
From: sixaguilas@gmail.com on behalf of Aguilar Family <sixaguilas@cox.net>
Sent: Tuesday, September 22, 2015 10:22 PM
To: SOCRE CEQA
Subject: SDGE Substation Expansion

Follow Up Flag:
Flag Status:

Thank you for listening to the residents and considering a new alternative sight for the SDG&E expansion project that was being planned for San Juan Capistrano. Fifty years ago, when there were no people around this plant in San Juan Capistrano, it would not have been a problem. Today, this aged plant is in the middle of residential neighborhoods to thousands of people, along with schools and parks. Many people have already complained about the health issues they have suffered from living near the plant.

The proposal for San Juan would not only destroy a historical building but would also require special permits to exceed the height limits imposed on structures in San Juan Capistrano. In addition, the construction would add to the already congested traffic that flows through our neighborhood and town as a result of overflow traffic from the I-5 Freeway (taking a five minute drive to the grocery store and converting it to 30-45 minutes during rush hour and weekends).

We understand the need for these plants, but with the unknown health hazards, they should be located in remote areas away from human population.

Thank you again for your consideration of alternative sights.

Sincerely,

Hector & Lauren Aguilar
31146 Via Santo Tomas
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California State Senate

SENATOR
PATRICIA C. BATES
THIRTY-SIXTH SENATE DISTRICT



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LEGISLATIVE ETHICS

September 22, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

Also via email at socre.ceqa@ene.com

RE: South Orange County Reliability Enhancement
Recirculated Draft EIR

To Whom It May Concern:

It is my understanding that the California Public Utilities Commission (CPUC) is considering a new alternative (Alternative "J") as part of its Recirculated Draft Environmental Impact Report (RDEIR) of the San Diego Gas & Electric (SDG&E) South Orange County Reliability Enhancement (SOCRE) project. This alternative has some significant shortcomings that are concerning to the residents and businesses in my Senate District.

The City of Laguna Niguel, along with the Laguna Niguel Chamber of Commerce and the South Orange County Economic Coalition, have all written to oppose Alternative J. The DEIR indicates that in order for the SOCRE project to be built on the Trabuco Substation site, SDG&E would need to expand onto property currently owned by AT&T, which would increase the cost of the project significantly. Additionally, this AT&T service center in Laguna Niguel is critical for the regional service the company provides and should Alternative J be approved, AT&T would be required to relocate to a new area of the County.

Additionally, the CPUC suggests that SDG&E might be able to tie into Southern California Edison (SCE) lines, however there are concerns that because this is the far south end of the SCE service territory, such a tie-in could threaten reliability for SCE customers.

I would ask that the CPUC reject Alternative J and reconsider the viability of the project as proposed by SDG&E. SDG&E's proposed project can be built entirely on property it owns and would be located at the load center of the regional electrical distribution system. These factors have tangible benefits from an operational standpoint as well as a taxpayer protection standpoint.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia C. Bates". The signature is fluid and cursive, with the first name being the most prominent.

PATRICIA C. BATES
Senator, 36th District



LISA A. BARTLETT

ORANGE COUNTY BOARD OF SUPERVISORS
SUPERVISOR, FIFTH DISTRICT

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September 21, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

Also via emailed to socre.ceqa@ene.com

RE: South Orange County Reliability Enhancement Recirculated Draft EIR

Dear Commission President Picker:

I serve as the Orange County Supervisor of the Fifth District, which encompasses South Orange County. The entire San Diego Gas & Electric (SDG&E) service territory in Orange County is within my jurisdiction. After significant review and meetings with constituents, I continue to support the South Orange County Reliability Enhancement (SOCRE) project plan because it provides energy reliability and system redundancy in the most cost-effective manner for my district.

Responsible Investment in Energy Infrastructure

Reliable power is essential for maintaining quality of life, assuring public safety, and fostering economic growth. According to the Center of Demographic Research at California State University, Fullerton, South Orange County's total population is expected to grow up to 690,000 residents by 2035. This population projection is further validated by the Regional Housing Needs Assessment issued by metropolitan planning organizations and the Department of Housing and Community Development. Regional economists also expect similar trends in job growth.¹ It is prudent for both the public and private sectors to make responsible infrastructure investments for residents and businesses.

Concerns Regarding Relocation and Entitlement Costs of Alternative J

After careful review of Alternative J, I would like to express my concerns regarding the cost and uncertainty of relocation. Currently, SDG&E owns the Capistrano Substation property and will make improvements within the site's footprint. Alternative J would require SDG&E to expand its Trabuco Substation onto private property owned by AT&T. I am confident that

¹ Saddleback College. 2015. *2015 South Orange County Economic Report*. Mission Viejo: Saddleback College.

elected officials in South Orange County will not support eminent domain or coercion of a costly private property acquisition of the AT&T site. Such actions are highly objectionable and the entitlement cost would ultimately lead to unnecessary rate increases.

Additionally, AT&T's large regional operation in Laguna Niguel requires significant space for employees and vehicles. While it may initially appear there is available land elsewhere, local General Plans have prudently planned for open space, institutional, and/or other uses. It is reasonable to assume that AT&T will have a difficult experience relocating to an infill site with proper zoning and size for their needs.

Concerns Regarding Reliability

Testimony from California Independent System Operator (CAISO) demonstrated that the Capistrano Substation is near the load center for all of SDG&E's service territory in South Orange County. In their independent professional assessment, they conclude that Capistrano Substation is the proper location for improving transmissions equipment to 230 kV. CASIO's testimony asserts that the interconnection with Southern California Edison (SCE) found in Trabuco and Pico Alternatives potentially jeopardizes the reliability of electrical service to SCE customers who live in my district. The connection would occur at the end of the SCE line and place further stress on an already overburdened system. Therefore, improvements at Capistrano Substation remain the most logical proposal because it does not require an SCE interconnection. Furthermore, SOCRE reduces costly delays, higher costs and reliability issues identified in the other alternatives.

As the elected representative for all of South Orange County, I encourage the CPUC to approve the SOCRE project as proposed by SDG&E. SOCRE is the preferred proposal because it is located in the load center of their service area, it can be built on property it owns, and it is the most responsibly cost-effective option that will ensure the reliable energy distribution in the region.

Thank you for your time and thoughtful consideration.

Sincerely,



Lisa A. Bartlett

County Supervisor, Fifth District
Vice Chair, Orange County Board of Supervisors

Cc: Orange County Board of Supervisors



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VIA ELECTRONIC MAIL (SOCRE.CEQA@ene.com)

September 23, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

Re: Comments of AT&T California on Recirculated SOCRE EIR

California Public Utilities Commission:

AT&T California appreciates the opportunity to comment on the recirculated draft environmental impact report (EIR) for SDG&E's South Orange County Reliability Enhancement (SOCRE) project. These comments focus on the new "Trabuco Alternative" included in the recirculated EIR. As discussed below, in order to adequately consider the impacts of the Trabuco alternative, the recirculated EIR must be revised to include the potential environmental impacts of relocating AT&T's Laguna Nigel Field Operations Center ("Laguna Nigel Center").

As described in Section 3.2.12, "Alternative J – SCE 230-kV Loop In to Trabuco Substation" would involve acquisition by SDG&E of "approximately 2 acres of land, currently owned by AT&T, adjacent to the north side of the existing Trabuco Substation for the construction and operation of the 230-kV switchyard." Figure 3-5 of the recirculated EIR indicates that the entire maintenance yard of AT&T's facility north of the existing Trabuco Substation would be taken and used to expand SDG&E's Substation.

The AT&T maintenance yard that would be taken is an integral part of AT&T's Laguna Nigel Field Operations Center ("Laguna Nigel Center"). The Laguna Nigel Center is crucial to AT&T's ability to provide service in South Orange County, and it is the only AT&T Field Operations Center between Tustin, CA and Oceanside, CA. The Laguna Nigel Center cannot function without the maintenance yard.

The Laguna Nigel Center consists of 43,672 square feet of building space and 192,509 square feet of land. It provides office, warehouse and parking space for approximately 144 Technicians and Managers from four AT&T work groups – Service Delivery & Assurance, Business Systems, Network Infrastructure and Construction & Engineering. Together these teams build and maintain the AT&T network that provides voice, data and video services to residents and businesses in the following cities or areas: Lake Forest, Laguna Niguel, San Clemente, Rancho Santa Margarita, Mission Viejo, San Juan Capistrano, Laguna Woods,

Laguna Hills, Trabuco Hills, Coto de Caza, Aliso Viejo, Newport Beach, Dana Point and Camp Pendleton. Combined, these teams average approximately 4,800 service visits per month.

The 2 acres that would be taken by the Trabuco Alternative include a maintenance yard providing parking for approximately 170 company and 160 personal vehicles, as well as a vehicle maintenance building, underground storage tanks, and gas pumps. The vehicle maintenance building services 180 vehicles. It has three service bays, each capable of lifting 43,000 pounds, as well as storage for tools, equipment, parts, new and used oil and other fluids. The maintenance yard is integral to the Laguna Niguel Center's function as a place to store and service the vehicles used to maintain AT&T's networks.

If the Trabuco Alternative were implemented, AT&T would have to locate, purchase and develop one or more new Field Operations Centers in the area to replace the Laguna Niguel Center. However, the recirculated EIR does not consider any of the potential environmental impacts that would result from the location and construction of one or more new Field Operations Centers. For example, AT&T may need to develop new property, which could have environmental impacts. This appears likely because all other AT&T Orange County Field Operations Centers are at capacity, and there are no consolidation opportunities. AT&T has attempted several times over the past few years to find alternatives for additional South Orange County Field Operations Centers and has been unsuccessful each time. It could take AT&T a year or more to build a new Field Operations Center and could cost up to \$7 million. Moreover, new Field Operations Center locations may require AT&T's service trucks to travel further in order to make service calls. That could cause traffic and air quality impacts. However, none of the potential impacts of developing one or more new properties to replace the Laguna Niguel Center, or of increased traffic and air quality impacts are considered in the recirculated EIR.

AT&T's Laguna Niguel Center is integral to the construction, operation and maintenance of its local network. If the Laguna Niguel Center is taken for the Trabuco Alternative, it will need to be replaced, and that is likely to have various environmental impacts to the region. In order to adequately consider the impacts of the Trabuco Alternative, the recirculated EIR must be revised to include the potential environmental impacts of relocating AT&T's Laguna Niguel Center.

Sincerely,



M. Leslie Hovey
General Attorney

cc: Robert A. Damaschino
Michael Johsz
Peter M. Hayes

From: Rhen Kohan <rkohan1@cox.net>
Sent: Wednesday, September 23, 2015 9:44 PM
To: SOCRE CEQA
Subject: Response to RDEIR/A.12-05-010----SDGE Substation

Follow Up Flag:
Flag Status:

Honorable Darwin E. Farrar

Administrative Law Judge

California Public Utilities Commission

RE: A.12-05-010

Response to Recirculated Draft EIR

Dear Judge Farrar:

I am responding to the RDEIR, SDG&E SOCRE Project.

1. INTRODUCTION OF ALTERNATIVE J: I applaud the CPUC/ORR introducing Alternative J. This appears to remove the necessity for voltage increase at the Capistrano Substation. Population and housing has not been mentioned as a negative factor, yet it is a substation surrounded by homes as mentioned in the testimony on by June 24, 2015, by Dariush Shirmohammadi. Alternative J does not seem to impact any community like the present proposal does ours and again, we applaud that..

2. HISTORICAL REGISTRATION PENDING FOR SUBSTATION: We await hearing that the substation building has been awarded final Historical Registration. How SDG&E, who early on, said they could not in any way avoid razing the substation, now say they can work around it describing how they intend to do so (after much resistance and protest), it makes one wonder what they REALLY intend and at what cost to the integrity of this structure. Can this proposed work retain the aesthetics of the structure visible from the street?

3. POPULATION AND HOUSING: I am a healthy female in her 60s. I live across the street from the substation. I am not ill. I do not smoke. IF the substation is ENLARGED as SDG&E proposes, undergoing years of construction and disruption, I will hold SDG&E responsible for any illnesses I contract from inhalation of emissions thereof (which cannot be avoided to total extent). I understand that the substation does need some upgrade of equipment and am in support of that BUT NOT MAKING IT INTO A SUPERSTATION.

4. LAND USE-CITY'S BUILDING HEIGHT EXCEEDED: Quoting from "5.2.12 Alternative J – SCE 230-kV Loop-in to Trabuco Substation" "Alternative J does not include the expansion of the existing Capistrano Substation. Therefore, the construction of 45- to 50-foot-tall buildings to house new 138-kV and 230-kV equipment as described for the proposed project would not occur, and conflicts with the City of San Juan Capistrano zoning height restriction would not result. " **I voice my support, and request NO voltage line increase occur at the Capistrano Substation.**

5. NEW LOCATION: SDGE&E has in their own testimony made my point regarding a totally new substation at a new REMOTE location in their testimony by SAN DIEGO GAS & ELECTRIC COMPANY, SECOND SUPPLEMENTAL TESTIMONY OF JOHN JONTRY, CORY SMITH, WILLIE THOMAS, SCOTT BOCZKIEWICZ, KARL ILIEV, JEFFREY SYKES, ROBERT FLETCHER, JR., AND DEBBIE SCHAFER on September 14, 2015:

“Both Laguna Niguel and Trabuco (the substations adjacent to Capistrano) are built out to their ultimate 4-transformer capacity already. Therefore, at some point beyond the 10-year planning horizon, under the Modified Proposed Project, sufficient continued load growth would require an expansion of Capistrano Substation beyond its current fence-line or construction of a new substation at a new location.” Well why not a new substation, new remote location now?

Thank you for your time and I wish you well in your time, serious consideration, and review remembering the PEOPLE in this community surrounding this substation,

Rhen Kohan

31061 Via Santo Tomas, Above Calle Bonita/Southern Border of Substation

San Juan Capistrano, CA

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September 20, 2015

California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite 300
San Francisco, CA 94111

Also via email at socre.ceqa@ene.com

RE: South Orange County Reliability Enhancement
Recirculated Draft EIR

To Whom It May Concern:

It has come to my attention that the California Public Utilities Commission (CPUC) has recirculated its Draft Environmental Impact Report (DEIR) on the San Diego Gas & Electric (SDG&E) South Orange County Reliability Enhancement (SOCRE) project. A new alternative, known as "Alternative J" is now being considered by the CPUC. Alternative J has some significant deficiencies and is strongly opposed by the City of Laguna Niguel as well as the Laguna Niguel Chamber of Commerce and the South Orange County Economic Coalition.

Alternative J suggests it would be preferable to have SDG&E expand its Trabuco substation in Laguna Niguel, which would require SDG&E acquiring land currently owned and operated on by AT&T for its regional service center. AT&T has indicated it is opposed to such an expansion, which would require this company to leave the city and find a location elsewhere.

SDG&E has a proposed project that will provide regional electric reliability by expanding entirely within a property footprint that is completely owned by SDG&E. Additionally, the proposed SOCRE project in San Juan Capistrano is located in the load center of the region.

I encourage the CPUC to reject Alternative J and approve the SOCRE project at the Capistrano Substation as proposed by SDG&E.

Sincerely,

B

Bill Brough
State Representative
73rd Assembly District
State of California

September 24, 2015

California Public Utilities Commission
RE: SOCRE Project
C/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111
Email: SOCRE.CEQA@ene.com

Re: SCE's Comments on the Recirculated Draft Environmental Impact Report (SCH 2013011001) for the San Diego Gas & Electric Company South Orange County Reliability Enhancement Project (A.12-05-020)

Dear Ladies and Gentlemen:

In response to a request from the California Public Utilities Commission's (CPUC) Energy Division, Southern California Edison Company (SCE) is providing the enclosed comments to the above-referenced Recirculated Draft Environmental Impact Report (RDEIR) circulated by the CPUC on August 10, 2015.

In particular, this letter explains how the RDEIR omits critical information demonstrating that: 1) Alternative J - SCE 230-kV Loop In to Trabuco Substation (Alternative J), as described on Page 2-22 and illustrated in Figure 3-5 of the RDEIR, is not a feasible alternative to the Proposed Project; and 2) Alternative J should not be considered environmentally superior to the Proposed Project because the RDEIR fails to account for several additional components associated with Alternative J.

In addition, because SCE did not have the opportunity to comment on the CPUC's February 23, 2015 Draft Environmental Impact Report (DEIR) when Alternative D – SCE 230-kV Loop In to Reduced-Footprint Substation at Landfill (Alternative D), described on Page 2-14 and illustrated in Figure 3-3 of the RDEIR, was identified as one of the environmentally superior alternatives, SCE is also providing comments with respect to Alternative D.

Alternatives D and J present many similar concerns, as further discussed below, and each also has unique concerns, which are also identified below.

With respect to Alternative D, SCE's comments incorporate by reference the following documents (collectively, referred to by SCE as "SDG&E's DEIR Comment Package"), which were submitted along with San Diego Gas & Electric's (SDG&E) April 10, 2015 DEIR

Comment Letter:

- SDG&E’s “Detailed Comments on the Draft EIR”;
- SDG&E’s “Attachment C Alternatives Consistency Analysis”; and
- SDG&E’s November 21, 2014 letter to the CPUC entitled “Re: CEQA Alternatives Screening Report for San Diego Gas & Electric Company’s South Orange County Reliability Enhancement Project, Application No. A.12-05-020”.

In addition, SCE has reviewed SDG&E’s September 14, 2015 Second Supplemental Testimony (Supplemental Testimony), and concurs with the concerns expressed therein regarding Alternative J.

Alternatives D and J Are Not Feasible Alternatives

The California Environmental Quality Act (Pub. Resources Code § 21000 *et seq.*, CEQA) and its implementing Guidelines (14 CCR § 15000 *et seq.*) require that an EIR describe “a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project...” CEQA does not establish a stringent limitation on the factors which a lead agency may consider when determining whether an alternative is feasible. Rather, CEQA provides that such a decision may rest on “economic, legal, social, technological, or other considerations.” (Pub. Resources Code § 21081(a)(3).) Similarly, the CEQA Guidelines define “feasible” as: “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” (Pub. Resources Code § 21061.1; 14 CCR § 15364.)

As reiterated in SDG&E’s DEIR Comment Package and Supplemental Testimony, and as further discussed below, Alternatives D and J are not feasible as described and cannot be “accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Further, Alternatives D and J do not meet the project objectives.¹

Alternatives D and J Require Review under the CAISO Transmission Planning Process and Tariff Requirements

As explained in SDG&E’s DEIR Comment Package and Supplemental Testimony, both Alternatives D and J would require SDG&E to pursue an interconnection with SCE’s system under SCE’s Federal Energy Regulatory Commission approved Transmission Owner’s (TO) Tariff, and the California Independent System Operator’s (CAISO) Transmission Control Agreement among TOs and the CAISO, and the CAISO Tariff. As described in detail in SDG&E’s November 21, 2014 Letter and Supplemental Testimony, the process for such an interconnection is lengthy, detailed and costly. Such an undertaking would require extensive studies to determine the interconnection impacts to SCE’s system as well as identify any additional facilities that may be required to accommodate such an interconnection.

¹ SCE notes that the other SCE-related alternatives (C1 and C2, described on Page 2-13 and illustrated in Figure 3-3) identified by the CPUC present these same concerns.

Because the CEQA Guidelines define “feasible” as: “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors,” (Pub. Resources Code § 21061.1; 14 CCR § 15364), Alternatives D and J, for the reasons outlined in SDG&E’s DEIR Comment Package and Supplemental Testimony, clearly cannot be accomplished within a reasonable period of time to meet the project objectives. Further, there are numerous technological and legal concerns, discussed in SDG&E’s DEIR Comment Package and Supplemental Testimony, and in SCE’s comments below, which further would render these alternatives infeasible.

The RDEIR Does Not Adequately Describe the Scope of Work Associated with Alternatives D and J

As stated above, the RDEIR does not acknowledge the interconnection process and the resulting identification of additional facilities necessary to accomplish the interconnection. Accordingly, the RDEIR does not consider the “whole of the action” consistent with CEQA Guidelines § 15378 (Pub. Resources Code §21065). Until the system impact and facilities studies that would be required under an interconnection request are completed, the scope of work and activities that would be required to actually implement these alternatives is unknown and cannot be analyzed per CEQA.

Alternatives D and J Would Result in Paralleling SCE’s 230 kV System with SDG&E’s Local 138 kV System

Alternatives D and J would result in paralleling the existing SCE 230 kV system with SDG&E’s local lower voltage 138 kV system. Such a second lower-voltage connection between the SCE and SDG&E systems would significantly complicate the operations of the two utilities’ systems. In the event of an unplanned outage on the existing 230 kV lines, power flow would flow to the 138 kV system. Given the considerably higher rating of the 230 kV line connections, the redirected power flow to the parallel 138 kV lines may be significant and well beyond the capability of the 138 kV system to accommodate, resulting in overloading the lower rated 138 kV facilities. Further, as discussed in the SGE&E Supplemental Testimony, the potential result of such a paralleling scenario could result in restricting the allowable flow on the SCE 230 kV lines in South Orange County, and limiting the transfer capability between the SCE and SDG&E systems, thus reducing the import capability for both utilities.

In order to mitigate this scenario, SDG&E would need to either: 1) radialize its 138 kV system, (i.e., some portion of SDG&E’s load would be served only by SCE’s 230 kV system); or 2) reinforce its existing 138 kV system to carry the significantly higher loading in the event of the interruption of the 230 kV interconnection with SCE. The RDEIR does not address either of these mitigations or the potential scope of work necessary to accomplish them. As presented, Alternatives D and J are thus infeasible. Also by omitting this scope of related work, the RDEIR fails to take into account the “whole of the action”.

The Discussion of Alternatives D and J Do Not Identify the Point of Interconnection and Potential Joint Ownership Issues

RDEIR Figure 3-3, Alternative C1, C2, and D -SDG&E 230-kV Interconnect with SCE, and Figure 3-5, Alternative J - Trabuco Substation Conceptual Site Plan, raise questions with respect to which transmission and substation facilities would be owned by which utility due to the fact it is unclear whether the RDEIR identifies a feasible interconnection point. Further, because the interconnection point has not been clearly identified and the requisite studies have not been completed, the RDEIR fails to account for the entire scope of work necessary to accomplish these alternatives. As noted in SDG&E's Supplemental Testimony, typical interconnections between one utility and another would include some type of revenue metering at the point of change of ownership; the RDEIR does not appear to account for this with respect to the size and scope of such equipment, or where it would be located (e.g., at the substation or on the transmission line). Furthermore, from a feasibility perspective, the alternatives' potential interconnection issues are further complicated by the fact that such interconnections could likely require some type of joint ownership agreement between SCE and SDG&E with respect to the facilities that would be ultimately interconnected in order to delineate roles and responsibilities between the two utilities. The utilities would likely need such an agreement to determine operations and maintenance responsibilities, as well as such complicated matters as determining which utility would have responsibility for which facilities vis-à-vis applicable state, regional and federal reliability standards and regulations. Lastly the RDEIR does not identify nor analyze the increased physical space requirements, such as increased spacing between certain equipment and additional fencing, often necessitated by a single facility containing components owned and operated by two separate utilities.

The Alternatives Are Not Clear Regarding Which SCE Transmission Lines Would Be Interconnected and Alternative J Appears to Propose a Tap

It is unclear in the RDEIR Alternatives D and J descriptions and figures whether the alternatives will tap or loop in one or more of the nearby SCE 230 kV lines. For example, the description of Alternative D states as follows: "Both SDG&E and SCE transmission lines are located within this corridor. Power would be provided to the new substation from SCE's Serrano-SONGS 230-kV line." As illustrated in Figure 3-3, Alternatives D only discusses the loop of SCE's Serrano - SONGS 230 kV line (one line only, as stated "... (SCE's) existing Serrano - SONGS 230-kV line. ...") into the alternative's proposed substation. There is no discussion of the connection of SCE's other Serrano - SONGS 230 kV line. Based on what is discernable in the limited information in the RDEIR, it appears that this alternative would result in SCE's Serrano - SONGS lines crossing SCE's Santiago - SONGS 230 kV lines. SCE prefers to avoid such crossings as they are difficult to design and construct.

The RDEIR's description of Alternative J states as follows: "A new underground, double-circuit 230-kV transmission line segment (approximately 0.5 miles long) would be constructed within new ROW that would loop the new substation into SCE's Santiago-SONGS 230-kV line." Similar to Alternative D, the RDEIR does not indicate which SCE Santiago-SONGS line would be connected. There is no description of what to do with the second SCE Santiago - SONGS 230 kV line. Confusing matters more is the fact that the smaller inset figure on Figure 3-5 shows that two SCE 230 kV lines depicted in pink would be connected to the substation, but there is also a line depicted in purple and labeled as an "(e)xisting SCE 230 kV

line”. It is unclear what line characterized as the “(e)xisting 230 kV line” on the inset figure is. Will it remain energized or will it be removed? SCE believes that this part of figure should be clarified.

Assuming the “(e)xisting SCE 220 kV “line in Figure 3-5 is to be removed, please note that SCE would not terminate any 230 kV lines into a single bus (a ring-bus arrangement) termination, as shown in the electric single line diagram depicted on the proposed expanded Trabuco Substation on Figure 3-5. SCE’s design standard requires that 230 kV lines be terminated into a breaker-and-half or a double breaker configuration for reliability purposes. To be in compliance with SCE design standards, more circuit breakers and potential larger space would be needed within the substation, which are not identified in the figure. It is unclear if the assumptions about the size of the substation in the figure take into account this extra scope of work.

Not until such important scope determinations and clarifications are made can the feasibility of these alternatives be determined.

The RDEIR Lacks Sufficient Description of Alternatives for a Meaningful Environmental Analysis

Just as the RDEIR fails to provide the entire potential scope of work and to accurately depict the challenges of Alternative J (and Alternative D and other SCE-related Alternatives) to meet the project objectives, the RDEIR also understates the environmental impacts associated with the additional work needed to fully construct Alternative J. In fact, the RDEIR concludes that environmental impacts associated with Alternative J would be equal to or less than those of the Proposed Project in every respect. Yet that conclusion is not supported by quantitative and qualitative analyses in the RDEIR. Note, the DEIR was similarly flawed with respect to its determination that Alternative D was an Environmentally Superior Alternative.

The RDEIR’s designation of Alternative J as the Environmentally Superior Alternative is predicated on a set of unsubstantiated assumptions and an incomplete description of all of the alternative’s necessary components. A more accurate conclusion regarding Alternative J is that the alternative may not be environmentally superior to the Proposed Project once all potential scope is identified and all potential impacts are considered, even if Alternative J were feasible. At a minimum, all potential impacts associated with every component of this alternative would have to be more fully analyzed to support a complete comparison of Alternative J against the Proposed Project.

Further, specifically in regards to cultural resources, the RDEIR appears to be focused on avoiding impacts to the Capistrano Substation. However, the conclusion that Alternative J is environmentally superior to the Proposed Project cannot be made by only focusing on Capistrano Substation cultural resources impacts. It does not appear that any record searches or surveys were conducted for Alternative J with respect to the loop-in of the Trabuco Substation to SCE’s Santiago-SONGS 230kV line. At this time, it is unknown if cultural resources exist within the loop-in alignment(s), and if so, if those resources could be avoided. Furthermore, it is unknown if any additional work would be required by SCE to accommodate the proposed loop-ins. Accordingly, the conclusion that Alternative J is the Environmentally Superior Alternative for

Cultural Resources is premature and without sufficient analysis of the additional impact areas.

Conclusion

In conclusion, the analysis of Alternative J in the RDEIR does not account for technical limitations and feasibility concerns. In addition, the RDEIR also fails to account for and analyze the environmental impacts for a large amount of necessary work associated with Alternative J (assuming it were feasible), as well as additional work necessary to construct any of the other SCE project alternatives – work that could lead to additional undisclosed environmental impacts. Given these errors, the RDEIR’s conclusion that Alternative J would be environmentally superior to the Proposed Project is not supported by the evidence. That conclusion should be revised in the Final EIR to more accurately account for the limitations and impacts associated with this and the other SCE project alternatives.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Burhenn', with a long horizontal line extending to the right.

Thomas Burhenn

DEPARTMENT OF TRANSPORTATION

DISTRICT 12

3347 MICHELSON DRIVE, SUITE 100

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September 23, 2015

Mr. Andrew Barnsdale
California Public Utilities Commission
RE: SOCRE Project
c/o Ecology and Environment, Inc.
505 Sansome Street, Suite #300
San Francisco, CA 94111

File: IGR/CEQA
SOCRE
SCH#: 2013011011
Log #: 3132C
I-5 PM 4.067, 9.593, 10.296

Dear Mr. Barnsdale:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the proposed South Orange County Reliability Enhancement (SOCRE). The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. Caltrans is in receipt of the Recirculated Draft Environmental Impact Report (Recirculated DEIR) for SOCRE, which includes a new proposed alternative called Trabuco Alternative. This proposed project is located in proximity to Interstate 5 (I-5) and State Route 74 (SR-74). **Caltrans is a responsible agency** on this project, and has the following comments:

- What is the potential impact of heavy duty oversized trucks on Caltrans facilities during the construction period?
- The applicant should apply for permit/aerial right-of-way (R/W) including vertical clearance approval for the proposed project.
- Contractors should avoid the SR-74/I-5 Interchange during construction.
- Transmission line poles should not fall in the area proposed for the future widening of any project.
- Traffic Control Plans that have impacts on Caltrans facilities prepared by contractors working for San Diego Gas & Electric (SDG&E) should be approved by Caltrans.
- Advance Notices should be given to travelling motorists for the proposed lane closures.
- Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any

Mr. Barnsdale
September 23, 2015
Page 2

work within the Caltrans R/W prior to construction. Please refer to Caltrans Encroachment Permits Manual for more information.
<http://www.dot.ca.gov/hq/traffops/developserv/permits>

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (949) 724-7677. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please do not hesitate to call Leila Carver at (949) 756-7827.

Sincerely,



MAUREEN EL HARAKE
Branch Chief, Regional-Community-Transit Planning
District 12

c: Scott Morgan, State Clearinghouse
Mahesh Bhatt, Caltrans District 12 Traffic Operations – Permits
Farid Nowshiravan, Caltrans District 12 Traffic Operations – Permits

From: Hill, Albert <albert.hill@cpuc.ca.gov>
Sent: Thursday, September 24, 2015 4:28 PM
To: Barnsdale, Andrew; SOCRE CEQA; Lukins, Chloe; Abhulimen, Joseph A.; Mee, Charles; 'ATrial@SempraUtilities.com'; 'RGiles@semprautilities.com'; 'richard@WorkEnviroLaw.com'; Moldavsky, Edward
Subject: A1205020 RDEIR Supplemental Comments
Attachments: Attachment (ORA's Supplemental Comments).pdf; ORA's Supplemental Comments.pdf

Please find attached ORA's Supplemental Comments on the RDEIR. ORA requests that SDG&E indicate if the attached diagram is, in its view, confidential by COB tomorrow. If it is not so designated, these comments, including the diagram, will be served on the service list of A.12-05-020.

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