

**San Diego Gas & Electric Company (SDG&E) Response
Cleveland National Forest Power Line Replacement Projects (Project)
Tie Line (TL) 629E – Data Request 05, Dated April 5, 2017**

California Public Utilities Commission (CPUC) Bullet #1

Clarify if any poles within TL 629E previously contained 12kV underbuild (i.e. prior to the wood-to-steel replacement) and if so, specify the circuit numbers and where the underbuild occurred, and where the underbuild is currently occurring. Additionally, please provide the circuit number for the conductor currently on the 33 12kV distribution poles adjacent to TL 629E.

SDG&E Response:

Currently, Distribution Circuit (C)441 and C1215 is underbuilt on portions of Transmission Line (TL) TL629E and will be rebuilt concurrently during wood to steel conversion of the Project and will remain 12kV underbuilt. A list of TL629E structures that currently has 12kV distribution underbuilt (C441 and C1215) is below in Attachment A: Structure Tables, Table A: TL629E Existing 12kV Underbuild. In addition, Attachment B: TL629E Sketch Map is attached for reference.

The 33 12kV distribution poles referenced above in CPUC's Bullet #1 is C1215. A list of C1215 structures is below in Attachment A: Structure Tables, Table B: C1215 Structure.

CPUC Bullet #2

Clarify SDG&E's position on "co-locating" versus "transferring" of existing AT&T facilities and how PSU-1 applies in both circumstances. Please provide information specific to each project segment as applicable and how the project is conforming with the requirements of PSU-1.

SDG&E Response:

The Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) analyzes the existence of telecommunications infrastructure in Section D.12 Public Services and Utilities. The text discusses that some of the existing SDG&E poles that are to be replaced as part of the scope of this Project currently have existing telecommunication lines on them that are maintained and operated by AT&T. The Final EIR/EIS analyzes the potential impacts (IMPACT PSU-1) to maintain acceptable service ratios, response times or other performance objectives for telecommunications services. In order to mitigate this potential impact, Mitigation Measure (MM) PSU-1, which requires SDG&E receive a commitment from AT&T that the existing telecommunication line would be transferred onto the new poles in a timely manner, was developed. As provided in the discussion in Section D.12 on Page D.12-11, SDG&E believes that MM PSU-1 is applicable to telecommunication lines that currently exist on the same poles that are proposed to be replaced as part of the scope of this Project and that the telecommunication line will be "transferred" to the new pole.

"As stated above, AT&T provides telecommunications services in the project area and, in many areas, leases space on existing facilities proposed to be replaced as

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part of the proposed power line replacement projects. Where AT&T's telecommunications lines are currently strung on the same poles, replacement of the poles without coordination with AT&T could result in interruptions of telecommunications services or a delay in the removal of the existing poles. To mitigate this adverse and significant impact to a level that is considered not adverse under NEPA, and less than significant under CEQA (Class II), mitigation measure MM PSU-1 has been provided."

In regards to the discussion of co-location of AT&T telecommunication lines, co-location would describe moving a telecommunication line from an adjacent structure/easement corridor that is outside of the Project's scope and moving it on to the proposed Project structure. As is the case with the portion of C1215 located north of TL629E (discussed above in Bullet #1 SDG&E Response). C1215 was not originally identified in the Project scope to be rebuilt/fire hardened. C1215 currently has joint utility structures that include an AT&T telecommunication line. In an effort to consolidate SDG&E's electric facilities in this particular location from two separate easements to one easement that includes both the distribution and the transmission lines, SDG&E through Minor Project Refinement #2 (submitted on December 21, 2016) requested the ability to relocate C1215 to the adjacent TL629E structures that are currently in construction as part of this Project. A list of TL629E structures that will have C1215 installed/co-located is below in Attachment A: Structure Tables, Table C: TL629E Structure where C1215 will be co-located.

SDG&E believes that MM PSU-1 is not applicable in this case as there is not currently AT&T telecommunication lines on this portion of TL629E; therefore, no "transfer" of telecommunication line to the new steel pole is necessary. In addition, the consolidation or "re-location" of C1215 off of the joint utilities' easement to the north will not interrupt telecommunication services in the surrounding area. The typical practice for removal of electric facilities from a joint utility structure is for SDG&E to remove all electric conductors and associated hardware, including the cross-arms; cut the pole to the telecommunication level; and then quitclaim the electric easement if no longer being used by SDG&E for other facilities and transfer the structure to AT&T, where it then becomes a telecommunication easement only.

In all other areas of the Project that are currently under construction; such as on TL625B (Poles Z272870, Z272877, Z272879, Z272890, Z272892, Z272899) where telecommunication lines already existing on the transmission structure, SDG&E has received a commitment from AT&T to transfer the telecommunication line to the newly installed steel pole in compliance with MM PSU-1. Once the transfer has been completed by AT&T and their construction contractor, the old pole will be removed. At this time, SDG&E is finalizing engineering on future segments and working with AT&T to identify the specific structure(s) where telecommunication currently exist and where they will be required to be transferred once the new pole(s) is installed.

CPUC Bullet #3

Provide all relevant documentation between SDG&E and AT&T regarding feasibility of collocating AT&T facilities on TL 629E as originally proposed by SDG&E. Should co-location be determined infeasible by one or more parties, please provide SDG&E's proposed path forward for TL 629E. The response provided by SDG&E shall include the proposed plans for the

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12kV distribution poles previously proposed for removal and whether or not documentation has been obtained from the landowner to support SDG&E's proposed plans (if necessary). Please note that a condition of the approval for this project included implementation of PSU-1 and if the requirements of PSU-1 are infeasible to implement then a stop-work may be issued by the CPUC immediately.

SDG&E Response:

SDG&E has been working in good faith with AT&T to coordinate the transfer of existing AT&T facilities on to the newly installed structures as well as co-location when feasible. Specific to TL629E, AT&T has identified facilities that are feasible to transfer and/or co-locate and those that are infeasible. Please refer to the email documentation and sketch maps in Attachment C: AT&T Coordination Documentation showing where AT&T is and is not planning to transfer/co-locate.

The stand alone portion of the distribution circuit, C1215 that SDG&E plans to co-locate to TL629E and as defined in the Minor Project Refinement #2, will be vacated by SDG&E and, per AT&T's request, a quit-claim process will be used to assign the structures and any applicable rights to AT&T. A list of TL629E structures that will have C1215 installed/co-located is below in Attachment A: Structure Tables, Table C: TL629E Structure where C1215 will be co-located.

Land owners along the affected area include private property as well as Campo Kumeyaay Nation tribal land. The Campo tribe has been notified about AT&T's request to remain on the existing poles. The quit-claim process has not yet been initiated and there is no associated private property land owner documentation at this time.

Attachment A: Structure Tables

Table A: TL629E Existing 12kV Underbuild

Structure ID	Existing 12kV Circuit
Z40572	Circuit (C) 441
Z40575	C441
Z40577	C441
Z40578	C441
Z40579	C441
Z40580	C441
Z40581	C441
Z40582	C441
Z40583	C441
Z40584	C441
Z40585	C441
Z40586	C441
Z40587	C441
Z40588	C441
Z40589	C441
Z40590	C441
Z44207	C1215
Z44208	C1215
Z44209	C1215

Table B: C1215 12kV Circuit Structures

Structure ID	12kV Circuit
P209388	C1215
P40845	C1215
P40846	C1215
P40847	C1215
P40848	C1215
P40849	C1215
P40850	C1215
P40851	C1215
P40852	C1215
P40853	C1215
P40854	C1215
P40855	C1215
P40856	C1215
P40857	C1215
P40858	C1215
P40859	C1215
P40860	C1215
P40861	C1215
P40862	C1215
P190371	C1215
P41025	C1215
P41026	C1215

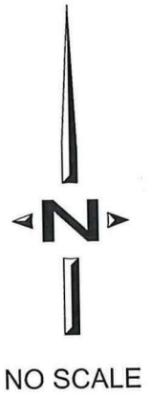
Structure ID	12kV Circuit
P41027	C1215
P41028	C1215
P41029	C1215
P1000073	C1215
P41030	C1215
P41031	C1215
P41032	C1215
P190481	C1215
P190480	C1215
P190479	C1215
P41033	C1215

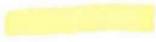
Table C: TL629E Structures where C1215 will be Co-located

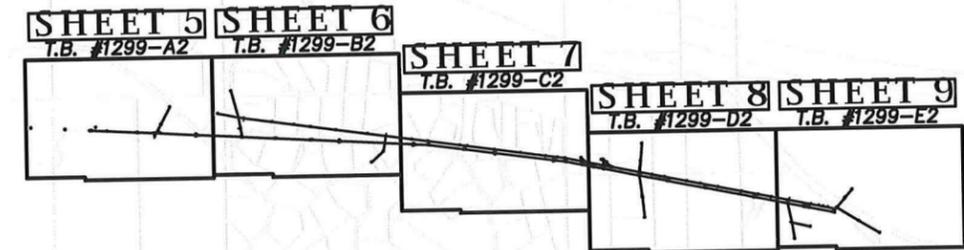
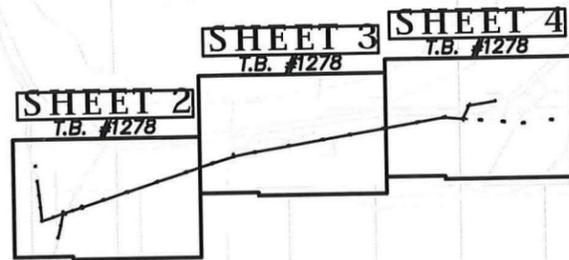
Structure ID	Co-located 12kV Circuit
Z44210	C1215
Z44212	C1215
Z44213	C1215
Z44214	C1215
Z44215	C1215
P250026	C1215
Z44217	C1215
Z44219	C1215
Z44220	C1215
Z44221	C1215
Z44223	C1215
Z44225	C1215
P250025	C1215
Z44226	C1215
P250024	C1215
Z44227	C1215
Z44228	C1215
Z44229	C1215
Z44230	C1215
Z44232	C1215
P257767	C1215
P257768	C1215
Z100145	C1215
Z100035	C1215

Attachment B:
TL629E Sketch Map

TL629E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD



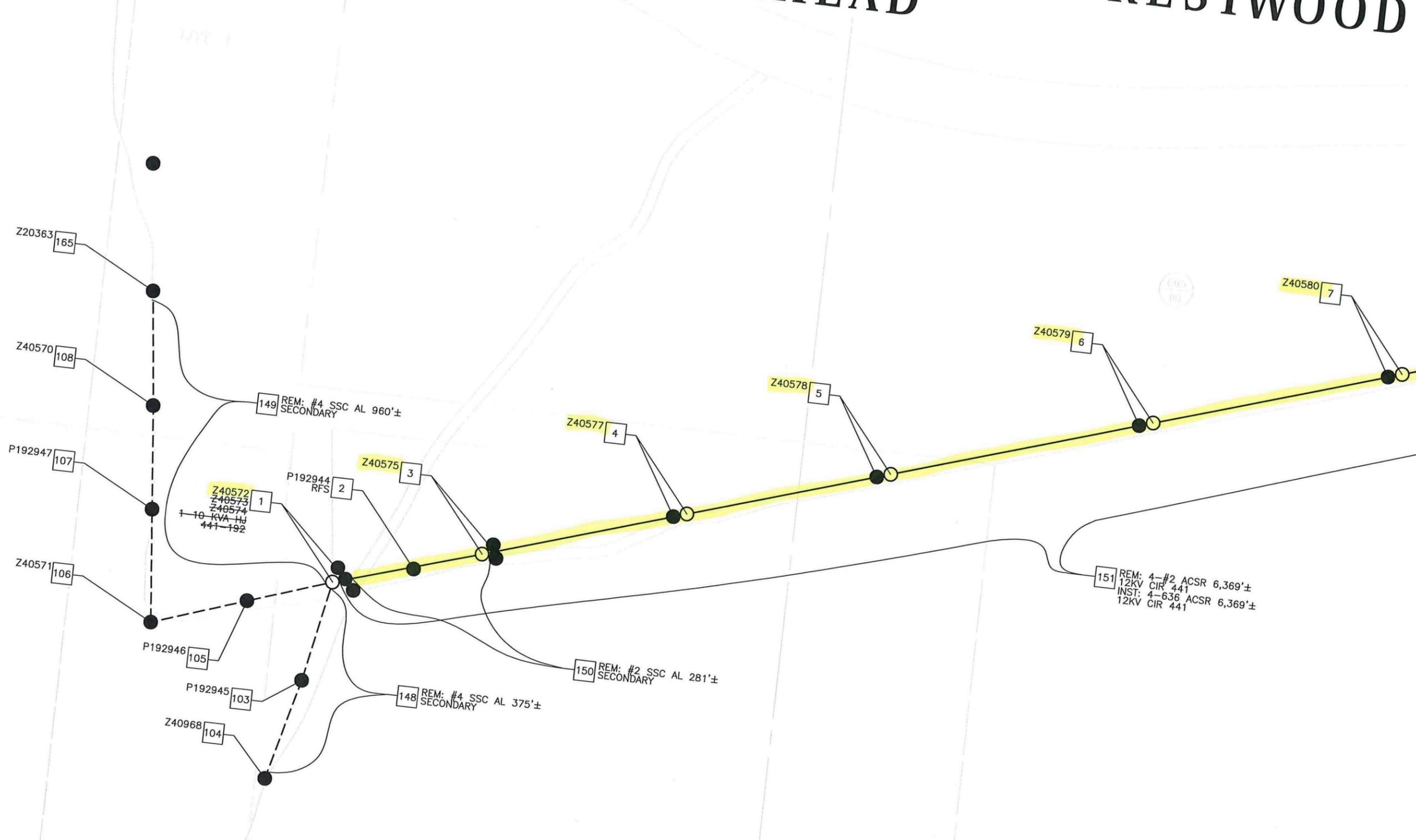
-  TABLE A
-  TABLE B
-  TABLE C



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PLANT DATE 8/9/2016	SHT 1 OF 1		

1E029E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD



OLD HIGHWAY 8

MATCHLINE "A" - SEE SHEET 3

SCALE 0 100

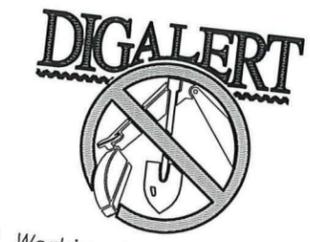
North arrow pointing up.

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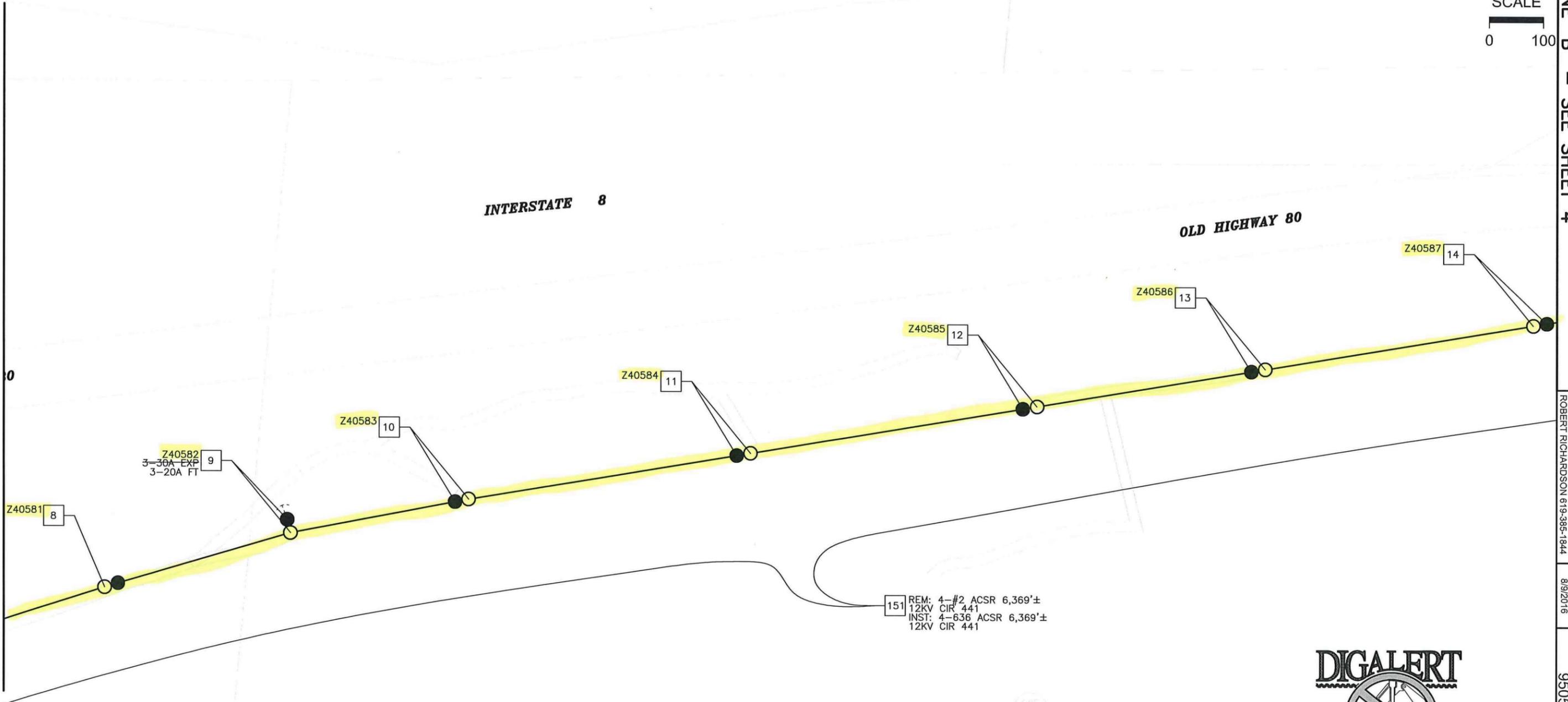
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TL629E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD



MATCHLINE "B" - SEE SHEET 4

MATCHLINE "A" - SEE SHEET 2



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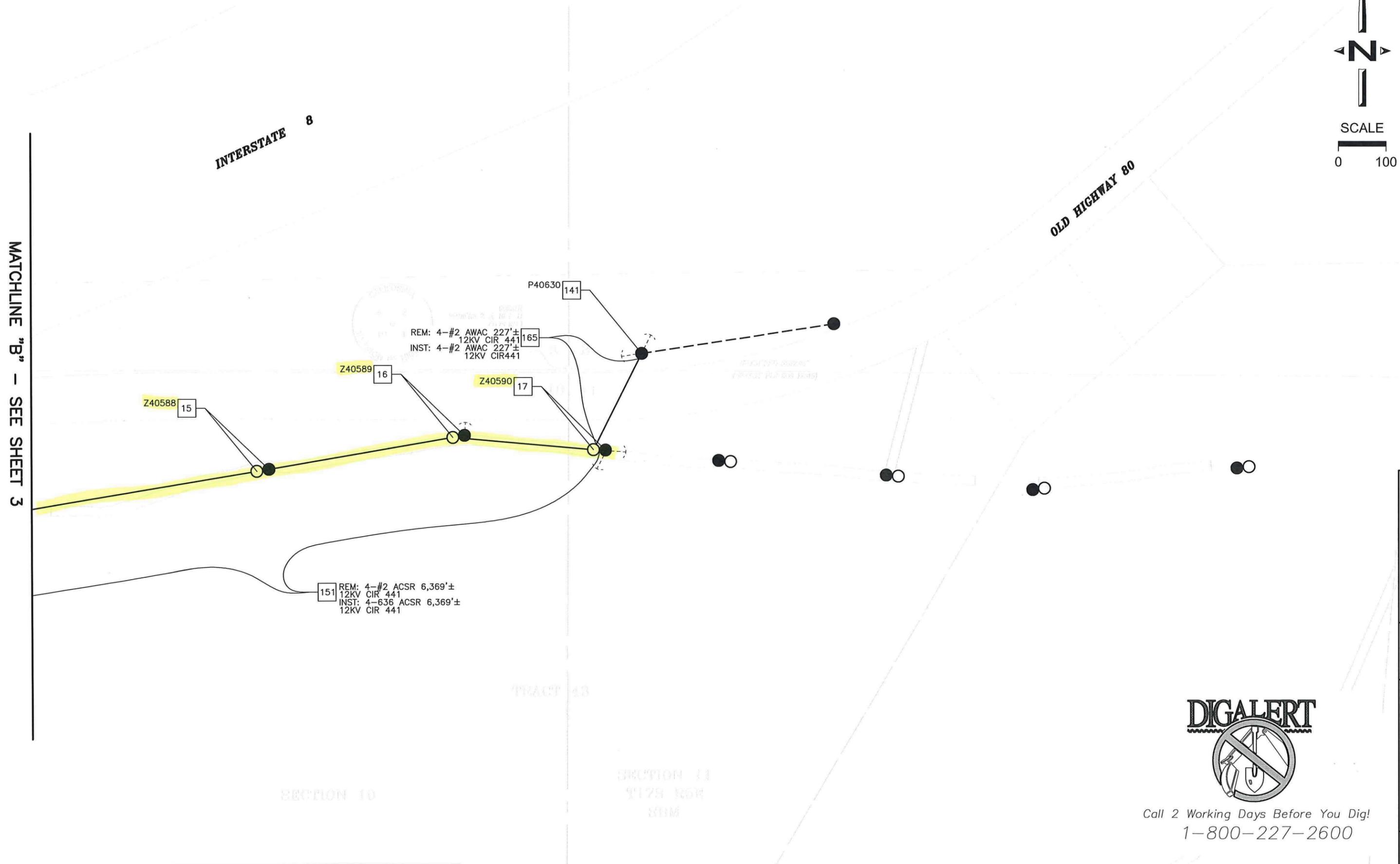
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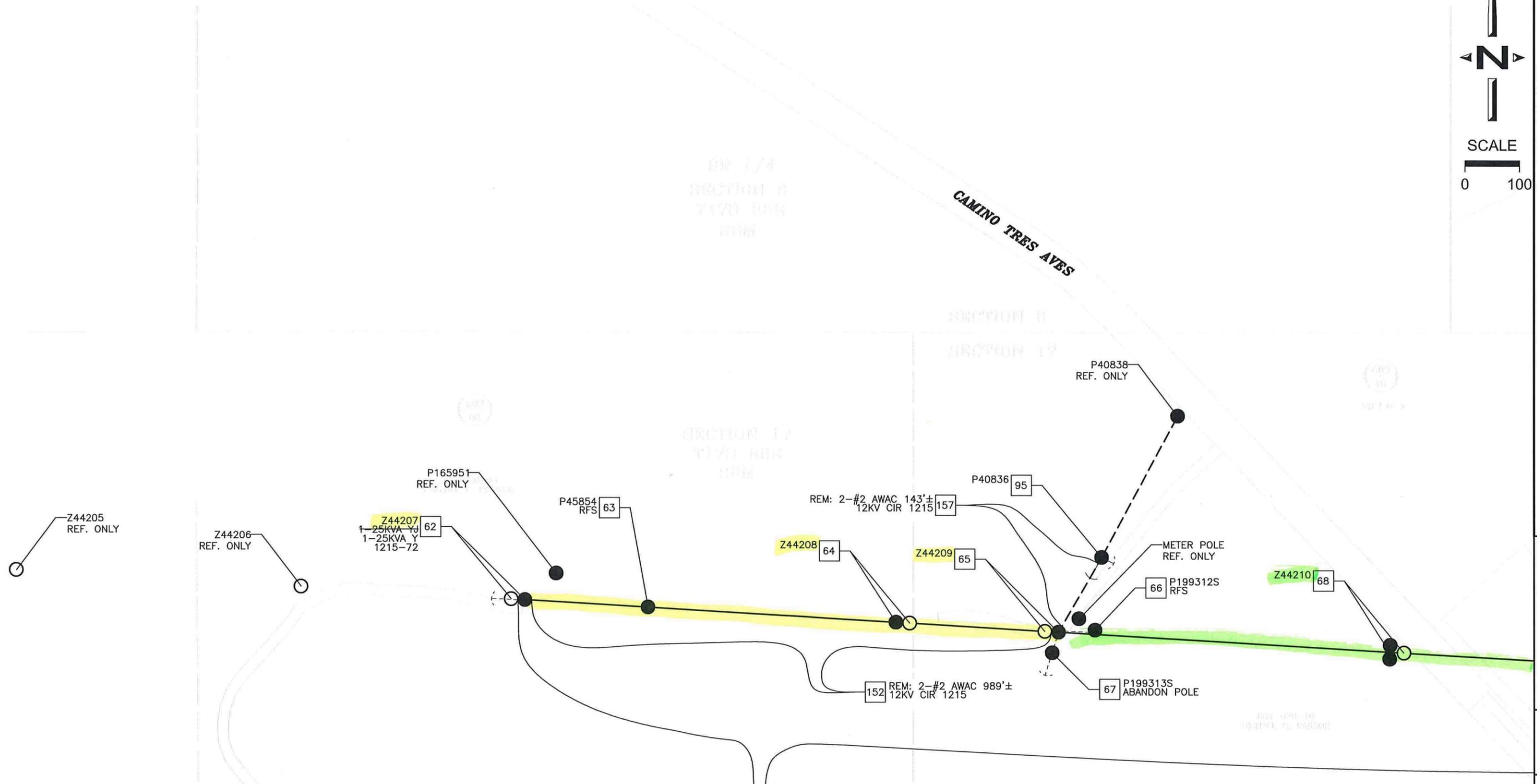
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MATCHLINE "C" - SEE SHEET 6



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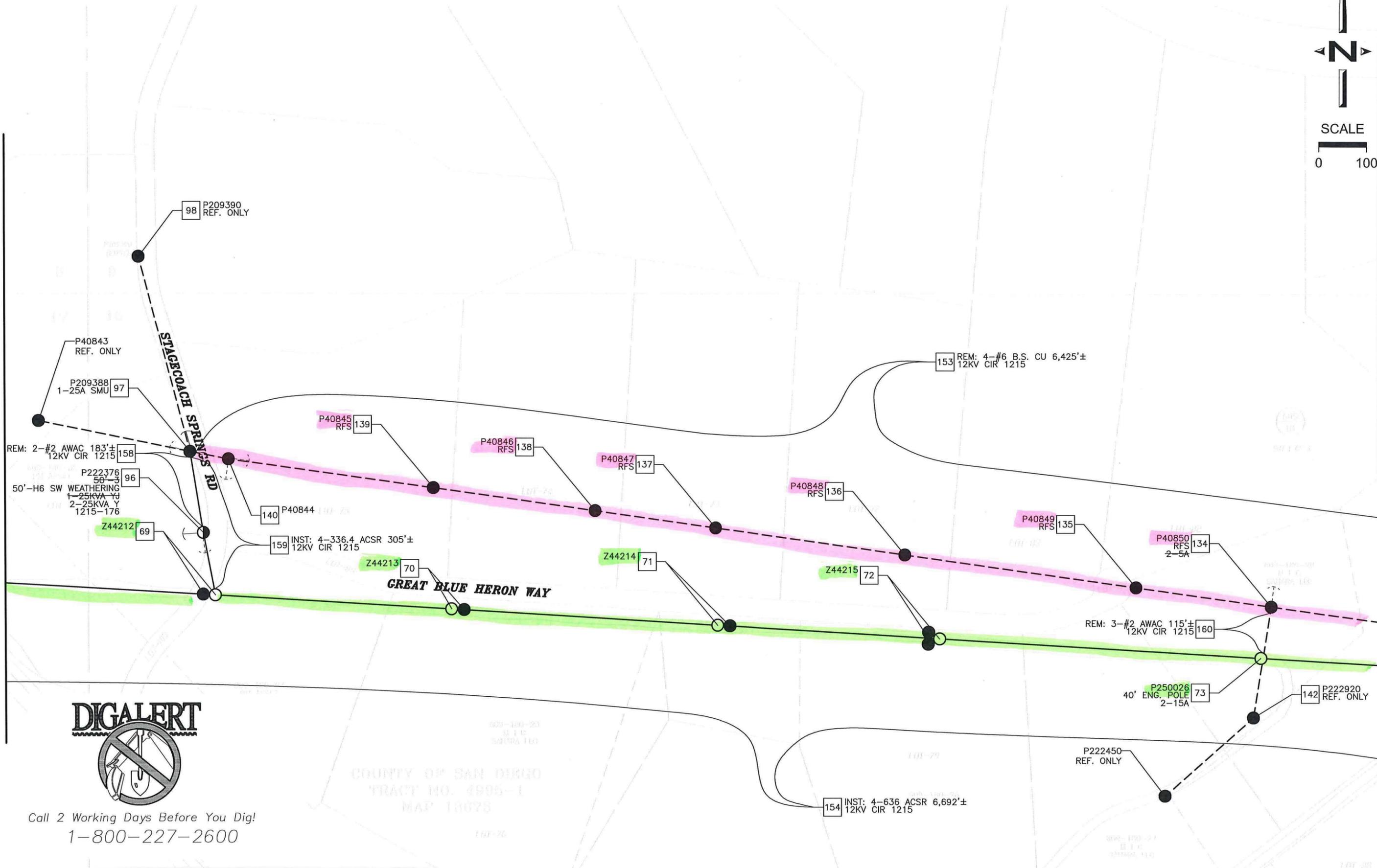
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MATCHLINE "D" - SEE SHEET 7

MATCHLINE "C" - SEE SHEET 5



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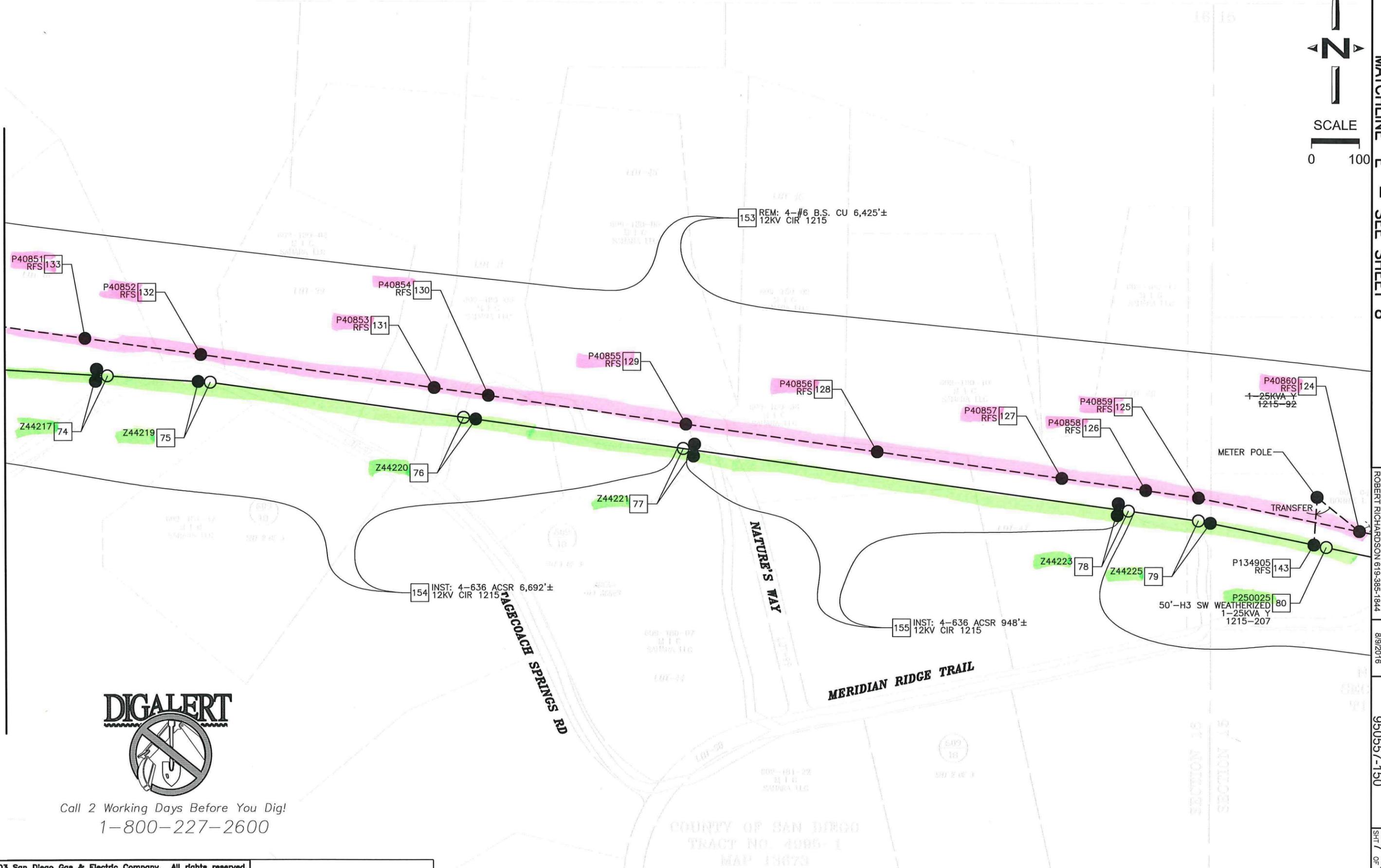
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TL629E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD



MATCHLINE "E" - SEE SHEET 8

MATCHLINE "D" - SEE SHEET 6



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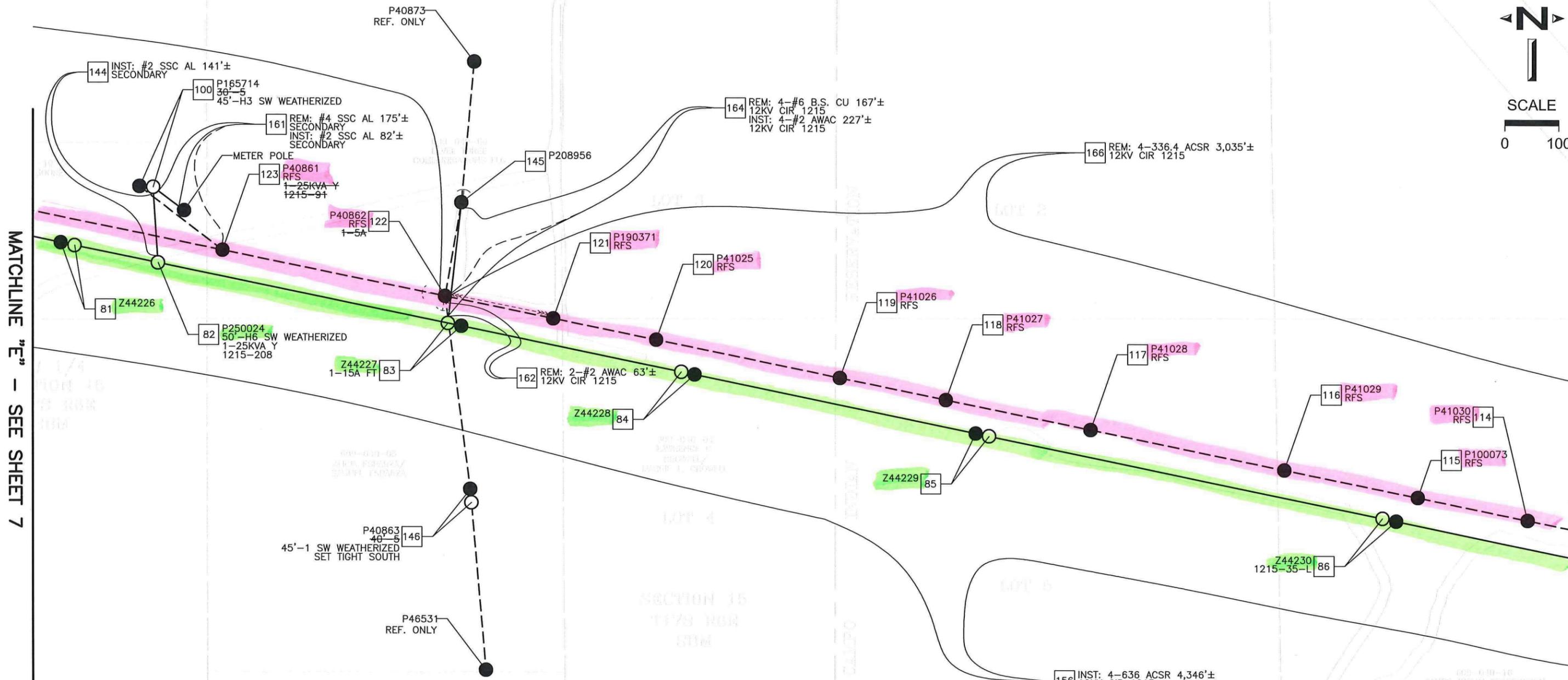
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2919396

COUNTY OF SAN DIEGO
TRACT NO. 4996-1
MAP 13873

TL629E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD



MATCHLINE "E" - SEE SHEET 7

MATCHLINE "F" - SEE SHEET 9




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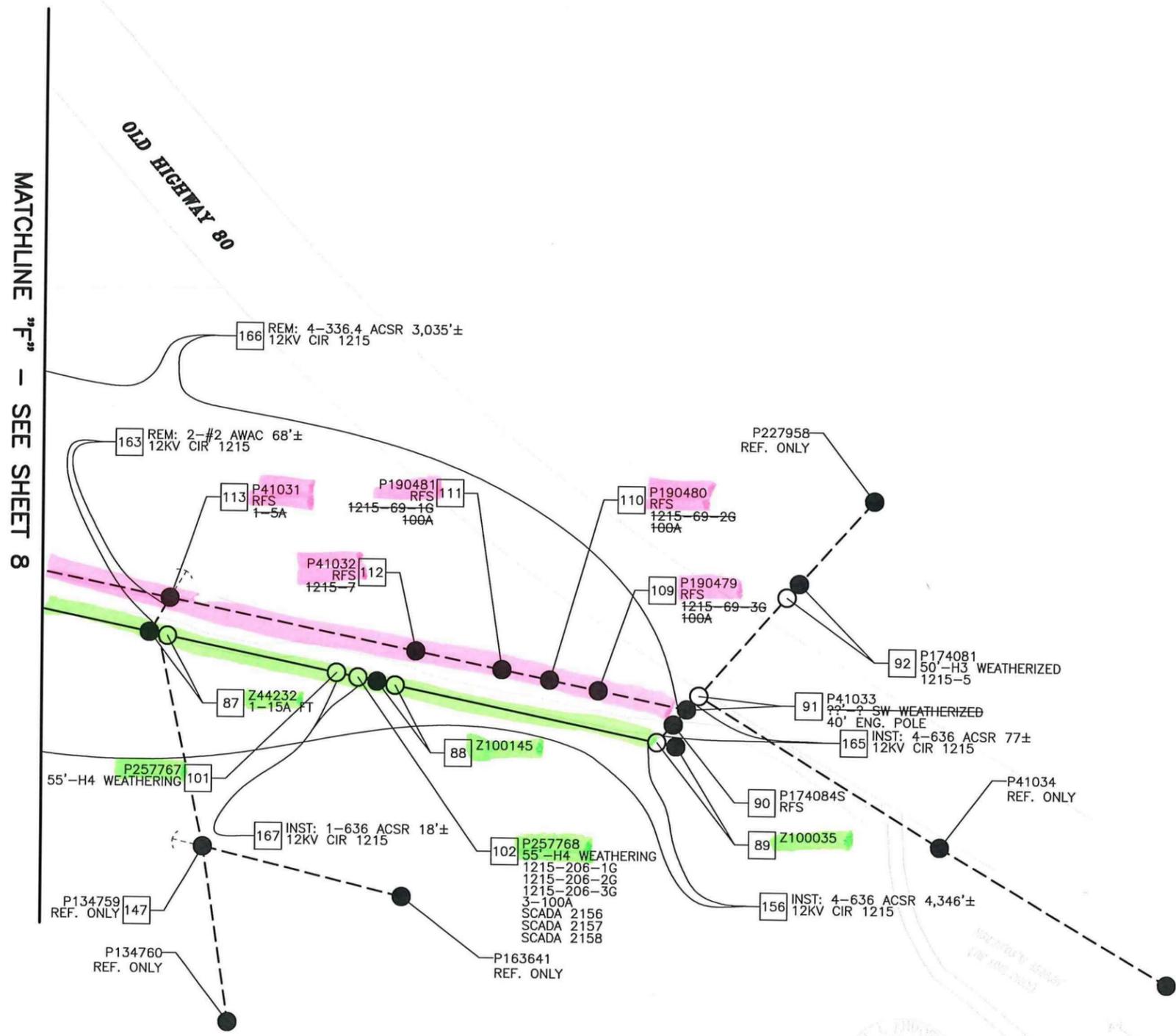
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Attachment C:
AT&T Coordination Documentation

From: [Knowd, Tim M.](#)
To: [Reynolds, Kirstie](#)
Subject: Fwd: [EXTERNAL] ATT participation and exclusion list of poles, C157 and TL629E
Date: Wednesday, March 29, 2017 3:25:58 PM
Attachments: [ATT participation and exclusion of pole C157 and TL629E.pdf](#)
[ATT00001.htm](#)

FYI.

Tim

Begin forwarded message:

From: "Stricklin, Mark" <[XXXX](#)>
To: "Tunison, Scott" <[XXXX](#)>, "Rodriguez, Paul" <[XXXX](#)>
Cc: "Rodriguez, Reuben" <[XXX](#)>, "McConnell, Michael" <[XXXX](#)>, "Prasad, Neha" <[XXXXcom](#)>, "Still, Myles R" <[XXXX](#)>, "Knowd, Tim M." <[XXXX](#)>
Subject: [EXTERNAL] ATT participation and exclusion list of poles, C157 and TL629E

All,
Please see AT&T's below email regarding Comm transfers that they will and will not do. I have requested AT&T submit the same info for TL6931, TL682, TL625B. I will provide this info once I receive it.

If you have any questions please contact

[XXXX](#)

Cell (XXX) XXX-XXXX



From: TERAN III, VINCENT [<mailto:XXXX>]
Sent: Wednesday, March 29, 2017 1:22 PM
To: Stricklin, Mark
Subject: ATT participation and exclusion list of poles, C157 and TL629E

Mark-

Please distribute as required. Please let me know if you or SDGE is expecting anything further from me at this time. Thank you for your patience.

Vincent Teran, III

AT&T, California

Manager- Design Engineer

3750 Home Ave

San Diego, CA 92105

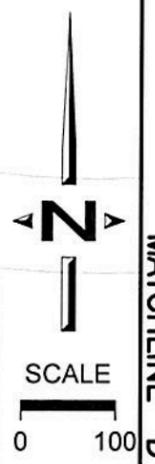
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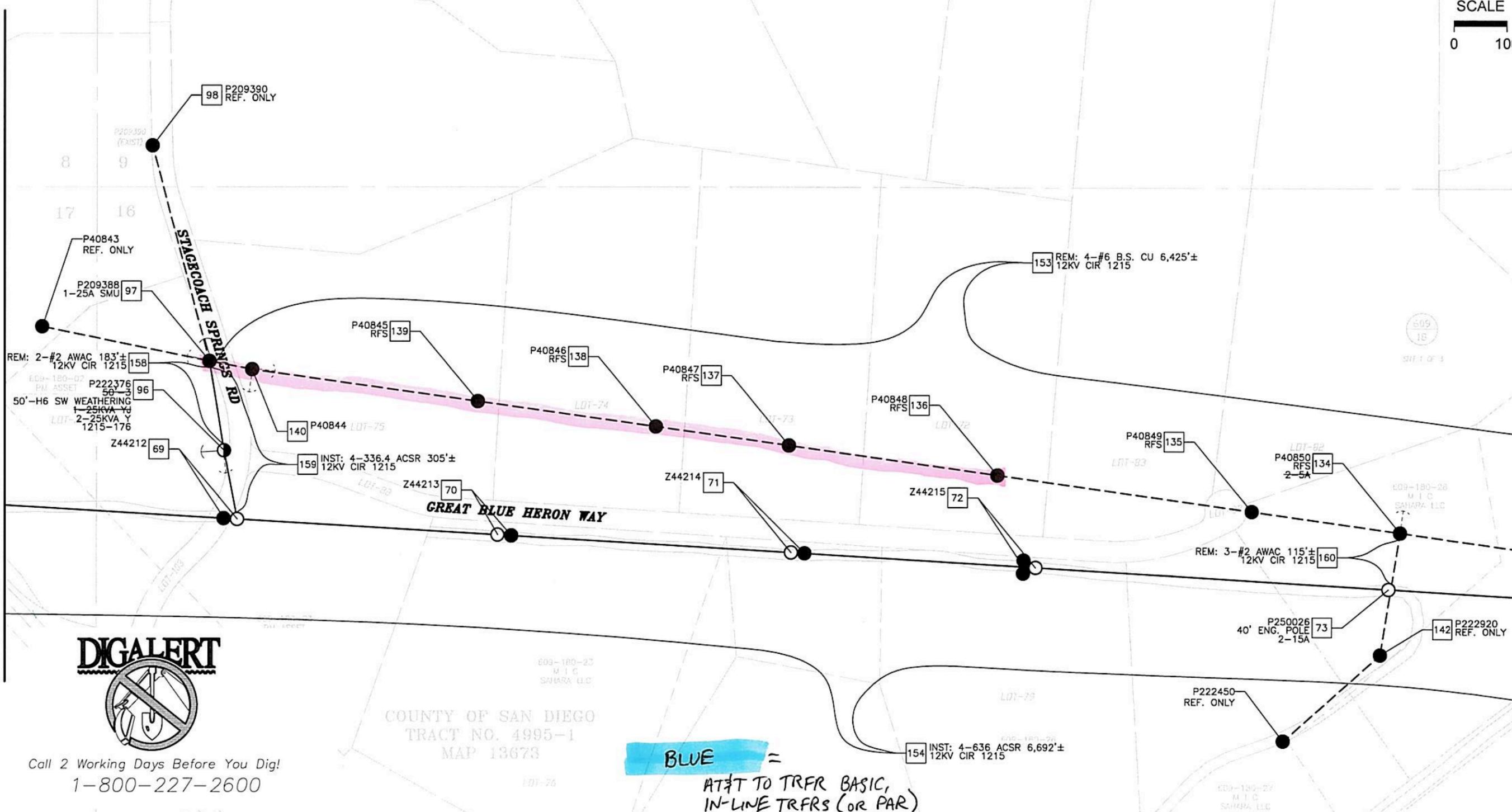
TL629E - W2S - CAMERON TAP TO CRESTWOOD OVERHEAD

AT&T PARTICIPATION & EXCLUSION POLES.



MATCHLINE "D" - SEE SHEET 7

MATCHLINE "C" - SEE SHEET 5



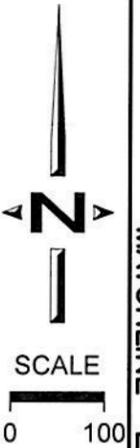
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BLUE = AT&T TO TRFR BASIC, IN-LINE TRFRS (OR PAR)

PINK = AT&T WILL NOT RELOCATE.

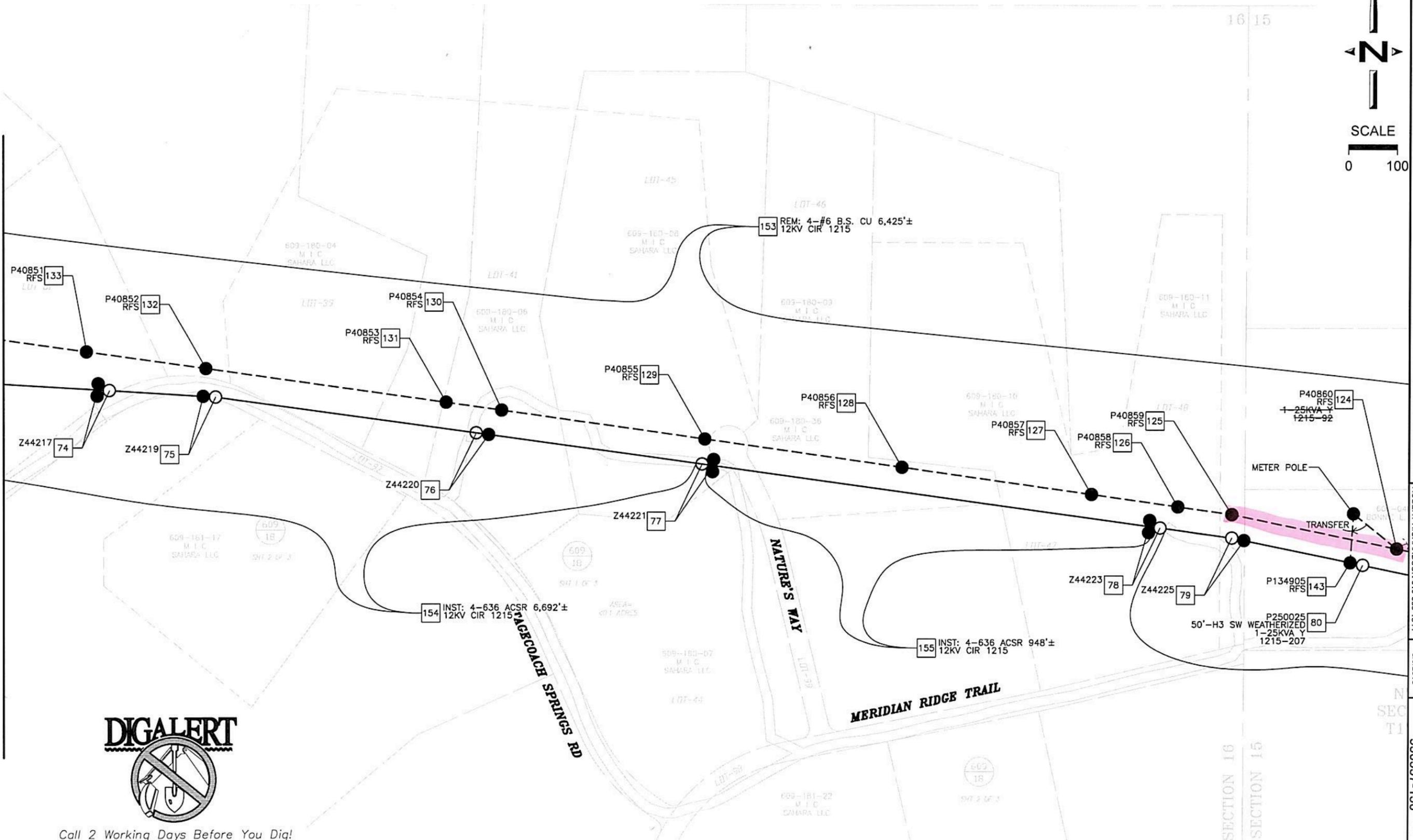
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MATCHLINE "E" - SEE SHEET 8

MATCHLINE "D" - SEE SHEET 6



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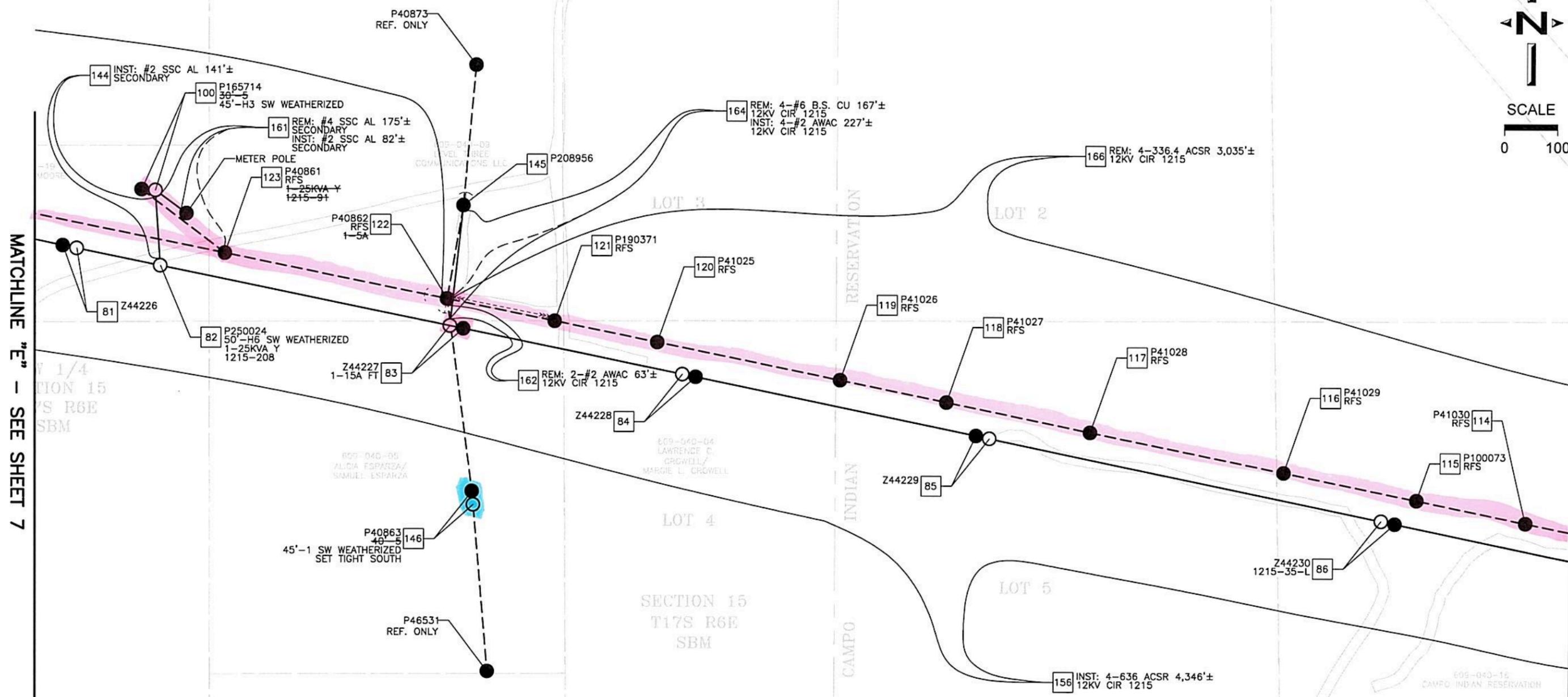
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MATCHLINE "E" - SEE SHEET 7

MATCHLINE "F" - SEE SHEET 9



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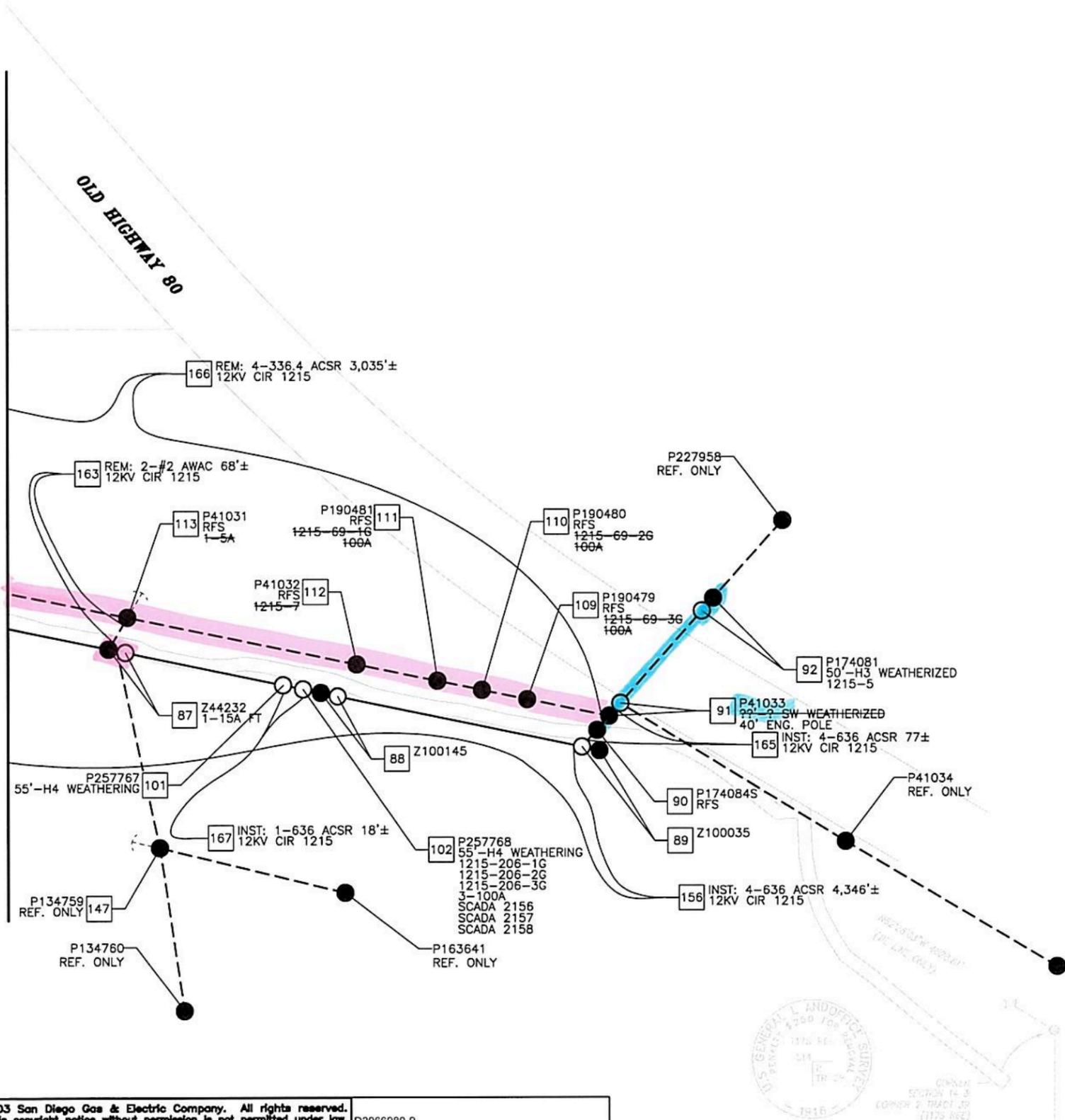


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