STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

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

June 8, 2016

Chris Terzich
Environmental Project Manager
San Diego Gas & Electric Company
8315 Century Park Court MS CP32D
San Diego, CA 92123

RE: Vine 69/12 Kilovolt (kV) Substation Project: Notice to Proceed #1

Dear Mr. Terzich,

On June 2, 2016, San Diego Gas and Electric (SDG&E) submitted a Notice to Proceed (NTP) request to the California Public Utilities Commission (CPUC) for the Vine 69/12 Kilovolt (kV) Substation Project (Project). The substation and associated telecommunication and distribution facilities are located in the City of San Diego, San Diego County. As requested under this NTP request, SDG&E is seeking CPUC authorization to construct the entirety of the Vine 69/12 kV Substation Project, including the installation of the new substation along with distribution and telecommunication facilities.

In accordance with the California Environmental Quality Act, a Final Mitigated Negative Declaration (MND) was prepared by the CPUC for the Vine 69/12 kV Substation Project. On May 12, 2016, the CPUC granted SDG&E a Permit to Construct the Project (Decision 16-05-008). The decision conditionally authorizes construction of the Project with the implementation of the applicant-proposed measures (APMs) and mitigation measures identified in the Final MND. A Notice of Determination was submitted to the State Clearinghouse on May 31, 2016, indicating the CPUC's approval of the Project. The CPUC also adopted a Mitigation, Monitoring, Compliance and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the Vine 69/12 kV Substation Project during implementation.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP request. The evaluation process ensures that all APMs and mitigation measures applicable to the location and activities covered in the NTP request are implemented, as required in the CPUC's Decision.

NTP #1 for the Vine 69/12 kV Substation Project is granted by the CPUC based on the factors described below.

SDG&E NTP #1 Request

A detailed description of the Project is included in the MND and is summarized as follows:

The Vine 69/12 kV Substation Project is located in the southwestern portion of the City of San Diego, California. Specifically, the Project is approximately two miles northwest of downtown San Diego and directly adjacent to and east of the San Diego International Airport. The Project area is comprised of light to medium industrial, commercial, and residential land uses.

The main components of the Project are provided below, with detailed descriptions of these components provided in Section B.1.10 of the MND (Project Components):

- Construct a new 69/12 kV Vine Substation at the southwestern corner of the intersection of Vine Street and Kettner Boulevard, just west of Interstate 5 (I-5).

- Relocate approximately nine existing 12-kV distribution circuits utilizing a combination of existing and new underground distribution conduits. The relocated distribution circuits would generally be placed within the franchise portion of City of San Diego public streets (public right-of-way [ROW]) in the Project area, including Columbia Street, India Street, Kettner Boulevard, Pacific Highway, Sassafras Street, State Street, Vine Street, West Laurel Street, West Hawthorn Street, West Palm Street, and West Redwood Street. An optional alignment for the 12 kV distribution line would utilize India Street between West Redwood Street and West Palm Street, and then West Palm Street to Columbia Street to avoid potential conflicts with a proposed sewer line planned for placement in Columbia Street between West Redwood Street and West Palm Street.
- Loop in an existing 69 kV power line (TL604) to the proposed Vine Substation, which includes removing two existing wood poles and one stub guy pole near the corner of California Street and Vine Street, replacing one existing distribution pole with a new tubular steel pole (TSP), and installing two new TSPs adjacent to the eastern lane of Pacific Highway.
- To connect the Vine Substation and Kettner Substation to SDG&E's telecommunication system, additional fiber optic cable would be installed generally within the underground 12-kV distribution duct banks (approximately 2,850 feet), with an overhead connection (100 feet) into Vine Substation.

As part of the NTP request, SDG&E provided Attachment A: Detailed Project Components Map (dated 11/20/15) which depict the activities requested and the temporary workspaces required to construct each component, as approved by the Project's Final MND. Construction methods, equipment, and procedures for the removal and installation of poles and conductors, as well as for the installation of underground duct bank, were described in detail in the Project's Final MND.

Construction of the Project is anticipated to take approximately 14 months from initial mobilization through completion, beginning in June 2016 and ending in July 2017. Upon completion of construction activities, all areas of temporary disturbance will be restored to near pre-construction conditions. Cleanup work will include removing any temporary facilities that will not be required for other approved Project activities; repaving roads; and collecting and properly disposing of any waste, trash, or debris.

CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and are required to be implemented prior to and during construction where applicable. The Pre-Construction Mitigation Measures Status Report Table in SDG&E's NTP request provides preconstruction compliance information for the issue areas addressed by the Vine 69/12 kV Substation Project Substation Final MND. The following contains a status of applicable mitigation measures and APM required submittals, including any outstanding requirements:

Biological Resources: The majority of the Project footprint consists of developed land characterized by light to medium-industrial, commercial, and residential land uses. Vegetation is limited to ornamental landscaping and disturbed habitat. There is no habitat for special-status plant species within the Project footprint; no special-status plants were found during field surveys. Special-status wildlife species were not detected during surveys of the Project; however, two special-status wildlife species have a low potential to occur within the Project area: Peregrine falcon and Mexican long-tongued bat. APM BIO-1 requires that nighttime emergent bat surveys be conducted no more than five days prior to the removal of the palm trees located at the Vine Substation site.

Cultural and Paleontological Resources: As required by APMs CUL-01 and CUL-02, archaeological and paleontological resource monitoring will take place. An archaeological monitor(s) familiar with the types of prehistoric and historic resources that could be encountered within the Project area will be present during

initial ground-disturbing activities associated with the Vine Substation. In addition, an archaeological monitor(s) will be present during all trenching activities associated with the underground 12-kilivolt lines along Kettner Boulevard. A paleontological monitor will be on site to observe excavation operations that involve the original cutting of deposits to depths greater than 3.5 feet within areas classified as having high paleontological resource sensitivity. A Paleontological Resource Mitigation Plan (PRMP) has been prepared and approved by the CPUC, and will be implemented during construction. All construction personnel will receive a Worker's Environmental Awareness training module on paleontological resources.

Hazards and Hazardous Materials: During construction, hazardous materials such as cleaning solvents, paints, adhesives, vehicle fuels, oil, hydraulic fluid, and other vehicle and equipment maintenance fluids would be used and stored in construction staging yards. Spills and leaks of hazardous materials during construction activities could result in soil or groundwater contamination. As proposed, all hazardous materials would be stored, handled, and used in accordance with applicable regulations, worker training on hazardous material protocols would be provided, and best management practices (BMPs) would be employed. A project specific Hazardous Materials and Waste Management Plan is being prepared by SDG&E and will be implemented during construction.

Air Quality: A Fugitive Dust Control Plan has been prepared and approved by the CPUC. The Plan will be implemented during construction.

Noise: Construction activities associated with 12-kV duct bank construction and vault installation would occur along the Project route near existing residences. The noisiest phase of this particular construction is the use of concrete saws to cut the trench. Each phase of duct bank construction would progress down the streets at an average rate of approximately 65 to 85 feet per day over a six-month period, spending approximately one day in front of a given residence (SDG&E, 2015a – Attachment 3.12-A).

Mitigation Measure N-1 of the Vine 69/12 Kilovolt Substation Project's Final MND requires that SDG&E obtain approval of a Construction Noise Control Plan from the City of San Diego and to provide a final copy of the plan to the CPUC. The City of San Diego approved the Project's Construction Noise Control Plan on April 19, 2016 and the Construction Noise Control Plan was provided to the CPUC.

Transportation/Traffic: SDG&E has submitted Construction Traffic Control Plans (TCPs) to the City of San Diego and California Department of Transportation (CalTrans), as applicable, and has provided the City and CalTrans stamped, approved TCPs to the CPUC. The appropriate permits and/or agreements from the City of San Diego, North Coast Transit District (NCTD), and San Diego Metropolitan Transit System (MTS) will be obtained prior to construction and provided to the CPUC, as well as documentation demonstrating that coordination with emergency service providers and bus transit authorities has been conducted.

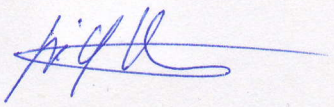
Conditions of NTP Approval

The conditions noted below shall be met by SCE and its contractors:

- All applicable project mitigation measures, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction where applicable.
- Copies of all relevant permits, compliance plans, and this NTP #1 shall be made available on site for the duration of construction activities, including, but not limited to, the City of San Diego approved grading plan(s), Storm Water Pollution Prevention Plan (SWPPP), and NCTD and San Diego MTS permits. All permits and plans shall be made available to the CPUC Environmental Monitor (EM) upon request.
- Prior to conducting construction activities, each crew member shall receive Worker Environmental Awareness Program training.

- Nighttime emergent bat surveys shall be conducted no more than five days prior to the removal of the palm trees located at the Vine Substation site. Documentation of these surveys shall be provided to the CPUC EM prior to tree removal.
- SDG&E has indicated that Operational Protocols would be utilized that require pre-construction surveys and monitoring of bird nests to avoid and minimize impacts to nesting birds and that the implementation of SDG&E's Natural Community Conservation Plan and compliance with the legal requirements of MBTA and CFGC would reduce impacts to nesting birds to a less-than-significant level. SDG&E shall provide documentation of pre-construction survey results to the CPUC EM prior to construction in any given area.
- A paleontological monitor shall be on site to observe excavation operations that involve the original cutting of deposits to depths greater than 3.5 feet within areas classified as having high paleontological resource sensitivity. The PRMP shall be implemented during construction.
- The Hazardous Materials and Waste Management Plan shall be implemented during construction. Any spill greater than or equal to 1-gallon and/or any spill that reaches jurisdictional waters, storm drains, or causes pollution to surface or groundwater, threatens wildlife, or is reportable to other agencies will be reported within 24 hours to the CPUC's EM.
- Public complaints shall be forwarded to the CPUC within 48 hours. A log of all complaints and the current status shall be provide to the CPUC monthly.
- In the event that biological, cultural, or paleontological resources are discovered during construction activities, construction work in the immediate area of the find shall be halted and directed away from the discovery. SDG&E shall report any biological, cultural, or paleontological resource discoveries made during construction to the CPUC EM immediately.
- No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes to construction technique or mitigation implementation to a lesser level are required, a Minor Project Change shall be submitted to CPUC review and approval.

Sincerely,



Eric Chiang
CPUC Environmental Project Manager

cc: V. Strong, Aspen