

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 3, 2017

Tim Knowd
Project Manager
San Diego Gas & Electric Company
1010 Tavern Road
Alpine CA, 91901

**Subject: Cleveland National Forest Power Line Replacement Projects
(Application No. 12-10-009) – Tie Line (TL) 626E – Data Request 5**

Dear Mr. Knowd:

On December 21, 2016, San Diego Gas & Electric Company (SDG&E) submitted Minor Project Refinement Request (MPRR) #2 to the California Public Utilities Commission (CPUC) for approval. MPRR #2 included minor project refinements to Tie Line (TL) 625B and TL 629E as requested by SDG&E. The CPUC approved MPRR#2 on February 10, 2017, with conditions.

In MPRR#2, SDG&E proposed removal of 33 existing distribution poles and co-location of the 12 kiloVolt (kV) circuit to the TL 629E alignment. In response to an earlier data request made by CPUC, dated August 15, 2016 (Data Request #1), SDG&E provided the following information about the 12kV distribution pole removal activity on August 24, 2016 (Data Response #1):

“NTP Request #1 Map 9-13 of 13. Poles P40845/P40846, P40847, P40848, P40849, P40859, P40860, P40861, P40862, P190371, P41025, P41026, P41027, P41028, P41029, P4100073, P41030, P41031, P41032, P190481, P190480, P190479, P174084S are no longer required because of the approved 12 kV underbuild design of the fire-hardened TL629E. However, due to extended correspondence with the Campo Tribe regarding the relocation of the existing 12 kV to the rebuilt TL629E, these poles were not identified for removal in the April 29, 2015 map book. Since the time of the April 29, 2015 map book submittal, resolution with the Campo Tribe has been achieved and the Tribe and SDG&E agreed to remove all of the old distribution poles associated with the underbuild design. Please note that the poles will not be removed until the communication line (AT&T) is transferred to the rebuilt TL629E (per MM PSU-1).”

CPUC approved the removal of 12kV poles as part of MPRR#2, with the following condition:

“PSU-1: Prior to commencing work along the 12kV distribution line paralleling TL 629E (transfer of 12kV wire, AT&T facilities, and removal of poles), SDG&E shall provide CPUC with an updated record of written verification from AT&T that telecommunication facilities will be relocated on new poles and the timing of the relocation of facilities.”

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On March 14, 2017, SDG&E provided correspondence from AT&T confirming co-location of telecommunication facilities onto TL 629E.

Based on recent communication from SDG&E, the CPUC understands the following:

- SDG&E has commenced stringing underbuilt 12kV conductor on TL 629E steel pole structures. The 12kV conductor on the 33 adjacent poles conditionally approved for removal is currently in place and operational. The AT&T facilities are also in place and operational on the 33 adjacent poles. Accordingly, the poles have not been removed to date. SDG&E will remove and decommission the 12kV conductor from the 33 adjacent poles once the 12kV conductor is operational on TL 629E.
- Based on meetings between SDG&E and AT&T, transferring AT&T facilities onto TL 629E may not be feasible, as proposed by SDG&E and described in Data Response 1. Therefore, the 12kV pole structures may remain in place in order to accommodate AT&T facilities.

CPUC requests the following information be provided by SDG&E to ensure compliance with project conditions:

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.
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.
3. Provide all relevant documentation between SDG&E and AT&T regarding feasibility of co-locating 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 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.

The CPUC expects a response to this letter within 48 hours of receipt to avoid project delays. Information requested above may be submitted under confidential cover. If you have any questions regarding this letter or need additional information, please contact me at 415.703.1966 or lisa.orsaba@cpuc.ca.gov.

Sincerely,



Lisa Orsaba
CPUC Environmental Project Manager

Mr. Tim Knowd

April 3, 2017

cc: *Jack Mulligan, CPUC Legal Division (jmulligan@cpuc.ca.gov)*
Lonn Maier, CPUC CEQA Division (lmaier@cpuc.ca.gov)
Adrianna Kripke, SDG&E Legal (akripke@semprautilities.com)
Kirstie Reynolds, SDG&E (kreynolds@semprautilities.com)
Brad Aughinbaugh, USFS (baughinbaugh@fs.fed.us)
David Hochart, Dudek (dhochart@dudek.com)
Allison Rice, Dudek (arice@dudek.com)