

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 31, 2018

Ms. Jennifer Kaminsky
Environmental Manager
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123

RE: Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project – Induced Current on AT&T Communication Cable – Compliance with Mitigation Measure Hazards – 7 and Safety Testing

Dear Ms. Kaminsky:

The California Public Utilities Commission (CPUC) staff has determined that San Diego Gas & Electric Company (SDG&E) has met the compliance standard for the Sycamore-Peñasquitos 230-kV Transmission Line (Project) in Mitigation Measure (MM) Hazards-7. This determination of compliance is made on the basis of additional modeling and documentation provided by SDG&E demonstrating that the induced voltage on AT&T's facilities would not exceed the 15-volt threshold specified in MM Hazards-7. Information on the additional modeling conducted by SDG&E, coordination with AT&T, and CPUC review of the modeling results is provided in detail below.

SDG&E's compliance with the requirements of MM Hazards-7 resolves the final open requirement, identified in the project's EIR, as a prerequisite to energizing the transmission line and this letter constitutes notice that SDG&E may proceed with energizing the project.

While the model results meet the compliance requirements of MM Hazards-7, AT&T raised concerns that the model that was used to predict induced voltage on AT&T's facilities was designed for predicting induced voltage on metallic pipelines and not telecommunication lines. AT&T was concerned about the efficacy of the model in predicting induced voltages on telecommunication lines. AT&T suggested a field test to ascertain how the model results compare to induced voltages, measured once the transmission line is energized, in order ensure that the Project does not create a safety hazard for AT&T workers or its customers. Safety is important to the CPUC, and out of an abundance of caution, the CPUC requests that SDG&E coordinate with AT&T to conduct a field test of the induced voltage observed on AT&T's line within 30 days after project energization. The CPUC requests that SDG&E inform the CPUC of coordination efforts with AT&T and provide the CPUC with the test methods and results upon completion of the field verification.

Background

The CPUC notified SDG&E on May 2, 2018 that SDG&E had not complied with the requirements of MM Hazards-7. Specifically, SDG&E conducted modeling of the induced voltage on AT&T's facilities and the model results provided to the CPUC in March 2018 indicated that induced voltage on AT&T's facilities could reach 41 volts, which exceeded the threshold of 15 volts specified in MM Hazards-7.

In May, June, and July 2018, SDG&E took actions to comply with MM Hazards-7 including:

- **May 2018**—SDG&E/ARK communicated with AT&T to further understand the configuration and grounding on AT&T's facilities.
- **June 15, 2018**—SDG&E/ARK provided an updated model, which reflected additional information that SDG&E received from AT&T regarding grounding on AT&T's facilities and maps provided by AT&T regarding the location of grounding.
- **June 27, 2018**—SDG&E, ARK, AT&T, and CPUC met to discuss the revised model results, the model parameters, and define data needed by AT&T to verify the model parameters reflected AT&T's facilities.
- **July 2018**—SDG&E/ARK provided the information requested by AT&T to verify that the model reflected AT&T's facilities and revised the model to test the sensitivity of the model to grounding resistance.
- **July 13, 2018**—SDG&E/ARK provided a revised model report, which reflected that the induced voltage on AT&T's facilities would not exceed 15 volts with the requested change in grounding resistance.
- **July 18, 2018**—SDG&E, ARK, CPUC, and AT&T held a meeting to verify the revised modeling parameters and discuss the model results. AT&T requested additional information on the model input for AT&T's lines.
- **July 2018**—SDG&E/ARK supplied additional information to AT&T regarding the requested model inputs.

Compliance with Mitigation Measure Hazards-7

MM Hazards-7 requires that SDG&E conduct an induced voltage touch study and specifies that the maximum allowable touch voltage under steady-state conditions is 15 volts. SDG&E's study, dated July 18, 2018, finds that the maximum induced voltage is predicted to be 15 volts. On July 24, 2018, John Fuller, AT&T Principal Network Design Engineer, sent an email to CPUC stating that no further information was required from SDG&E for parameter verification and that, "any further changes to the parameters reviewed, within the range of possible values, would have no significant impact on the model results".

The CPUC finds that SDG&E has complied with the requirements of MM Hazards-7 by modeling the induced voltage on AT&T's facilities, obtaining AT&T's verification that the model was correctly configured, and demonstrating that the induced voltage is not expected to exceed 15 volts. To further ensure the protection of public safety, the CPUC requests that SDG&E and AT&T cooperatively conduct a field test of the induced voltage on AT&T's facilities and provide the results of the field test to the CPUC within 30 days after the test is conducted.

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

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

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cc: Matt Huber, SDG&E Project Manager
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