

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Ms. Linda Wrazen
Regulatory Case Administrator
San Diego Gas & Electric
Southern California Gas Company

January 14, 2013

(Sent via email: lwrazen@semprautilities.com)

***Subject: Data Request No. 1 – Completeness Review
Application No. 12.12.007 - Application for a Permit to Construct - San
Diego Gas & Electric Transmission Line (TL) 6931 Fire Hardening/Wind
Interconnect Project***


Dear Ms. Wrazen:

San Diego Gas & Electric (SDG&E) submitted Application A.12.12.007 for a Permit to Construct (PTC) to the California Public Utilities Commission (CPUC) on December 13, 2012. As part of the application submittal, SDG&E provided Volume II, Proponent's Environmental Assessment (PEA), dated December 2012, in support of the subject project.

Both the CPUC's *Information and Criteria List* and the *Working Draft PEA Checklist for Transmission Line and Substation Projects* were used as a basis for evaluating completeness and ensuring that sufficient information is available in the PEA so that the CPUC can conduct the environmental analysis required by the California Environmental Quality Act (CEQA). Based on review of the PEA, CPUC finds that the PTC Application and supporting documentation requires additional information to be deemed complete. Please see Attachment A for a list of information the CPUC will need to complete its review of SDG&E's application.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.1691 or amy.baker@cpuc.ca.gov.

Sincerely,


Amy Baker
Energy Division
California Public Utilities Commission

Attachment A: Data Request No. 1, Completeness Review for the SDG&E TL 6931 Fire Hardening/
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cc: John Porteous, Dudek

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GENERAL

Please provide the following:

- 1) The list of agencies, other interested parties, and land owners electronically in Excel format (Application Appendices C and H). For land owners, please include all parcels within 300 feet of any project component with the following data: assessor parcel number (APN), owner mailing address, and parcels' physical addresses.
- 2) Agency and public involvement contacts and correspondence to date, including names, addresses, phone numbers, and e-mail addresses.
- 3) Supporting technical reports/data for resource sections (e.g., air quality, biological resources, cultural resources, geotechnical report, noise).
- 4) A list of persons and their qualifications responsible for compiling the detailed information for each area of environmental concern in the Proponent's Environmental Assessment (PEA).

GEOGRAPHIC INFORMATION SYSTEM (GIS)

- 1) Please provide the following digitally formatted GIS data in the CA State Plane Zone VI NAD83 Feet coordinates/projection:
 - Interconnect route/proposed alignment
 - Existing Transmission Line (TL) 6931 alignment
 - Mile markers
 - Pole locations
 - Staging areas
 - Pull sites
 - Permanent and temporary helicopter pad sites
 - Permanent 100-foot right-of-way (ROW) and temporary 100-foot ROW
 - Temporary wood poles
 - Underground 138 kilovolt (kV)
 - Temporary 69 kV
 - Boulevard Substation location
 - New and existing access roads
 - Key observation point (KOP) locations
 - Visual simulation locations
 - Vegetation communities

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- Special-status plant and wildlife species
- Permanent and temporary impact data
- Potential jurisdictional streams
- National Wetlands Inventory (NWI) wetlands
- Sensitive receptor locations
- Roadways listed in Tables 4.15-1 and 4.15-2
- Cumulative project points within vicinity of project
- I-8 Pavement Rehabilitation transmission line
- ECO substation transmission line
- Sunrise Powerlink alignment
- Alternative power line route(s)
- Environmental Data Resources (EDR) search boundary
- National Renewable Energy Laboratory (NREL) wind data
- California Natural Diversity Database (CNDDDB) locations
- U.S. Fish and Wildlife Service (USFWS) occurrence data
- Watersheds/sub-areas
- State parks.

SECTION 1 PEA SUMMARY

- 1) **Section 1.4.0 U.S. Fish and Wildlife Service:** Please indicate if the 2010 and 2011 Quino checkerspot butterfly surveys for the Manzanita Wind Project included the transmission line corridor to the Boulevard Substation. Please provide copies of these surveys.
- 2) **Section 1.4.1 Native American Heritage Commission:** Please provide the following:
 - a. A copy of the records found in the literature search. Please provide copies of all site records, reports, and maps.
 - b. A copy of all letters and documentation of Native American consultation.

SECTION 2 PURPOSE AND NEED

- 1) Please explain why the fire hardening work stops at the point where the Shu'luuk Wind Project interconnects and does not continue the entire length of TL 6931.

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- 2) Please further expand on SDG&E's responsibility to permit and construct the proposed interconnect in relation to California Independent System Operator's (CAISO's) Federal Energy Regulatory Commission (FERC)-approved tariff.

SECTION 3 PROJECT DESCRIPTION

- 1) Please explain why the proposed project requires 13 new access roads and whether the proposed alignment is identical to the existing TL 6931 alignment. Please show proposed access roads (new and existing) on Figures 3-2 through 3-2D.
- 2) Please illustrate the existing alignment for TL 6931 from the Crestwood Substation to the Boulevard Substation along with the proposed alignment on Figures 3-1 and 3-2 through 3-2E.
- 3) Please provide description and illustration to scale (similar to Figure 3-2D) of the proposed interconnection from pole number 1 to the Shu'luk Wind Project. Please illustrate facilities proposed as part of the Shu'luk Wind Project that TL 6931 would interconnect to.
- 4) Please illustrate the new Boulevard Substation configuration on Figures 3-2D and 3-2E that TL 6931 would tie into.
- 5) Please describe and show all proposed modifications to the 12 kV distribution facilities.
- 6) In PEA Section 3.4 please describe if SDG&E is acquiring new ROW easements and if yes, approximately how much would be required. Please list properties that may likely require acquisition.
- 7) Please provide a list of major construction equipment that would be used, number and duration of use, and number of construction vehicle trips.
- 8) Please elaborate on the purpose and need for three permanent helicopter landing sites needed to operate and maintain the project. Please show these facilities on Figures 3-2 through 3-2 D. Also, please describe why the acreage for one helicopter staging yard is included in the temporary workspace requirements shown in Table 3-4 if the helicopter sites are permanent.
- 9) Instead of an approximate number of poles, please provide the maximum number of poles that are needed for this project. If different than the approximate number of poles in the PEA, please update temporary and permanent impact acreages for project.

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- 10) Please provide the approximate diameter of the base and tip of steel pole on Figures 3-4 and 3-5.
- 11) Please provide the size and type of conductor used and insulator configuration.
- 12) Please provide the approximate span length between poles.
- 13) Please indicate if a temporary source of power is needed at the staging areas. If yes, please describe how the power will be provided to the staging areas (e.g., a temporary power line or a generator).
- 14) Please provide detailed information for the underground portion of the 138 kV line into the Boulevard Substation including trench depth and width, methodology used to make trench, cubic yards of soil removed, would engineered fill be used as backfill, underground duct banks (include dimensions and illustration), and type of casing used for the cable. Also, please provide rationale for undergrounding from pole 52 to Boulevard east.
- 15) Please indicate if any trenchless technologies will be used during project construction. If yes, please show location(s) on Figure 3.2A–3.2E and describe the construction methodology.
- 16) Please provide a description of how the removed components (i.e., wood poles, transmission lines, conductors, and insulators) would be removed from the project site. If anything is disposed of, please indicate what disposal facility would be used.
- 17) Under Operation and Maintenance the PEA describes the activities required for insulator washing but then indicates this will not be required for the 69 kV/138 kV line as polymer insulators that do not require washing will be used. Is there a possibility that other insulators will be used that require washing? If yes, please provide information about the insulators and the approximate amount of water that would be needed for washing insulators along the 5.2-mile double-circuit transmission line. Does the existing TL 6931 require insulator washing? If yes, how much water is needed? PEA Section 4.9, Hydrology and Water Quality (under question 4.9d), indicates that there would be no change in water discharge volumes during operations and PEA Section 4.16, Utilities and Service Systems (under question 4.16d), states that water is expected to be used for insulator washing and would be similar to what is used

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now for TL 6931. Please clarify if water use during operations would be the same, less, or more with the proposed project than under existing conditions.

SECTION 4 ENVIRONMENTAL IMPACT ASSESSMENT

4.1 Aesthetics

- 1) Section 4.12, Methodology. Please describe the KOP selection process – specifically, was the County of San Diego consulted/involved in the selection process?
- 2) Section 4.1.3, Existing Conditions (Proposed Project Viewshed). Please provide a graphic that depicts the Proposed Project Viewshed. A graphic is necessary to substantiate the textual claims provided in Section 4.1.3, including the statement that “intervening landform and vegetation will partially or fully screen views of the Proposed Project from many places within the surrounding area.” In addition, a graphic will be helpful in determining whether an additional KOP should be located on Old Highway 80 (included in the County Scenic Highway System).
- 3) Section 4.1.4, Impacts, Question 4.1c:
 - a. VP -4: Please provide heights for a) wood poles, b) galvanized steel poles, and c) steel distribution pole depicted in Figure 4.1-4. The text states that new poles would be “52% taller than existing poles” but does not provide the heights of either existing or proposed poles. In addition, Table 4.1-2, Summary of Simulation Views, states that two existing wood poles will be “shortened to the distribution level.” Provide the height of the existing poles and the height of the poles once shortened to the distribution level.
 - b. VP-7: Please provide height of a) galvanized steel pole, and b) H-frame wood pole to be removed in Figure 4.1-5.
 - c. VP-10: Please provide height of a) galvanized steel cable pole, and b) existing wood support pole in Figure 4.1-6.
- 4) Section 4.1.4, Impacts, Question 4.1d. The question 4.1d analysis does not discuss glare and reflectivity of galvanized steel poles. Provide information regarding reflectivity and potential

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glare of galvanized steel pole surfaces. Will dulling the material entirely avoid glare impacts to motorists and residents?

- 5) Figures: Please provide high-quality individual jpeg images of the photographs included as Figures 4.1-3a through 4.1-3f. Also provide high-quality jpeg images of the photographs and visual simulations included in Figures 4.1-4 through 4.1-6 (existing reproduction quality of images in Figures 4.1-4 through 4.1-6 is relatively poor as existing and proposed transmission infrastructure appear blurry in the hard-copy PEA document).

4.2 Agricultural and Forestry Resources

No additional information is requested at this time.

4.3 Air Quality

- 1) The maximum daily PM₁₀ emissions appear to be associated with overlapping days during CalEEMod Phases 5–8 and 10–12 (see “tblConstructionPhase sheet” in CalEEMod inputs in Appendix A). The majority of those emissions are associated with fugitive road dust due to hauling and worker trips. Please explain what activity is associated with those phases as they do not appear to involve haul trucks. According to the CalEEMod report, there would be hauling only associated with transport of 1,930 cubic yards of soil imported during the grading phase.
- 2) Please provide evidence to support the finding that the maximum daily construction emissions of PM₁₀ and PM_{2.5} would be reduced by 96% and 75%, respectively, as shown in Table 4.3-5. The applicant proposed measures (APMs) for air quality impacts would not be sufficient to provide this level of reduction. For example, watering disturbed areas twice daily, as implemented by CalEEMod, only results in a 55% reduction in fugitive dust emissions. Furthermore, the PM₁₀ emissions associated with fugitive road dust due to hauling and worker trips have been reduced by 99%, and the PM_{2.5} associated with these trips have been reduced to zero in most construction phases. No APMs have been proposed that would reduce off-site PM₁₀ and PM_{2.5} emissions from travel on paved roads.
- 3) While the operational emissions for maintenance and repair have been quantified as shown in Table 4.3-6, please verify whether the operational emissions would increase relative to

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existing operations. It seems that the operational emissions would be equal to or less than those associated with the existing transmission line as a result of fire hardening.

4.4 Biological Resources

- 1) Please provide the Biological Technical Report and all supporting focused survey reports used for the development of the PEA (e.g., bat, Quino checkerspot butterfly (QCB), arroyo toad, eagle reports, etc.). Please provide a table of survey conditions, personnel, dates, and times.
- 2) Please provide a copy of the wetland delineation, including supporting data sheets and other documentation.
- 3) Please provide information for the following:
 - What was the process for determining which species would be surveyed for botanical/wildlife?
 - Were all areas mapped for plant communities?
 - What was the minimum mapping unit for mapping vegetation communities?
 - What buffer area was surveyed for wildlife species (e.g., QCB, arroyo toad)?
- 4) Please include a complete species list. Were there any survey limitations?
- 5) Please provide more detail regarding where all temporary impacts associated with conductor installation, wire pulling, and other aspects will occur and the estimated acreage of disturbance to each resource.
- 6) Please confirm that Tables 4.4-5 and 4.4-6 include all temporary and permanent impacts associated with the proposed project.
- 7) Please provide more detail regarding how each type of vegetation will be removed (e.g., process for protecting adjacent vegetation, process for clearing/tracking, treatment of vegetation after clearing, etc.)
- 8) Please confirm that no trees will be trimmed or removed as part of the construction of this project. Based on a review of the aerial photographs it appears as though there may be several locations where the project comes in close proximity to tree resources.

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- 9) Please provide more detail regarding the equipment that will be used to remove and move vegetation.
- 10) Please consider these comments regarding Table 4.4-2, Special-Status Wildlife Species with the Potential to Occur:
 - Related to San Diego mountain king snake--the Habitat Requirement section refers to the range of the San Bernardino Mountains king snake, not the San Diego mountain king snake, which does occur in the area
 - Golden eagle - observation of eagle in vicinity should increase the potential to occur; the lack of CNDDDB points within 5 miles should not be considered as the sole rationale for discounting potential to occur
 - Least Bell's vireo potential to occur should be increased as they are known to occur in smaller patches of habitat
 - Please explain why the willow flycatcher and the potential for the California Department of Fish and Wildlife Fully Protected species white-tailed kite and ringtail were not evaluated.
- 11) Please provide more information supporting the claim that the proposed project area does not function as a wildlife movement corridor. Also, it has been noted that the Pacific flyway is a broad-band migration route that encompasses the coast, mountains, and desert regions of San Diego County - albeit to a lesser degree over the mountainous portion of the county.
- 12) Please provide more detail that allows verification that there are no impacts to wetlands, waters, or other jurisdictional areas.
- 13) Please confirm that this area does not support QCB critical habitat.
- 14) The impact analysis for wetlands/waters appear to be in conflict with one another (response to County questions 4.4b and 4.4c), please verify that the discussion for both is accurate.
- 15) Do the proposed mitigation ratios comply with County of San Diego guidelines for impacts to the various vegetation community types?
- 16) Some modification to the various APMs may be required (e.g., requiring restoration of all temporary impact areas).

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4.5 Cultural Resources

Please see Section 1, PEA Summary, Question 2, above.

4.6 Geology, Soils, Seismicity, and Mineral Resources

- 1) Please add relative distance of earthquake events to proposed project area in Table 4.6-2.
- 2) Please confirm that no other significant earthquakes occurred within a 50-mile radius of the proposed project since 2005. If there are additional earthquakes, please add fault information, magnitude, and distance to the proposed project area to Table 4.6-2.

4.7 Greenhouse Gas Emission

No additional information is requested at this time.

4.8 Hazards and Hazardous Materials (Fire Hazards)

No additional information is requested at this time.

4.9 Hydrology and Water Quality

- 1) Please provide commitment letter(s) from municipal water agencies confirming availability of 2.3 million gallons of water during the construction period as well as the amount needed during operation for insulator washing.

4.10 Land Use and Planning

- 1) Section 4.10.3, Existing Conditions, Land Use Designations and Existing Land Uses. The discussion on page 4.10-2 of the PEA regarding General Plan Land Use designations includes land uses established by the 2011 San Diego General Plan; however, the designations depicted on Figure 4.10-1 include old designations. Please revise Figure 4.10-1 with the updated designations. Also, provide a similarly scaled figure with the relevant zoning information.
- 2) Please provide a figure (same scale as 4.10-1) identifying the location of residences on parcels traversed or adjacent to the alignment of TL 6931. The text states that the route “traverses 29 privately owned parcels that are primarily vacant and those that are

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occupied by small, low-density single-family residences or mobile homes.” Where are these residences located?

4.11 Noise

- 1) Please include the following in the regulatory background: California Natural Resources Agency (CEQA requirements), CPUC, Caltrans (vibration guidance), and San Diego County Department of Planning and Land Use (DPLU) Noise and Vibration Guidelines. Please also include discussion of County of San Diego impulsive noise thresholds.
- 2) Please provide ambient noise levels for sensitive receptor locations closest to the alignment rather than providing a generic range of ambient noise levels. Three measurements should suffice:
 - Receptor property line closest to alignment in vicinity of mile marker 2
 - Receptor property line closest to alignment in vicinity of mile marker 4
 - Receptor property line closest to alignment in vicinity of mile marker 5
- 3) Please evaluate impacts based on the applicable criteria. Please note the County’s construction noise thresholds apply at the boundary line of the property where the noise source is located or any occupied property where the noise is being received. Therefore, please confirm that the distances from construction activities to sensitive receptor locations were measured to the nearest property line rather than the receptor itself. If not, please revise the analysis accordingly.
- 4) Please quantify the noise and vibration impacts associated with potential blasting activities and disclose noise/vibration levels at the nearest sensitive receptors. These should be compared to all applicable County thresholds (including impulsive noise) prior to introducing mitigation.
- 5) Please quantify/discuss the residual impacts after mitigation.

4.12 Population and Housing

No additional information is requested at this time.

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4.13 Public Services

- 1) It is our understanding that the Campo Fire Station will not be open year round. Please provide confirmation whether this fire station will or will not be open year round.

4.14 Recreation

No additional information is requested at this time.

4.15 Transportation and Traffic

No additional information is requested at this time.

4.16 Utilities and Service Systems

No additional information is requested at this time.

4.17 Cumulative Analysis

- 1) On page 4.17-5, Agricultural Resources is listed as a resource having the potential to result in temporary cumulative impacts; however, this topic is not addressed in the text. Please provide information regarding the cumulative impacts of agricultural resources.

SECTION 5 SIGNIFICANT IMPACTS / ALTERNATIVES

- 1) Please provide a Word file including a list of all the APMs (Table 5-1).
- 2) PEA Section 5.3.1 states that a “system” alternative was analyzed and rejected but offers no information as to what was considered and why it was rejected. Please provide details of the system alternative considered.
- 3) It was noted that in the electronic version of the PEA on SDG&E’s website (<http://www.sdge.com/sites/default/files/regulatory/Volume%20II.pdf>) in the last paragraph on page 5-5, instead of the reference to Figure 5-1 it says “Error! Reference source not found.”

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APPENDICES

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