PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



January 13, 2016

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

RE: Request for Additional Data #21 – 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 reviewed San Diego Gas and Electric Company's (SDG&E) comments on the Draft Environmental Impact Report (EIR) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project), and SDG&E's responses submitted to date for Data Requests #1 through #20.

The CPUC requests additional data to verify the components of the No Project Alternative.

Information provided by SDG&E in response to this Request for Additional 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 <u>both</u> hardcopy and electronic format. We request that SDG&E respond to this request no later than January 22, 2016. Please let us know if you cannot provide the information by this date. Delays in responding to these data needs will continue to result in associated delays in preparation of the Final 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 Proposed 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,

Billie Blanchard Project Manager

Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor

Molly Sterkel, Program Manager Marcelo Poirier, CPUC Attorney

Billie Blandrak

Jeff Thomas, Project Manager, Panorama Environmental

Susanne Heim, Deputy Project Manager, Panorama Environmental

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Darryl Gruen, Attorney for ORA Chris Myers, ORA Alan Colton, SDG&E Director - Major Projects

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #21 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 adequately respond to SDG&E's comments on the Draft EIR 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 #21			
#	Reference Source, Page #	Data Need	
1	DR#18, Item 2	An EIR must describe and analyze the impacts of the "no project" alternative to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (CEQA Guidelines Section 15126.6(e)). If the Proposed Project or an alternative were not approved, SDG&E is still required to meet NERC planning criteria for system reliability. The CPUC understands that the No Project Alternative does not meet all of the objectives of the Proposed Project.	
		SDG&E identified in their response to Data Request #18 a set of actions that could be included in a No Project scenario. The CPUC requests further clarification on the need for the actions identified by SDG&E as part of a No Project Alternative scenario as it is understood that time has passed since the approval of the 2012/13 Transmission Plan and that system conditions may have changed and other projects that have been approved may help mitigate particular reliability issues.	
		Please address the following specific questions regarding the No Project Alternative:	
		 Would it be possible to install an SPS instead of a 2nd Mission-Bay Boulevard 230-kV line? If not, why? 	
		Would it be possible install an SPS instead of upgrading the Mission-Miguel 230 kV lines 1 &2? If not, why?	
		3. Would the upgrade to the Artesian-Bernardo 69-kV lines be addressed by the approved Artesian 230/69-kV Sub and loop- in? Is this upgrade specific to the No Project Alternative or would this upgrade be implemented even if the Proposed Project or an alternative were approved?	
		Would the upgrade to the Bernardo-Felicita Tap-Felicita 69-kV lines be addressed as part of the Chicarita 69-kV conversion	

Table 1: Application No. 14-04-011 Data Needs #21			
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		project? Could an SPS at Rancho Carmel address the overload on the line in lieu of reconductoring the line? If not, why?	