SDG&E TL 6975 San Marcos to Escondido Project (A.17-11-010)
Energy Division Data Request #4 Date July 25, 2018
SDG&E Response #4 Date August 7, 2018

REPORT OVERVIEW

On March 16, 2018, the CPUC deemed the application and PEA for the TL 6975 San Marcos to Escondido Project (A.17-11-010) complete. The Energy Division has required additional data to prepare a complete and adequate analysis of the potential environmental effects of the Project, in accordance with the requirements of CEQA.

Request No.	DATA REQUEST	SDG&E RESPONSE
1	Provide information on any telecommunication facilities present within SDG&E's right-of-way for TL 6975. The term "facilities" is meant to include any conductors/cable, connection boxes, etc. This information will include owner/operator, type of lease or operating agreement, and expiration of agreement, as well as information on the type of service carried by each facility (e.g., telephone, cable television, DSL, etc.) and material composition of the conductor/cable (i.e., copper, fiber optic, etc.).	There are both AT&T and Cox telecommunication facilities within the Proposed Project right-of-way. Please see below for more information: • AT&T o Type of agreement - License Agreement o Expiration - Either party may terminate agreement with 30 days prior written notice; Licensee may terminate upon 30 days written notice and removal of equipment; Owner may terminate in whole or in part in event of Licensee's default or abandon pole and offer to Licensee. o Type of Service carried – SDG&E believes telephone and cable television however, this question should be directed to AT&T to confirm the type of services they carry o Material composition – SDG&E does not have this data since these attachments were made prior to SDG&E capturing the type of material. This question should be directed to AT&T • Cox Communications o Type of agreement - License Agreement o Expiration - Agreement shall continue for 3 years and thereafter from year to year unless cancelled by either party o Type of Service carried – SDG&E believes telephone and cable television however, this question should be directed

Request No.	DATA REQUEST	SDG&E RESPONSE
		to Cox Communications to confirm the type of services they carry o Material composition – SDG&E does not have this data since these attachments were made prior to SDG&E capturing the type of material. This question should be directed to Cox Communication
2	Provide copies of reports for previous cultural resources investigations conducted within ¼-mile of the project footprint.	SDG&E has copies of reports for seven cultural resources investigations within ¼ mile of the project which were conducted for SDG&E projects and will be provided to the CPUC's cultural resources specialist under confidential cover as soon as a confidentiality declaration has been completed and signed in accordance with Decision (D) 17-09-023. SDG&E does not have copies of reports for additional cultural resources investigations conducted within ¼-mile of the project footprint. These confidential reports must be requested directly from the South Coastal Information Center (SCIC) by the CPUC's qualified consultant.
3	To further substantiate the results of the eligibility evaluation of the two substations in the Historical Resource Inventory and Evaluation Report (Yates *et al* 2018), provide information demonstrating that engineering documentation was reviewed, including identifying the engineers to establish lack of eligibility under Criteria B/2 or C/3.	SDG&E Substation Engineering does not typically archive original drawings for substations over the long term. Instead, substation plans are updated to reflect development episodes that result in substantial modifications, and older drawings are discarded. Although historic aerial photographs indicate that a smaller substation facility was present at the site of today's Escondido Substation by 1953, the earliest information available for that substation dates to 1972. Although a portion of today's San Marcos Substation is visible in a 1970 aerial photograph, the earliest information available to SDG&E for that substation dates to 1972. Both of the 1972 data sources credit the same engineer, listing his last name and his first name initial only. SDG&E was not able to obtain any additional archival information on the engineer however SDG&E's consultant will conduct due diligence historical research to determine if the engineer has any historical significance. In the report and the DPR forms, the substation evaluations will be updated as appropriate to include this information.
4	The information provided in Response #9 to Data Request #3 is not sufficient to calculate the volume of excavation for the	Please see below for more information to calculate the volume of excavation for the retaining walls proposed at locations 55, 60 and 61.

Request No.	DATA REQUEST	SDG&E RESPONSE
	retaining walls propose at pole locations 55, 60, and 61. Provide the additional information to complete these calculations.	Location 55: Cut: 98 cy Fill 663 cy. Net fill: 565 cy. Permanent ground impact: 4,682 sf. 15' Max height, 138' in Length. Location 60: Cut: 0 cy. Fill: 1,118 cy. Net Fill 1,118 cy. Permanent ground Impact: 3,368 sf. 19' Max Height 144' in length Location 61: Cut: 6 cy. Fill 983 cy. Net Fill: 977 cy. Permanent ground Impact: 4,019 sf. 17' Maximum Height 145' in Length
5	Item #17 in Data Request #3 requested a copy of the helicopter best management practices (BMP's) to include in the Project's CEQA administrative record. This was not provided in SDG&E response package; provide this document. Please also provide an explanation of how adherence to the BMPs would address or ameliorate potential CEQA impacts.	Please see Attachment 1 for the "SDG&E Helicopter Aviation Operations Manual." SDG&E is able to assist with clarifying its helicopter best management practices for the purposes of assessing impacts from a CEQA perspective; however, as the Lead Agency, the CPUC makes the ultimate determination with regards to significance of the impact determinations.

SDG&E TL 6975 San Marcos to Escondido Project (A.17-11-010)
Energy Division Data Request #4 Date July 25, 2018
SDG&E Response #4 Date August 7, 2018

Request No.	DATA REQUEST	SDG&E RESPONSE
6	Please confirm that references to the 636 ACSS/AW in the PEA Project Description should be ACSR/AW. Does this apply to other conductors referenced in the PEA Project Description? If not, specify which ones should be revised.	Both ACSR and ACSS conductors are being used on this project. The referenced information in the Project Description is correct for the conductor types anticipated to be used.
7	PEA Project Description Section 3.5.4.1, Above-Ground Installation, states that the distance between conductors would be approximately 9 feet. Is this referring the relative position of the conductors on a pole?	Yes, this distance is referring to the vertical separation between the 69kV conductors. The separation varies by pole top configuration. Nine feet is the largest separation used on the poles being installed.
8	In Corrected Table 3-10 provided as Attachment 6 to SDG&E response packet to Data Request #1, the original number in the "# of Days" column for "Foundation Construction (micropile)" was deleted without explanation and not replaced. Provide information as to why the cell should be blank or what should replace the deleted information. If the assumption is that the data would be the same as that for [Pier] Foundation Construction, provide a note indicating that.	No micropile foundations are proposed at this time, and therefore, this information was deleted.
9	Provide information on what the CPUC General Order 95 vegetation clearance requirements could be for the types of poles proposed for the Project.	Public Resources Code (PRC) 4292 includes requirements for vegetation clearing around poles. Vegetation clearing is only required when "Non-Exempt" hardware is in use on the pole. The Proposed Project is a 69-kV line and usually the only hardware that requires pole brushing are distribution switches. In some cases, the primary distribution underbuild could also have hardware, and those poles would require a 10-foot radius around each pole in state responsibility areas (SRAs). SDG&E brushes for fuses, lightening arrestors, switches, split bolts and hot line clamps. General Order 95 requires radial clearance of bare line conductors from tree branches or foliage within 18 inches. Within High or Very High Fire Threat Zones, radial clearance of bare line conductors from vegetation is required within 48 inches of the pole.

SDG&E TL 6975 San Marcos to Escondido Project (A.17-11-010)
Energy Division Data Request #4 Date July 25, 2018
SDG&E Response #4 Date August 7, 2018

Request No.	DATA REQUEST	SDG&E RESPONSE
10	For the CEQA administrative record, provide a copy of SDG&E's "current construction and operation practices" referenced in the discussion of Duct Bank Installation in PEA Project Description Section 3.7.8.5, Belowground Distribution Line Construction". Provide explanation as to how this would address CEQA impacts potentially resulting from this work.	SDG&E has provided project-specific information regarding its proposed construction and operation practices for the Proposed Project, which supersede any "current construction and operation practices." All construction and operation practices are consistent with existing applicable laws and regulations (i.e., general orders). Per Attachment 2, Revised PEA Project Description, SDG&E has removed this more general reference in the Proposed Project environmental document to clarify that the project-specific construction and operation practices described in the PEA Project Description should be used for the baseline condition. Because this language has been removed from the Project Description, no additional explanation regarding how the standards/practices would address CEQA impacts has been provided, as the CEQA analysis should be based on the more detailed project-specific information regarding construction and operation practices.
11	PEA Project Description Section 3.8.1, General Project Operation and Maintenance Activities and Practices, makes reference to SDG&E's existing operations and maintenance protocols and procedures. Provide the document for the CEQA administrative record and explain how it would address potential CEQA issues.	SDG&E has provided project-specific information regarding its proposed operation and maintenance practices for the Proposed Project, which supersede any "operations and maintenance (O&M) protocols and procedures." All O&M procedures are consistent with existing applicable laws and regulations (i.e., general orders). Per Attachment 2, Revised PEA Project Description, SDG&E has removed this more general reference in the Proposed Project environmental document to clarify that the project-specific O&M protocols and procedures described in the PEA Project Description should be used for the baseline condition. Because this language has been removed from the Project Description, no additional explanation regarding how the standards/practices would address CEQA impacts has been provided, as the CEQA analysis should be based on the more detailed project-specific information regarding construction and operation practices.

ATTACHMENT 1: SDG&E Helicopter Aviation Operations Manual

ATTACHMENT 2: Revised PEA Project Description