STATE OF CALIFORNIA GAVIN NEWSOM, Governor

PUBLIC UTILITIES COMMISSION

300 CAPITAL MALL, 5th FLOOR SACRAMENTO, CA 95814



April 9, 2020 VIA MAIL and EMAIL

Ms. Keri Cuppage, CPM, Environmental Compliance Manager San Diego Gas & Electric Company 8330 Century Park Court San Diego, CA 92123-1530

Re: California Public Utilities Commission (CPUC) Review of Artesian Substation Expansion Project – San Diego Gas & Electric Company (SDG&E) Minor Project Refinement (MPR) Request #2

Dear Ms. Cuppage,

The CPUC Infrastructure Planning and California Environmental Quality Act (CEQA) Energy Division has conducted a review of Artesian Substation Expansion Project (Project) – SDG&E MPR Request #2 submitted to the CPUC on April 2, 2020. The request would add additional minor modifications to the existing Bernardo and Rancho Carmel substations to facilitate a connection to the new underground getaways. Although, the MPR #2 requests a modification to the permitted scope of work for the Project; as noted in the MPR Request #2, minor modifications were (in general) contemplated and analysed in the Project's IS/MND (published February, 2018).

The MPR Request #2 identifies additional activities including replacement of the existing oil circuit breaker (CB) with a new gas CB and removal of oil containment structure (no longer needed) at the Bernardo substation. Additionally the replacement of an existing gas CB with a new gas CB at the Rancho Carmel substation is specified in the MPR Request #2. The new gas CB will utilize sulfur hexafluoride (SF₆), as with the new CBs currently being installed (as part of the Project) at the Artesian Substation.

SDG&E states in the MPR Request #2 that these minor modifications (included in the request) are all located within the boundaries of the existing Bernardo and Rancho Carmel substations, and no biological, aquatic, or cultural resources are present or could be present at these locations. As only surface excavation is required for removal of the oil containment structure at the Bernardo substation, the requested work is not anticipated to have any effect on subsurface resources.

Replacement of an existing gas CB with a new gas CB at Rancho Carmel substation would result in reduced GHG emissions, due to the lower leak rate for the new equipment. Although the installation and operation of a new gas CB (at the Bernardo substation) would slightly increase emissions of SF₆, a greenhouse gas, these emissions would be well below the threshold, identified in the IS/MND. The proposed construction is anticipated to have a negligible effect on the overall construction schedule, with no impact that would warrant a change to the health risk assessment completed for the project.

The CPUC/Environmental Science Associates (ESA) technical staff have evaluated the request and have determined that the activities described in the MPR Request #2 would not result in any new impacts nor any changes to the impact conclusions provided in the IS/MND with implementation of relevant APMs and MMs listed in the MMRCP.

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Based on the information provided, the CPUC believes that the MPR Request #2 would not trigger additional permit requirements, create a new significant impact, nor increase the severity of a previously identified impact. Therefore, MPR Request #2 is considered acceptable and is approved by the CPUC.

Sincerely,

Patricia Kelly Project Manger

Energy Division, CEQA Unit

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cc: Mary Jo Borak, CPUC Energy Division Maria Hensel, Julie Watson, ESA