STATE OF CALIFORNIA EDMUND G. BROWN JR., *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298

March 18, 2016

Ms. Shivani Ballesteros
San Diego Gas and Electric Company
8330 Century Park Court, CP31F San Diego, CA 92123

(via email: SSidhar@semprautilities.com)

SUBJECT: Completeness Review of SDG&E Application (A.15-08-006) and Proponent's Environmental Assessment (PEA) for the Tie Line 649 Wood-to-Steel Replacement Project

Dear Ms. Ballesteros:

The California Public Utilities Commission's (CPUC's) Energy Division Infrastructure Permitting and CEQA section has completed its review of San Diego Gas and Electric Company's (SDG&E's) application and PEA for a Permit to Construct application for the Tie Line 649 Wood-to-Steel Replacement Project. The CPUC has determined the Application/Proponents Environmental Assessment (PEA) contains sufficient information to satisfy the requirements of the CPUC's Information and Criteria List, as well as the PEA Checklist, and was deemed complete on January 25, 2016.

As noted in the January 25, 2016 completeness review letter, the CPUC reserved the right to request additional information. This request for additional information does not constitute a deficiency, but is necessary to complete the California Environmental Quality Act (CEQA) analysis for the subject project. Please note that this determination has been made with the understanding that the CPUC may request additional data, as necessary, to review and analyze the potential environmental effects of the proposed project in accordance with CEQA requirements.

Please direct questions related to this application to me at (415) 703-2168 or connie.chen@cpuc.ca.gov. Please copy the CPUC's consultant, Tom Engels, Horizon Water and Environment, on communications (tom@horizonh2o.com).

Sincerely,

Connie Chen
Infrastructure Permitting and CEQA Section, Energy Division

Att: Attachment A, Data Request No. 1 – March 18, 2016
cc: Tom Engels, Project Manager, Horizon Water and Environment

Administrative

1. Please provide the list of public agencies and other interested parties as well as the parcel and mailing information for properties within 300 feet of the proposed project electronically in Excel format. (Application Appendix C)
2. Please indicate if any public or regulatory agency outreach has occurred since completion of the PEA. If yes, please provide information regarding any agency and public involvement contacts and correspondence to date. Please include names, addresses, phone numbers, and e-mail addresses.

PEA Section 3 - Project Description

1) Complete the table below listing equipment to be used at each work area type and duration. This is to supplement the information provided in the revised PEA Attachment 3-C: Construction Equipment Summary submitted in October 2015.

Activity	Equipment	Duration of Use
Conductor Installation	2 bucket trucks	8-hours per day
Guard Structures at Heritage Road	2 bucket trucks	2-hours per day
Blasting	1 drill;	
Pulling Sites	Same as stringing sites?	
Existing Pole Removal	1 boom truck; 1 bucket truck; 1 hydraulic pole puller	2-hours per pole; X poles per day
Dewatering	1 submersible pump; 1 desiltation tank	
Vegetation Trimming	1 aerial lift truck; 1 chipper trailer; hand-held mechanical equipment (chain saws, weed trimmer, leaf blower, etc.)	

2) How long would construction activities generally take at each pole location and work site? Please complete the table below, which is modified from PEA Table 3-4 on Page 3-25.

Additionally, please specify the total number of workers for each construction phase identified in PEA Table 3-4.

Activity	Approximate Duration (days per site)	Total Duration of Activity (days)	Total Number of Workers
Staging yard set-up/Road refreshing/Vegetation trimming/BMP Installation	N/A	?	
Road Modifications (widening)	?	?	

Micro-Pile Foundation Construction	3?	40	
Pier Foundation Construction	4?	63	
Direct-Buried Construction and Pole Installation	5?	90	
Trenching for Installation of Underground Cables	X days for 20-ft long trench at Pole 18.5; X days for 100-ft long trench between Poles 25 and 26.	3	
Guard Structures at Heritage Road	?	?	
Blasting	?	?	
Stringing Activities (General site anywhere along the alignment)	5?	60	
Stringing Activities near Pole 1	5?	N/A	
Stringing Activities near Pole 10	2?	N/A	
Stringing Activities near Pole 11	?	N/A	
Stringing Activities near Pole 18.1	?	N/A	
Stringing Activities near Pole 18.3	?	N/A	
Stringing Activities near Pole 18.5	?	N/A	
Stringing Activities near Pole 22	?	N/A	
Stringing Activities near Pole 23	?	N/A	
Stringing Activities near Pole 97 (north, east west)	20?	N/A	
Pulling Sites	?	?	
Existing Pole Removal	1 day/ potentially delayed for 30-60 days if third party facilities are present	?	
Transfer conductor/Sagging Activities	?	60	
Demobilization/Clean Up/Road refreshing	N/A	26	
Revegetation	?	?	

3) Identify the sizes, types, and quantity of all generators that would be used, and their duration of use throughout the construction period.

4) Please clarify if PEA Table 3-5 on page 3-26 includes the use of multiple construction teams; would there be 35 total construction personnel throughout the duration of project construction or more? [From PEA Page 3-25: 25 line workers (5 crews of 5), 10 ground workers (5 crews of 2), 1 general foreman, 4 working foreman = 40 construction personnel]

5) Please clarify all nighttime lighting requirements for project construction. PEA Section 3, Project Description page 3-25 states that construction activities may occur at night "on occasion." Section 4-1, Aesthetics page 4.1-17 states floodlights would be used with a portable generator.
   a) How many hours within a 24-hour work day would nighttime lighting be used?
   b) Approximately how many work areas would be lit during the night on any given day throughout the construction period? *For example, approximately X pole work sites, X stringing site(s), and X staging area(s) would require nighttime lighting for up to X hours total, per work day.*
   c) Please provide specifications for the generators to be used for nighttime lighting.
6) PEA Page 3-12 – Please provide a description of how guys, anchorage, and grounding rods would be installed. What equipment would be used for installation? What would be the permanent footprint of these features? Please provide a representative photo of these features.
7) PEA Page 3-19 – What types of materials would be imported and compacted to repair roads? Approximately how much of each type of material (rip rap, gravel, etc.) will be imported? When would these materials be imported (at the start of the project, spread equally throughout the project's duration, or some other timing/project phase)?
8) For each construction phase/activity, what is the estimated total quantity (cubic yards) of waste, including removed poles that would require off-hauling to a recycling or disposal site, and the quantity by phase?
9) When excavated, where would native soil be stockpiled for use in filling the old pole hole? If an old pole is not removed for 60 days, how will stockpiled soil be managed and where would it be stored (see description on PEA Page 3-19)?
10) Clarify the locations that would be reseeded with native plants. Would the immediate area surrounding new poles be kept free of vegetation? If so, where would reseeding occur?

Air Quality/Greenhouse Gas Emissions

11) Please provide an estimate of approximately how much total fossil fuel might be used for the project's construction activities.
12) Please explain (in detail) the calculations used to estimate hauling trips shown in the Trips and VMT table in PEA Attachment 4.3-A Air Quality Modeling Results - CALEEMOD.
   a) Please provide the CALEEMOD file (Excel workbook) used for the PEA analysis.
   b) How does the CALEEMOD Trips and VMT table (PEA Attachment 4.3-A Page 9 of 33) relate to the PEA Attachment 3-C: Construction Equipment Summary and the various trucks

included for each phase? Do hauling trips include equipment deliveries and disposal trips? How many trips are associated with equipment importing vs. exporting?

c) Is there a distinction based on truck type and how they were considered in the estimates of hauling trips listed in the PEA Attachment 4.3-A (Page 9 of 33)? For example, were crew delivery trucks, concrete delivery trucks, and dump trucks, and tractor trailer units (listed in the PEA Attachment 3-C: Construction Equipment Summary) all considered in the hauling trip estimates in the PEA Attachment 4.3-A (Page 9 of 33)? Would they all occur on a daily basis? Further, how were the tractor trailer units considered in CALEEMOD—how many trips were associated with those and were they daily trips or some other frequency? For example, in the PEA Attachment 3-C: Construction Equipment Summary, the Staging Yard Setup/Road Reestablishing phase has a Tractor Trailer Unit and a Dump Truck that would cumulatively result in 6 trips per day; however, in the CALEEMOD Trips and VMT table (PEA Attachment 4.3-A Page 9 of 33), no hauling or other trips are shown for this construction phase. A spreadsheet showing how the hauling trips were calculated would be very helpful in addressing these questions.

d) As an example, upon reviewing the PEA Attachment 4.3-A and the PEA Attachment B: Construction Equipment Summary (Oct. 2015 version), the Pier Foundation Construction phase has a duration of 63 days and 3 trucks associated with it (concrete truck, dump truck, delivery truck—not counting water trucks). It would appear that this would result in an estimate of approximately 189 one-way hauling trips. However, the CALEEMOD results (Attachment 4.3-A Air Quality Modeling Results) shows 79 trips. Please clarify why the CALEEMOD estimate is less.

13) How were worker and vendor trips accounted for in the PEA AQ emission estimates since it appears they weren't included in CALEEMOD (based on Attachment 4.3-A Air Quality Modeling Results)? Was there a separate file that estimated worker and vendor trips? If so, please provide the table.

14) Please complete the table below (italics indicate example text):

Activity	**Number of Poles or Activity Areas Disturbed**	**Area per pole/activity site (square feet)**	**Material Export per pole/activity site (cubic yards by material type)**	**Material Import per pole/activity site (cubic yards by material type)**
Direct Bury	89	314	*9.5 cy of waste debris (old wood pole)*	*2 cy of concrete* *1 cy of gravel*
Micro-Pile Foundation	7	1260	*42.8 cy of unused excavated soil* *10 cy of waste debris (old wood pole)*	*25 cy of concrete* *10 cy of gravel*
Pier Foundation	21	5625	*7.9 cy of unused excavated soil*	*15 cy of concrete*
Access Road Modification	4	1000	*N/A*	*XX cy of gravel*

Turnarounds	10		N/A	N/A
Underground Trenches	2	1200	N/A (trenches would be excavated and backfilled with the same material)	N/A (trenches would be excavated and backfilled with the same material)
Stringing Sites	28	4500	N/A	N/A
Guard Structures	2	144	N/A	N/A
Staging Areas	2	435600	N/A	N/A
Pulling Site	1	1875	N/A	N/A

Biological Resources

15) Provide a copy of the fairy shrimp protocol survey report, when available.

16) Please confirm the data shown in PEA Tables 4.4-6, 4.4-7, and 4.4-8 include all temporary and permanent impacts associated with the proposed project, including, but not exclusive of direct bury, micro-pile foundation, and pier foundation pole construction, pole removal, distribution line removal, guard pole installation, underground distribution line intercept trenches, vegetation removal, dewatering, blasting, access road modifications, access turnarounds, overland access, storage and staging areas, stringing sites, and pulling sites.

Cultural Resources

17) Please provide an electronic copy of the project archaeological survey report and all excavation reports. Please include copies of all record search materials, including site records, reports, and maps.

18) Please provide copies of all letters and documentation of Native American consultation not previously included in PEA Attachment 4.5, such as emails or telephone logs from individuals who were contacted.

Hazards and Hazardous Materials

1) Please confirm that the Federal Aviation Administration (FAA) made a "determination of no hazard to air navigation" and provide a copy of the FAA determination letter.

2) Where would temporary restrictions of two-way travel on local roadways be required? And what would be the duration of two-way travel restrictions?

Hydrology and Water Quality

3) Regarding the use of potable and recycled water to control dust on roads, how was the estimated 4.5 million gallons needed for dust control calculated? Is this the minimum amount of water necessary to maintain dust control?

4) Is the Otay Water District Will Serve Letter dated October 2014 still valid? Has SDG&E confirmed the Water District is still able to provide the amount of water requested?

GIS Data

5) Most of the GIS data submitted in December 2015 is not usable for our analysis, as those layers are generally only lines and points that do not define areas. We need polygon layers in order to conduct the CEQA analysis.

   Please submit the following GIS layers:

   1. Pole Disturbance Areas, with pole type and associated work area identified (direct-bury, pier foundation, micro-pile). In the revised route maps submitted in December 2015, some of the pole sites are shown with a circular buffer and some are shown with a square-shaped buffer. Please label the buffer areas according to the type of pole to be installed.
   2. Staging Yards
   3. SDG&E's Utility Line Easements (we need the locations of the right-of-way that is 20ft wide from Pole 1 to 117 and 12ft wide from pole 18.1 and 18.5 as stated on PEA Page 3-14)
   4. Access Road Easements (if any)
   5. Access Road Turnarounds
   6. Pulling Sites
   7. Stringing Sites

6) Provide GIS layers (polygons) for all data presented in the Biological Technical Memorandum, PEA Attachment 4.4-A. GIS shapefiles should include documented species occurrences, mapped vegetation communities, plant species observations, wildlife species observations, Quino checkerspot butterfly survey results, Coastal cactus wren survey results, riparian bird survey results, burrowing owl survey results, soil types, jurisdictional/non-jurisdictional resources (waters/wetlands/vernal pools/road ruts), land management and habitat plan areas (Att. 4.4A, Figures 8 and 9), and any other survey results pertinent to this project.