

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



September 16, 2016

VIA MAIL AND EMAIL

Ms. Brittney L. Lee
Regulatory Case Administrator
San Diego Gas & Electric Company
8330 Century Park Court
San Diego, CA 92123-1530

Re: Comments on Proponent's Environmental Assessment San Diego Gas & Electric Company's
(SDG&E's) Artesian 230kV Substation Expansion Project (A.16-08-010)

Dear Ms. Lee:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has conducted a review of San Diego Gas and Electric's (SDG&E) Proponent's Environmental Assessment (PEA) for SDG&E's proposed Artesian 230kV Substation Expansion Project (Project) according to the CPUC's PEA Checklist for Transmission Line Projects (October 7, 2008). The Energy Division finds that the PEA does not contain sufficient information to satisfy the requirements of the Commission's Information and Criteria List (see Attachment 1, PEA Review for a list of deficiencies), and recommends that the PEA be supplemented to include the identified information in order for the application to be deemed complete.

Please note that the Energy Division is aware that application A.16-08-010 is for a Permit to Construct (PTC) pursuant to General Order 131-D which involves a more limited review of a project's need and objectives than for a Certificate of Public Convenience and Necessity (CPCN). This more limited review is for the purpose of developing appropriate project alternatives should the proposed Project's impacts not be mitigable to a less-than-significant level. Therefore, the attached list of deficiencies, with respect to the Project need and objectives, is intended to allow the Commission to fully disclose the Project need and evaluate appropriate alternatives, if necessary. The Energy Division has not determined at this time whether a Mitigated Negative Declaration is appropriate, or whether an Environmental Impact Report will be necessary.

In addition to the aforementioned information, the Energy Division may request additional data, as necessary, to prepare a complete an adequate analysis of the potential environmental effects of the Project in accordance with the requirements of CEQA.

Please do not hesitate to call me at (415) 703-3221 if you have any questions.

Sincerely,

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

Andrew Barnsdale, Project Manager
Infrastructure Permitting and CEQA
Energy Division

cc: Mary Jo Borak, CPUC Energy Division
Marcelo Poirier, CPUC Legal Division
Julie Watson, ESA

Attachment: PEA Review

Final Proponents Environmental Assessment (PEA) Review

San Diego Gas & Electric Company's Artesian 230 kV Substation Expansion Project

Review of the PEA for San Diego Gas & Electric Company's Artesian 230 kV Substation Expansion Project was based on the CPUC Proponent's Environmental Assessment (PEA) Checklist for Transmission and Substation Projects, October 7, 2008. Based on these criteria, the following additional information is needed in order to deem the application and PEA complete.

Chapter 1: PEA Executive Summary

No comments

PEA Chapter 2: Proposed Project and Purpose and Need

- *Load growth and load forecast*
 1. The pre-filing PEA included a 10 year forecast starting with 2013, but the PEA does not include data from 2014, 2015 and 2016. Please include this information to provide a complete load forecast and support the objectives and purpose of the Proposed Project.
 2. The PEA states that the CAISO analysis indicated N-1 overloads of two transmission lines but provides no indication of the magnitude of overload , nor does it appear that there is an explanation as to what the physical constraints may be that result in the overload or which component of the lines are overloading. Please provide this information. Please also include a complete listing of line normal and emergency ratings as well as normal and N-1 line flows.
- *69kV congestion at Sycamore Canyon Substation as Project Objective*
 1. Please include more information and forecast data regarding reliability violations at Sycamore Canyon Substation in order to further support the objective of the Proposed Project relieving 69kV congestion at the Substation.
- *Proposed Project:*
 1. The CAISO 2014-2015 Transmission Plan identified a need for a second Pomerado-Poway 69kV line with a service date of June 2016. The status for the proposed second Pomerado-Poway 69kV line should be disclosed and discussed, as well as the interaction and effects it

would have with the Proposed Project. If this line is constructed and operational, please indicate so in the system configuration figures in the PEA.

PEA Chapter 3: Project Description

No comments.

PEA Chapter 4: Description and Evaluation of Alternatives

- *Alternative 1. Third Sycamore Canyon -Pomerado 69kV line*
 1. Please provide additional information as to the duration of the solution provided by this alternative.
 2. This alternative requires installation of a System Protection Scheme at Sycamore Canyon to trip third Sycamore Canyon -Pomerado 69kV line under certain contingencies. Please describe these contingencies in detail.
- *Alternative 2. Proposed Project with GIS Substation Design*
 1. This alternative appears to be electrically the same as the Proposed Project: Please include data to support the need for an additional 230-69kV transformer by 2022.
- *Alternative 3. Chicarita 69kV Conversion*
 1. This alternative appears to result in additional load on the Sycamore Canyon 230/69kV transformers. Please clarify this.
 2. Please provide additional information as to the duration of the solution provided by this alternative.

PEA Chapter 5: Environmental Impact Assessment

No comments

PEA Appendices

No comments