

Attachment B. Completeness Review Details

TE/VS Interconnect Project A.07.10.005

	July 2008 PEA Location
Project Purpose and Need	
1. The Project Purpose and Need and Objectives section provides supporting documentation for why some of the features of project could achieve the project objectives, and then lists the project objectives. The section is generally repetitive in its provision of documentation supporting transmission and pumped storage generally, and lacking in analysis specific to the project. More detailed analysis is required to demonstrate how the specific features of the Proposed Project achieve each Project objective. Pumped storage is not part of the Proposed Project and is not relevant to the purpose and need of the project as presented. Refer to the Sunrise Powerlink Project PEA, Section 2 as an example of a statement of needs and objectives.	Please see Chapter 2. Chapter has been revised extensively
2. The Project Purpose and Need and Objectives section lacks organization to facilitate review. For the sake of clarity, and to ensure completeness, the section should state each project objective and provide documentation and analysis of how the project specifically satisfies each objective, in turn.	Please see revised Section 2.1.1

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<p>Project Description</p>	
<p>1. Many of the figures supplied for the purposes of illustrating the project components do not correspond to written descriptions in the text. It is unclear to CPUC which project is being proposed: the project described in the text, or the project described in the figures. These two elements must be harmonized to represent accurately what project components are being proposed.</p> <ul style="list-style-type: none"> a. Figure 3-6 shows a segment of the Talega-Escondido 230 kV transmission line that would be removed and replaced as a component of the proposed TE/VS project, yet the text describes a requirement to bundle the existing circuit rather than remove and replace it. This figure does not show the new 69 kV towers that would likely be required per the text. b. Figure 3-6 (plate 8) on page 3-26 shows a "Rainbow Substation", which does not currently exist, and is not described in the text of Section 3 as being a component of the Talega-Escondido 230 kV transmission upgrades associated with the proposed TE/VS project. c. Figure 3-14 shows one set of towers, rather than two, for the looped interconnection between the Northern (Lake) substation and SCE's Valley-Serrano transmission line, which is described in the text (page 3-36) as requiring two sets of towers. In addition, this figure depicts tower spans at greater distances (some more than 2,000 feet) than described in the text (page 3-7) as the approximate maximum tower span. Finally, this figure depicts the Southern substation in a different location than what is represented on other figures and in the text. d. Figures depicting transmission hardware show a vacant position for a "future" circuit (e.g., Figures 3-11 and 3-32). Figure 3-13 shows a future overhead line. However, the text does not describe a future additional 500 kV circuit as a reasonably foreseeable future phase as required per the PEA checklist. A description of any future phase of the TE/VS project must be provided in the PEA, including an estimated schedule of construction and preliminary engineering work. Figures that do not accurately represent the project should be omitted or amended and explained in the text. 	<p>See Chapter 3, which has been extensively revised and organized according to PEA Guideline structure.</p> <ul style="list-style-type: none"> a. These towers need to be identified in conjunction with SDG&E b. References to "Rainbow Substation" have been removed. c. Please see Attachment 1 for revised tower placement details. Text has been revised to match. d. Text has been revised.

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<p>2. Graphic items that are required:</p> <ul style="list-style-type: none"> a. Map(s) that show the locations and dimensions of ancillary facilities including laydown, pulling stations, storage yards, and fly yards. b. Map(s) that show more clearly, and at a more appropriate scale, proposed access roads. c. Map(s) that show any anticipated trees to be removed. d. Detailed maps that show individual tower locations and the locations of specialty poles/towers at a scale of no less than 1 inch equals 400 feet (1" = 400') e. Maps and diagrams that show required and anticipated SCE and SDG&E system upgrades, areas of temporary and permanent impacts, and facility dimensions. f. Maps identifying specific towers that would require helicopter construction. g. Maps showing details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route and facilities. Maps should be of an appropriate scale that potential impacts may be identified. h. Temporary and permanent disturbance areas should be clearly marked on all impact maps. i. GIS data layers for the Proposed Project preliminary engineering and locations of temporary and permanent disturbance are not provided. j. Please include mile markers ("Mileposts") on all figures and in all in-text references to specific project features. For the sake of clarity, please number Mileposts from north to south, consistent with the Sunrise Powerlink Project DEIR/DEIS Section E.7.1. 	<ul style="list-style-type: none"> a. Please see Attachment A, and relevant sections in Chapter 3. b. Please see Attachment 3 c. Please see Attachment 3 d. Please see Attachment 1 e. Please see available f. Please see Attachment 1 g. Please see Chapter 4.11 h. Done i. Please see disks, attached j. Done
<p>3. Please provide unique pole/tower identification numbers on all maps and for all in-text discussions, where relevant.</p>	<p>Please see Attachment 1</p>
<p>4. Please explain whether guying would be required across a road.</p>	<p>Please see Chapter 3</p>
<p>5. Please provide the approximate distances between conductors (both horizontally and vertically) and from the ground to the lowest conductor.</p>	<p>Please see Chapter 3</p>
<p>6. Please explain whether lighting would be required at the new substation facilities.</p>	<p>Please see Chapter 3</p>
<p>7. Please identify the proposed towers that would be installed via helicopter, what type of helicopter is to be used for what activity, and where helicopters would be staged and refueled.</p>	<p>Please see Figure 1.1.1-1</p>

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8. Please define what types of vegetation clearing may be required (including the approximate number and size of trees that may need to be removed), how each type of vegetation removal would be accomplished, the type of equipment typically used for vegetation clearing, and how restoration would be carried out for areas of temporary disturbance.	Please see Attachment 3
9. Please provide the locations and general or average distance between pull and tension sites, the estimated length, width, and area of pull and tension sites, and the type of equipment required at these sites.	Please see Attachment 1
10. Please provide a description of how construction crews and equipment would be transported to and from the pole site location, including vehicle type, number of vehicles, and estimated number of trips and hours of operation.	Please see Chapters 3.6.1.1 and 3.8
11. Please provide a description of the method of pole/tower installation, including types of equipment required, actions taken to maintain a safe work environment, what would be done with soil removed from a hole/foundation site, details of any excavations (e.g., auger holes) required, how poles/towers and associated hardware would be assembled, and the total permanent footprint for all poles/towers.	Please see Chapters 3.6.1.1 and
12. Please quantify the approximate cubic yardage of material to be removed from trenches or excavations, the amount to be used as backfill, and the amount and location of offsite disposal.	Please see Chapter 3
13. Please provide a description of Hazardous Waste and Spill Prevention Plans and a discussion of how construction waste would be disposed.	Please see Chapter 3.8.4
14. Please provide a description of night lighting requirements and controls for both construction and operation.	Please see Chapter 3
15. Please provide a description of how cleanup and post-construction restoration would be performed, including personnel, equipment, and methods.	Please see Chapter 3
16. The Talega-Escondido upgrade is described as both approximately 47 miles long and approximately 51 miles long. Please correct this inconsistency.	Done
17. Please include a table detailing all project components and facilities including number of poles, number of towers, distance of project segments, structure type, height, ROW details, number of helipads, and miles of proposed access roads. Please include details related not only to the TE/VS transmission line, but all reasonably foreseeable future projects, related projects, and required system upgrades.	Please see Attachment 1
18. Please include a table detailing all project equipment to be used during construction, including time and duration of use. See Sunrise Powerlink Project DEIR/DEIS, Section B.4.7, Table B-14 as an example of the detail required.	Please see Chapter 3.8.5

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19. Table 3-8 (page 3-120), Construction Schedule, appears to be partially in German (e.g., Tage, Do, Mi) and uses European-style dating. Please provide a U.S. English version of this table. Please include a schedule for ROW acquisition.	Modified. Please see Chapter 3.8.6
20. Please describe project operation and maintenance activities in detail. Refer to Sunrise Powerlink Project DEIR/DEIS, Section B.5 for an example of the detail required.	Please see Chapter 3.9
21. Please identify who would be responsible for designing, constructing, and maintaining upgrades.	Not yet determined
22. Please explain why a 500-foot wide right-of-way is considered necessary, and whether, where, and when future expansion of facilities proposed in the ROW is anticipated.	This is part of the FERC-mandated requirements from licensing LEAPS under FERC Docket Pn-11858
Alternatives	
1. The Applicant rejects certain alternatives based on the alternatives' "failure to substantially fulfill the identified objectives for the proposed projects." However, no explanation of which objectives are fulfilled, if any, is provided. Furthermore, the only objective identified as being unfulfilled is expansion of the State's backbone transmission and generation systems, making it difficult to evaluate whether these alternatives indeed "substantially" fail in meeting project objectives. Alternatives are required to be considered under CEQA if they would feasibly attain <u>most</u> of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the proposed project.	Please see revised Chapter 6
2. The use of Sunpath is incorrect: (page 8-19) "Sunrise (Sunpath) Powerlink Project (SDG&E Proposed Alignment)." Sunpath is generally reserved as a name for a combination of the Sunrise Powerlink (SRPL) and the Greenpath Transmission Projects, and it should not be applied in reference to the Sunrise Powerlink Project alone.	Corrected
3. The SRPL is eliminated by the applicant as a reasonable alternative to the Proposed Project (TE/VS) for failing to meet project objectives. However, all of the TE/VS project objectives, as identified in Section 2 of the PEA, would be satisfied by SRPL. The applicant notes that SRPL would not "facilitate the transmission of hydroelectric energy." However, transmission of hydroelectric energy is not one of the stated objectives of the TE/VS project, but rather one of the stated objectives of the LEAPS project, which is not part of the application before the CPUC. If the SRPL were to be rejected as an alternative to the TE/VS project, it ought to be rejected on the grounds that it does not eliminate or substantially lessen any of the significant environmental impacts of the Proposed Project, should that be the case.	Please see revised objectives in Chapter 2

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<p>4. Page 8-27 states "Any transmission route that identifies the Imperial Valley as either a starting or end point would not serve to increase capacity to or facilitate the generation or transmission of hydroelectric energy. Since the SRPL project fails to meet the Applicant's objectives, the Tehachapi transmission project is not a feasible alternative," and then goes on to state that the Tehachapi transmission project is a "related" project rather than an "alternative". Please explain the reference to the Imperial Valley and SRPL in this statement. Furthermore, if the Tehachapi Renewable Transmission Project is a related project, as identified, potential cumulative effects of the proposed project in combination with the Proposed Project must be evaluated specifically in Section 6.</p>	<p>Both the Objectives (Chapter 2) and alternatives (Chapter 6) have been revised extensively</p>
Detailed Discussion of Environmental Effects	
<p>1. System upgrades and reasonably foreseeable future phases identified in the PEA are not given adequate impact analysis. Impact analysis must be performed for all project components, including reasonably foreseeable and related project components.</p> <ul style="list-style-type: none"> a. For example, the text (page 3-36) notes that the Northern substation will be constructed to accommodate SCE's future expansion circuits. However, environmental impacts analysis is not performed in Section 6 for these reasonably foreseeable future expansion projects, as required per the PEA checklist. b. Similarly, environmental impacts analysis is not performed for the reasonably foreseeable SDG&E system future transmission expansion that is built into the design of the Southern substation. As identified on page 3-58, the arrangement of the substation allows for a future fifth bay. c. Upgrades to the SCE system, as identified on pages 3-60 and 3-67 as being reasonably foreseeable future phases, are not evaluated for their potential environmental impacts. These required projects include upgrades to the Etiwanda-San Bernardino 220-kV, the San Bernardino-Vista 220-kV, and the Etiwanda-Vista 220-kV transmission lines. In addition, the three single-circuit overhead transmission lines possibly required as a part of the SCE system upgrades, as identified in Table 3-3 on page 3-82, are not described adequately nor is impact analysis performed. d. Finally, upgrades to SDG&E's system, including upgrades at Escondido and Peñasquitos substations, are not evaluated for their potential environmental impacts. 	<p>Please see Chapters 5 and 6.</p>
<p>2. Per the PEA checklist, either Section 5 or Section 6 must include a list of projects (i.e., past, present and reasonably foreseeable future projects) within the Project Area that the applicant is involved in and a list of projects that have the potential to be proximate in space and time to the Proposed Project. Cumulative impacts analysis must be performed specifically with regard to these lists.</p>	<p>Please see Attachment 6</p>

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<p>3. The Detailed Discussion section does not make clear what specific contribution the Proposed Project would have toward cumulative environmental impacts. For example, in the Agricultural Impacts section, there is no mention whatsoever of the Proposed Project, yet there is a determination made about the level of cumulative impact of the Proposed Project plus other reasonably foreseeable development. In addition, it is unclear how the Proposed Project would avoid contributing to a cumulatively significant impact on aesthetic resources, noise, recreation, and traffic based on the impact conclusions presented in the Sunrise DEIR. In addition, the geographic scope of cumulative impacts must be specifically defined for each issue area.</p>	Please see Chapters 5 and 6
Affected Property Owners	
<p>1. A list of property owners within 300 feet of the TE/VS transmission line and LEAPS generation facilities is provided in the CPCN application. However, the list does not appear to and must include landowners within 300 feet of the Talega-Escondido transmission upgrades and any other upgrades to the adjacent utility systems required as a part of the Proposed Project.</p>	Please see Chapter 7