

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 21, 2008

Mr. Kevin O'Beirne  
San Diego Gas & Electric Company  
8830 Century Park Court – CP32D  
San Diego, CA. 92123

**Re: Data Request #24 for the SDG&E Sunrise Powerlink Transmission Project,  
Application No. 06-08-010**

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division and its consultant team are currently preparing the Final EIR/EIS for the Sunrise Powerlink Project. We have received SDG&E's Responses to Data Requests No. 1 through 23. During the analysis of comments on the Draft EIR/EIS or of Testimony in Phase 2 of the ALJ's proceeding, we have identified additional items that require information from SDG&E; these items are detailed in the attachment to this letter.

Additional data requests may be necessary to address alternatives and other CEQA/NEPA topics. This letter constitutes Data Request No. 24. We would appreciate receiving your response to this request by April 2, 2008.

**Please submit one set of responses to me and one to Susan Lee at Aspen in San Francisco, in both hard copy and electronic format.** Any questions on this data request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V  
Project Manager for Sunrise Powerlink Project  
Energy Division, CEQA Unit

cc: Sean Gallagher, CPUC Energy Division Director  
Ken Lewis, CPUC Program Manager  
Steve Weissman, ALJ  
Traci Bone, Advisor to Commissioner Grueneich  
Nicholas Sher/Jason Reiger, CPUC Legal Division  
Lynda Kastoll, BLM  
Susan Lee, Aspen Environmental Group

## Data Request 24

**24-1 Access Roads.** At the Public Participation Hearings and in subsequent comments or communications, members of the public have indicated serious concerns about access roads identified by SDG&E, as illustrate in Draft EIR/EIS Appendix 11. In addition, SDG&E states in its March 12, 2008 testimony (page 2.41) that the Environmentally Superior Southern Alternative would cause a significant increase in the extent of required access roads (143 miles compared w/ 83 miles). In some cases, the roads designed by SDG&E seem excessively long or create severe impacts on landowners in terms of how they use their property. Related to this issue, we have several questions.

**a. Access Road Final Design.** Please describe the processes by which SDG&E will develop final engineering for access roads and obtain rights to construct access roads for an approved transmission line route. Clarify the extent to which location and design of proposed roads across individual landowners' properties are negotiated with landowners. Also, does SDG&E's power of eminent domain allow it to design and construct access roads over the objection of landowners?

**b. Temporary Access Roads.** SDG&E's March 12, 2008 testimony (page 2.17) states that "Access roads not required for future maintenance would be removed and rehabilitated after construction is complete." No separate GIS shapefiles were provided to the EIR/EIS team identifying access roads not required for future maintenance. Please describe how and when the decision regarding temporary vs. permanent access roads will be made.

**c. Modification of Access Roads included in Preliminary Engineering.** Certain access roads defined by SDG&E create severe land use impacts (as described in "d" below), and need to be modified. Does SDG&E intend to use the preliminary access roads defined for the EIR/EIS as guides to construction, or would final access roads be designed that could be significantly different from the preliminary engineering provided to the EIR/EIS team?

**d. Example 1.** Maps 1 through 3 on the following pages illustrate an example of a serious access road problem. Dr. Dave Smith lives along the Interstate 8 Alternative at 24414 Wildwood Glen Lane, Alpine. The photo in Map 1 illustrates a portion of a very long access road that would provide access to towers S3024 and S3023. The road goes directly through Dr. Smith's home. There are two problems with this situation. The first is that it makes no sense to design an access road through an existing residence. The second problem is that the long access road would serve a future tower that is located only a few hundred feet from the existing SDG&E 69 kV line leading to the Descanso Substation, which already has an access road.

Please explain the rationale behind the development of access roads in this area and in all areas of the project/alternatives. Describe the process that SDG&E would use to correct this situation if this route was approved and access roads were not modified in the Final EIR/EIS.

**e. Example 2.** Map 4 shows access roads (in gold) through Moretti property for Proposed Project access in northern Santa Ysabel Valley. The entire transmission corridor would be accessible using a new access road along the corridor itself, but additional access roads are shown in SDG&E's preliminary design, requiring very long access roads that meander through the entire Moretti property.

Please explain the rationale behind the development of these access roads, and whether SDG&E could construct and maintain the project using only the roads along the corridor itself. Also, if additional access to this route segment is required, describe in detail the process that would be

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used to work with the landowner to select a route that minimizes impact to their land and operations.

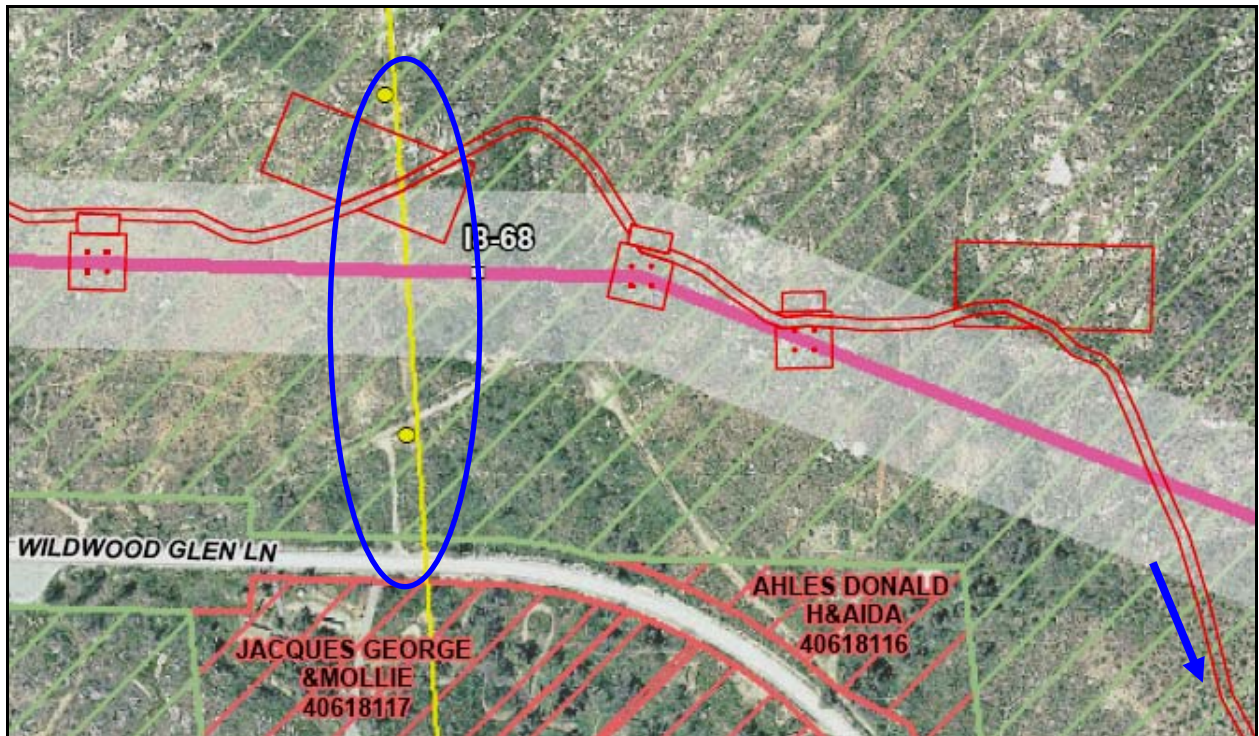
**f. Example 3.** Maps 5 and 6 show segments of the Interstate 8 Alternative where it parallels the existing Southwest Powerlink transmission line. One of the benefits of collocating a new transmission line with an existing line is that the existing access road can generally serve both lines. In most topography, only spur roads from the existing road to the proposed new tower would be required.

Explain why SDG&E has shown a new access road along the collocated portion of the Interstate 8 Alternative, rather than assuming use of the existing SWPL access road.

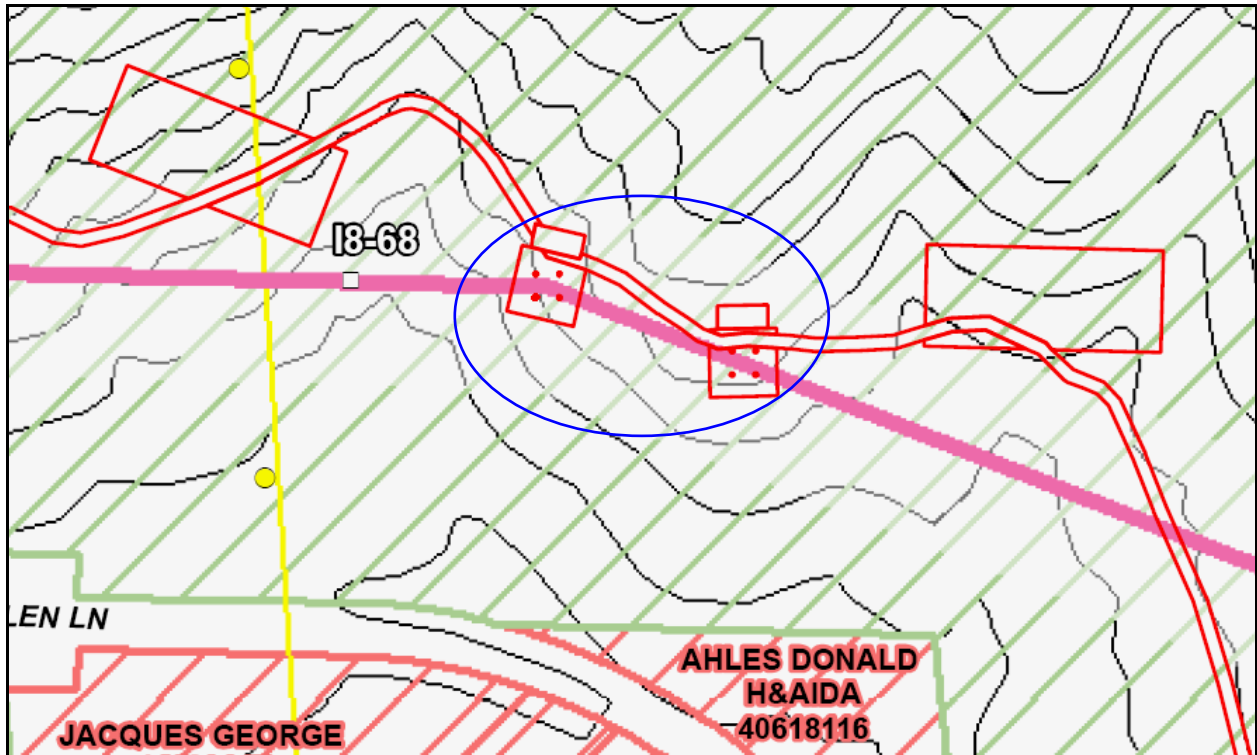
Of the “143 miles of access roads” required for the Interstate 8 Alternative (from SDG&E testimony), how many miles are either already existing access roads for the SWPL, or could be eliminated by using SWPL access roads?



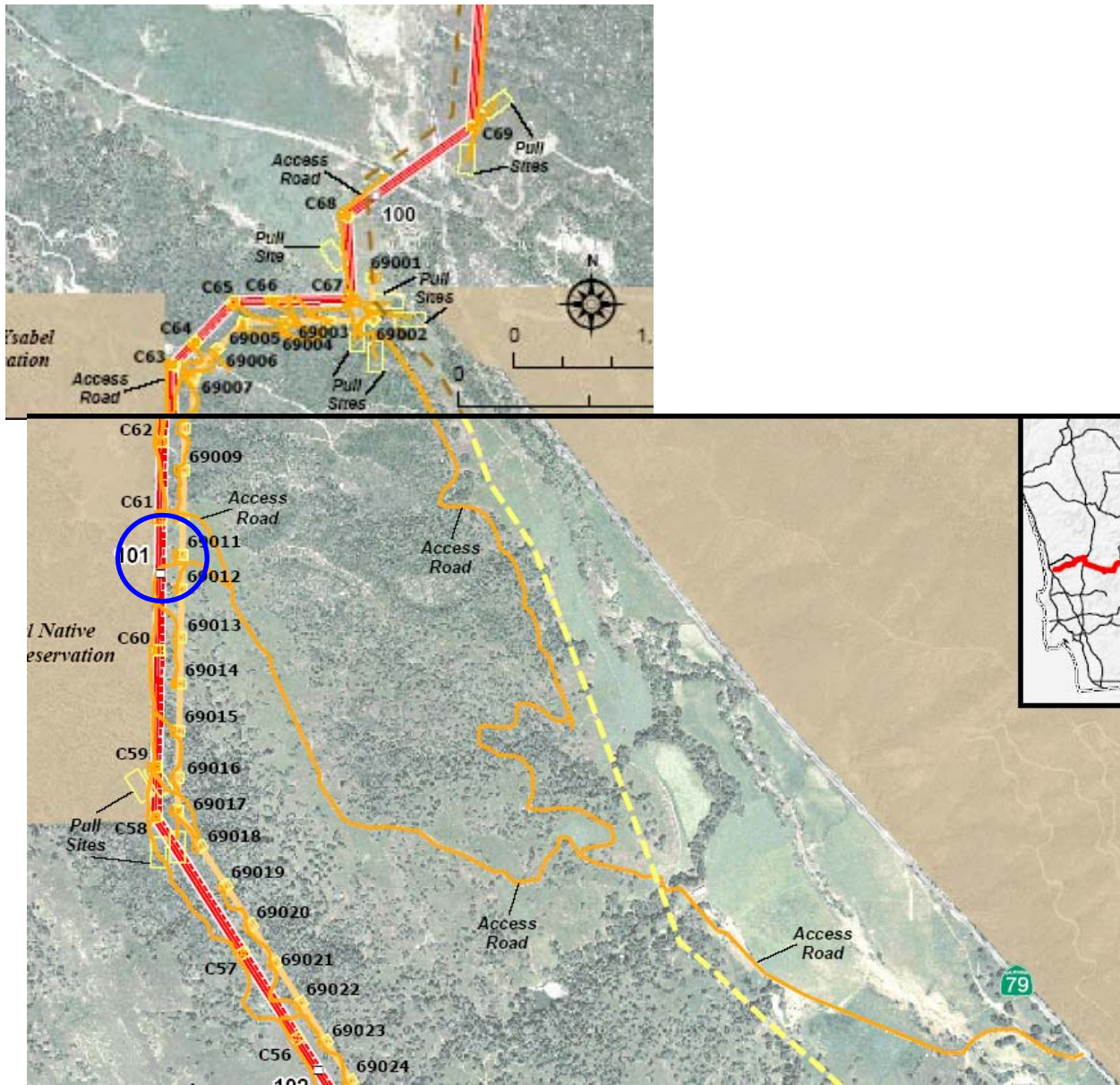
Map 1: Access road through Smith residence (house circled in blue)



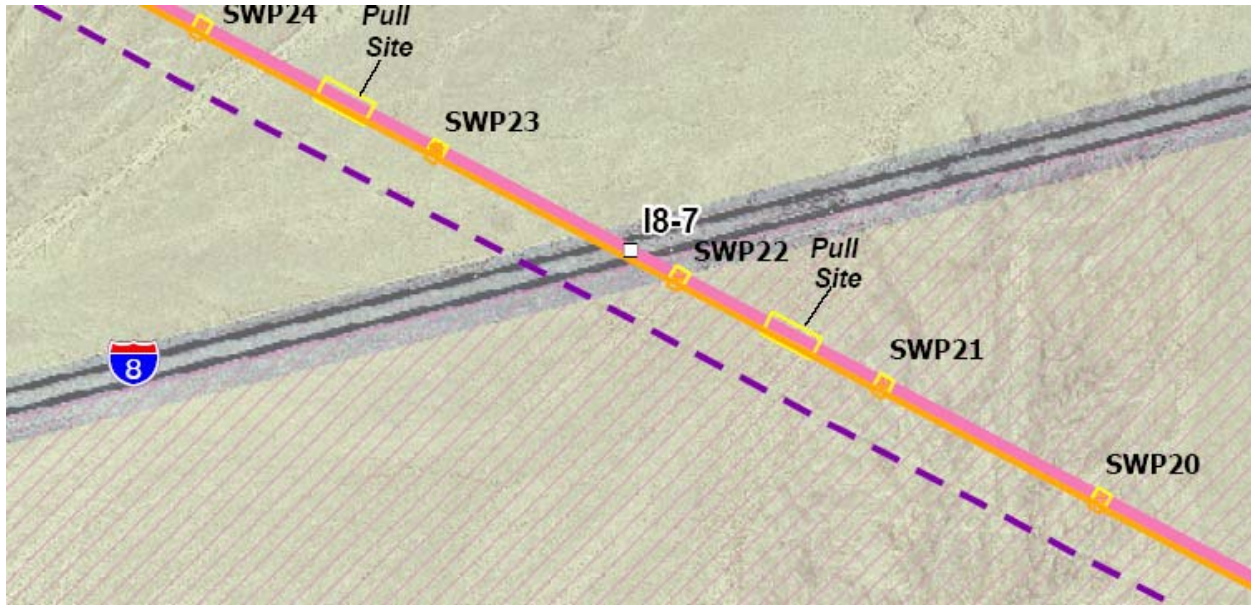
Map 2: Blue arrow points toward Smith residence. Note existing access roads in blue oval; roads already serve the 69 kV line (in yellow).



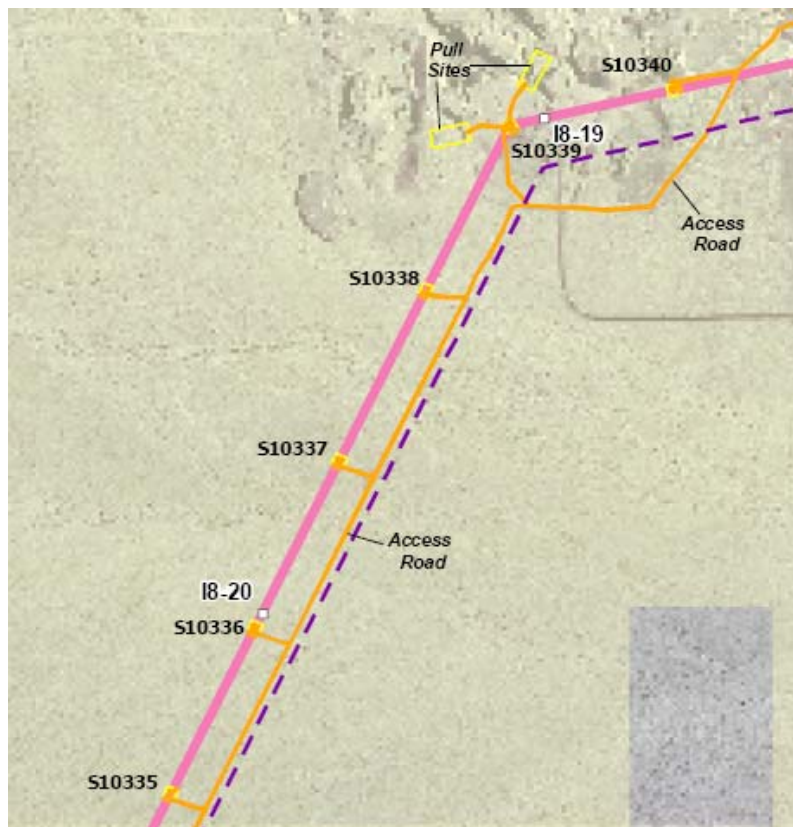
**Map 3: Topography of area, illustrating apparent ease of accessing circled towers from the 69 kV line's access road by following contours from the west.**



**Map 4.** Access roads are shown in gold through Moretti property for Proposed Project access in northern Santa Ysabel Valley. Most of transmission corridor would be accessed by roads following the corridor itself as shown above, but two pairs of towers (circled in blue) are shown as requiring access via very long roads that meander through the entire Moretti property.



**Map 5. Interstate 8 Alternative where it crosses the Interstate 8 Freeway in Imperial County. Purple dashed line is existing SWPL (400 feet from I8 Alternative). Access road shown in orange (adjacent to pink transmission line).**



**Map 6. Interstate 8 Alternative. The segment shown above (west of Ocotillo) shows an access road paralleling the SWPL (purple dashed line).**

**24-2 Santa Ysabel Land along SR 79.** In SDG&E's March 12, 2008 testimony (Chapter 9, pages 9.3 to 9.5) SDG&E states that the Draft EIR/EIS' Northern Environmentally Superior Route may be infeasible because of the following:

SDG&E reviewed the results of recent land surveying in the area, tax assessor records, and information provided by a title company and the federal Bureau of Indian Affairs ("BIA"). Each of these parcels, in whole or in part, is owned by the United States, indicating that they are Tribal trust lands. ... Aspen's Northern Route crosses the Santa Ysabel Indian Reservation. Because SDG&E cannot condemn the necessary easements across the Reservation, the Tribe has an effective veto over constructing Sunrise along this route.

We have reviewed the testimony and Attachments 9-1, 9-2, and 9-3.

**a.** Please explain why SDG&E believes that Caltrans does not have the authority to issue an encroachment permit for utility construction within State Highway 79. Please provide a copy of the Caltrans easement that shows that the original landowners retain easement rights within the Caltrans ROW.

**b.** Please provide a map illustrating a possible route modification for the Santa Ysabel All Underground Alternative that avoids potential tribal land.

**24-3 Fire and Fuels.**

**a.** Please verify that there have been three (3) fires caused by 230 kV transmission lines in SDG&E territory since February 2004 as indicated on pages 5.5, 5.12, and 5.21 of SDG&E's March 12, 2008 Phase 2 testimony. Please describe in detail any and all mechanical, electrical, and meteorological reasons for each ignition, the wind conditions at the time of each ignition if known, the maintenance status of the transmission line at fault (e.g., time since last maintenance). Please also provide a description of the vegetation present at the site of the fire and in the immediate vicinity of the fire, a description of the topography of the site of the fire, and a description of how the fire was extinguished (including any SDG&E personnel involvement).

**b.** Please confirm whether SDG&E developed Proposed Project design criteria based on weather station data at Lindbergh Field, Ramona Airport, Campo, and Beaumont Canyon stations as presented in Mussey Grade Road Alliance (MGRA) March 12, 2008 Phase 2 testimony pages 58 and 61. Please provide SDG&E's rationale for the selection of these weather stations in developing wind loading design criteria, particularly with regard to the portion of the Proposed Project on the western slope of the mountains and in the vicinity of Bloomdale Creek, Santa Ysabel Creek, the San Diego River, Kimball Valley, and San Vicente Creek.

**c.** Please confirm that SDG&E applied a "gust factor" of 1.6 to a 100-year maximum wind speed in setting design criteria for the Proposed Project as presented in MGRA Phase 2 testimony page 64. Please explain or correct the discrepancies and deficiencies noted in MGRA Phase 2 testimony page 65, including the difference between the number of segments in SDG&E's method for developing wind loading design compared with the number of segments presented in SDG&E's map, and the inconsistent application of the "gust factor" calculation as



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presented in MGRA Phase 2 testimony page 65. Please provide SDG&E's rationale for using sustained 100-year wind speed multiplied by a "gust factor" rather than actual wind gust data.

Please verify or otherwise explain the probability that wind gusts will exceed the design criteria during the lifetime of the Proposed Project for the return periods of 50, 100, 200, and 300 years as presented in Table 2G-2 on page 69 of MGRA Phase 2 testimony. Please also confirm SDG&E's chosen return period for wind loading design criteria for the Proposed Project.