

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 20, 2013

Ms. Jennifer Pierce  
San Diego Gas and Electric Company  
8326 Century Park Court  
San Diego, CA 92123-4150

**RE: San Diego Gas and Electric Company's Application for a Permit to Construct the Salt Creek Substation Project (A. 13-09-014) – Data Request #2**

Dear Ms. Pierce:

The Energy Division of the California Public Utilities Commission (CPUC) has reviewed San Diego Gas and Electric's (SDG&E's) response to Data Request #1, dated November 25, 2013. CPUC requests additional data and clarification of details provided in that response, and in SDG&E's application for the Salt Creek Substation Project (A. 13-09-014). Please provide the information requested in Attachment A by January 20, 2014, or sooner. Please direct questions related to this application to me at 415-703-5360.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Coontz".

Jason Coontz  
California Public Utilities Commission

Enclosure: Salt Creek Substation Project (A. 13-09-014) Data Request #2

# ATTACHMENT A

## SALT CREEK SUBSTATION PROJECT (A. 13-09-014)

### DATA REQUEST #2

Table 1: Salt Creek A.13-09-014 Data Request #2

#	PEA Section, Page #	Data Need
<b>Project Description</b>		
1	Appendix 3-A	<b>Provide a cross-section for typical underground distribution ducts (12-kV).</b> Appendix 3-A only includes typical cross-sections for the 69-kV distribution ducts.
2	3.3.1.5	<b>Clarify the infrastructure that will be located within the 12-kV underground duct packages.</b> Section 3.3.1.5 of the project description states that three distribution circuits will be installed as part of the project and up to 13 additional circuits could be installed as the residential and commercial load develops, for 16 circuits total. The project description also states that the distribution configuration includes four duct packages and each duct package consists of six conduits, for a total of 24 conduits. Based on this configuration, there are eight conduits more than required for the distribution alone (two per duct package).
3		<b>Clarify whether cargo netting would be used across State Route 125 or roads where guard structures are used.</b> Caltrans provided a comment letter on SDG&E's Application. The letter stated that netting may be used across highways.
4	AD.32	<b>Identify new water line locations and approximate length of new irrigation line (linear feet or miles) required to connect the water line to existing water infrastructure</b> SDG&E's response to Data Response #1, item 32, fails to address the request for new water line locations and distances between the new line and the existing infrastructure. Because reclaimed water is proposed for irrigation at the Salt Creek Substation, additional information is needed to define the distance between existing reclaimed water lines and the proposed irrigation lines.
5	AD.18	<b>Update the acreage of temporary and permanent project disturbance to reflect project changes submitted to CPUC on 11/25/2013 (e.g., new access roads, revised Hunte Parkway staging area).</b>
6	DR.4	<b>Clarify the proposed use of a generator at Salt Creek Substation.</b> SDG&E Response to Deficiency Letter item #4 states that, "a small generator (approximately 5 hp) has been added to the sources in the Salt Creek Substation Construction..." The project description previously submitted by SDG&E stated that the substation construction would use power from a temporary overhead power line. Is the small generator an additional power source at the substation, or is it a back-up source of power?
7		<b>Define the proposed disposal method for removed vegetation and brush. Would vegetation be chipped on site or brought to a landfill?</b>
8	AD.28	<b>Specify the location of the underground conduit for the AT&amp;T line. Is this one of the underground distribution ducts, or an additional underground conduit?</b>
9		<b>Specify the volume of concrete that would be used for:</b>


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		<ul style="list-style-type: none"> <li>a. Directly embedded steel pole backfill</li> <li>b. Equipment foundations at the substation site</li> <li>c. Underground duct banks</li> <li>d. Manholes/vaults</li> <li>e. Driveway at Hunte Parkway</li> <li>f. Any other proposed concrete structures</li> </ul>
10	AD.18	Provide additional details on the temporary guard structures. Define the size of the holes required for the wood poles. Define the height of the poles above ground level. Confirm that the temporary impact per guard structure is 72 square feet and the total number of guard structures is 38 (33 in PEA plus 5 in 11/25/13 GIS revisions).
11		Provide additional details for the aboveground substation construction. Specify the depth of the excavations for the concrete foundations. Describe the ground grid construction. Describe the construction methods, height, and composition (e.g., steel) of the all-weather structure. Provide a picture of a similar all-weather structure.
12	DR.2-1	<p><b>Attachment DR.2-1 is missing some information. Provide the Excel file and update the file to include the following information:</b></p> <ul style="list-style-type: none"> <li>a. Provide the duration of use (hours) and the number of workers per equipment for the substation (Table A-1). This information was included in the remaining tables and omitted from the substation equipment table.</li> <li>b. In Table A-1 there appears to be words missing for two pieces of equipment under the activity "Substation Above Grade Construction." The last row says "with trailer" and two rows above says "Processing." Please provide the missing information.</li> <li>c. In Table A-3 under the activity "Underground Trench/Conduit/Substructure," provide the number of Dump/Haul Trucks. Please also clarify the equipment title in the last row for the activity titled "Steel Structure Installation."</li> <li>d. In Table A-4 under the activity "Steel Structure Installation," please provide the data for all columns to the right of the column labeled "Use."</li> <li>e. In Table A-1 under the activity "Site and Access Road Grading," the duration of 90 days is inconsistent. No equipment is used for more than 75 days and there would be no overlap making the total duration greater than 75 days.</li> <li>f. In Table A-2 under the activity "Foundation Installations," the generator is listed as being used for 30 days. The total duration for this activity is 5 days. Please correct the generator usage and ensure that the corrected value was used for the air quality calculations.</li> <li>g. In Table A-2 under the activity "Underground Trench/Conduit/Substructure," there are two workers listed per backhoe, five per concrete truck, and four per delivery truck. Please clarify that these personnel totals are correct.</li> <li>h. In Table A-3 under the activity "Foundation Installations," the duration of 45 days seems too long. No equipment is used for more than 8 days and there is limited overlap. Please clarify the duration on site total.</li> <li>i. In Table A-3 under the activity, "Steel Structure Installations," please provide the full text under the last line item, which states, "(Typically Manitec on.)"</li> <li>k. In Table A-4 under the activity "Underground Trench/Conduit/Substructure," there are seven Dump/Haul Trucks and ten Concrete Trucks listed. Line items for these pieces of equipment are inconsistent with line items in previous equipment tables, which list the number of trips. Please clarify the number of trips for these trucks.</li> </ul>
13	DR.2-1	<b>Update the construction workforce estimate for the project; the number of workers required for construction of the project is underestimated.</b> The PEA states that a maximum of 35 workers would be on site during construction. This number is inconsistent

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		<p>with the number of workers required for each piece of equipment by activity. The single activity of "Underground Trench/Conduit/Substructure" for the 12-kV Distribution Lines could require up to 49 workers on site at one time. Because this activity will be happening simultaneously with construction of other project elements, it is reasonable to expect that the number of construction workers during peak construction would be greater than 50. Please review the construction workforce estimates and provide a peak and average number of workers required to construct the project.</p>
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**Aesthetics**

14		<p><b>Clarify the type of insulators that are proposed and their potential to produce glare.</b> The photo below shows a recently hardened portion of TL 6913. It portrays conditions near sunset. The insulators are exhibiting significant glare, an aesthetics threshold of significance. The insulators that created this glare could be construed as specular. Is the same type of insulator proposed for TL 6965?</p> 
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**Biological Resources**

15	Page 4.4-54	<p><b>Verify the acreage of suitable Quino checkerspot butterfly (QCB) habitat that is located within the survey area and the acreage that would be impacted by the project.</b> Page 4.4-54 of the PEA states:</p> <p><i>Using the suitable QCB habitat criteria established under SDG&amp;E's QCB Low-Effect HCP, approximately 50 acres of suitable QCB habitat occur within the proposed Salt Creek Substation, southern terminus of the Transmission Corridor, and buffer southeast of Hunte Parkway, including nonnative grassland, Diegan coastal sage scrub, and wildflower field habitats (Figure 4.4-1c). During focused QCB surveys, small patches of dot-seed plantain (P. erecta), which is a QCB</i></p>
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		<p><i>larval host plant, was observed in the southern end of the BSA; however, no QCB were observed during these surveys. Although these impacted areas are considered suitable according the HCP criteria, since they are neither within the Mapped Area nor occupied, no habitat mitigation is required for these impacts, per SDG&amp;E's HCP for QCB.</i></p> <p>We reviewed SDG&amp;E's QCB Low-Effect HCP and discussed the mitigation requirements with Patrick Gower at U.S. Fish &amp; Wildlife Service (USFWS) on November 21, 2013. The HCP requires mitigation for impacts to unoccupied suitable QCB habitat at a 1:1 ratio. Mr. Gower stated that this mitigation would be required for any project impacts to suitable QCB habitat (defined in the HCP). This mitigation would be in addition to the mitigation required under the NCCP. SDG&amp;E submitted a Project Survey Report (PSR) to USFWS that stated SDG&amp;E would mitigate for impacts to 0.16 acre of QCB habitat. The GIS data submitted to CPUC on November 25, 2013, show approximately 17 acres of suitable habitat within the survey area. There is a discrepancy between the 50 acres of suitable habitat discussed in the PEA, the 17 acres of suitable habitat shown in the GIS, and the 0.16 acre identified in the PSR. The entire substation site (8.77 acres of permanent impact) is suitable habitat and will require mitigation at a 1:1 ratio.</p>
16	AD.62-1	<p><b>Verify the acreage of wetland and riparian areas within the project area.</b> We are unable to reproduce the updated calculations of riparian and wetland areas provided in Attachment AD.62-1, Table 4.4-1, using the GIS data provided on November 25, 2013. Please provide details for the calculation.</p>
<b>Section 4.15 Recreation</b>		
17	N/A	<p><b>Verify the recreational uses and City planning status of the multi-purpose trail directly east of the proposed substation that links the Hunte Parkway Trail with the Greenbelt/Open Space &amp; Network Trails, as identified on Figure 5 of the City of Chula Vista Draft Parks and Recreation Master Plan (2010). Provide the GIS data for this multi-purpose trail.</b></p>
18	AD.82	<p><b>Describe the duration of closures, and closure procedures (e.g., City coordination, public noticing, and signage and fencing), for the sewer access road and transmission corridor access roads south of Hunte Parkway.</b></p> <p>Closure details were provided for trails north of the substation and along Hunte Parkway, but not south of Hunte Parkway. SDG&amp;E 11/25/13 Data Response #82 states:</p> <p><i>The public trail along Hunte Parkway may need to be closed during some of the distribution work in Hunte Parkway. However, there is an existing sidewalk on the north side of Hunte Parkway that provides alternative access should the trail on the south side of Hunte Parkway need to be closed for short periods of time. This trail closure would be included as part of the traffic control plan that would be required prior to commencing the distribution work in Hunte Parkway.</i></p> <p>This statement is incomplete because it does not address the multi-use trail shown on Figure 5 of the City of Chula Vista Draft Parks and Recreation Master Plan (2010) and the sewer access road, which have trail-related uses (e.g. hiking and mountain biking).</p>
<b>Appendix 4.6-A</b>		
19	4.6-A	<p><b>Provide Appendices A through E for the "Geotechnical Investigation for Salt Creek Substation Proponent's Environmental Assessment (PEA)" (Kleinfelder West 2008). The appendices to Appendix 4.6-A were not included in the file that SDG&amp;E submitted to CPUC.</b></p>