting refueling to off-site airports limits SDG&E's options and increases the time and emissions associated with helicopter operations. If helicopter refueling in the Project area is not included in the Project Description it will not be allowed during construction without an approved petition for modification from the CPUC.	It is anticipated that helicopter operations and refueling of helicopters may be necessary at all staging yards proposed for the project. Each staging area may be used for helicopter activities at certain times depending on the construction sequencing and other project restrictions.  In each staging yard, there will be a designated area for helicopter landing and associated activities required for construction. All required spill prevention measures will be in place. When the helicopter is at a staging yard there may be a fuel truck to support the helicopter, with a minimum of five hundred (500) gallons of fuel.  SDG&E agrees that the use of the staging areas for helicopter refueling during construction in lieu of flying to the nearest airport for refueling will decrease helicopter emissions for the project.
14	N/A	<b>Describe the potential design for the retaining wall face and provide a representative photograph of a retaining wall using this design and construction method.</b>	SDG&E anticipates utilizing a Verdura wall which is an MSE (mechanically stabilized earth) retaining fill wall system that utilizes a series of soil lifts bounded by a geo-fabric to provide stability. It uses a typical 1:4 (H:V) slope. A matrix of stone blocks is used to finish the wall face. These blocks use a mechanical connection to provide stability. Please see attached representative photograph of a retaining wall using this design and

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			construction method (Attachment DR2 – Q14).
16	N/A	<p><b>Describe any modifications that SDG&amp;E proposes to existing access roads to prevent erosion and channeling.</b></p> <p>Does SDG&amp;E propose improvements to any of the existing access roads to prevent future erosion? If so, please define these improvements.</p>	<p>SDG&amp;E's Transmission Construction and Maintenance (TCM) conducts routine road maintenance on the electric transmission and gas roads, which involves re-grading existing roads and work pads, vegetation trimming where vegetation is encroaching into the roadway, refreshing existing dissipaters (cleaning out rip rap and accumulated silt and replacing rip rap), and installation of water bars and dissipaters, as necessary. SDG&amp;E Best Management Practices (BMP's) and drainage controls will be installed according to SDG&amp;E BMP Manual to minimize erosion and protect water quality. Although TCM maintains SDG&amp;E access roads, the proposed project would likely include road maintenance as necessary, prior to and during project construction activities, as described in the PEA and the Response to Question #3 in the Deficiency Report 1.</p>
17	N/A	<p><b>Identify the landfill(s) that would be used for material disposal including removed vegetation, removed poles, and spoils. Provide the estimated hauling distance to the landfill.</b></p>	<p>It is anticipated that non-hazardous solid waste and exempt waste (treated wood poles) generated during construction of the Proposed Project would be sent to the Republic Services Otay Landfill (Solid Waste Information System [SWIS] No. 37-AA-0010), located approximately 20 miles south of the Proposed Project in Chula Vista. Hydrocarbon impacted soils exceeding Otay Landfill's permitted acceptance criteria would be sent to TPST Soil Recycler, located 135 miles north of the project in Adelanto. Hazardous or otherwise regulated wastes would be sent to either the WMI-Chemical Waste Management Kettleman Hills-B-18 Nonhaz Codisposal Landfill (SWIS No. 37-AA-0023) located approximately 290 miles north of the Proposed Project or the Clean Harbors LLC Buttonwillow Landfill (SWIS No. 15-AA-0257) located approximately 240 miles north of the Proposed Project.</p> <p>The Republic Services Otay Landfill is a private facility with a permitted capacity of 61,154,000 cubic yards per year. It is a Class III solid waste landfill, meaning it cannot accept solid or liquid hazardous waste. It has</p>

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			approximately 24,514,000 cubic yards of capacity remaining as of March 2012, and is expected to be active until the year 2028.
18	N/A	<p><b>Identify the locations of overland access routes and describe the activities to be performed within overland routes.</b></p> <p>No overland access routes are defined in the GIS; however, the Project Description in the PEA discusses the use of overland access. Please define where these overland access routes will be located, their dimensions, and the activities (e.g., vegetation removal) that would be conducted within the overland access routes.</p>	Submitted in Partial Response 1 dated 10/24/14
23	N/A	<p><b>Clarify the area that is required for permanent maintenance pads.</b></p> <p>One part of the PEA states there would be a 50-foot by 75-foot area (3,750 square feet) for permanent maintenance needs, whereas another says that approximately 700 square feet would be needed. These are very different values. Specify which value is correct or why they are different.</p>	<p>The 700 square feet (15-foot radius) is a typical area kept clear of vegetation around certain power line and transmission line structures.</p> <p>The typical maintenance pad at power line and transmission line structures is approximately 3,750 square feet (or 50 feet by 75 feet). For the Proposed Project, permanent structure operation and maintenance work pads have been specifically identified at new structure locations and these permanent work pads have been included within the Proposed Project GIS data. It is important to note that the 15 feet of clearance around each pole often overlaps with the required maintenance pads.</p>
24	EMF Management Plan	<p><b>Provide existing EMF data at the edge of the right-of-way by transmission line segment (e.g., Segment A West).</b></p> <p>SDG&amp;E's EMF Management Plan only includes data for the Proposed Project condition and does not provide the existing EMF or change in EMF.</p>	Submitted in Partial Response 1 dated 10/24/14
28	GIS	<p><b>Clarify if direct access connections from the work areas to the Stonebridge Staging Yard would be needed.</b></p> <p>There are currently no proposed direct access roads to and from the work areas at P2, P3, or P4. If direct access</p>	Submitted in Partial Response 1 dated 10/24/14

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		connections are necessary, provide the revised access route data.	
64	GIS	<b>C-2: Identify the drainage features that appear to intersect with the SR-56 Staging Yard. Explain whether or not they could affect use of the area as a staging yard.</b>	Submitted in Partial Response 1 dated 10/24/14
84	GIS	<b>Overview-2: The long access route west of Segment A (near P20 through P23) does not connect to any work areas. State the purpose for this access road.</b>	The existing SDG&E access road reference in Question 84 is not required for the Proposed Project and has been removed from the Proposed Project access road GIS layer.
85	GIS	<b>Overview-4: Identify the ingress/egress route(s) for the SR-56 Staging Yard.</b> Include the access route(s) in the revised GIS data.	Following consultation with the Property Owner of the SR-56 Staging Yard, the Project will not utilize the SR-56 Staging Yard as shown. Data Request Question No. 85 is therefore no longer applicable. SDG&E is currently working with the Property Owner, and an alternative site has been identified for SDG&E's potential use in place of the previously identified SR-56 Staging Yard. SDG&E will provide the specifics of the alternative staging yard site with the response to Data Request Question No. 1, which is still pending.
88	Deficiency Report #1, Item 15	<b>Clarify the location of proposed marker balls within Segment D.</b> From our current GIS data set, Segment D east of tower structure E24 shows several spans with marker balls. Will the marker balls be on the shield (guard) wires of the new monopole or the higher shield wires of the existing steel lattice towers?	Submitted in Partial Response 1 dated 10/24/14
89	Data Request #1, Item 21	<b>Please provide a CD of the baseline photos and simulations included in the PEA.</b> The CPUC requested a CD of the baseline photos and simulation in Data Request #1, Item 21. The response said a CD would be shipped; however, it was never received.	Submitted in Partial Response 1 dated 10/24/14
90	N/A	<b>There is a large cable strung on the H-frame between the</b>	Submitted in Partial Response 1 dated 10/24/14

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		poles just south of Poway Road to the Scripps Summit Business Park (refer to Attachment 4). Its line’s catenary is well below the conductor’s catenary. What does SDG&E plan to do with this line when the H-frames are removed? Will the line be removed?	
103	PEA Appendix 4.4- A Page 58 and Appendix F	<p><b>Provide GIS data for Quino checkerspot butterfly (QCB, <i>Euphydryas editha quino</i>) localities and Mapped Areas.</b></p> <p>The PEA states, “The QCB has a moderate potential to occur within the BSA. Host plants and suitable habitat is present within the BSA and known localities exist just outside of the BSA; however, the Proposed Project is located outside of the SDG&amp;E Quino Mapped Area.”</p> <p>Provide GIS data that identify where QCB localities occur “just outside the BSA” (or any within the BSA). Please also provide the most current data for the QCB Mapped Area in the BSA. According to SDG&amp;E’s QCB Low-Effect HCP, the USFWS will update the Mapped Areas annually and provide the information to SDG&amp;E.</p> <p>Finally, provide a Project-specific habitat assessment for the QCB for the BSA regardless of whether or not it is within the previously mentioned “Mapped Areas.” The assessment needs to include GIS data and mapping of potential QCB habitat. USFWS will require protocol surveys for QCB in suitable habitat areas prior to construction.</p>	Refer to attachment DR2 – Q103 – QCB Memorandum.
104	PEA Appendix 4.4- A Page 65 and Appendix F	<p><b>Provide GIS data for the burrowing owl (BUOW, <i>Athene cunicularia</i>) habitat assessment.</b></p> <p>The PEA states, “The burrowing owl has a moderate potential to nest and winter within the BSA. The BSA is within the known range of this species but there is limited suitable habitat present.”</p> <p>Provide GIS data that identify the locations of potential BUOW</p>	Refer to attachment DR2 – Q104 – BUOW Memorandum.

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		habitat in the BSA and an explanation as to how those locations were determined. In addition, CDFW has requested protocol surveys for BUOW. Protocol surveys will need to be conducted by SDG&E in the spring. The BUOW survey report needs to be provided to CPUC within 30 days of survey completion.	
107	PEA Appendix 4.4 A; Appendix A, Figure 6; Appendix E, Table 2; Figure 12 (page 25)	<p><b>Provide explanation for “very low” potential for California Orcutt grass (Oc; <i>Orcuttia californica</i>).</b></p> <p>The PEA indicates that Oc has very low potential to occur and that vernal pool habitat is present, but the BSA is outside the known range of the species in San Diego County. However, the CNDDDB shows a location for this species at the western end of the alignment, and a vernal pool is mapped at the western end of the alignment.</p>	Refer to attachment DR2 – Q107 – Orc. Cal. Memorandum.