

PUBLIC UTILITIES COMMISSION

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SAN FRANCISCO, CA 94102-3298



March 16, 2012

Ms. Linda Wrazen
Regulatory Case Administrator
San Diego Gas & Electric
8330 Century Park Court,
San Diego, California 92123-1530

Subject: Data Request No. 13 – San Diego Gas & Electric (“Applicant”), South Bay Substation Relocation Project (CPCN Application No. 10.06.007)

Dear Ms. Wrazen:

The California Public Utilities Commission (CPUC) has identified additional information required to complete our analysis of the South Bay Substation Relocation Project. Please provide the information requested in *Attachment A*. Distribution of the Draft Environmental Impact Report (DEIR) is dependent on a response to this data request. Please provide the CPUC with a schedule indicating when a response will be submitted by San Diego Gas & Electric.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.5484 or jensen.uchida@cpuc.ca.gov.

Sincerely,

Jensen Uchida
Energy Division, Room 4A

Att: Attachment A – Data Request No. 13

ATTACHMENT A
Data Request No. 13

ATTACHMENT A
SDG&E South Bay Relocation Substation Project
Data Request No. 13

The following data request is being submitted to obtain information from SDG&E regarding the No Project Alternative. CPUC staff also recognizes the potential for action items that may occur under the No Project Alternative to be used to provide area support should the South Bay substation ultimately be removed.

A. No Project Alternative

CEQA requires an evaluation of the No Project Alternative so that decision makers can compare the impacts of approving the project with impacts of not approving the project. According to CEQA Guidelines the No Project Alternative must include the assumptions that conditions at the time of the NOP (i.e. baseline conditions including not removing the existing South Bay Substation) would not change since the Proposed Project would not be installed. The No Project Alternative must also describe the events or actions that would be reasonably expected to occur in the foreseeable future if the project were not approved.

Under the No Project Alternative, CPUC staff has identified the following components that may be reasonably expected to be developed as needed over time to support the area system while maintaining the South Bay Substation in place.

No Project Alternative Components:

1. Add a third 230/69-kV transformer at Miguel
2. Convert the Montgomery substation from a 69-kV feed substation to a 138-kV substation by looping the adjacent South Bay – Sweetwater 138-kV circuit into it.
3. Construct a new 69-kV line from Miguel to the Sunnyside tap and rearrange the lines so that a Miguel – Sunnyside line and a Miguel – Sweetwater line are created.
4. Provide additional support to the South Bay area (should such support be required) by one or both of the following actions.
 - a. Operation of the existing Peaker units in the vicinity of Boarder substation during times of peak loads as necessary to maintain reliable service.
 - b. Placing series capacitors in the Miguel – Border 69-kV line to allow for the injection of additional power into the South Bay region.

With respect to each of the above components or sub-components please provide the following information as well as any additional information that may be pertinent to the feasibility and performance of the No Project Alternative.

ATTACHMENT A (Continued)

- Can the system resulting from the implementation of the above components (on an incremental basis) and maintaining the existing South Bay substation in place meet NERC and WECC reliability criteria?
 - If not, in what time frame will the criteria be violated and what are the contingencies / circumstances that would result in non-compliance?
 - If so, what is seen as the best timing to implement each component?
- What are the construction & environmental related issues that may be created by the alternative? (R/W acquisition/expansion, space limitations, etc.) In particular please comment at least to the following:
 - With respect to the new 69-kV line to Sunnyside Tap, please note the possibility for double circuit 69-kV construction as well as undergrounding of at least one of the 69-kv circuits.
 - With respect to conversion of the Montgomery substation please note the extent of additional land required and potential availability. Also please note the magnitude of the impact on distribution level short circuit duty and the resultant impact on distribution equipment.
 - With respect to the need for additional operation of area peaking generation, estimate the additional annual run time for the generation if the alternative were to be implemented.

B. Removal of the South Bay Substation as Planned Combined with Components Described Under the No Project Alternative

Assuming the South Bay Substation is removed as planned, please provide the following information with respect to each of the components or subcomponents described under the No Project Alternative as well as any additional information that may be pertinent to the feasibility and performance of removing the South Bay Substation as planned combined with the implementation of the components described under the No Project Alternative.

- Will the system resulting from the implementation of the components described under the No Project Alternative combined with the removal of the South Bay Substation as planned meet NERC and WECC reliability criteria?
 - If not, in what time frame will the criteria be violated and what are the contingencies / circumstances that would result in non-compliance?
 - If so, what is seen as the best timing to implement each component?
- It is assumed the construction & environmental related issues associated with this plan would be the same as those described under the No Project Alternative. If there are any additional issues that should be considered please so note.

ATTACHMENT A (Continued)

C. South Bay Substation Site Alternative

Finally, additional information is requested regarding use of the existing South Bay Substation site to develop the Proposed Project.

- Please indicate whether construction and operation of an AIS as well as GIS is feasible within the existing South Bay Substation site. In the event the footprint needs to be expanded under either the AIS or GIS configuration, please identify the area that would be expanded. If there are any additional issues that should be considered please so note.