

**SDG&E 10/1/10 Response**  
**A. 10-06-007 South Bay Substation Relocation Project PTC**  
**Energy Division Data Request 01 Dated September 8, 2010**  
**SDGE-ED-001: Q 1-8, 1-3, 1**

**CHAPTER 3.0      PROJECT DESCRIPTION**

- 1) Please provide a timeline for the proposed construction activities in relation to the South Bay Power Plant demolition. The timeline should identify when construction of the various project components would occur for the South Bay Substation Relocation Project in relation to the South Bay Power Plant demolition activities.

**SDG&E Response:**

SDG&E has been in contact with the Dynegy plant operators and it appears that Dynegy expects to begin demolition activities in March of 2012 (if the RMR status is removed) and continue the removal process for two years (until 2014). All construction dates for SDG&E are dependant upon the date the CPUC issues the Permit to Construct, the date the California Coastal Commission issues its Coastal Development Permit and after RMR has been removed. At this time, SDG&E is estimating construction activities to begin in April of 2011 in order to meet its December 2012 in-service date for the substation (additional work to occur in 2013 and 2014 as noted below). The demolition and removal of the existing South Bay Substation would tentatively begin in late 2013 and continue into 2014.

Depending upon the issue dates noted above, SDG&E has tentatively scheduled key milestone construction dates as follows:

1.      04/11 to 10/11 – Substation Grading and Site Development (includes walls and access roads)
2.      09/11 to 3/12 – Substation Below Grade work (includes foundations, ducts, grounding and control shelter)
3.      01/12 to 10/12 – Substation Above Grade work (includes control shelter, structures, equipment, insulators and wires)
4.      2/12 to 12/12 – 230kV Transmission Line work
5.      04/12 to 11/12 – Substation electrical work, commissioning and testing
6.      1/13 to 12/13 – 69kV Transmission Line work
7.      09/12 to 12/12 – Loop in Tie Line 23042
8.      12/12 to 12/12 – Energize new 230kV Bay Boulevard Substation

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9. 01/13 to 12/13 – 69 kV cutovers (length of time is dependent on outages) <sup>1</sup>
10. 01/14 to 06/14 – 138 kV Transmission Line work
11. 06/14 to 12/14 – Demolish South Bay Substation (depending on RMR, 69kV cutovers and Power Plant removal work)

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<sup>1</sup> Activities in numbers 9, 10 and 11 could begin approximately three to six months earlier if outage coordination allows the cutovers to be completed sooner than 12/13.

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- 2) Section 3.4.4, South Bay Substation Demolition: Please clarify whether any of the existing utilities such as gas lines that are owned and operated by San Diego Gas & Electric (SDG&E) located within the limits of the South Bay Power Plant property would be removed as part of this project. If utilities that are owned and operated by SDG&E located outside of the South Bay Substation limits are not planned to be removed as part of this project, please identify the responsible party for removal of these facilities and indicate when removal will be completed.

**SDG&E Response:**

The removal of any gas lines currently owned and operated by SDG&E located within the limits of the South Bay Power Plant are not included in the South Bay Substation Relocation Project

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- 3) Table 3-17, Coastal Development Permit: Please indicate whether a Coastal Development Permit will be required for the demolition of the existing South Bay Substation. In the event a Coastal Development Permit is required, please identify the Agency that will be responsible for issuance of the Coastal Development Permit.

**SDG&E Response:**

SDG&E has contacted the Coastal Commission and is in the process of setting up a meeting to discuss the approval process and determine which agency has responsibility for issuance of the Permit. SDG&E will provide this information as soon as it becomes available.

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**SDG&E Response:**

The demolition of the existing South Bay Substation constitutes “development” under the Coastal Act and therefore requires a Coastal Development Permit (CDP). SDG&E plans to obtain a CDP for the South Bay Substation Relocation Project (Project) as a whole; thus, the scope of the permit application will include the construction of the Bay Boulevard Substation, reconfiguration and extension of the electric transmission line facilities, and demolition of the existing South Bay Substation.

SDG&E believes that the agency responsible for issuing any CDP for the Proposed Project is the California Coastal Commission. Although the Proponent’s Environmental Assessment (PEA) indicated in Table 3-17: Permit, Approval, and Consultation Requirements in Chapter 3 – Project Description that the Project would be seeking a CDP from the City of Chula Vista (City), SDG&E has since determined that the agency responsible for approval of the CDP is the California Coastal Commission as discussed below.

As discussed in the PEA, the Project is located within the boundaries of the City of Chula Vista’s Local Coastal Program (LCP), which has been certified by the California Coastal Commission. Therefore, under Coastal Act Section 30519(a), authority to issue CDPs within this geographic area has generally been delegated to the City. Under Section 30519(b), however, delegation of permitting authority shall *not* apply “to any development proposed or undertaken on any tidelands, submerged lands, or on public trust lands, whether filled or unfilled, lying within the coastal zone, nor shall it apply to any development proposed or undertaken within ports covered by Chapter 8 (commencing with Section 30700)...”. Delegation of permitting authority *does* apply “to any development proposed or undertaken by a port or harbor district or authority on lands or waters granted by the Legislature to a local government whose certified local coastal program includes the specific development plans for such district or authority.” Coastal Act Section 30519(b).

SDG&E believes that the Coastal Commission retains jurisdiction over the Project pursuant to Coastal Act Section 30519(b) because the Project is located within public trust lands and within

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a port covered by Chapter 8 of the Coastal Act. SDG&E is currently seeking City and Coastal Commission concurrence of this interpretation.

Furthermore, SDG&E believes that General Order 131-D (G.O. 131-D), Section XV expressly requires that a coastal development permit be obtained from the Coastal Commission and that G.O. 131-D Section XIV preempts the City of Chula Vista's exercise of permitting authority under the LCP to the extent the City's exercise imposes conditions, restrictions or limitations beyond those contained in Chapter 3 of the California Coastal Act.

In the event it is subsequently determined that coastal permitting authority over any portion of the Project has been delegated to another agency by the Coastal Commission, SDG&E will request consolidated review by the Coastal Commission of the entire Project.

For these reasons, SDG&E currently plans to seek a CDP from the Coastal Commission, and not the City as originally indicated in the PEA.

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- 4) Section 3.0.3, Methods: Please identify whether it would be feasible to co-locate a 69-kilovolt (kV) conductor within the proposed 138 kV duct bank. The discussion should indicate whether the proposed undergrounding of the 138 kV and associated duct bank could be redesigned to include a 69 kV conductor to allow for the potential undergrounding of the 69 kV utilities located within the South Bay Power Plant property limits.

**SDG&E Response:**

To co-locate a 69 kV circuit within the proposed 138 kV duct bank would not be feasible. The proposed 138 kV duct bank is designed for double-circuit configuration to accommodate an existing 138 kV circuit and a future 230 kV circuit for ultimate build-out. Although only three of the six conduits would be occupied within the proposed 138 kV package for this Project, utilizing the spare conduit positions for a 69 kV circuit would eliminate future capabilities of adding a 230 kV circuit. Additionally, the easement right-of-way in this area cannot accommodate an additional duct package beyond what it is designed for at this time. The current design allows for one future 230 kV circuit when SDG&E's load requires it.

The proposed 138 kV duct bank design (double-circuit) cannot be modified further to include additional circuits as this is already our ultimate build-out design that accommodates two (2) transmission circuits. A new duct package alignment would have to be established parallel to the route of the proposed 138 kV duct package to accommodate an additional 69 kV circuit. This additional scope would increase the cost of the Project. In addition, a de-rating of the transmission lines would occur as additional circuits within the same packages would cause mutual heating to the cables, thus limiting the cable's current carrying capabilities. In turn, this would limit SDG&E's future operational capabilities.

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- 5) Section 3.4.0, Bay Boulevard Substation: The Proponent's Environmental Assessment (PEA) identifies a 75-foot-tall lattice steel tower to support an approximately 8-foot-diameter microwave telecommunications disc at the proposed Bay Boulevard Substation. Please identify whether the project is consistent with the Height Regulations provided in Section 19.46.060 of the City of Chula Vista Municipal Code. The response should indicate whether a reduced tower height is feasible and the design rationale for the proposed communication tower height.

**SDG&E Response:**

The proposed relocated microwave tower is not consistent with the City of Chula Vista Municipal Code or Local Coastal Program. The proposed microwave tower, which is currently located at the existing South Bay Substation will need to be relocated to the new Bay Boulevard Substation and would need to be 75 feet tall to provide enough height to be above the 55-foot-tall 230 kV substation structures. A height of 75 feet will allow for a clear path to the existing mountain top to intercept into the existing SDG&E backbone network that would not be blocked with near field obstruction and is a reliable link for providing communication services at the new substation. Furthermore, the substation final grade is not complete. The height of the relocated microwave tower is anticipated to provide vertical tolerance of the substation grade. Lastly, SDG&E must leave space on the tower for constructing other reliable microwave systems to connect other substations into the network for future expansion.



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- 6) Section 3.4.2, 69 kV Relocation: Please identify the location of the existing overhead 12 kV distribution circuits that would be underbuilt onto the proposed 69 kV poles. An exhibit that identifies the location of the existing 12 kV utilities should be provided along with an exhibit that shows the location of the future 12 kV facilities to be underbuilt onto the proposed 69 kV poles.

**SDG&E Response:**

The location of the distribution under-build will reside along Bay Boulevard on portions of transmission circuits TL644 and 645. Please see attachment 3-A: Detailed Project Components Map in the South Bay Substation Relocation Project PEA for an illustration of the alignment of TL 644 and 645.

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7) Please indicate whether all proposed utilities will be located within the existing 300-foot-wide easement.

**SDG&E Response:**

All proposed utilities will be located within the existing 300- foot-wide easement or located within a franchise position.

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8) Please indicate whether any substation modifications will be required to other substations located within the service area to accommodate the proposed Bay Boulevard Substation.

**SDG&E Response:**

Some minor work will be required at the following substations to accommodate the Proposed Project:

- Telegraph Canyon Substation: Terminate TL13824
- Imperial Beach Substation: Upgrade TL647 line protection
- Miguel Substation: Upgrade TL641 line protection

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**Section 4.4      Biological Resources**

- 1)      Figure 4.4-2, Vegetation Communities Map. In the response submitted by SDG&E on August 23, 2010, SDG&E states that Figure 4-2, Vegetation Communities Map, has been revised to include the requested vegetation communities and associated Holland codes. Please provide the revised exhibit.

**SDG&E Response:**

Figure 4.4-2: Vegetation Communities Map has been uploaded to Dudek's FTP site to a folder named "SBS Data Request 1 – Maps".

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- 2) Wetland Vegetation: Please provide any updates and correspondence with other Agencies regarding whether the project site contains wetlands characteristics that are considered environmentally sensitive habitat areas under the California Coastal Act.

**SDG&E Response:**

Since the submittal of the PEA and PTC, SDG&E has held one meeting with the City of Chula Vista (City). During this meeting, SDG&E asked the City if they felt that the retention basin area was considered a "wetland" and, if so, would a Local Coastal Program amendment be triggered as a result of filling the wetland. The City was asked to review this issue in the context of a coastal development permit (CDP) application. For the wetlands outside of the retention basin, SDG&E asked the City if the LCP's 4:1 mitigation ratio applies, or if we could provide mitigation at a 2:1 ratio as proposed in the PEA. The City confirmed that the 4:1 ratio is strictly interpreted. Although there is a pending LCP amendment to allow lower ratios with City approval, it probably will not be adopted in time to apply to this Project. The City did, however, suggest that off-site mitigation could be possible and that it would discuss that further in the context of our CDP application.

SDG&E has contacted the Coastal Commission and is in the process of setting up a meeting to discuss the approval process and determine which agency has responsibility for issuance of the Permit. SDG&E will provide updated information as soon as it becomes available.

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- 3) Coyote Bush Scrub: Coyote brush scrub is considered a sensitive habitat by the City of Chula Vista and California Department of Fish and Game. Please indicate whether SDG&E has any mitigation credits within the NCCP mitigation banks for coyote brush scrub, which is a subtype of coastal sage scrub.

**SDG&E Response:**

The SDG&E NCCP identified 36 types of habitat within the Subregional Plan Area (Page 41 of the NCCP). Coastal sage scrub is one of the broad types listed. However, the NCCP does not require a list of the subtypes under each type of habitat. SDG&E mitigation credits are primarily high-quality coastal sage scrub habitat. Impacts covered under SDG&E's NCCP to habitats listed within the Subregional Plan Area are covered by the Agreement. The mitigation credits were agreed to and approved by the California Department of Fish and Game and the U.S. Fish and Wildlife Service. Therefore, any Project-related impacts to coyote brush scrub are covered by the SDG&E NCCP.

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**Section 4.10      Noise**

- 1)      Figure 4.10-1, Noise Measurement Location Map: Please provide the noise measurement location for noise measurement site location number 3 (Marina View Park) referenced in the response provided by SDG&E on August 24, 2010.

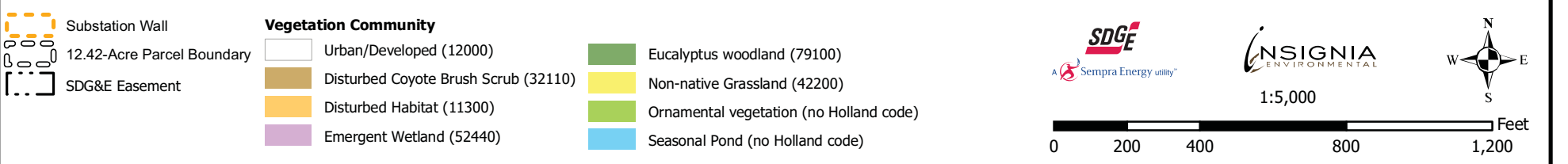
**SDG&E Response:**

Figure 4.10-1: Noise Measurement Location Map has been uploaded to Dudek's FTP site to a folder named "SBS Data Request 1 – Maps".



**Figure 4.4-2: Vegetation Communities Map**

**South Bay Substation Relocation Project**

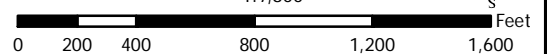






**Figure 4.10-1: Noise Measurement Location Map** **South Bay Substation Relocation Project**

- Noise Measurement Location
- Substation Wall
- 12.42-Acre Parcel Boundary
- SDG&E Easement
- New Access Routes and Driveways



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