



California Public Utilities Commission



September 9, 2021

San Diego Gas and Electric Company
Attn. Melinda Kimble
Project Manager
8315 Century Park Ct.
San Diego, CA 92123

RE: Notice to Proceed Request No. 1 for the San Marcos to Escondido Tie Line 6975 Project (D.20-09-034)

Dear Ms. Kimble:

On March 3, 2021, San Diego Gas and Electric Company (SDG&E) submitted formal Notice to Proceed Request No. 1 (NTPR-1) to the California Public Utilities Commission (CPUC) seeking the authority to proceed with a portion of the construction of the San Marcos to Escondido Tie Line (TL) 6975 Project (Project). SDG&E submitted a revised NTPR-1 on September 2, 2021, in response to CPUC's request to remove a component of Segment 1 from NTPR-1 based on the requirements of pending mitigation measures.

The revised NTPR-1 was followed by an amended NTPR-1 which included verification of the completion of preconstruction surveys conducted at four known archaeological sites, pursuant to MM CUL-6. I confirm that you have adequately completed the pre-construction surveys consistent with MM CUL-6. Further documentation and efforts are required to complete the final reporting and disposition of collected artifacts consistent with MM CUL-6, however this may be completed concurrent with construction. Please note that further grading work or other improvements in the locations subject to MM CUL-6 may require additional survey.

CPUC evaluated the Project in accordance with the California Environmental Quality Act (CEQA) in an Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse Number 2019049009, January 2020). A Permit to Construct (PTC) for the Project was granted by the CPUC on October 5, 2020 (Decision 20-09-34). NTPR-1 seeks permission for SDG&E to begin the construction of certain Project activities which include rebuilding an existing 69 kV power line west of San Marcos Substation, constructing a new 69kV power line from Melrose Tap to Meadowlark Junction and reconductoring an existing line from Meadowlark Junction to Escondido Substation, consistent with descriptions in the IS/MND and further clarified below.

NTPR-1 work activities will primarily take place within the cities of San Marcos and Escondido and unincorporated areas in northern San Diego County, California. However, small portions of work along Segments 1 and 2 will occur within the cities of Vista and Carlsbad. SDG&E's stated purpose for the Project is to (1) mitigate violations of the North American Electric Reliability Corporation (NERC) reliability criteria; (2) eliminate existing congestion in the Escondido/San Marcos area; and (3) improve power service reliability by providing an additional feed to the existing San Marcos substation.

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NTPR-1 addresses proposed construction of the following components of the Project (as described in detail in the Final IS/MND, Appendix A, Chapter 2, *Project Description*) and summarized below:

- Segment 1 Rebuild – rebuilding approximately 1.8 miles of an existing 69 kilovolt (kV) power line from the existing San Marcos Substation to Melrose Tap, including the replacement of existing wood poles with new steel pole structures, removal of certain existing pole structures from use, and work in the existing San Marcos Substation to accommodate the new circuit. A portion of Segment 1 is excluded from this Notice to Proceed, as discussed below.
- Segment 2 New Build – addition of approximately 2.8 miles of a new single circuit 69 kV overhead power line from the end of Segment 1 to the existing Meadowlark Junction within SDG&E's existing 150-foot easement.
- Segment 3 Reconductoring/Re-energizing – Reconductoring approximately 7.4 miles of a de-energized power line (TL13811/13825) from Meadowlark Junction to the existing Escondido Substation, including work within the existing Escondido Substation to accommodate the new circuit.
- Operation of three dedicated temporary material storage and staging yards and two auxiliary yards:
 - Carlsbad Business Park
 - San Elijo Recycling Plant
 - Rock Springs Road
 - Keanry (auxiliary)
 - Icon 3PL Materials Yard (auxiliary).
- Grading, Retaining Walls, and Access Road Improvements – Includes vegetation clearing, tree trimming (but no tree removal), and improvements to existing access roads. Four new access spur roads are anticipated for Structures 68, 70, 77, and 78.
- Overhead Power Line Construction and Removal – Installation of steel power poles on concrete foundations or direct-buried into augered holes by crane or helicopter. Stringing equipment will be used to install conductor from structure to structure; helicopters may also be used for stringing. Existing pole components will be removed, and existing pole foundations will be removed to approximately 2.0 feet below final grade. Direct bury poles will be removed completely, with the holes backfilled with clean fill, soils, or decomposed granite.

This approval of NTPR-1 ***does not include the following***:

- Installation of the Project's Alternating Current (AC) Mitigation System, potentially including five deep well locations and three coupon test stations (subject of NTPR-2, submitted August 4, 2021); and,
- The portion of Segment 1 in the vicinity of the intersection of West San Marcos Boulevard and Discovery Street. Specifically, the following elements are not included in NTPR-1, but will be subject of a forthcoming Notice to Proceed request:
 - Structure 8
 - Structure 8 guard structure
 - Structure 10
 - Structure 11
 - Structure 11 guard structure
 - Structure 11 underground distribution line
 - Structure 12.

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SDG&E submitted the following items in accordance with Applicant Proposed Measures (APM's) and mitigation measures as described in the Mitigation Monitoring, Reporting, and Compliance Program (MMRCP) included in the IS/MND, for actions proposed under NTPR-1:

Applicant Proposed Measure / Mitigation Measure(s)	Implementing Actions	Status/Determination
MM BIO-1 NCCP/LEHCP Mitigation Commitment/Proof of Mitigation Credits	Prior to any NTP approval, SDG&E provides a written commitment to its 1995 Subregional Natural Community Conservation Plan (NCCP) or 2017 Low Effect Habitat Conservation Plan, as well as proof of sufficient mitigation credits under each plan to cover project-specific impacts to biological resources.	The commitment and proof of credits was received on July 6, 2021.
MM CUL-3 Cultural Resources Monitoring Plan	Prepare and implement a project-specific Cultural Resources Monitoring Plan (CRMP) describing the procedures for managing cultural resources discovered during construction activities.	The CRMP was submitted and determined to be complete on March 18, 2021.
MM CUL-6 Cultural Resources Pre-construction Survey and Surface Collection	Prior to the start of Project-related ground disturbing activities, pre-construction surveys of the four archaeological sites bisected by existing access roads shall be conducted to map and collect all artifacts located within the roadbeds. Artifact mapping shall be conducted using a handheld GPS unit capable of sub-meter accuracy, and the final disposition of the artifacts shall be determined by SDG&E in coordination with the San Luis Rey Band of Mission Indians.	A memorandum documenting implementation of pre-construction survey was submitted on September 8, 2021, as an attachment to the amended NTPR-1. CPUC confirms completion of the fieldwork component as part of this letter, allowing construction to proceed. The CPUC awaits final reporting and further coordination to determine the final disposition of the artifacts.
MM GEO-1 Supplemental Geotechnical Engineering Plan/Report	Prepare and incorporate recommendations of the supplemental geotechnical report, along with those presented in the Geotechnical Investigation Report by GEOCON, Inc/, and the AC Interference Analysis & Mitigation System Design by ARK Engineering & Technical Services, in the design	The supplemental geotechnical report was submitted and determined to be complete on May 18, 2021.

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	and construction of the project components subject to the California Building Code.	
MM PALEO-3 Paleontological Resources Mitigation and Monitoring Plan	Prepare and implement a project-specific Paleontological Resources Mitigation and Monitoring Plan (PRMMP) complying with the recommendations of the Society of Vertebrate Paleontology (SVP).	The PRMMP was submitted and determined to be complete on July 15, 2021.
APM HAZ-1 Health and Safety Plan	Prepare and implement a project-specific Health and Safety Plan (HASP) in accordance with applicable federal and state occupational standards.	The HASP was submitted on December 6, 2020. No approval from CPUC was required.
MM HAZ-1 Soil and Dewatering Management Plan	Prepare and implement a project-specific Soil and Dewatering Management Plan (SDMP) describing the procedures for managing excavated soil and groundwater generated from dewatering activities.	The SDMP was submitted and determined to be complete on February 18, 2021.
MM NOI-1 Construction Noise Reduction and Mitigation Plan	Prepare and implement a project-specific Construction Noise Reduction and Mitigation Plan (CNRMP) describing the procedures for managing construction-related noise in accordance with MM NOI-1 and applicable noise ordinances, including mailed notification to residents within 100-feet of construction.	The CNRMP was submitted and determined to be complete on September 1, 2021. Notification to affected residents is pending.
MM US-1 Preliminary Construction and Demolition Debris Register	Prepare and submit Construction and Demolition Debris Register (CDDR) to CPUC for review. The preliminary CDDR documents how the project will achieve waste diversion percentages.	The CDDR was submitted and determined to be adequate on March 3, 2021.
MM WIL-1 Construction Fire Prevention Plan	Prepare and implement a project-specific Construction Fire Prevention Plan (CFPP) in consultation with appropriate fire departments, as described in MM WIL-1.	The CFPP and supplemental information including documentation of fire department consultation was submitted to CPUC and determined to be complete on February 18, 2021.

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SDG&E is authorized to proceed with Project construction provided that:

- All construction activities are carried out in accordance with the methods and conditions described in NTPR-1, and all APMs, mitigation measures, compliance plans, and permit conditions described in the MMRCP are implemented. Some measures are on-going and/or have time-sensitive requirements and shall be implemented prior to and during construction, as applicable. Updates on implementation of the measures shall be provided to the CPUC throughout construction. A copy of the MMRCP and the NTPR-1 approval shall be maintained on site for the duration of construction at the Project site;
- Updates (e.g., reports, mapping) demonstrating that all preconstruction biological resource surveys (plant and wildlife) have been conducted, sensitive resource populations identified, and flagged/fenced, and jurisdictional areas identified and flagged as required in APM BIO-5, APM BIO-6, and MM BIO-3 shall be provided to the CPUC prior to commencing construction activities; and,
- The following implementing actions are undertaken and, as applicable, shall be completed by SDG&E prior to the start of construction:
 - Maintain copies of all permits, compliance plans (e.g., Storm Water Pollution Prevention Plan, Construction Fire Prevention Plan, Water Reclamation and Recycling Permit etc.) on-site for the duration of the construction activities.
 - Provide Worker Environmental Awareness Training to all Project personnel, including construction and monitoring personnel. SDG&E will maintain training logs at the construction site and make those available to the CPUC or designated compliance monitor upon request in addition to including updates of trainings conducted with weekly reports. Although not specified as part of MM CUL-2, PALEO-1, PALEO-2, and MM WIL-1, the CPUC requests the opportunity to review the Worker Environmental Awareness Training materials as soon as these are available.
 - In accordance with APM NOI-1, provide confirmation if whether a variance from the Cities of Carlsbad, Escondido, San Marcos, or Vista, or the County of San Diego will be required to construct any portion of the Project. If a variance request has been submitted, provide a copy/copies to the CPUC.
 - In accordance with APM NOI-2 and MM NOI-1, provide proof of notification that SDG&E has informed residences (and other noise-sensitive receptors) within 300 feet of construction areas, (or 100 feet from noise-sensitive receptors pursuant to MM NOI-1) prior to the start of construction, consistent with the timings in the approved CNRMP. The CPUC requests documentation/notification include the noise complaint hotline (telephone number) the schedule for activities potentially affecting receptors and a basic outline of potential nuisance issues.
 - In accordance with MM NOI-2 and MM NOI-3, confirm if blasting is anticipated to be required for the Project's construction. If so, provide documentation of efforts to notify of impacted property owners.

Sincerely,

Trevor Pratt

Trevor Pratt
Project Manager
California Public Utilities Commission
Energy Division – Infrastructure Permitting and CEQA Section

cc: D. Davis, ESA
Christine Root, CPUC

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