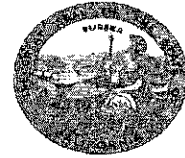


PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO CA 94102-3298



September 13, 2012

Rebecca W. Giles
Regulatory Case Manager
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123

RE: Completeness Review of San Diego Gas & Electric Company's Application (A. 12-05-020) for a Certificate of Public Convenience and Necessity for the South Orange County Reliability Enhancement Project

Dear Rebecca:

Thank you for your responses, dated August 14 and August 16, to the June 15, 2012 letter from the California Public Utilities Commission Energy Division requesting additional information regarding San Diego Gas & Electric Company's (SDG&E's) project application (A. 12-05-020). After reviewing these responses, the Energy Division requests the submittal of additional information to complete the project application. Attached is a list of these items. Additional information submitted by SDG&E in accordance with this letter should also be filed as supplements to the above application.

We request that responses to these items be provided to us by October 15, 2012. Upon receipt of the supplemental information, the Energy Division will perform a third review to assess the adequacy of the application.

The Energy Division reserves the right to request additional information at any point in the process. Questions related to the SOCRE project should be directed to me at (415) 703-3221.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Barnsdale".

Andrew Barnsdale
Energy Division
California Public Utilities Commission

REVIEW OF PROJECT PROPONENT'S RESPONSES TO THE CPUC'S JUNE 15, 2012 DEFICIENCY LETTER

Section 3.0, Proposed Project Description

Summary of Proposed Project Disturbance Areas

The quantity of temporary and permanent disturbance represented by the project is presented in Section 3 of the Proponent's Environmental Assessment (PEA), and in the supplemental materials submitted by SDG&E dated August 14 and August 16. Additional information is required to fully characterize the disturbance represented by the project, as follows:

1. GIS layers submitted by SDG&E show the areas of disturbance that would result from installation of the new electrical transmission line infrastructure, including areas of permanent and temporary disturbance around and associated with each pole, access road improvement areas, stringing sites, and laydown areas. As indicated by SDG&E, because many of the new poles would be installed in close proximity to the locations of existing transmission line poles and structures that would be removed, the areas of disturbance associated with pole and structure removal are largely the same as the areas of disturbance associated with new pole installation – however, this is not the case for all of the existing poles and structures that would be removed. Further GIS data confirming any areas of disturbance associated with the poles and structures to be removed is required for an accurate analysis of the impacts of the proposed project to biological and other resources. Specifically, GIS layers showing any additional disturbance associated with the removal of poles and structures that are not located in close proximity to the new poles (as listed in Table 1) are required. These GIS data should primarily include areas of permanent and temporary disturbance around and associated with each of the poles and structures listed in Table 1.

If these data are not available, SDG&E is requested to confirm that the maximum disturbance associated with the removal of these poles and structures would be no greater than an area of approximately 150 feet by 150 feet (the estimated area of disturbance presented in the PEA for the installation of new poles).

2. SDG&E has also submitted GIS layers showing the distribution line infrastructure that would be upgraded as part of the project. Further data describing the disturbance associated with this project element is also required, for an accurate analysis of the impacts of the proposed project to biological and other resources. Specifically, GIS layers showing all disturbance associated with the removal and installation of distribution infrastructure – including areas of permanent and temporary disturbance around and associated with each pole removed or installed, access road improvement areas, stringing sites, and laydown areas – similar to those described above under 1., are required. If these data are not available, SDG&E is requested to confirm that the maximum disturbance associated with the installation and removal of distribution line poles would be no greater than an area of approximately 150 feet by 150 feet.

Volumes of Excavation and Fill

As indicated by SDG&E in their August 14, 2012 submittal, excavation and fill estimates for the San Juan Capistrano Substation are provided in PEA Section 3.5.3.1. Preliminary excavation and fill information for project transmission line construction was also included in the PEA, in Appendix 3-D, Detailed Construction Schedule and Vehicle Use Tables (used in the Air Quality and Traffic analysis to estimate truck trips relating to import/export of fill and construction debris).

Although estimates of excavation and fill associated with transmission line pole removal and installation may be accounted for in the PEA's air quality calculations, they are also required to be presented separately, per CPUC PEA Checklist Sections 3.7.2.2, "Pole Installation and Removal," 3.7.3.1, "Trenching," and 3.7.3.2 "Bore and Jack." SDG&E's response to the deficiency letter did not provide data regarding the total volumes and types of excavated materials, soil backfill, other types of fill, and concrete that would be required for each component of the proposed project. In general terms, these data are necessary to convey the magnitude and extent of the project in terms understandable by the general public. An accounting of the full extent of excavation and fill is also required in order to evaluate the risks of impacting previously undiscovered cultural resources, excavating hazardous soils, and impacting biological resources that may grow in or use these areas. These data will also be used to assess the air quality and traffic and transportation data provided in the PEA for completeness. SDG&E is requested to submit separate estimates of excavation and fill volumes associated with transmission line construction, based on existing information about the project elements and engineering.

Table 1. Transmission Line Poles and Structures to be Removed as Part of the Project Not Located in Close Proximity to Poles to be Installed

Transmission Structure	Transmission Line	Type
Z198319	TL13835	2-POLE H-FRAME
Z198320	TL13835	2-POLE H-FRAME
Z198322	TL13835	2-POLE WOOD H-FRAME
Z206511	TL13835	2-POLE WOOD H-FRAME
Z221659	TL13835	2-POLE H-FRAME TANG
Z221658	TL13835	2-POLE H-FRAME TANG
Z221656	TL13835	2-POLE H-FRAME TANG
Z221655	TL13835	2-POLE H-FRAME TANG
Z221653	TL13835	2-POLE WOOD H-FRAME
Z221651	TL13835	2-POLE H-FRAME TANG
Z221650	TL13835	2-POLE H-FRAME TANG
Z221649	TL13835	2-POLE H-FRAME TANG
Z221648	TL13835	2-POLE H-FRAME TANG
Z221647	TL13835	2-POLE H-FRAME TANG
Z221644	TL13835	2-POLE H-FRAME TANG
Z221642	TL13835	2-POLE H-FRAME TANG
Z221641	TL13835	2-POLE H-FRAME TANG
Z327418	TL695 & CIRC 204 (69 kV)	WOOD
Z247455	TL13835 (138 kV)	WOOD
Z247456	TL13846 (138 kV)	WOOD
Z322477	TL695 & CIRC 204 (69 kV)	WOOD
Z247439	TL13835 (138 kV)	WOOD
Z220835	TL13836 (138-kV)	WOOD
Z322479	TL13846 (138 kV)	WOOD
Z322479	TL13833 (138 kV)	
Z36515	TL13835 (138 kV)	WOOD
Z322489	TL695 & CIRC 204 (138 kV)	WOOD
Z322485	TL13836 (138 kV)	WOOD
Z322481	TL13846 (138 kV)	WOOD
Z36517	TL13835 (138 kV)	WOOD
Z322490	TL695 & CIRC 204 (138 kV)	WOOD
Z322482	TL13846 (138 kV)	WOOD
Z322484	TL13836 (138 kV)	WOOD
Z322483	TL13846 (138 kV)	WOOD
Z322484	TL13836 (138 kV)	WOOD
Z322483	TL13846 (138 kV)	WOOD
Z220838	TL695 & CIRC 204 (69 kV)	WOOD
Z220839	TL695 & CIRC 204 (69 kV)	WOOD

SOURCE: SDG&E GIS data submitted August 16, 2012