

A.09-02-012, A.07-10-005 ALJ/ANG/eap



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ATTACHMENT 4

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 5, 2008

Mr. David Kates
The Nevada Hydro Company, Inc.
2416 Cades Way
Vista, California 92083

Re: Third Application Completeness Review – Talega-Escondido/Valley-Serrano 500 kV Interconnect Project Proponent’s Environmental Assessment Supplement (November 12, 2008 version) -- Application No. A.07-10-005

Dear Mr. Kates:

The California Public Utilities Commission’s (CPUC) Energy Division has conducted its third completeness review of The Nevada Hydro Company’s (TNHC) Talega-Escondido/Valley Serrano 500 kV Interconnect Project (TE/VS) Application for a Certificate of Public Convenience and Necessity (CPCN) (A.07-10-005) and the Proponent’s Environmental Assessment (PEA) Supplement dated November 12, 2008. The November 12, 2008 supplement to the PEA was filed with the CPUC on November 13, 2008 to address issues raised in CPUC’s August 18, 2008 second completeness review letter regarding the Applicant’s PEA submitted in July 22, 2008. The first PEA deficiency review was submitted to TNHC on March 6, 2008 upon which the applicant requested an extension to respond and later filed the July PEA version.

The Energy Division evaluates the completeness of a PEA to ensure that sufficient information has been provided by the Project Proponent for the CPUC to initiate its environmental analysis of the project, as required by the California Environmental Quality Act (CEQA). The Energy Division has 30 days in which to assess the completeness of the Project Proponent’s application.

Based on our review of TNHC’s Application and the July 2008 PEA, as amended and modified by the November 2008 PEA Supplement, the Energy Division concludes that the PEA for the Proposed Project as supplemented remains incomplete at this time. **Your latest submittal addresses many of our previous review comments noted in our review letter dated August 18, 2008. However, there are important areas that remain deficient.**

A major deficiency of the PEA continues to be that the Project Description lacks sufficient detail to allow a clear and comprehensive understanding all aspects of the Proposed Project. As noted in previous letters, CEQA Guidelines §15124 states that “an accurate, stable, finite project description is an essential element of an informative and legally sufficient EIR under CEQA.” The Project Description, as the basis for subsequent analysis of all aspects of the project, must be accurate and contain sufficient information for a proper review to be undertaken. It must include the information that an interested party would need in order to understand the nature and magnitude of the Proposed Project, including actions to be undertaken and structures to be constructed at specific locations. **If important aspects of a project cannot be described or are missing, or if the project is evolving and not stable, it is premature to initiate the environmental review process.**

As noted previously, Project Description information that is insufficient, vague, confusing, or missing will result in the need for CPUC to make data requests of the Applicant and await responses to those requests. This will delay the environmental review process. Also, changes to or extensive clarifications of the Project Description at a later date may jeopardize the validity or utility of analyses conducted to that point. Redefining the project would require an amendment of the original application and necessitate re-

initiating the environmental review. For these reasons, it is imperative that a complete description be available when the environmental review commences.

The Project Description must encompass the entire project, including project elements that may be constructed by others or that are remote from the main project but necessary for it to operate as intended. It must allow a minimally informed reader to grasp the nature of the Proposed Project and all of its aspects that may have an environmental effect if implemented.

In October of 2008, we reviewed a preliminary version of the PEA Supplement and provided comments to you on October 20, 2008. We expected responses to these comments to be incorporated into the November submittal. However, deficiencies in the PEA remain. The major deficiencies in the PEA are enumerated below and defined in detail in Attachment 1:

1. **Missing US Marine Corps assurance of Case Springs Substation site availability.** TNHC must demonstrate by a written communication from the USMC to TNHC that the Case Springs Substation site can be used as proposed or that there is another agreed upon site. Although there have been discussions between the Applicant and the USMC regarding the proposed Case Springs Substation site on Camp Pendleton, there is no agreement or indication that an agreement is pending. Without concurrence from the USMC regarding the use of its property, the TE/VS project lacks a connection with the SDG&E system. This is a major deficiency. In a conversation with Lieutenant Sam Pellham on November 21, 2008, the CEQA team was told that the USMC still requires additional time to evaluate the TE/VS proposed substation location and footprint. The CPUC's understands that a meeting was scheduled for December 3, 2008, between the USMC and TNHC, to discuss this matter further. With concurrence of the USMC on the use of the site, this deficiency can be overcome. Absent this concurrence, TNHC must describe how TE/VS would interconnect to the existing SDG&E system.
2. **Missing confirmation that the US Forest Service agrees with facility locations and specifications.** TNHC must demonstrate by a written communication that it has concurrence from the USFS that the site locations on Plan Facility Site Maps 1 through 12 provided in the PEA Supplement dated November 12, 2008 are acceptable or a more recent version as indicated by Virgil Mink's email dated Nov. 26, 2008 to Peter Lewandowski. TNHC has met with the US Forest Service (USFS) regarding project facilities to be located within Cleveland National Forest (CNF). TNHC represents that subsequently various facility locations have been adjusted and that the USFS now concurs with these locations and the type of towers to be used. However, USFS reports that a final determination has not been made as to which types of towers would be required at each location. Also, lacking a final Case Springs Substation site, the last portion of the route from tower 136 is unknown. Roads in the CNF that are on slopes greater than 15% remain to be resolved. With confirmation that the USFS concurs that the submitted maps in the Nov. 12, 2008 PEA submittal (or a subsequent revision of these maps) represent the agreed upon locations, this deficiency can be overcome.
3. **New project elements inadequately described.** The November 12, 2008 PEA Supplement introduced new project facilities not previously included in the July 22, 2008 PEA that was reviewed in the August 18, 2008 deficiency letter. These are two proposed new 115 kV transmission lines from the proposed Santa Rosa Substation to the existing Elsinore and Skylark Substations, and a new underground 500 kV transmission line segment to substitute for the previously proposed overhead transmission line between the main TE/VS transmission line and the proposed Santa Rosa Substation. What information is provided for these facilities in the PEA supplement is minimal and incomplete. TNHC must provide a complete description of the locations, specifications, tower types, detailed construction requirements and methods, excavation material disposal, and impacts associated with those facilities. This information must be on a par with the level of information required for other aspects of the TE/VS project.

Mr. David Kates
The Nevada Hydro Company
December 5, 2008

4. **Property owners affect by new project elements not identified.** TNHC must identify property owners affected by these newly introduced project components discussed in Item 3 above. Property owners near proposed facilities are required to be notified. This information needs to be supplied.
5. **Inconsistencies and contradictions among text, tables, and figures need to be resolved.** Changes in the project made by TNHC have introduced inconsistencies and contradictions into the PEA. In particular, in the PEA supplement: (1) the text information in Chapter 3, Project Description; (2) the information included in the Tower Structure Summary Table [Tab 7]; and (3) the information shown on Section 3: Facility Maps [Tab 7] must be made congruent and accurate. By way of examples: the text states that all towers on CNF will be lattice steel, but the table states otherwise; the table identifies a 120,000 sq. ft. pull station at tower 138 that is not found on Facility Map Plan 12 of 12; the text states that the TE/VS 500 kV transmission line would enter the Case Springs Substation from tower 138, but Facility Map Plan 12 of 12 shows a different configuration, with towers 137 and 138 not even linked to the transmission line.

To avoid increasing confusion between the various submittals from TNHC, it is recommended that the PEA Supplement of November 12, 2008 be modified and edited to address the deficiencies identified in this letter. It is further recommended that the entire amended supplement be submitted, rather than providing a separate amendment to the supplement. **In the next submittal, please indicate all changes to the PEA made after the November 12, 2008 version in ~~strikeout~~/underline.**

One set of responses to this letter should be provided to the Energy Division and one to our consultant, Aspen Environmental Group, in both hardcopy and electronic format. The responses need to be docketed at CPUC by the applicant as well, thereby establishing that they have been delivered and made part of the project record.

Upon receipt of the information requested, we will review it within 30 days and determine if it is adequate to accept the PEA and application as complete. We are available to meet with you to discuss the matters in this letter. You are urged to arrange such a meeting to discuss any aspects of this letter that you feel require clarification or elaboration.

At any point in the review process, the CPUC reserves the right to ask for additional information in the form of data requests. Any questions on the completeness review should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP
PURA V
Project Manager for TE/VS Interconnect
Energy Division CEQA Unit

cc: Ken Lewis, Acting CPUC Energy Division Director
Victoria S. Kolakowski, Administrative Law Judge
Chloe Lukins, CEQA Unit Supervisor
Nicholas Sher, CPUC Legal Division
Fritts Golden, Aspen Project Manager
Traci Bone, Advisor to Commissioner Grueneich

Attachment 1. Completeness Review Details

TE/VS 500 kV Interconnect Project A.07.10.005

1. Applicant submitted Draft PEA in January 2008 and CPUC provided deficiency comments on March 6, 2008.
2. Applicant submitted new PEA in July 2008 and CPUC provided deficiency comments on August 18, 2008. Comments on that PEA are in first column below.
3. November 12, 2008, Applicant submitted PEA Supplemental information. Comments on the PEA Supplement are provided in the second column below.

CPUC August 18, 2008, Comments on PEA (July 2008)	CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)
Project Purpose and Need	
<p>1. Chapter 2 is improved [as compared to January 2008 Draft PEA] with regard to readability and substantiation of the achievement of project objectives. However, there remains a lack of technical support for Project Objectives 2 and 3. These two objectives state that the Proposed Project would “Provide 1,100 MW of incremental transmission import capability to San Diego.” In the CPUC Sunrise Powerlink proceedings, the CAISO only credited the TE/VS Project with reducing local capacity requirements in San Diego by 625 MW. Since this concern was raised by the entity that will have operational control of the TE/VS Project, it needs to be addressed in a revised Chapter 2. Please provide modeling or other information to substantiate achievement of Project Objectives 2 and 3 as described in the PEA.</p>	<p>1. Supplemental information has addressed August 18 deficiency comment.</p>
<p>2. See item 1, above.</p>	
Project Description	
<p>1. The text of Chapter 3 and the figures throughout the PEA still lack internal consistency. The Project Description is generally lacking in descriptive detail on critical project components. The Project Description should be based on text, with reference to figures for clarification or illustration. In many instances, the text is silent regarding components shown on figures. Figures should be checked for consistency with the text and with each other. All project-related elements shown on a figure should be labeled or a legend should be provided. The north orientation on the figures changes from figure to figure, yet the north indicator on the figures is difficult to read in most cases. This can lead to confusion. Please correct this problem in a revised Chapter 3.</p>	<p><u>1. Not completely addressed.</u> Inconsistencies between text and figures remain, and newly introduced project components raise additional deficiencies in the project description. Two new 115 kV transmission lines were not previously disclosed in the July 2008 PEA. These two 115 kV transmission lines are described as a part of the proposed project on page 1 but are not further described elsewhere in terms of locations, lengths, specifications, construction requirements, and visual features. The two 115 kV transmission lines proposed to interconnect the Santa Rosa Substation with the Elsinore and Skylark Substations are not shown on any maps, and line drawings showing typical wood or steel poles that would be used are also lacking.</p> <p>The interval of the contour isolines on Figure 3.6.1-8 is not specified. A diagram of the proposed water treatment facility is not provided, nor is a cross-sectional diagram of the location of the underground tunnel that would be required to accommodate the underground transmission line between the top of the mountain at South Main Divide</p>

CPUC August 18, 2008, Comments on PEA (July 2008)	CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)
	<p>Road and Santa Rosa Substation. Drawings of proposed communications towers, stringing equipment locations, and splicing locations are not provided.</p> <p>Although Figure 4.11.2-6 shows some of the areas within Camp Pendleton that are discussed in paragraph 6 on page 3-77, a majority of locations are not shown. It will be difficult to assess impacts to USMC operations without a clear map of the environmental setting on the base.</p> <p>The proposed water treatment plant must be described in more detail, and impacts of the plant and the fate of precipitates and sludge from the plant must be discussed in the environmental effects section. Information required to supplement the project description in Chapter 3 includes plant design, types and amounts of chemicals stored and used, construction requirements of the plant, and similar factors that can affect the environment.</p> <p>Text states that “Any permanent disposal of excess materials from LEAPS construction will be utilized in the pad construction for the Santa Rosa Substation in accordance with the grading plan described in Section 3.8.4.3.” However, it is understood from the text that the Santa Rosa Substation will most likely be constructed years before LEAPS, in which case the Santa Rosa site could not make use of the excess material.</p> <p>The discussion of benching (page 3-175) should be expanded and should include an illustration. If the terrain is “extremely steep and rugged,” it is not clear how a tracked earth-moving vehicle can get to the site to excavate a terraced access to tower excavations. Please clarify and provide detail on how this would occur, whether the Forest Service would allow this type of grading activity on Forest System lands, and how the temporarily disturbed areas would be restored.</p> <p>The specifications of the underground tunnel required for the transmission line that would be located between the top of the mountain in the vicinity of South Main Divide Road and the Santa Rosa Substation are not provided (page 3-181). There is no map or diagram clarifying the location of this tunnel, and there is no discussion of the construction techniques or equipment and labor requirements of the tunnel. It is assumed that Tunnel Drill Jumbos, Tunnel Scoop Trams, and the Tunnel Boring Machine listed in Table 3.8.5-2 would be used in construction of the tunnel. However it is unclear whether any of the other equipment or personnel listed in this table would be required for this component.</p>
<p>2. The proposed tower locations presented in PEA Chapter 3 and attachments differ substantially from the tower locations provided in the</p>	<p>2. <u>Not yet completely addressed</u>. TNHC has held discussions with the US Forest Service (USFS) regarding the proposed locations of transmission towers and with the</p>

<p align="center">CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p align="center">CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
<p>earlier draft of the PEA (submitted February 8, 2008). The text of Chapter 3 is unclear about whether the US Forest Service has been consulted regarding these new tower locations. Similarly, the text of Chapter 6 (Alternative No. 6) acknowledges that the Case Springs Substation site may not be acceptable to the Department of the Navy, Marine Corps Base Camp Pendleton. CPUC requests confirmation of agency concurrence or anticipated concurrence with the Proposed Project's facility locations on land under the agency's jurisdiction. A lack of concurrence from the U.S. Forest Service on the tower locations and from the Marine Corps on the substation site brings into question the feasibility of the project and the accuracy of the Project Description and will cause delays in the CEQA process.</p>	<p>US Marine Corps (USMC) regarding the proposed Case Springs Substation. TNHC states that the information in Supplemental PEA Tab 4 was provided to the USFS and the USMC. The information is on a CD and consists of maps of proposed facility locations and data sheets for towers. The Supplemental PEA does not say whether the figures showing final tower locations were reviewed by the USFS.</p> <p>Facility locations on CNF: TNHC reports that as a result of discussions with the USFS, alternate locations have been identified on CNF land for a number of proposed towers and related features, such as access roads. TNHC has represented to the CPUC that the USFS has concurred with the location of these features as presented in the Supplemental PEA.</p> <p>Supplemental PEA Tab 7 revises previously submitted Attachment 3 (July PEA). A number of figures are provided at Tab 7. One figure, Facilities Plan Site 6 of 12, Aerial Base [page 12], shows towers 3001 through 3005 carrying an overhead transmission line between the main TE/VS Interconnect line and the proposed Santa Rosa Substation near Lake Elsinore. This overhead connection would descend down the face of the Elsinore Mountains within CNF. However, the Supplemental PEA text states that this connection will not occur overhead, but will be underground. (Section 3.6.1.3.2) Facilities Plan Site 12 of 12 [page 24] shows towers 137 and 138 near the TNHC-proposed Case Springs Substation site. These towers appear to serve no purpose, as they do not carry conductors. As shown in the figure, from tower 136 the TE/VS interconnect transmission line would enter the proposed substation via towers identified as numbers 2006 and 2005. This is not consistent with text in Supplemental PEA Tab 10 (Mile-by-Mile Project Description), in which the last paragraph on page 4 states that the 500kV Interconnect terminates at tower 138.</p> <p>During the review of the Supplemental PEA by CPUC, the USFS was asked to review the Tab 7 figures showing tower and facility locations on CNF. While the USFS confirmed discussions were held with TNHC, the USFS have not reached concurrence on tower types and locations. Therefore, it is not clear to CPUC what is being represented on the figures provided in Tab 7, particularly in light of inconsistencies among text, tables, and figures in the Supplemental PEA.</p> <p>Also in Tab 7, a table is provided: Tower Structure Summary Table. This table lists various characteristics of each tower. A number of the listed towers are identified as being H-frame structures, many of which are in CNF. The information provided by TNHC to the USFS prior to their discussions included H-frames. However, TNHC has represented that they have agreed with the USFS to not use H-frame towers in CNF.</p>

<p>CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p>CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
	<p>This agreement is not reflected in the information provided in the summary table. The table also provides information on towers 137 and 138. As noted above, these appear to connect to no project facilities. However, information is not provided for towers 2006 and 2006, which the figure shows as supporting transmission lines. The table also identifies a 120,000 square foot pulling station in the vicinity of tower 138 (PS 138) on USMC Camp Pendleton. This pull station is not on Facilities Plan Site 12 of 12, nor is it mentioned in the mile-by-mile description of the route provided in Tab 10.</p> <p><u>Because of the inconsistencies among text, tables, and figures in the Supplemental PEA, CPUC is unable to accurately and fully describe the Proposed Project in a way that would allow a reviewer to understand the nature and location of facilities and an analyst to know the existing conditions potentially affected by a facility.</u></p> <p>Case Springs Substation: TNHC has engaged in discussions with officials at Marine Corps Base, Camp Pendleton regarding the siting of a substation (Case Springs Substation) to interconnect the TE/VS Interconnect Transmission line with the SDG&E system. In a memorandum dated September 24, 2008, the Commanding Officer at Camp Pendleton requested his staff to submit comments on the proposed substation location to him by October 24, 2008. Subsequent to that date he will make a determination regarding whether and where a substation would be allowed. TNHC states that a USMC decision is pending, but that it remains up to several months in the future. Therefore, whether the substation can be located as shown in the PEA remains unknown. If it cannot be constructed at the indicated substation site, it would need to be moved to either a different location on Camp Pendleton (with USMC concurrence) or onto CNF land (with USFS concurrence). The connection between the TE/VS line and the SDG&E system would need to be redesigned and configured to accommodate a new substation location.</p> <p><u>In the absence of a definite substation location, CPUC is unable to accurately and fully describe the Proposed Project, to disclose the Proposed Project's environmental setting and, thus, the Proposed Project's effects on the environment.</u></p> <p>Lacking clarity on the type and location of transmission facilities within CNF (as illustrated by inconsistencies among the tables, text, and figures found in the Supplemental PEA) and without a definitive Case Springs Substation location, the project description is inconsistent and incomplete. Until these issues are resolved, the PEA is deficient and environmental review would be premature.</p> <p>TNHC needs to definitively show that the USFS and USMC concur in the location</p>

CPUC August 18, 2008, Comments on PEA (July 2008)	CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)
	and type of facilities proposed. TNHC will need to verify all text, tables, and figures furnished as part of a PEA submittal are consistent with each other as to information presented and that this information is consistent with USFS and USMC concurrences.
a. Concerns about the accuracy of Figure 3.6.2 remain. Aspen provided TNHC with GIS files for the Talega-Escondido centerline. Please provide a figure that accurately represents the Talega-Escondido upgrades, including the Lilac Substation and the 69 kV line relocation discussed in the text.	a. Supplemental information has addressed August 18 deficiency comment.
b. Figure 3.6.3-2 (plate 8) on page 3-113 of the PEA still contains the non-existent "Rainbow Substation" and still contains figure text describing removal and replacement of the existing conductor, which is not the project as described in the text. Figure 3.6.3.1 also shows a Rainbow Substation and the previously proposed Valley-Rainbow transmission line. Figure 4.6.1-14 (plate 4) shows a "Proposed Rainbow Substation". The PEA should not include graphic and non-graphic references to non-existent, non-proposed system elements.	b. Supplemental information has addressed August 18 deficiency comment.
c. Figure 3.1.1-1 provides an improved graphical representation of the Proposed Project. However, this figure, the GIS database provided by TNHC, and Attachments 1 and 3 of the PEA create new inconsistencies between the description of the project in the text and the representation of the project on the figures. No explanation is given why the Proposed Project appears to begin at Milepost 0.5 rather than MP 0.0. The location of the SCE Valley-Serrano line to which the Proposed Project would connect is not shown. In discussions with CPUC, the Project Proponent represented that the project would be constructed and put into operation in phases, and that the connection between the 500 kV Interconnect transmission line and the proposed Santa Rosa Substation would temporarily be on overhead transmission lines until a future date, when they would be reinstalled underground. The PEA fails to convey this information or to provide any detail; if it is overhead lines, as indicated in a meeting with CPUC on March 20, 2008, please discuss. Also, identify and describe the transition tower that would be required to transition from underground to overhead.	c. This figure is much improved. However, there remain inconsistencies between the identification of exclusively "Lattice Tower Pads" as shown on the figure, and the identification in the "Tower Structure Summary Table" ([Tab 6] Att. 1 Revisions) of eight H-frame structures. The table is also inconsistent with the text of Chapter 3 (Section 3.6.1.2), which states "There are a total of 138 structures specified, and these structures are numbered 1 through 138. Of the structures specified, 138 structures are non-specular lattice, and currently no structures are dual H-frame monopoles." Finally, the text of Chapter 3 refers in numerous places to tubular steel poles (TSPs). If there are none, these discussions should be omitted. If there are TSPs their locations should be specified. This issue could be clarified by clearly identifying tower types on all figures, by clarifying the text at each tower type reference, and by providing line drawings of typical LSTs and H-frame or TSPs proposed for the TE/VS Interconnect.
Figure 4.6.1.7 shows an alignment similar to the Proposed Alignment plus	Concern about Figure 4.6.1.7 has been sufficiently addressed.

<p align="center">CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p align="center">CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
<p>several alternative alignments and substation locations that are not part of the Proposed Project. Please eliminate figures or the elements in figures that depict alternate project alignments and facility locations that are not part of the Proposed Project for which CPUC approval is being sought.</p>	
<ul style="list-style-type: none"> a. It is assumed that the Applicant meant to refer to Attachment 1 rather than "Attachment A". As no symbol legend is provided for Attachment 1, it is unclear whether the required construction elements have been identified. Please provide a symbol legend and any other missing information in a revised Attachment 1. b. Please provide an index map for the figures in Attachment 3. Attachment 3 currently contains a collection of detailed tower and work area locations on individual aerial photos; however there is no overall key showing the location and orientation of each sheet and the relative location of towers to one another. Confirm whether all sheets are oriented with north at the top. In the absence of information to the contrary, it is assumed that the entire area indicated on these illustrations will be permanently disturbed. c. See item 2b above. d. Attachment 1 provides detailed location and vegetation impact data for Tower Nos. 1 through 138 and associated access roads but does not provide data for towers 1001 through 1021, 2001 through 2006, nor 3001 through 3005. In addition, Attachment 1 does not include a symbol legend. Please provide the missing information identified as an addendum to Attachment 1. e. Maps for all non-Talega-Escondido upgrades must be provided. Please obtain these from SCE and SDG&E through a data request, indicating that the CPUC environmental document is required to have maps for these facilities. f. Concern sufficiently addressed, unless the Forest Service does not agree with tower locations and the towers designated for helicopter construction. 	<ul style="list-style-type: none"> a. See item 2b. b. See item 2. d. <u>Not yet completely addressed.</u> As requested, a legend has been added to the plan and profile figures in Attachment 1. However, neither the Supplemental PEA text nor the legends in Attachment 1 explain the red rectangles identified in the legend as "Spotting Constrain." It is assumed that this means there are constraints on spotting towers within the indicated areas for technical reasons; this assumption needs to be confirmed. In addition, it is unclear to what "qcb_fch83_gcs83" and "cagn_pch27_g", presented in the legend, are referring. e. Supplemental information has addressed August 18 deficiency comment, however see item 1 for additional mapping and figure requirements.

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<p>g. Figures in Section 4.11 show settled and recreational areas in the project vicinity, but do not show details of the proposed project ROW in the vicinity of all settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route and facilities. None of the maps in Section 4.11 show project facilities overlain on existing land uses as requested. Please provide the requested figures as an addendum to Chapter 4.11.</p> <p>h. Areas from the construction of helipads and/or helicopter staging/refueling areas are not identified on any figures. If they are within Construction Work areas, this should be indicated. If helipads are required at any tower locations, these should be indicated. The text of Section 3.8.1.4 states “Final siting of staging areas for the TE/VS Interconnect line would be conducted with the input of the helicopter contractor, and affected private landowners and land management agencies. The size of each staging area would be dependent upon the size and number of towers to be installed. Staging areas would likely change as work progresses.” However, it is critical to an adequate description of the Proposed Project to identify areas of temporary impact due to helicopter use. Please identify helipads and/or helicopter staging/refueling areas on Figure 3.1.1-1 and in Attachment 3, at a minimum. In addition, please provide GIS shapefiles for helipads if not previously provided. Please clarify whether Attachment 3 identifies temporary and permanent impacts or only permanent impacts.</p> <p>i. Certain GIS data conflict with the in-text Project Description. Please see item 1c above.</p>	<p>g. Supplemental information has addressed August 18 deficiency comment.</p> <p>h. Supplemental information has addressed August 18 deficiency comment.</p> <p>i. Requires update to GIS database depending on new tower and facilities locations.</p>

CPUC August 18, 2008, Comments on PEA (July 2008)	CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)
<p>j. In-text references to Mileposts in the Project Description and Environmental Impacts sections were not made as requested. Please provide detailed description of the project in a Milepost-by-Milepost fashion, commensurate with the discussion of the Sunrise Powerlink Imperial Valley Link in Section B.2.1 and the LEAPS Transmission-Only Alternative in Section E.7.1.1 of the Draft EIR/EIS, each of which provides a mile-by-mile description of the route and includes a description of relevant land uses, road crossings, and important landmarks. Refer to specific pole/tower numbers when describing transition towers and elsewhere, as relevant. Include the portion of the project that links the main portion of the TE/VS Interconnect in the vicinity of South Main Divide Road with the Santa Rosa Substation and sub-transmission lines connecting to the local distribution system.</p>	<p>j. Supplemental information has addressed August 18 deficiency comment.</p>
<p>3. Project description discussions rarely mention pole/tower numbers and never mention project Mileposts, as requested above. See item 2j above. Attachment 1 uses stationing to indicate tower locations. Please provide Mileposts as well to allow for cross-referencing to other figures and the text. These can be on the figures or in a look-up table.</p>	<p>3. Supplemental information has addressed August 18 deficiency comment, subject to adjustments for new pole or tower locations.</p>
<p>4. Text of Chapter 3 states “Minimum design clearance from conductor to ground is 14’ vertical, 11’3” horizontal, 33’ phase to phase horizontal and 37’ vertical.” This sentence is confusing. Please confirm that the statement means that phase-to-ground clearances are 14 vertical feet and 11.25 horizontal feet, and that phase-to-phase clearances are 33 horizontal feet and 37 vertical feet.</p>	<p>4. Supplemental information has addressed August 18 deficiency comment.</p>
<p>5. There is no discussion of outdoor lighting requirements at the Lake Switchyard or the Santa Rosa Substation. Please correct this deficiency in a revised Chapter 3.</p>	<p>5. Supplemental information has addressed August 18 deficiency comment.</p>

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<p>6. It is presumed that the applicant meant to refer to Figure 3.1.1-1. It is unclear from Figure 3.1.1-1 where helicopters would be staged and refueled. Please clearly identify in the text and on the figure where helicopters would be staged and refueled. In addition, please see item 2h above. Section 3.8.2.2 Foundations describes tubular steel pole foundations as being typically up to 10 feet in diameter and 60 feet in depth (yielding approx. 4,700 cu. ft or 160 cu. yds of excavated rock). In Section 3.8.2.2.4 Tower and Pole Erection, the text states that all construction work would be completed by hand at remote work sites where helicopter installation would occur. Please explain the construction of the foundation and whether all necessary equipment could be lifted to the site by helicopter. Also, discuss disposal of the excavated material.</p>	<p>6. <u>Not yet completely addressed.</u> Requires responses to question on Chapter 3 regarding disposal of excess excavated material from tower foundations.</p>
<p>7. Please see item 2h above regarding disturbance areas for required helipads and/or helicopter staging areas.</p>	
<p>8. Attachment 1 does not include a legend explaining the symbols used on the strip maps at the top of each sheet. Please provide a legend sheet. In addition to apparent tower locations, there are various rectangles shown. Please identify what these represent. Pull sites are identified in Attachment 3, however these sites appear inadequate to pull and tension the transmission line as designed, and these sites are not included in Attachment 1. In addition, <u>for every figure presented in the PEA the text should describe what the figure is intended to illustrate.</u> Figures ought to accompany and accurately represent text, not substitute for it.</p> <p>Please also clarify whether conductors at helicopter-constructed towers would be helicopter-tensioned.</p>	<p>8. See item 2d above.</p>

<p align="center">CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p align="center">CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
<p>9. Concerns about pole/tower installations remain. It is unclear where tubular steel poles would be installed and where lattice steel towers would be installed. Figure 3.1.1-1 should identify which towers are TSPs and which are LSTs. Please clarify whether any of the TSPs would be constructed by helicopter. If so, please explain the mechanism of tower foundation drilling/excavation of up to 10 feet in diameter and up to 60 feet deep as stated in Chapter 3.8.2.2.2. It is unclear whether equipment capable of drilling/excavating such a large hole could be delivered to the site by helicopter. In addition, please clarify whether an additional construction staging area beyond the area of disturbance shown for each structure in Figure 3.1.1-1 and Attachment 3 would be required for each helicopter-constructed structure. This information should be provided in a revised Chapter 3.</p>	<p>9. See item 2c, above.</p>
<p>10. Please quantify the approximate cubic yardage of material to be removed from boring the 1.7-mile underground GIL (including any additional underground segment that would be required between the main portion of the Interconnect southwest of South Main Divide Road and a transition station to the northeast of South Main Divide Road). Please discuss how the material would be used onsite or removed and disposed of offsite.</p>	<p>10. Supplemental information has addressed August 18 deficiency comment.</p>
<p>11. Concern adequately addressed for the Proposed Project, however this information is required as well for all required system upgrades including upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site.</p>	<p>11. Supplemental information has addressed August 18 deficiency comment.</p>
<p>12. Please revise this table to also provide the number of hours per day and the number of days per week vehicles would be in use, as is listed in the sample Table B-14 and requested previously.</p>	<p>12. Supplemental information has addressed August 18 deficiency comment.</p>
<p>13. Concern adequately addressed for this submittal. However, please revise the schedule according to when the revised PEA sections requested in this completeness review are to be submitted to the Docket Office.</p>	<p>13. Supplemental information has addressed August 18 deficiency comment.</p>

<p align="center">CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p align="center">CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
<p>14. Section 3.9.1.2.1 states “climbing inspections of transmission structures would be conducted annually.” Please clarify what percentage of the transmission structures would be inspected by climbing on an annual basis and how towers would be selected for climbing inspections.</p>	<p>14. Supplemental information has addressed August 18 deficiency comment.</p>
<p>Alternatives</p>	
<p>1. Chapter 6 is much improved; however, little explanation of which of the Proposed Project’s individual objectives are fulfilled or not fulfilled by an alternative is provided. Although Table 6.2-1 identifies each retained alternative’s ability to fulfill the identified project objectives, the applicant must substantiate (in the text of Chapter 6) how each retained alternative fulfills most project objectives <u>and how each rejected alternative fails to fulfill most project objectives</u>. Please provide this information. Chapter 6 repeatedly states that an alternative “would not allow for the attainment of the Project’s primary goals and objectives.” Please explain and substantiate how identified alternatives fulfill or fail to fulfill each of the eleven TE/VS and LEAPS project objectives stated in Chapter 2.</p>	<p>1. Supplemental information has addressed August 18 deficiency comment.</p>
<p>2. Please see item 1 above.</p>	

<p align="center">CPUC August 18, 2008, Comments on PEA (July 2008)</p>	<p align="center">CPUC December 5, 2008 Comments on PEA Supplement (November 12, 2008)</p>
<p>Detailed Discussion of Environmental Effects</p> <p>1. Impacts for system upgrades other than the Talega-Escondido 230 kV upgrades are not discussed. It is anticipated based on the description of upgrades that impacts would be minimal; however, impacts from all required system upgrades must be addressed. Please provide a discussion of impacts related to upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site. Please include this information as an addendum to Chapter 5.</p> <p>Please provide the CPUC with copies of the final Facilities Study for the SCE system interconnection. SCE provided the CPUC with a copy of the preliminary Facilities Study for the interconnection of the Lake Elsinore Advanced Pumped Storage Project that was provided to Nevada Hydro Company on December 1, 2006 as a part of the SRPL EIR/EIS process. SCE indicated that the Facilities Study was preliminary because although SCE had received comments from TNHC, comments had not been received from the CAISO and a Facilities Study review meeting had not been held at the time of submittal. Please provide any update of this Facilities Study.</p> <p>Please also provide any Facilities Study update for the SDG&E system interconnection since the February 27, 2006 version (indicated as a final version on its cover letter) provided to CPUC from SDG&E.</p>	<p>1. <u>Information required.</u> The introduction of new project components, namely the two 115 kV transmission lines out of the Santa Rosa Substation, necessitates an update to the discussion of environmental effects of these new project components.</p>
<p>Affected Property Owners</p> <p>1. Please confirm in a cover letter submitted with the Final PEA that the Mailing List in Chapter 7 contains landowner information for <u>all</u> components of the project, including required system upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site. Supplement or replace Chapter 7 in the PEA submittal, as required.</p>	<p>1. The introduction of new project components, namely the two 115 kV transmission lines out of the Santa Rosa Substation, necessitates an update to the list of affected property owners.</p>