

Attachment A
SDG&E East County Substation Project
CPCN Application 09.08.003
Proponent's Environmental Assessment (PEA)
Completeness Review

September 2, 2009

Table 1, Proponent's Environmental Assessment (PEA) Discrepancies, located at the end of this document, provides a list of discrepancies found in the PEA and technical report by section and page number. Please provide clarification of these discrepancies. Below are requests for additional information by section.

CHAPTER 1 – PEA SUMMARY

Attachment 1-B: Please provide stakeholder list as an electronic file (excel format).

CHAPTER 2 – PROJECT PURPOSE AND NEED

- a. **Pages 2-7 and 2-8.** Please provide locations of five active generator applications submitted to California Independent System Operator (CAISO) for connection to Southwest Powerlink (SWPL), and one for connection to the Boulevard Substation. Page 2-8 states that the proposed project is located near already planned wind-generation projects. Figure 3-2 provides general location information of these wind projects. Please show overlay of locations on Figures 2-1 and 2-2, wind resources maps, or other aerial/land use base map with scale. If exact location is not known, then please show approximate locations used to generate Figure 3-2 and determine the location for the proposed project.
- b. **Pages 2-7 and 2-8.** Given that the noted wind projects are in CAISO's Generator Interconnection Queue to be studied, it is reasonable to assume that CAISO has information regarding these projects. The current status of the CAISO studies is not provided, especially as to how the overall development of wind in this region will be addressed. This goes back to the location issue and whether the proposed site is one that will/can serve the full development of regional wind or will other sites be required? Please provide the status of studies being done and the contact at CAISO with who San Diego Gas and Electric (SDG&E) is discussing interconnection of wind projects to the East County (ECO) Substation Project.
- d. **Sections 2.0 and 2.1.** List and show location of region's planned generation (other than the six wind projects referred to above) to be accommodated by the project. Please provide status of these projects.

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- e. **Pages 2-8 and 2-9.** The referenced text indicates an ultimate 500/230 kilovolt (kV) capacity in excess of 4300 megavolt-ampere (MVA) (2600 divided by 0.6). The project description indicates only ONE 500/230 kV transformer. The 4300 MVA sizing for one transformer not only seems to be on the large side, it exceeds the capability of the SWPL. This should either be clarified or corrected.

CHAPTER 3 – PROJECT DESCRIPTION

- a. **Section 3.4, Page 3-11: Connected Actions: Energia Sierra Juarez Gen-Tie Project.** Please provide GIS layers of Gen-Tie project from SWPL tie-in to point of origin.
- b. **Section 3.4, Page 3-11: Connected Actions.** Please provide location and update on proposed wind development project that the Gen-Tie project would connect to in Mexico. Please provide information on project phasing, total number of turbines proposed, and general description (*i.e.*, height and location of turbines).
- c. **Section 3.4, Page 3-11: Connected Actions: Iberdrola Tule Wind Project.** Please show the Iberdrola Tule Wind Project location on Figure 4.16-1 or other aerial/land use base map with scale. Please provide update on the County of San Diego and Bureau of Land Management (BLM) environmental process. Please provide location and update on proposed Gen-Tie location of where it would connect with the Boulevard Substation.
- d. **Section 3.4, Page 3-11.** Please provide information on other known wind projects that will tap into the ECO or Boulevard substations.

CHAPTER 4 – ENVIRONMENTAL IMPACT ASSESSMENT

Chapter 4.1 – Aesthetics

- a. **Section 4.1.** Information regarding the type of materials and colors to be used for the proposed project elements is included on page 3-25 (Project Description). However, additional information is needed regarding materials and colors to be used for insulators and other hardware.
- b. **Pages 4.1-11 and 4.1-12.** Regarding the White Star Communication Facility, text states that two wooden poles would be replaced with a single steel pole, 75 feet in height, and that the existing storage facility would be replaced with a prefabricated storage facility of similar color and size. Height of the existing structures to be replaced is requested.

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- c. **View Point 31: Visual effects of the proposed Boulevard Substation from Old Highway 80.** The PEA provides a simulation (No. 31) of the proposed substation from a vantage point that does not fully show the expanded substation from Old Highway 80. The existing viewpoint and simulation are appropriate for showing the cable riser structure and a portion of the new substation only. An additional simulation, or a panoramic simulation, should be provided to illustrate the full visual impacts from Old Highway 80.
- d. Please provide all photos and simulations as .jpg files.

Chapter 4.3 – Air Quality

- a. **Table 4.3-11: Peak Daily Construction Emissions.** This table does not reflect the overlap of different project elements. Please provide the peak daily construction emissions associated with overlapping construction phases.
- b. **Operation emissions.** The URBEMIS model assumes operation of two generators at the ECO Substation while the Project Description states only one generator would be located at the ECO Substation. Please clarify.
- c. **Section 4.3.4 (APM-AIR-08).** Please provide specific reasoning as to why APM-AIR-08 limits active grading to 12.8 acres. Please identify if APM-AIR-08 accounts for overlapping construction schedules.
- d. **Attachment 4.3-A** states that helicopter emissions were estimated using URBEMIS (i.e., helicopters are considered "other general industrial equipment"). The URBEMIS "other general industrial equipment" category does not include aircraft (it does include on-ground equipment). Helicopter emissions should be estimated using the Federal Aviation Administration's (FAA's) Emission and Dispersion Modeling System (EDMS). Note that the use of the FAA's EDMS is required for general conformity determinations.

Chapter 4.4 – Biological Resources

- a. **Tables 4.4-2 and 4.4-3, page 4.4-41:** There are discrepancies in the temporary and permanent impact acreages provided in Tables 4.4-2 and 4.4-3 compared to the impact areas depicted on Figure 3-4. Please clarify the discrepancies listed in Table 1, PEA Discrepancies.
- b. Is SDG&E preparing a wetland delineation for the proposed project? If yes, what is the timing of completion? Please provide a copy of the report when it is complete for inclusion in the EIR/EIS analysis.

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Chapter 4.9 – Land Use and Planning

Please provide all parcels within 300 feet of the proposed project with the following information:

- APN number
- Mailing address
- Parcel’s physical address.

To differentiate between property owners and the project stakeholders, please provide separately from Attachment 1-B, Stakeholder List.

Chapter 4.10 – Noise

- a. Please provide in the CadnaA files the applicable input information, such as the identifying construction and operations noise modeling receptor sites, source to receptor distances, etc. for the construction and operations noise levels. Also, provide the output files.
- b. Please provide calculations demonstrating that construction equipment noise and helicopter noise can be feasibly mitigated. The PEA analysis relies on applicant proposed measures (APMs) and the short-term nature of construction to arrive at a less-than-significant impact conclusion.
- c. Please evaluate construction noise in terms of the 8-hour average sound level between the hours of 7 a.m. and 7 p.m. per Section 36.409 of the County of San Diego Noise Ordinance.
- d. Please incorporate the County’s impulsive noise standards (Section 36.410 of County Noise Ordinance) and if applicable also evaluate potential noise impacts based on these standards.
- e. Please determine the construction and operational noise levels at the nearest property lines.
- f. For the fixed-location distribution or transmission facilities located on or adjacent to a property line, please also identify the noise levels at 6 feet from the boundary of the easement upon which the facility is located if the noise levels exceed the applicable criteria beyond the facilities property line or easement.
- g. Please verify the Leq and L10 legend symbols in Figure 4.10-2. It is unusual for the Leq to be greater than the L10 value.

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Chapter 5.2 – Alternatives

- a. Please provide supporting information and studies used for the conclusions reached in the environmental impacts for all alternatives evaluated and for those eliminated.

Table 1. PEA Discrepancies

Page Number	Discrepancy
<i>Section 3, Project Description</i>	
3-12	3rd paragraph: Text states that a single stationary generator (size not given), to be used as a backup to the station lights and power transformers, will be installed at the ECO Substation. In Attachment 4-3 (page 4.3-2) the text states that two diesel powered generators (200 kW and 100 kW) will be installed at the ECO site. More info on generator(s) is needed.
3-37	Section 3.5.4: Text states that one backup generator would be installed at White Star (Attachment 4-3 states one propane generator will be installed). More information on the generator is needed.
3-38	Section 3.6.0: Text states SWPL loop-in would require 7 acres of land; however, Table 3.1 and dimensions given in text (200 feet x 2,285 feet) state that 10.5 acres of land would be required.
3-38	Section 3.6.1: Text states temporary workspace for each 138 kV transmission line pole location would be 50 x 50 feet; however, Table 3.3 (Temporary Workspace Requirements) states 70 feet x 70 feet for steel poles and 30 feet x 30 feet for wood distribution poles.
3-45	Figure 3-21: Figure does not show the new dirt access road proposed to be constructed to access the facility (according to text on page 3-49, one dirt access road, 35 feet long x 20 feet wide would be constructed from Tierra Del Sol Road to the facility). Please provide diagram of access road.
3-67	There is a discrepancy between the peak construction personnel presented in Table 3-6 and the construction workers assumed in Attachment 4-3, Emissions Calculation Methodology. Since construction of components overlap, it would be helpful to provide peak personnel according to schedule as well as for project components.
<i>Sections 3 and 4.4, Biological Resources – Temporary and Permanent Impacts</i>	
There are discrepancies between this section and the project description regarding temporary and permanent impact acreages.	
4.4-41	Between Figure 3-4 (plus 2 acres of staging yards not identified on figure) and Table 4.4-2, there seems to be a discrepancy of 0.71 acre. It should be noted that the construction buffer depicted on Figure 3-4 is not identified as a temporary workspace requirement in Table 3-3 (Temporary Workspace Requirements). Rather, it is listed as a new permanent land requirement of the ECO Substation (approximate dimensions are described as 20-foot-around fencing). The acreage for the buffer, as stated in Table 3-1, is 4.5

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	acres. If the construction buffer is intended to be 1,028,423 feet minus 876,902 feet (square footage of the permanent slope and grading impacts depicted on Figure 3-4), the acreage of the buffer would be approximately 3.48 acres. If this is the intention then it is unclear what the 24.9 acres identified in Table 4.4-2 accounts for.
4.4-41	In Table 3.3, temporary impacts of the transmission line is listed as 33.6 acres. In Table 4.4-2, vegetation community temporary impact in acres is listed as 28.54 acres (a discrepancy of 5.06 acres).
4.4-41	Between Figure 3-4 and Table 4.4-3, there seems to be a discrepancy of 4.05 acres. According to Table 3-1, cut-and-fill slopes require 25 acres, not 20.13 acres as depicted on Figure 3-4. Adding the additional 4.87 acres (25 acres minus 20.13 acres) results in a total of 89.64 acres, which is nearly 1 acre greater than the value presented in Table 4.4-3. It should be noted however that in Table 3-1, the total new project land requirement for the ECO Substation is stated as 87.5 acres.
4.4-41	Regarding the 138 kV transmission line: Table 3-2 (Project Access Roads) states that 5.25 acres of new dirt access roads to the new transmission structures will be required. Table 4.4-3 lists the permanent vegetation impact area associated with the transmission line as 4.74 acres (a 0.51 acre difference between these two tables). Also, Table 3-1 doesn't specify the acreage required for each new transmission and distribution structure (the table only considers the transmission line right-of-way (ROW)).
Section 4.5, Cultural Resources	
4.5-12	Table 4.5-3: Discrepancies between the information provided in the PEA and the information provided in the Cultural Resources Technical Report (TR): -Site description of 7011H is not consistent -Date recorded for sites 7046, 7055, 7080H, and 7086 not consistent (PEA:1979, TR:1978) -7060 updated (2006) in PEA, date recorded in TR is 1979 -Date recorded for 7051 not consistent (PEA 1981, TR 1979) -Date recorded for 9156 not consistent (PEA 1981, TR 1978) -Date recorded for 9278H not consistent (PEA 1982, TR 1979) -Date recorded for 9279 not consistent (PEA 1982, TR 1979). Please clarify which descriptions/dates are correct.
Cultural Resources Technical Report	
4	Figure 1-2, ECO Substation Project Area: This figure is not consistent with Figure 3-5, ECO Substation Layout of the PEA. Please confirm impact analysis is accurate with differences in facility layout.

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24	Site 7015H: Text states 138 kV transmission line would span the SD&AE RR at two locations; however, according to Figure 4.9-1, the RR would be spanned at three locations.
<i>Section 4.7, Hazards and Hazardous Materials</i>	
4.7-9	Second Paragraph, 138 kV transmission line: Phase I reconnaissance indicated the agricultural fields near MP 3.1 are an item of concern on the basis that fertilizer tanks were observed at the site. The PEA text states (with no reference or source) that the fields are part of a certified organic farm and, therefore, do not pose a risk to the transmission corridor.
4.7-14	Table 4.7-1: Carrizo Gorge Railway is identified as occurring between MP 7 and 8. According to the Phase I ESA, Carrizo Gorge Railway occurs within MP 5.
4.7-14	Table 4.7-1: 1509 Starship Lane is identified as occurring between MP 7 and 8. In the Phase I ESA, 1509 Starship Lane occurs within MP 12.
4.7-14	Table 4.7-1: Remaining sites beginning with the Boulevard Transfer Station are identified as occurring between MP 12 and 13.3. In the Phase I ESA, these sites are identified as occurring within MP 14.
4.7-14	Table 4.7-1: Jacumba Burnsite 1 and 2, Jacumba Texaco Gas Station and the Caltrans Boulevard Facility are identified as no risk sites. According to Phase I ESA, these sites are identified as data gaps.
<i>Section 4.14, Transportation</i>	
4.14-4	Tables 4.14-1 and 4.14-2: Tables list a range of levels of service (LOS) for roadways. Please provide reference for the LOS information.

Attachment B
Data Request
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Project Description

The CPUC requests a dollar estimate of the different components of the project cost in order to assess the feasibility of project alternatives and the practicality of any mitigation measures that we may require.

CPUC therefore request a dollar estimate for:

- a) the ECO Substation and 500kV loop in,
- b) the 138kV transmission line,
- c) The Boulevard substation,
- d) The White Star Communication Center,
- e) Any components of the Eco project not explicitly listed above.

Iain Fisher

September 4, 2009