

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 12, 2015

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Follow-up Data #13 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of San Diego Gas and Electric Company's (SDG&E) application (A. 14-04-011) and related Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project) and SDG&E's responses to Data Requests #1 through #12.

The CPUC requests clarifications to some of SDG&E's prior data request responses, particularly with respect to the air quality and greenhouse gas emissions data provided for alternatives, as indicated in the attached data needs Table 1 below.

Information provided by SDG&E in response to this Request for Additional Follow-up Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than **May 19, 2015**. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the EIR. If a conference call to clarify any of our questions is helpful, please let us know.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the Project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Billie Blanchard".

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager

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Nicholas Sher, CPUC Attorney
Jeff Thomas, Project Manager, Panorama Environmental
Susanne Heim, Deputy Project Manager, Panorama Environmental
Darryl Gruen, Attorney for ORA
Chris Myers, ORA
Alan Colton, SDG&E Director - Major Projects

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #13 FOR THE SYCAMORE-PEÑASQUITOS 230-KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified additional areas where more information is needed to prepare a complete and adequate analysis of the potential environmental effects of the Proposed Project and in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

Table 1: Application No. 14-04-011 Data Needs #13

| # | Reference Source, Page # | Data Need |
|---|------------------------------|--|
| Los Peñasquitos Canyon Preserve – Mercy Road Alternative | | |
| 1 | Data Request #8, Response #3 | Explain why only light helicopter emissions were accounted for in the unmitigated and mitigated summary sheets. Emissions from heavy helicopters and helicopter installation/demolition are estimated on the “helicopter” sheet but are not included in the summary tables. If heavy helicopters will not be used, explain why. If heavy helicopters will be used, update the summary tables to reflect the use of heavy helicopters. |
| 2 | Data Request #8, Response #3 | Fugitive dust emissions for Segment A and Segment C were not included in the unmitigated and mitigated summary sheets. There is a sheet for Segment A fugitive dust emissions; explain why information from this sheet was omitted from the summary table or revise the summary table as appropriate. Provide fugitive dust emissions from Segment C, or explain why there would be no fugitive dust emissions. |
| 3 | Data Request #8, Response #3 | Clarify why there were no fugitive dust emissions from construction in 2017 (Segments B and C only), or provide fugitive dust emissions to reflect construction activities in 2017. |
| 4 | Data Request #8, Response #3 | Clarify why emissions from the Segment C Mercy Road Alternative differ from emissions from the Proposed Project Segment D. Segment C would be constructed in the same manner as Proposed Project Segment D; therefore, emissions would be the same. |
| 5 | Data Request | Table A-16-Q3 appears to be “Maximum Daily Mitigated Construction |

Table 1: Application No. 14-04-011 Data Needs #13

| # | Reference Source, Page # | Data Need |
|--|---------------------------------|--|
| | #8, Response #3 | Emissions”; however, the table is titled Maximum Daily Unmitigated Construction Emissions” – please clarify. |
| 6 | Data Request #8, Response #3 | Identify whether or not the staging yards submitted for the Proposed Project would cover the staging needs for this alternative. |
| 7 | Data Request #8, Response #3 | Identify whether or not the Encina Hub or Mission-San Luis Rey phase transposition work would be completed under this alternative. |
| Segment D 69-kV Partial Underground Alternative | | |
| 8 | Data Request #8, Response #7 | Clarify why emissions from the Segment D Partial Underground Alternative for Segments A, B, and C differ from the Proposed Project. Segments A, B, and C would be constructed in the same manner as the Proposed Project; therefore, emissions would be the same. However, emissions estimated for each segment under this alternative differ from those calculated for the same segment under the Proposed Project. |
| 9 | Data Request #8, Response #7 | Clarify why fugitive dust emissions for Segment A were not estimated. |
| 10 | Data Request #8, Response #7 | Explain why only light helicopter emissions were accounted for in the unmitigated and mitigated summary sheets. Emissions from heavy helicopters and helicopter installation/demolition are estimated on the “helicopter” sheet but are not included in the summary tables. If heavy helicopters will not be used, explain why. If heavy helicopters will be used, update the summary tables to reflect the use of heavy helicopters. |
| 11 | Data Request #8, Response #7 | Table A-29-Q7 appears to be “Maximum Daily Mitigated Construction Emissions”; however, the table is titled Maximum Daily Unmitigated Construction Emissions” – please clarify. |
| 12 | Data Request #8, Response #7 | Clarify what “Segment DF” is and why emissions from this Segment were not included in the unmitigated and mitigated summary tables. |
| 13 | Data Request #8, Response #7 | Identify whether or not the staging yards submitted for the Proposed Project would cover the staging needs for this alternative. |
| 14 | Data Request #8, Response #7 | Identify whether or not the Encina Hub or Mission-San Luis Rey phase transposition work would be completed under this alternative. |
| Pomerado Road to Miramar Area North Underground Alternative | | |
| 15 | Data Request #8, Response #5 | Explain why only light helicopter emissions were accounted for in the unmitigated and mitigated summary sheets. Emissions from heavy helicopters and helicopter installation/demolition are estimated on the “helicopter” sheet but are not included in the summary tables. If heavy helicopters will not be used, explain why. If heavy helicopters will be used, update the summary tables to reflect the use of heavy helicopters. |
| 16 | Data Request #8, Response #5 | Identify whether or not the staging yards submitted for the Proposed Project would cover the staging needs for this alternative. |

Table 1: Application No. 14-04-011 Data Needs #13

| # | Reference Source, Page # | Data Need |
|--|--------------------------------------|--|
| 17 | Data Request #8, Response #5 | Identify whether or not the Encina Hub or Mission-San Luis Rey phase transposition work would be completed under this alternative. |
| All Routing Alternatives Identified Above | | |
| 18 | Data Request #8, Response #3, #5, #7 | Clarify why helicopter emissions are calculated to be the same for all three alternatives. If helicopter emissions would not be the same, revise helicopter air quality and greenhouse gas emission estimates appropriately for each of the three routing alternatives. |