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February 11, 2014

Mr. Lon Payne Project Manager California Public Utilities Commission 505 Van Ness Avenue, 4th Floor San Francisco, CA 94102

RE: Notice to Proceed (NTP) Request to Construct Tie-Line 637 Wood-to Steel Project

Dear Mr. Payne:

On February 5, 2014, the California Public Utilities Commission (CPUC) voted to grant the San Diego Gas & Electric Company (SDG&E) a Permit to Construct (Decision D.14-02-04) for the Tie-line (TL) 637 Wood-to-Steel Replacement Project (Project) contingent upon implementation of the Mitigation Monitoring, Compliance and Reporting Program (MMCRP). SDG&E is formally requesting a Notice to Proceed (NTP) from the CPUC to begin construction of the Project.

Project Location and Activities Included within NTP Request

The Project is located in the unincorporated communities of Ramona and Santa Ysabel, San Diego County, California, and occurs along an approximately 14 mile segment extending from the existing Santa Ysabel Substation to the existing Creelman Substation. Please refer to the attached Project Vicinity Map (Attachment A) and the detailed maps submitted with the Proponent's Environmental Assessment (PEA).

The Project will replace 156 existing wood power line and interest distribution structures with new weathering steel structures. Of the 156 replacement structures, approximately 69 will be directly-embedded steel poles and approximately 87 will be engineered steel poles supported by micropile foundations. New underground distribution line will installed along 16 small sections. Eight existing wood structures including one stub pole, five distribution poles and two 69 kilo volt (kV) poles will be removed without replacement. Pole top work will occur at three existing structures and one pole will be topped above the existing communication infrastructures. Fiber optic cable will be installed along the entire power line including undergrounding at the Santa Ysabel and Creelman Substations. An approximate 1,170 foot segment of the existing power line will be relocated from an existing wet meadow to a new location adjacent to an existing access road. The entire power line will be reconductored from 3/0 aluminum conductor steel reinforced/alumoweld (ACSR/AW) to 636 aluminum conductor steel support/alumoweld (ACSS/AW) conductor and minor improvements will occur at the Santa Ysabel and Creelman Substations to allow for connection of the relocated TL 637 and underbuilt distribution line.

Construction is expected to last approximately 9 months from mobilization through site restoration and clean-up, beginning in late February of 2014 and ending in September of 2014. Construction methods, equipment, and structures to be installed were described in detail and analyzed in the PEA and Final Initial Study/ Mitigated Negative Declaration (MND) dated January 2014 (State Clearinghouse No. 2013101027). Project construction activities will include the removal of existing wooden poles; micropile construction for engineered steel poles; direct-embedded, weathering steel pole construction; guard pole installation; conductor stringing; undergrounding of distribution facilities and fiber optic cables; and establishment of temporary work areas. Temporary work areas would include staging and storage areas, incidental landing areas (ILAs), stringing sites, pole sites, erection sites for approximately 10 temporary guard structures, and access roads.

Conformance to Pre-Construction Requirements

With respect to Applicant Proposed Measures (APMs) and mitigation measures (MMs) requiring specified actions immediately prior to construction, SDG&E shall conform to the following statements:

- 1. Per APM GEN-1, SDG&E will ensure that no other SDG&E projects will overlap in the immediate vicinity of the Project.
- 2. Per APM AES-1, SDG&E shall install screening material (refer to example submitted on February 3, 2014) at the Warnock and Santa Ysabel Staging Yards.
- 3. Per MM BIO-3, SDG&E has incorporated the requirement to cover all holes into construction contract documents.
- 4. Per MM BIO-4, SDG&E shall conduct nesting bird surveys no more than 72 hours prior to the construction at a given location.
- 5. Per MM BIO-7, SDG&E shall flag all vernal pools that were included on the previously submitted map to ensure avoidance during construction. Flagging will be completed immediately prior to construction activities. Photograph documentation will be provided within the weekly compliance report as applicable.
- 6. Per APM CUL-1, SDG&E has incorporated measures to avoid cultural resources into the project design and has included within construction contract documents.
- 7. Per APM CUL-3, SDG&E shall maintain the record of trained personnel that have received Cultural Resources Sensitivity Training. Copies of the training sign-in session logs will be provided within the weekly compliance reports.
- 8. Per MM CUL-1, SDG&E shall implement all avoidance measures listed within the ASM Cultural Resources Report to include cultural resource monitoring during pole relocation work, establishment and flagging of Cultural Environmentally Sensitive Areas (ESA) sites and avoidance of all identified cultural resources.
- 9. Per MM CUL-1, SDG&E has incorporated measures to avoid cultural resources into the project design and has included within construction contract documents.
- 10. Per APM HAZ-1, SDG&E confirms that all new structures have been designed, and will be constructed utilizing weathering steel.
- 11. Per APM HAZ-3, SDG&E confirms that the project design complies with the Electrical Standard Practice 113.1 Wildland Fire Prevention and Fire Safety.

- 12. Per MM HAZ-1, SDG&E shall provide Hazardous Material Training to all contactors and subcontractors prior to the commencement of construction activities. Training sign-in logs will be provided within the Weekly Construction Status and MMCRP Compliance report.
- 13. Per MM HAZ-4, SDG&E shall coordinate with local air-traffic control at the Ramona Airport and submit the Notice to Airman immediately prior to helicopter operations on the Project. SDG&E will comply with applicable Federal Aviation Administration requirements, as needed, including the preparation of Congested Area Plan(s). Documentation of helicopter-related coordination will be provided within the Weekly Construction Status and MMCRP Compliance report.
- 14. Per APM HYD-1, SDG&E shall abide by the Water Quality Construction Best Management Practices (BMPs) manual for the duration of the Project and has incorporated requirements into construction contract documents.
- 15. Per MM HYD-2, SDG&E has incorporated the herbicide use requirement into construction contract documents.
- 16. Per MM NOI-1, SDG&E shall distribute a public notice mailer to residents at least seven days prior to the start of helicopter or stringing operations.

Pre-Construction Applicant Proposed Measures and Mitigation Measures

A summary of the status of all pre-construction APMs and mitigation measures (MMs) included within the MMCRP is provided in Table 1, Status of Pre-Construction Requirements. For reference, a detailed table of all pre-construction requirements has been included as Attachment B. Attachment B contains a listing of each pre-construction requirement, how SDG&E has fulfilled each requirement, and all applicable submittal and approval dates. For ease of review, construction and post-construction requirements have not been included within Table or Attachment B. The construction and post-construction requirement have been omitted because they are not required prior to issuance of the NTP.

Table 1: Status of Pre-Construction Requirements

Measure	Status	SDG&E Compliance Action/Submittal
APM-GEN-1	Complete	See conformance statement above.
APM-GEN-2	Complete	Maps of Staging Yards and ILAs submitted on February 3, 2014.
APM-AES-1	Complete	Photograph documentation verifying color used for screening material submitted on February 3, 2014.
		See conformance statement above.
APM-AES-2	Complete	Photograph documentation of pre-construction conditions submitted on February 7, 2014.
MM-BIO-1	Pending ¹ Approval	Biologist resumes submitted on September 3, 2013 and approved by CPUC on September 9, 2013. Rare Plant Survey Report submitted on December 20, 2013. Proposed San Diego Gumplant Avoidance Mitigation Measures and Map of reduced Santa Ysabel Staging Yard submitted on February 3, 2014.

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¹ Measures with a status of "Pending Approval" include item(s) that have been previously submitted to the CPUC for approval, but have not yet been officially approved.

Table 1: Status of Pre-Construction Requirements (cont.)

Measure	Status	SDG&E Compliance Action/Submittal	
MM-BIO-2	Pending Approval	Biologist resumes submitted on December 20, 2013.	
MM-BIO-3	Complete	See conformance statement above – requirements have been incorporated in construction contract documents.	
MM-BIO-4	Pending Approval	Biologist resumes submitted on December 20, 2013. See conformance statement above.	
MM-BIO-6	Pending Approval	Stephen's kangaroo rat (SKR) biologist qualifications submitted on September 20, 2013 and approved by the CPUC on September 25, 2013. SKR survey was completed in October 2013. SKR Survey Report submitted on December 20, 2013. No suitable habitat was identified and remaining requirements are not applicable.	
MM-BIO-7	Biologist resumes submitted on December 20, 2013. Map o Pending Approval See conformance statement above - All ESA flagging will occimmediately prior to construction.		
APM-CUL-1	Complete	See conformance statement above – requirements have been incorporated in construction contract documents.	
APM-CUL-2	Pending Approval	Paleontological Training Material submitted on February 7, 2013. Cultural ESA map submitted on December 20, 2013.	
APM-CUL-3	Pending Approval	Archaeological monitor resumes submitted on December 20, 2013. See conformance statement above – all project personnel will receive training prior to commencement of construction.	
APM-CUL-6	Pending Approval	Paleontologist resumes and Paleontological Monitoring Map submitted on December 20, 2013.	
APM-CUL-7	Pending Approval	Paleontologist resumes submitted on December 20, 2013.	
MM-CUL-1	Complete	Cultural ESA Map submitted on December 20, 2013. See conformance statement above – ESA flagging will occur immediately prior to construction.	
MM-CUL-2	Pending Approval	Cultural Resource occurs outside of reduced staging yard boundaries. Reduced Santa Ysabel Staging Yard Map submitted on February 3, 2014.	
MM-CUL-3	Complete	Cultural ESA map submitted on December 20, 2013.	
APM-GEO-1	Complete	Geotechnical Investigation Report submitted as part of SDG&E response to Data Request #1 on May 21, 2013.	
APM-HAZ-1	Complete	Pole designs submitted with PEA on March 13, 2013. See conformance statement above.	
APM-HAZ-2	Complete	The TL 637 Project Fire Plan was included with Permit-to-Construct filing as PEA Appendix 4.7-B and submitted on March 13, 2013.	
APM-HAZ-3	Complete	See conformance statement above.	

Table 1: Status of Pre-Construction Requirements (cont.)

Measure	Status	SDG&E Compliance Action/Submittal
APM-HAZ-4	Complete	Recreation area contact log submitted on February 7, 2014.
MM-HAZ-1	Complete	See conformance statement above – all project personnel will receive training prior to commencement of construction.
MM-HAZ-4	Complete	Notice to Airman (FAA) language provided within Helicopter Operations and Lift Plan submitted on February 3, 2014.
WIWI HAZ 4		See conformance statement above – required notifications will be completed immediately prior to helicopter operations.
MM-HAZ-5	Pending Approval	Helicopter Operations and Lift Plan submitted on February 3, 2014.
APM-HYD-1	Complete	See conformance statement above – requirements have been incorporated in construction contract documents.
MM-HYD-2	Complete	See conformance statement above – requirements have been incorporated in construction contract documents.
MM-HYD-4	Complete	List of Poles submitted on February 7, 2014.
APM-NOI-3	Complete	Record of Property Notification submitted on February 7, 2014.
		Draft public notice submitted on February 7, 2014.
MM-NOI-1	Pending Approval	See conformance statement above – public notice will be distributed at least 7 days prior to commencement of helicopter operations or stringing activities.
APM-TRA-1	Complete ²	Traffic Control Plans are included as Attachment C.
APM-TRA-2	Complete	Caltrans Encroachment Permit No. 11-11-6UC-0482R2 was submitted on February 3, 2014.

Notes:

SDG&E is not seeking approval for blasting activities: therefore pre-blasting APMs and MMs are not included within Table 1. If blasting is determined to be required, SDG&E will complete all applicable pre-blasting requirements.

Pre-Construction Permit Status

The following permits have been issued to the project as required by applicable local, state, and federal regulations:

- 1. Traffic Control Plans: In process with County for final approval (Attachment C).
- 2. Caltrans Encroachment Permit No. 11-11-6UC-0482R2: Extension Issued November 20, 2013.
- 3. Section 401 Water Quality Certification No. 11C-114: Issued May 16, 2012.
- 4. General Construction Permit and SWPPP, WDID No. 9 37C368844: Issued 2-3-14.

² Traffic control plans are complete and have been submitted to the County for final approval.

Additional NTP Requirements

As outlined within the MMCRP Section 3.1.2, an NTP request should generally include specific items as outline in Table 2, Additional NTP Requirements.

Table 2: Additional NTP Requirements

Requirement	Description
A detailed description of work	Refer to the description of work above.
A detailed description of the Project location	Refer to Project Vicinity Map within Attachment A.
Verification that all mitigation measure and APMs have been met or do not apply	Refer to Table 1 and Attachment B.
Verification of all applicable agency approvals and permits	Refer to description of permit status and Table 1.
Up to date biological surveys or commitment to complete	Pursuant to the SDG&E Subregional NCCP (APM BIO-1), a verification survey will be completed prior to commencement of construction and the results will be submitted to the CPUC.
Cultural resources survey	Previous surveys are sufficient to cover the entire footprint of the Project. Additional surveys are not necessary.
Construction schedule	A general description of the timing and duration of construction is included above.

Request for NTP

SDG&E respectfully requests authorization of the NTP. A pre-construction kick-off meeting with the CPUC has been tentatively scheduled for the week of February 17, 2014 and SDG&E is prepared to conduct a field kick-off meeting and Environmental Awareness Training immediately following issuance of the NTP. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 654-1269 or by email at BCarter@semprautilities.com. Alternatively you may also contact the SDG&E Environmental Project Manager, Eden Nguyen at (858) 637-3716 or by email at ENguyen@semprautilities.com.

Sincerely,

Brad Carter Project Manager

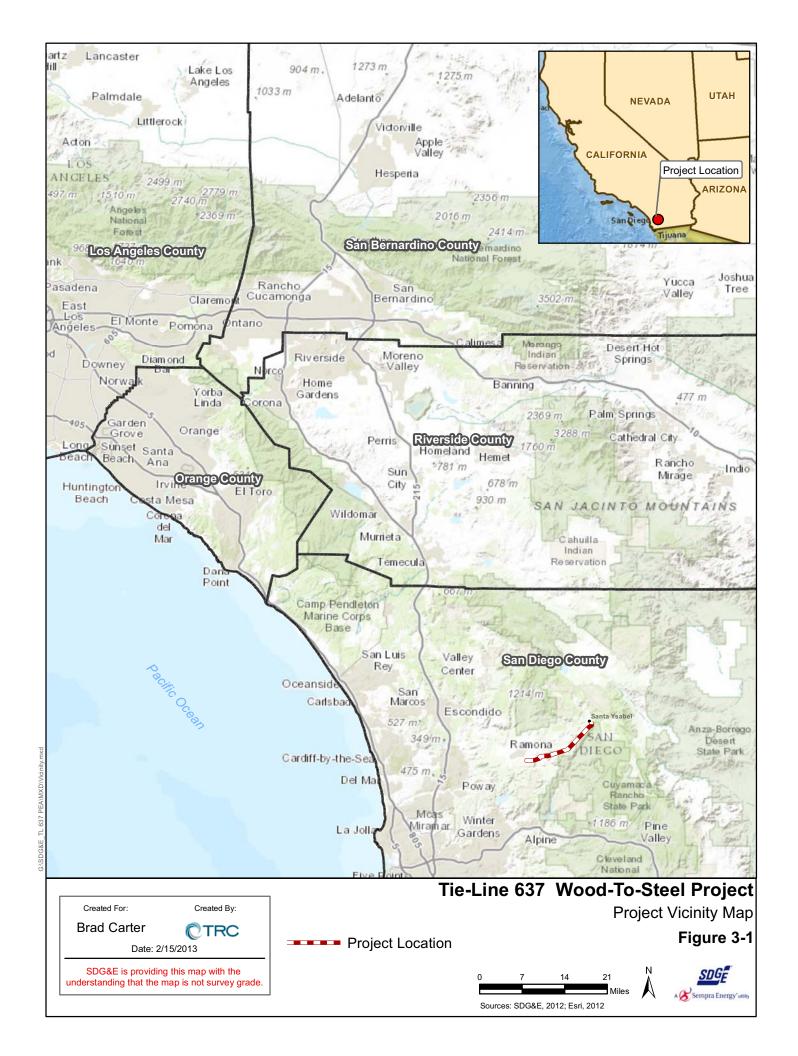
San Diego Gas & Electric Company

Attachment A: Project Vicinty Map Attachment B: Updated NTP Table Attachment C: Traffic Control Plans

cc: Eden Nguyen, SDG&E Environmental Project Manager

David Hochart, Dudek Environmental Compliance Director Allison Shaffer, Dudek Environmental Compliance Manager

ATTACHMENT A Project Vicinity Map



ATTACHMENT B Updated NTP Table

Measure ¹	Pre-Construction Requirement ²	Compliance Action/Submittal	Submitted ³	Approved ⁴
APM GEN-1	Documentation verifying construction schedule	Conformance Statement	Included with NTP request	N/A
APM GEN-2	Maps of Warnock and Santa Ysabel staging yard takeoff/landing areas	Maps of the Warnock and Santa Ysabel Staging Yards and Landing Areas	2-3-14	N/A
APM AES-1	Documentation verifying color of screening material	Conformance Statement	Included with NTP request	N/A
		Photograph of example screening material	2-3-14	N/A
APM AES-2	Documentation of pre-construction conditions	Photo-document of Project Area (pole locations, staging yards, stringing sites, etc)	2-7-14	N/A
	Botanist Qualifications	Resumes for Botanists	9-03-13	9-09-13
MM BIO-1	Rare Plant Survey and Report	Rare Plant Survey Report	12-20-13	
	Gumplant Avoidance or Mitigation	Proposed Avoidance Measures and Map	2-3-14	
MM BIO-2	Biologist Qualifications	Biologist Resumes	12-20-13 &	
WIWI BIO-2			2-3-14	
MM BIO-3	Incorporate commitments into construction contract	Conformance Statement	Included with NTP request	N/A
MM BIO-4	Biologist Qualifications	Biologist Resumes	2-3-14	
MM DIO C	SKR Biologist Qualifications	SKR Biologist Resume	9-20-13	9-25-13
MM BIO-6	Pre-construction Survey	SKR survey completed in October 2013	10-2013	N/A

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¹ Measures as included within the Final IS/MND and Draft MMCRP.

² Only the pre-construction requirement(s) of each measure are included. Many measures included within this table also have elements requiring submittal during and post construction that are not shown herein. SDG&E does not anticipate blasting activities will be required; therefore measures specific to blasting are not included herein. If blasting is determined to be required, SDG&E will comply with all pre-blasting APMs and MMs.

³ Items submitted with this revised NTP table are highlighted blue.

⁴ N/A is stated where CPUC approval is not required for documents previously submitted.

Measure ¹	Pre-Construction Requirement ²	Compliance Action/Submittal	Submitted ³	Approved ⁴
	Documentation of avoidance and mapping of occurrences	Per SKR report submitted on December 20, 2013, no suitable habitat was identified. Therefore, this requirement is not applicable.	N/A	N/A
MM BIO-6	Recommended minimization measures	Per SKR Report submitted on December 20, 2013, no suitable habitat was identified. Therefore, this requirement is not applicable.	N/A	N/A
	SKR Survey Report	SKR Survey Report	12-20-13	
	Biologist Qualifications	Biologist Resumes	12-20-13	
MM BIO-7	Documentation identifying the survey methods, locations of vernal pools, and construction footprint	Vernal Pool and Project Footprint Map	12-20-13	N/A
	Documentation of flagged Vernal Pools within Project Footprint	Conformance Statement	Included with NTP request	N/A
APM CUL-1	Incorporate commitments into construction contract	Conformance Statement	Included with NTP request	N/A
	Develop Cultural and Paleontological Resources Training Material and Submit to CPUC	Cultural Resources training material	12-20-13	
APM CUL-2		Paleontological Resources training material	2-3-14	
	Cultural ESA Map	Cultural ESA Map	12-20-13	N/A
	Archaeological Monitor Qualifications	Archeological Monitor Resumes	12-20-13	
APM CUL-3	Record of trained personnel and training session log	Conformance Statement	Included with NTP request	N/A
ADM CUIL C	Paleontological Monitor Qualifications	Paleontological Monitor Resumes	12-20-13	
APM CUL-6	Paleontological Monitoring Map	Paleontological Monitoring Map	12-20-13	N/A
APM CUL-7	Paleontologist Qualifications	Paleontologist Resumes	12-20-13	

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Measure ¹	Pre-Construction Requirement ²	Compliance Action/Submittal	Submitted ³	Approved ⁴
	Cultural ESA Map	Cultural ESA Map	12-20-13	N/A
MM CUL-1	Documentation of completion of Avoidance Measures outlined in ASM Report	Conformance Statement	Included with NTP request	N/A
	Incorporate commitments into construction contract	Conformance Statement	Included with NTP request	N/A
MM CUL-2	Flag ESA within Santa Ysabel Staging Yard	Reduced Santa Ysabel Staging Yard Map. New staging yard boundary excludes cultural ESA.	2-3-14	
MM CUL-3	Cultural ESA Map	Cultural ESA Map	12-20-13	N/A
APM GEO-1	Provide copy of Geotechnical Investigation	Geotechnical Investigation provided as part of SDG&E's response to Data Request # 1	5-21-13	N/A
ADM 11A77 1	Provide designs illustrating pole structures	Poles designed using weathering steel as described in PEA Appendix 3-C and Section 3.3.1	3-13-13	N/A
APM HAZ-1		Conformance Statement	Included with NTP request	N/A
APM HAZ-2	Submit SDG&E Project Fire Plan to CPUC	Project Fire Plan included with PTC filing as PEA Appendix 4.7-B	3-13-13	N/A
APM HAZ-3	Documentation that project design meets Electric Standard Practice 113.1	Conformance Statement	Included with NTP request	N/A
APM HAZ-4	Documentation of coordination with authorized officer for recreation area	Documentation (Communication Log) of SDG&E Coordination with County Recreation Authority	2-7-14	N/A
MM HAZ-1	Documentation of contractor and subcontractor training	Conformance Statement	Included with NTP request	N/A

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Measure ¹	Pre-Construction Requirement ²	Compliance Action/Submittal	Submitted ³	Approved ⁴
MM HAZ-4 ⁵	Documentation showing coordination with local air traffic control and compliance	Conformance Statement	Included with NTP request	N/A
WIWI HAZ-4	with all applicable FAA regulations	Notice to Airman (FAA) – language provided within Helicopter Operations and Lift Plan	2-3-14	N/A
MM HAZ-5	Helicopter lift plan	Helicopter Operations and Lift Plan	2-3-14	
APM HYD- 1	Incorporate commitments into construction contract	Conformance Statement	Included with NTP request	N/A
MM HYD-2	Incorporate commitments into construction contract	Conformance Statement	Included with NTP request	N/A
MM HYD-4	Provide list of poles to remain in place and those to be relocated outside of jurisdictional areas	List of Poles	2-7-14	N/A
APM NOI-3	Record of property owner notification	Copy of Notification, Mailing List and Parcel Map	2-7-14	N/A
	Provide public notice mailer	Helicopter and Stringing Operations Notice	2-7-14	
MM NOI-1	Mail public notice (at least 7 days prior)	Conformance Statement	Included with NTP request	N/A
APM TRA-1	Traffic Control Plan	Traffic Control Plans ⁶	Included with NTP request	N/A
APM TRA-2	Documentation of coordination with Caltrans and Encroachment Permit issuance	Caltrans Encroachment Permit	2-3-14	N/A

MM – Mitigation Measure APM – Applicant Proposed Measure N/A – Not Applicable

⁵ MM HAZ-4, MM HAZ-5, and MM NOI-1 require compliance submittals prior to use of helicopters and/or commencement of stringing operations. These items have been included within this table with the intent that helicopter use and stringing operations can be included within the initial Notice to Proceed.

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⁶ The traffic control plans have been submitted to the County for final approval. Work requiring traffic control will not proceed until the County has approved the traffic control plans.

ATTACHMENT C Traffic Control Plans

