PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 28, 2018 VIA MAIL AND EMAIL

Mr. Tim Lyons
Regulatory Case Manager II
San Diego Gas & Electric Company
8315 Century Park Court
San Diego, CA 92123

SUBJECT: Data Request #3 for the SDG&E San Marcos to Escondido TL6975 69kV Project Initial Study

Dear Mr. Lyons:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review of San Diego Gas & Electric Company's (SDG&E)'s San Marcos to Escondido TL6975 69kV Project (Project), we have identified additional information required in order to adequately conduct the CEQA review. The CPUC requests SDG&E provide the information below (Data Request #3) by July 16, 2018.

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) 703-1966 if you have any questions.

Sincerely,

Lisa Orsaba
Project Manager
Energy Division, CEQA Unit

cc: Lonn Maier, Supervisor
Marcelo Poirier, Legal Division
David D. Davis, AICP, ESA

Attachment:

1) Data Request #3

Data Request #3
SDG&E San Marcos to Escondido TL6975 69kV Project

1. The last sentence of PEA Project Description Section 3.5.3, Poles/Towers, on page 3-9 refer to "current SDG&E standards, including design standards for avian protection". What standards or documentation does this refer to? Provide this information to support the CEQA administrative record. (ESA is in possession of the document, *Reducing Avian Collisions with Power Lines* by the Edison Electric Institute and Avian Power Line Interaction Committee. If this document is an inferred reference in this statement, there is no need to submit it with your response.)

2. Table 3-2 on page 3-8 of the PEA Project Description counts a total of 31 direct-bury poles and 26 pier foundation poles. Based on ESA's review of the Project's GIS information, mapbook, and updated height above ground (HAG) table provided by SDG&E in T. Lyons' e-mail of May 25, 2018, ESA counts a total of 32 direct-bury poles and 25 pier foundation poles. Confirm this count.

3. PEA Project Description Section 3.5.4.2, Below-Ground Installation, at the top of page 3-12, a reference is made to the *AC Interference Analysis & Mitigation System Design Report* by ARK Engineering (2017). Provide this document for the CEQA administrative record.

4. PEA Project Description Section 3.5.4.2, Below-Ground Installation, the discussion states "The report recommends additional AC mitigation methods. Two sections of AC mitigations are proposed to be installed to reduce the pipeline AC density." What are they? Are these Applicant Proposed Mitigations? Provide more clarification.

5. PEA Project Description Section 3.5.4.2, Below-Ground Installation, the discussion states "In addition, two coupon test stations to monitor the pipeline AC density [are] also recommended." Describe coupon test station. Will these stations be part of the Project? If so, provide descriptive information sufficient for CEQA analysis.

6. In SDG&E's Response 16 to Data Request #1, it stated that substation work could occur anytime throughout the construction of the tie line, but would be timed to avoid outages. Once started, what would be the duration of construction activities at the substations?

7. PEA Project Description Section 3.7.1.6, Staging Yards, pages 3-17 and 3-18, it is stated that "The staging areas may be used … for parking and lighting." Describe the anticipated lighting requirements and use at staging yards. If lighting may be used for any other aspect of the Project, please describe those requirements and usage, as well.

8. In Table 3-5 on pages 3-18 and 3-19 of the PEA Project Description, a superscript reference "2" is included in the "Size" column for the Monteil and Rock Springs site and the South Andreasen site, but no Note 2 is included at the bottom of the table. Provide the missing information.

9. It is noted in Project Description Section 3.7.5, Vegetation Clearance, and Table 3-7 on page 3-22 that retaining walls would be installed on an as-needed basis. The same is mentioned in Section 3.7.8.1, Site Preparation for Structure Foundations on page 3-24. As this would involve earth-disturbing activities and permanent impact, provide more information on retaining walls including approximate wall width and heights, depth of foundation, construction methods, and proximity to foundations.

10. In SDG&E's Response 10 to Data Request #1, data was provided describing pier foundation excavations. The data indicated the range of excavation would be from 48 cubic yards for each 8-foot foundation to 167 cubic yards for each 12-foot foundation. However, PEA Project Description Section 3.7.8.2, Concrete Pier Foundations, pages 3-24 and 3-25, states that typical foundations would require approximately 45 to 90 cubic yards of excavation. Which is the more accurate and current data?

11. PEA Project Description Section 3.7.8.2, Concrete Pier Foundations, pages 3-24 and 3-25, makes mention of cable pole foundations. This is the first use of this term in the Project Description. Provide more information/detail on these features.
12. In the PEA Project Description's discussion of Steel Pole Installation for Concrete Pier and Micropile Foundations on page 3-26 indicates that "Helicopters … would be used for installation at Poles 61, 63, 64, and 65." SDG&E's Response 13 to Data Request #1 [and Response #10 in Deficiency Response #2], indicates the potential area for helicopter use is between Poles 63 and 65. Response 13 also indicates that a helicopter could be used in the area of Poles 52 to 54.3. The mapbook indicates no work would occur at Poles 54.1, 54.2, and 54.3. Confirm where helicopter use could occur.
13. In the final paragraph of the PEA Project Description's discussion of Conductor Stringing at top of page 30, it is indicated that it would take "half a day" to pull in three phases of conductor. Be more specific in this use of "half a day". Does this infer 4 hours, 12 hours, etc.?
14. How tall would temporary poles be?
15. In the discussion of Guard Structure Installation on page 3-27 of the PEA Project Description, road crossings are discussed and a distinction is made as to which would have guard structures and which would have traffic control (i.e., flaggers). In reviewing the Project's GIS and mapbook, our count of road crossings did not match that of the PEA. To assist in the analysis, provide a map of road crossings indicating where guard structures or traffic control would be used. Also, would the overcrossing between Poles 6 and 7 be a guard structure or traffic control site?
16. PEA Project Description discussion of Existing Facilities Removal, second paragraph, page 3-28, states the "individual steel members would be cut into smaller sizes". Describe how this would be done. Would it require use of a torch, etc.? Where would it be done?
17. PEA Project Description Section 3.7.3, Helicopter Access, on page 3-21, states that "SDG&E Best Management Practices (BMPs) would be implemented at the helicopter landing areas to reduce potential impacts …" The only landing area known at this time is Palomar Airport. BMPs addressing helicopter use and air quality, hazards, and noise were not found in the respective PEA analysis sections. Describe what BMPs would be deployed at that site. Also, if there is a document describing these BMPs, provide it for the CEQA administrative record.
18. The second paragraph of the discussion of Duct Bank Installation in the PEA Project Description, at the top of page 3-31, states that "All work would be done in conformance with SDG&E's current construction and operating practices." Provide a copy or documented summary of these practices for inclusion in the CEQA administrative record.
19. The discussion of Cable Pulling, Splicing, and Termination in the PEA Project Description, on page 3-31, mentions a "communication cable". This appears to be the first mention of this Project component. Describe this component. What is its purpose? Where would it/they be located?
20. PEA Project Description Section 3.7.6, Erosion and Sediment Control and Pollution Prevention during Construction, on page 3-23 states that "SDG&E would implement its *BMP Manual and Operational Protocols*." Provide a copy for inclusion in the CEQA administrative record. (ESA is in possession of SDG&E's *BMPs Manual for Water Quality Construction* (revised 2011). If this document is the same document, there is no need to submit it with your response.)
21. Provide estimates of water use for Project construction, restoration (e.g. irrigation), and operation.
22. PEA Project Description Section 3.7.7, Cleanup and Post-Construction Restoration, on page 3-23, states that "SDG&E would conduct a final survey to ensure that cleanup activities have been successfully completed, as requires." Describe the requirement(s) and the performance standards. How is the survey documented?

23. PEA Project Description Section 3.8.1, General Project Operation and Maintenance Activities and Practice, on page 3-40, indicates that aerial inspections would be performed annually. SDG&E's Response 14 in Data Request #1 indicates that a helicopter would be used twice a year for routine inspection work. Rectify these statements.

24. PEA Project Description Section 3.8.2, Road Maintenance, on page 3-40, states that SDG&E performs road maintenance as necessary and may require use of motor grader, water truck, and pickup trucks. Provide information about how road maintenance is currently conducted along Segments 1, 2, and 3. Does SDG&E's operations and maintenance protocols specify a schedule?

25. In PEA Project Description Section 3.8.5, Equipment Repair and Replacement, on page 3-41 the text indicates that SDG&E may remove and replace an existing structure with one that is larger and/or stronger. Does SDG&E conduct operations and maintenance pursuant to a separate authority? Would this activity occur as part of this Project? If so, information needs to be provided to adequately describe and assess the activities.

26. In Table 3-13 of the PEA Project Description, note 1 at the bottom of the table does not appear to be tied to any elements of the table. Provide the note.