

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Ms. Rebecca Giles
Regulatory Case Administrator
San Diego Gas & Electric
Southern California Gas Company

February 27, 2013

(via email: RGiles@semprautilities.com)

Subject: San Diego Gas & Electric Company – Master Special Use Permit and Permit to Constructed Power Line Replacement Projects, PTC Application No. 12.10.009— Data Request No. 3 - Completeness Review

Dear Ms. Giles:

The Energy Division of the California Public Utilities Commission (CPUC) has completed its review of the San Diego Gas & Electric's Application (A.12.10.009) for a Permit to Construct the Master Special Use Permit and Permit to Constructed Power Line Replacement Projects. With supplemental data and information provided by SDG&E in response to Data Requests No. 1 and 2, the CPUC has determined the Application contains sufficient information to satisfy the requirements of the CPUC's Information and Criteria List and can be deemed complete conditioned upon receipt of the revised Plan of Development.

The CPUC has identified additional data needs as listed in Attachment A. This request for additional information does not constitute a deficiency, but is necessary to complete the California Environmental Quality Act (CEQA) analysis for the subject project. Please note that this determination has been made with the understanding that the CPUC may request additional data, as necessary, to review and analyze the potential environmental effects of the proposed project in accordance with CEQA requirements.

If you have any questions or need additional information, please contact me at 415.703.1966 or lob@cpuc.ca.

Sincerely,

MJOrsaba.

Lisa Orsaba, Project Manager
Energy Division
California Public Utilities Commission

Cc: Tim Knowd, SDG&E (TKnowd@semprautilities.com)
Robert Hawkins, US Forest Service (rrhawkins@fs.fed.us)
Debbie Hobbs, US Forest Service (dshobbs@fs.fed.us)
John Porteous, Dudek (jporteous@dudek.com)

ATTACHMENT A
Data Request No. 3 – February 27, 2013
Application No. A.12-10-009
SDG&E Master Special Use Permit and
Permit to Construct Power Line Replacement Projects

MASTER SPECIAL USE PERMIT

- 1) Please provide a list of all facilities that are currently permitted on the CNF that would be included in the MSUP. Also, please provide the mileage and/or acreage of each of these facilities, as applicable (see Attachment A.1). Please provide GIS information for the permitted facilities.

PROJECT DESCRIPTION

- 1) To clarify distance discrepancies between the POD and GIS data provided, please provide the distance that each existing as well as rebuilt power and distribution line would traverse over various jurisdictions in the table provided as Attachment A.2. Please specifically indicate how many miles would be removed, new underground, and reconducted (new steel poles and removed wood poles) within each jurisdiction as indicated in Attachment A.2.
- 2) As part of the reconstruction of C449 please describe and illustrate the proposed 12 kV distribution along TL629 and tie into C441.
- 3) Please provide typical drawings for tangent, angle, and riser poles for the distribution lines.
- 4) The POD describes that 792 feet of TL629 would be undergrounded into the Crestwood Substation however, neither the graphics or GIS data provided show that a portion of TL629 would be undergrounded. Please provide a graphic that depicts the 792 feet of TL629 undergrounded into the Crestwood Substation. Please also provide relevant updated GIS data for this segment.
- 5) SDG&E references the use of state, county, Forest Service, and SDG&E exclusive use roads as providing access to SDG&E electric facilities within and outside of the CNF. It is assumed that access road requirements for each TL and C discussed in the POD refer to SDG&E exclusive use roads only within and outside of the CNF. Please confirm.
- 6) Please provide the number of peak underground crew that would be required for the undergrounding of TL629.
- 7) Please provide the anticipated construction period (in months) for the undergrounding of TL629.
- 8) Please provide updated detailed route maps that depict all features described in the text and shown in the legend of the detailed maps, including staging areas, stage areas and fly yards,

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and fly yards. For example, the POD text indicates that there would be a total of 12 fly yards; however, based on review Attachment A, Detailed Route Maps, only 11 fly yards are depicted on the maps.

- 9) Please clarify discrepancy regarding 12 kV distribution line access road mileage provided in POD Section 4.5 that states that 17.6 miles are within the CNF and POD Table 7, 12 kV Distribution Line Access Road Summary, that shows 15.6 miles within the CNF.

ALTERNATIVES

- 1) After scoping is complete, and in consultation with the Forest Service and the CPUC, please identify a preferred route within the alternative study corridor for TL626. Please provide all relevant information for this route including: number of new and removed poles, associated access road information, temporary and permanent impact areas, staging yards, fly yards, stringing sites, construction schedule (if different), equipment, workforce, land ownership, affected resources, and impact analysis. Please also provide analysis of the entire TL626 proposed alternative route for comparison purposes with TL626 as proposed by SDG&E.
- 2) After scoping is complete, and in consultation with the Forest Service and the CPUC, please also provide analysis of the entire C157 using the alternative route between the two wilderness areas for comparison purposes with C157 as proposed by SDG&E. Please provide similar level of information for all alternative routes shown to the east.

APPLICANT PROPOSED MEASURES

- 1) The POD text discusses several things SDG&E would do as part of project implementation; however, they are not identified as applicant proposed measures (APMs). In order to track implementation of these items as part of project construction/operation, as appropriate, please include as APMs in the consolidated list of APMs. A few examples include the following:

POD Section 7, introduction, page 35, "Prior to initiating construction, SDG&E would make all necessary notifications, including landowner notifications.

POD Section 7.2.3, page 51, "SDG&E would notify the Underground Service Alert a minimum of 48 hours in advance of excavating or conducting other ground-disturbing activities in order to identify buried utilities. Exploratory excavations (potholing) would also be conducted to verify the locations of existing facilities in the field, if necessary."

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POD Section 7.6, page 59, “If construction occurs outside the hours allowed by San Diego County, SDG&E would follow its established protocols and would provide advance notice by mail to all property owners within 300 feet of planned construction activities. The announcement would state the construction start date, anticipated completion date, and hours of construction.”

- 2) The POD does not include any biological resources APMs. At a minimum please provide an APM that indicates resources are protected in accordance with the Natural Community Conservation Plan and the Low-Impact Habitat Conservation Plan. Also, the POD Section 10.10.0 states that avian protection measures would be implemented but does not describe.

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Attachment A.1
MSUP Components

Project Component	CNF	Description
<ul style="list-style-type: none"> • Existing 69 kV power line • Existing 12 kV distribution lines • Existing communication site • Existing substation • Existing access roads • Other. 	28.5 miles 32.6 miles ? acres ? acres 45 miles ? acres	Consolidate existing use permits and easements to allow O&M of SDG&E electric facilities within the CNF. Includes proposed authorization for: <ul style="list-style-type: none"> • Right-of-way (ROW) repair • Pole brushing • Application of pesticides • Equipment repair/replacement • Insulator washing • Tree trimming • Use of helicopters • Fire protection.

Attachment A.2
Agency Jurisdiction of Project Components

Proposed Project Component	Jurisdiction	Number of Miles under Jurisdiction*	SDG&E DR 3 Response
TL682	CNF	1.32 (reconductor)	
	State	0.21 (reconductor)	
	Tribal (La Jolla Indian Reservation)	3.25 (reconductor)	
	Other Public	--	
	- BLM	0	
	- City of San Diego	0	
	- County of San Diego	0	
	- School Districts	0.27 (reconductor)	
- Water Districts	6.65 (reconductor)		
Private	8.47 (reconductor)		
TL626	CNF	7.99 (reconductor)	
	State	0	
	Tribal	0	
	Other Public	0	
	- BLM		
	- City of San Diego		
	- County of San Diego		
	- School Districts		
- Water Districts			
Private	10.78 (reconductor)		

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Proposed Project Component	Jurisdiction	Number of Miles under Jurisdiction*	SDG&E DR 3 Response
TL625	CNF	6.25 (reconductor)	
	State	0.37 (reconductor)	
	Tribal	0	
	Other Public		
	- BLM	0.05 (reconductor)	
	- City of San Diego	1.76 (reconductor)	
	- County of San Diego	0.23 (reconductor)	
- School Districts	0		
- Water Districts	2.91 (reconductor)		
Private	10.91 (reconductor)		
TL629	CNF	8.63 (reconductor)	
	State	0.82 (reconductor)	
	Tribal (Campo Indian Reservation)	0.50 (reconductor)	
	Other Public		
	- BLM	0.71 (reconductor)	
	- City of San Diego	0	
	- County of San Diego	0	
- School Districts	0.07 (reconductor)		
-Water Districts	0		
Private	19.09 (reconductor)		
TL6923	CNF	2.94 (reconductor)	
	State	0	
	Tribal	0	
	Other Public		
	- BLM	3.45 (reconductor)	
	-City of San Diego	0.27 (reconductor)	
	-County of San Diego	0	
- School Districts	0		
-Water Districts	0		
Private	6.75 (reconductor)		
C79	CNF	1.85 (removal)	
	State	0.38 (removal) 2.82 (underground)	
	Tribal	0	
	Other Public (none)	0	
	Private	0.02 (underground)	
C78	CNF	1.41 (removal) 1.81 (reconductor)	
	State	0	
	Tribal	0	
	Other Public (None)	0	
	Private	0.02 (removal)	

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Proposed Project Component	Jurisdiction	Number of Miles under Jurisdiction*	SDG&E DR 3 Response
		0.27 (reconductor)	
C157	CNF	1.71 (reconductor)	
	State	0	
	Tribal	0	
	Other Public	--	
	- BLM	0	
	-City of San Diego	1.20 (reconductor)	
	-County of San Diego	0	
- School Districts	0		
-Water Districts	0		
Private	0.60 (reconductor)		
C442	CNF	3.67 (reconductor)	
	State	0	
	Tribal	0	
	Other Public (None)	0	
	Private	2.52 (reconductor)	
C440	CNF	5.76 (removal) 4.28 (underground) 11.87 (reconductor))	
	State	0.09 (reconductor)	
	Tribal	0	
	Other Public (None)	0	
	Private	1.39 (removal) 4.13 (underground) 5.09 (reconductor)	
C449	CNF	4.93 (removal) 0.39 (underground) 1.72 (reconductor)	
	State	0	
	Tribal	0	
	Other Public	--	
	- BLM	0	
	-City of San Diego	0.51 (removal) 0.41 (reconductor)	
	-County of San Diego	0	
- School Districts	0.08 (underground)		
-Water Districts	0		
Private	0.27 (removal) 1.38 (underground) 0.17 (reconductor)		

*Source: SDG&E GIS data (October 2012)