

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 27, 2007

Mr. Kevin O'Beirne
San Diego Gas & Electric Company
8830 Century Park Court – CP32D
San Diego, CA. 92123**Re: Data Request #17 for the SDG&E Sunrise Powerlink Transmission Project,
Application No. 06-08-010**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division has reviewed the documents and materials that SDG&E has provided including the Proponent's Environmental Assessment (dated August 4, 2006), the Application Supplement Materials (dated September 1, 2006), and SDG&E's Responses to Data Requests No. 1 through 15 (responses to Modified DR 15 and DR 16 are pending). During the analysis of the aforementioned materials and in our preparation of EIR/EIS sections, we have identified additional items that require information from SDG&E. Additional data requests may be necessary to address alternatives and other CEQA/NEPA topics. This letter constitutes Data Request No. 17.

We would appreciate your prompt response to this request. We request that the response to these requests be provided to us in the priority order defined below.

- PD-24 (Connected Actions): August 6, 2007
- PD-25, -26, -27 (GIS data and Vegetation Management): August 10, 2007
- GEN-9 (Sensitive Lands Mapbook): August 24, 2007
- BIO-20 (Habitat Mitigation): August 13, 2007
- PD-28 and -29 (Future Expansion); ALT-90, -91, -92 (Alternatives Data): August 17, 2007
- CULT-3, -4 (Cultural Resources): August 6, 2007

Please submit one set of responses to me and one to Susan Lee at Aspen in San Francisco, in both hard copy and electronic format. Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unitcc: Sean Gallagher, CPUC Energy Division Director
Ken Lewis, CPUC Program Manager
Steve Weissman, ALJ

Traci Bone, Advisor to Commissioner Grueneich
Nicholas Sher/Jason Reiger, CPUC Legal Division
Lynda Kastoll, BLM
Susan Lee, Aspen Environmental Group

Sunrise Powerlink Transmission Line Project

Data Request No. 17

Project Description

PD-24 **Connected Actions.** As part of the EIR/EIS preparation process for the Sunrise Powerlink Project, we are evaluating projects in the area that could be considered under CEQA or NEPA as “connected” or “indirect” actions, or “cumulative projects”. As defined in NEPA (40 C.F.R. 1508.25(a)(1)), actions which are considered "connected actions" are the following

- (i) are automatically triggered by the proposed action,
- (ii) cannot or will not proceed unless the proposed action occurs first or simultaneously, or
- (iii) are interdependent parts of a larger action and depend upon the larger action for their justification.

As defined in the Assigned Commissioners Ruling of July 24, 2007, there are a number of projects that may need to be analyzed as connected actions as a result of facts disclosed in SDG&E’s testimony. Questions on each of these are presented below.

a. Jacumba Substation. Testimony in the Phase 1 hearings indicated that SDG&E is studying a new 500/230 kV substation that would interconnect new wind generation to the existing Southwest Powerlink and that this wind generation would not be deliverable unless the proposed Sunrise Powerlink Project is built. The testimony describes the location as being in the vicinity of Jacumba, near the San Diego/Imperial County border.

- i. Please describe the purpose of the Jacumba Substation and the likelihood that it, or a substation that serves a similar purpose, will be proposed for construction.
- ii. Identify on a map the locations that SDG&E is studying for construction of this future substation and all information regarding the most likely location of this future substation, its size, and the routes of the 230 kV transmission lines that could connect to wind generation areas.
- iii. Describe the likely timing of the construction of the substation and 230 kV transmission line relative to completion of the proposed Sunrise Powerlink Project.
- iv. Describe whether the substation and 230 kV line could be constructed in the absence of the Sunrise Powerlink Project.
- v. Identify, to the greatest extent possible, the location of the wind generation that would be interconnected at the new 500/230 kV substation.
- vi. What is the magnitude of the wind generation required to create the need for this new transmission line and substation?

b. Renewable generation in Imperial County. SDG&E’s testimony identified over 7,100 MW of renewable generation that could interconnect to the SDG&E system. The testimony says that many, if not most, of these renewable projects would stall or fail without new transmission.

i. What portion of the 7,100 MW of renewable development does SDG&E believe is contingent on Sunrise being built? Please define the amount, location, and type of renewable energy projects in the CAISO queue that could connect to the SDG&E system but which require construction of Sunrise.

ii. What renewable development would occur, if any, in the Imperial Valley or Mexico without Sunrise? Please list the renewable development projects assumed by SDG&E to occur in “reference case” of SDG&E’s economic assessment [include the name of each renewable project, megawatt capacity, type (wind, solar, etc.), and point of interconnection].

iii. Specifically what renewable development could occur only as a result of Sunrise (or any 500 kV transmission alternative)? Please list the renewable development projects assumed by SDG&E to occur in the Sunrise Powerlink case “Case 201” of SDG&E’s economic assessment [include the name of each renewable project, megawatt capacity, type (wind, solar, etc.), and point of interconnection], then list the renewable projects assumed to occur in each case that includes a 500 kV alternative (i.e., Case 203: LEAPS and Case 212: New 500 kV Parallel to SWPL).

PD-25 **Santa Ysabel 69 kV Replacement Towers to Substation.** At the south end of the Santa Ysabel Valley (south of the crossing of SR78), new steel towers would be required for approximately 1.5 miles in order to connect the 69 kV line with the Santa Ysabel Substation. Please provide preliminary engineering (tower locations, pull sites) and indicate any existing wood poles that would be removed. (Confirming a July 7, 2007 request made to Jonathan Woldemariam via email)

PD-26 **Provide Corrected or Complete GIS Data.** We have the following requests regarding GIS data.

a. Transition Towers. Please provide shapefiles for the transition structures at each end of the underground segments of the 92 kV and 69 kV lines in ABDSP. These structures have not been indicated on GIS data provided to date.

b. Tower Disturbance. In Data Request 1, item PD-10, we requested definition of the amount of ground clearance required at each new transmission tower. SDG&E’s response was that “SDG&E assumed the following average area of permanent disturbance, by structure type, for the assessment of impacts within the Proponent’s Environmental Assessment: Lattice - 79 square feet; Pole - 64 square feet; H-Frame - 77 square feet.” SDG&E has also informed us that temporary disturbance for each tower would be 100 by 100 feet (or 10,000 square feet).

i. The square footage provided in response to DR1 is extremely small. Please explain exactly what these areas represent.

ii. We have recently become aware that the GIS shapefiles provided by Arcadis for areas of impact at each tower differ dramatically from these figures provided in the data response (e.g., disturbance polygons range from 10,000 to 30,000 square feet, but some towers have no polygons at all). Please provide the following shapefiles for each tower along the proposed route and all alternative routes:

- A polygon representing the area of temporary disturbance for construction, including all areas to be cleared of vegetation.
- A polygon representing the area that will be permanently kept clear of vegetation.
- Every tower must have two polygons, one for temporary and one for permanent ground disturbance (unless they are the same; if so, this should be indicated).

c. Data Problems. Correct the following data problems for the proposed route and all alternatives and submit a complete corrected GIS file:

- Ensure that all impact areas are shown with correct area of impact (e.g., pull sites, staging areas).
- Include helicopter fly yards as separate impact areas, if they are not located within other disturbed parcels (e.g., substations).
- Eliminate double counting of shapefiles for many impact areas (e.g., pull sites, towers). This occurred throughout several of the alternatives (FTHL Eastern, West of Dunaway, and the I-8 Alternative).
- Ensure that all impact areas are identified (e.g., there are no access roads shown for many of the pull-sites and staging areas).
- Include relevant dimensions for all impact types (many access roads do not show their width)

PD-27

Vegetation Management. PEA Section 2.6.1 under “Pole or Structure Brushing” states that SDG&E would maintain a minimum clearance of 10 feet around the base or foundation of all electrical transmission structures, maintain work areas adjacent to access roads and electric transmission structures for vehicle and equipment access necessary for operations, maintenance and repair, remove shrubs and other obstructions near structures to facilitate inspection and maintenance of equipment and to ensure system reliability, and manage vegetation to ensure that vegetation with a mature height of 15 feet or taller would not be allowed to grow within 10 vertical feet of any overhead conductor. In addition, SDG&E presents an Applicant Proposed Measure that states the following:

- SDG&E will develop project-specific Fire Prevention and Response Plan (FPRP), which will be developed and reviewed by pertinent regulatory authorities. A Project Fire Marshal shall be assigned to enforce all provisions of the FPRP as well as performing all other duties related to fire prevention activities for the Proposed Project.

In addition, SDG&E must comply with State and Federal regulations (including NESC Rule 218, ANSI Requirement Z-133.1, NERC Standard FAC-003-1, IEEE Standard 516-2003, PRC 4291-4293, CPUC General Order 95 Rule 35).

GIS shapefiles provided by SDG&E do not identify any areas where vegetation management activities would occur. In order to ensure that the EIR/EIS impact analysis accurately assesses the effect of habitat loss, water quality, and visual effects that would result of vegetation management activities, please define specifically what vegetation management actions (in addition to those defined above at each tower location) will occur within the following timeframes:

- **Prior to construction of the transmission line.** GIS shapefiles should be provided to identify specific areas of the proposed and alternative corridors within which vegetation will be removed, and the extent of removal must be defined. This information should quantify the number and species of trees and shrubs that will be removed, to the extent this information is available.
- **On an ongoing basis during project operation.** Define specific plans for maintenance of a fire-safe corridor, including vegetation growth monitoring activities and the expected frequency of herbicide applications.

PD-28 **Future Circuits in Anza-Borrego.** PEA Section 2.5.2.1.1 (69/92 kV Underground Construction) states that “The dimensions of each duct bank would be approximately 3 feet wide by 3 feet in height with one cable per phase leaving three spare conduits for a future circuit.” Please explain any current plans for future circuits in this area. Define the timeframe for installation of these circuits, and how and where they would be installed in the aboveground portions.

PD-29 **Future 230 kV Expansion.** The four possible future 230 kV circuits identified in Data Response 4, item ALT-63 (Central East Substation to Sycamore Canyon, Peñasquitos, Escondido, Mission and Los Coches) all follow existing SDG&E transmission corridors. Please provide any existing baseline information (biological resources, cultural resources, land use, utilities, etc.) that would assist in our environmental assessment of these future expansion corridors.

General Requests

GEN-9 **Sensitive Lands Mapbook.** We plan to publish 20 pages from this mapbook in the EIR/EIS, but we need a few changes made. Please make the following changes and provide us with a replacement PDF of these 20 pages only (DW_P06 through DW_P26). Note that we need the newest version of this mapbook, which includes identification of existing towers to be removed.

- Change the lower right corner of each map so it reads “Appendix 11C, ABDSP Detail. Figure 11B-1”
- Eliminate the alternative route segments and associated components (e.g., pull sites) shown on the following map pages (the maps should show only the proposed route and its components): DW_P06, DW_P12, and DW_P21.
- From page DW_P12 through DW_P18, the 92 or 69 kV lines would be relocated under the highway. Please add a single line within the highway indicating the location of the underground transmission line (separate from the proposed route). This is currently shown by a yellow outline for “proposed project ROW” along the road, but we would like to show it as a separate color with its own legend identification (please remove the yellow outline along the highway).
- Please include a symbol showing the location of each of the 69/92 kV transition poles (overhead to underground) and indicate how the overhead conductors would connect to both the 500 kV towers (where underbuilt) or existing 69/92 kV poles (where they would remain).

- Remove the “Node” indicators and make all tower location symbols the same colors (not white).

Biological Resources

BIO-10 **Habitat Mitigation.** The Sunrise Powerlink project will generate the need for purchase of habitat to mitigate impacts to upland vegetation communities and possibly sensitive plant and animal species. What plans does SDG&E have with regard to finding mitigation land to offset impacts to various vegetation communities? Have specific parcels been identified for certain types of habitat or particular species? If so, please describe them.

Alternatives

ALT-90 **ABDSP 100’ ROW Alternative, East of Tamarisk Grove Campground Option.** SDG&E requested that we consider this option in which an alternative transmission line route within the Park would follow the Proposed Project route east of the campground, and the 100’ existing ROW west of the campground. This option requires an overhead connector segment between the two corridors in the area just west of the campground (both the 500 kV and the 69 kV lines would be on the connector towers). Please review the shapefiles provided that illustrate this connection segment and modify if needed for engineering reasons.

ALT-91 **Santa Ysabel SR79 All Underground Alternative.** This alternative has been modified to include a short overhead segment at the north end (to avoid an underground crossing of the Alquist-Priolo zone for the Elsinore Fault) and to be located underground within SR79 further north than was previously illustrated. Please provide preliminary engineering for the overhead segment.

ALT-92 **Width of disturbance for underground segments.** The shapefiles provided for preliminary engineering do not define an area of disturbance for underground route segments. For alternative that would be located in paved roads, no disturbance area is required. But the following alternatives would require some disturbance in unpaved areas. Please provide a shapefile for each that defines the width and length of the area disturbed.

- I8 Alternative: Buckman Springs Underground Option
- San Vicente Transition Road Underground Alternative (west end of alternative, not in a paved road)
- Oak Hollow Underground Alternative (portions of alternative are not in a paved road)
- Santa Ysabel Existing ROW Alternative (south of SR 78 not in a paved road)
- Santa Ysabel Partial Underground Alternative (south of SR 78 not in a paved road)
- San Felipe Substation Transmission Line (into and out of the substation)

Cultural Resources

CULT-3 **Cultural Resources Survey Data for Proposed Project.**

- a. Please provide us with information summarizing the status of cultural resources surveys for the Proposed Project. How many parcels remain to be surveyed? What percentage (and how many miles) of the length of each link remains to be surveyed?

b. Please provide updated data for all cultural resources surveys conducted to date for the Sunrise Powerlink Project. The data should be provided in the form of an updated Gallegos & Associates' Arc Reader CD. If not available in this format, we will need descriptions and maps depicting all portions of the Proposed Project surveyed, percentages of each link surveyed, locations and descriptions of all cultural resources recorded or updated, and any comments on the data you can provide. We have found the Arc Reader information previously provided to be comprehensive and a very accessible format for the cultural resources data and hope an updated version is available. This data should be provided directly to the Aspen Team cultural resources specialist, Kevin Hunt, at the following address: SWCA Environmental Consultants, 626 Fair Oaks Avenue, Suite 190, South Pasadena, CA 91030.

CULT-4 **Survey Data for Talega-Escondido Corridor.** Please state whether any cultural or biological resources surveys have been completed for this corridor, when they were completed, and provide us with any available survey reports or data.

Public Safety

PS-3 **Wind and Fire.** To support the fire analysis that will be included in the EIR/EIS, please answer the following questions related to the SWPL outage data provided (under PU Code 583) in Data Request 1 (ALT-3):

- a. Please provide further explanation of outages with no explanation for outage cause. Did any of these outages result from extreme weather conditions, especially wind (e.g., DPV2 tower collapse situation)?
- b. What extreme wind loading (mph or psf) did SDG&E use for design of the transmission line structures? Does SDG&E follow the design process outlined in NESC which utilizes a Wind Exposure factor and Structure Gust Response factor?