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8330 Century Park Court
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December 19, 2014

Reg.12-10/A.12-10-009
SDG&E CNF PTC Application

Sent Via Electronic Mail

Lisa Orsaba California Public Utilities Commission Energy Division 505 Van Ness Avenue San Francisco, CA 94102	Rica Nitka Dudek 605 Third Street Encinitas, CA 92024
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Subject: ED08-SDG&E Response to Questions 1-3.

Dear Ms. Orsaba and Ms. Nitka:

Attached please find SDG&E's response to ED's Data Request 8 issued on November 21, 2014 in the CNF MSUP-PTC Power Line Replacement Projects proceeding. This submittal also completes the utility's response to the above-referenced data request.

In Rebecca Giles' absence in the next 2 weeks, please contact me either by phone: (858) 637-7914 or e-mail: SBallesteros@semprautilities.com if you have any questions.

Sincerely,

Signed

Shivani Ballesteros
Regulatory Case Manager

Enclosures

cc: Allen Trial – SDG&E
Elizabeth Cason – SDG&E
Tim Knowd – SDG&E
Central Files - SDG&E

John Porteous – Dudek
Bob Hawkins – US Forest Service
Debbie Hobbs – Cleveland National Forest, USFS
Fred Bauermeister – Insignia
Kelli Taylor - Cleveland National Forest, USFS

ED08-SDG&E 12/19/14 Response
A. 12-10-009 Cleveland National Forest Power Line Replacement Projects (CNF) PTC
ED Data Request 8 Dated November 21, 2014
ED08-SDGE Questions 1-3

Based on public comments received during the comment period for the MSUP-PTC Power Line Replacement Projects Draft EIR/EIS additional questions regarding the project and alternatives are provided below.

Question 1: 1.0 PROJECT DESCRIPTION

Please provide information on where additional easement/rights-of-way would be required on private lands, by parcel number, for fire hardening the proposed power line replacement projects.

SDG&E Response to Q1:

SDG&E is currently reviewing those locations where additional easements or land rights may be required on privately-owned land for our power line replacement projects. It is anticipated that additional land rights will be required in areas where: (1) existing power lines will be rerouted in an effort to avoid environmentally sensitive areas; (2) existing power lines will be removed and/or relocated to avoid Recommended Wilderness Areas; (3) existing easements need updating to allow the rebuild of the power lines to the latest engineering standards; or (4) in locations where other unforeseen reasons arise as the project scope is finalized. SDG&E will pursue the same easement/right-of-way widths on private lands as those agreed to on U.S. Forest Service lands, thirty (30) feet for power lines and twenty (20) feet for distribution circuits. SDG&E will pursue those land rights necessary for these projects with individual property owners in the same sequence as the anticipated construction schedule in an effort to maintain the project schedule. A list of parcel numbers identified as of December, 2014 for TL629 segment E and TL625 Segment B is provided hereto as Table Q1.

Table Q1

	TL629E		TL625B
60508002	60918026	60904016	52402008
60509008	60918027	60509009	
60509009	60918028		
60807012	60918117		
60807013	60918004		
60807004	60918005		
60901006	60918006		
60901001	60918008		
60902001	60918007		
60902006	60918009		
60902003	60918010		
60902010	60918011		
60918002	60904019		
60918003	60904009		
60918023	60904005		

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Question 2: 2.0 PROJECT ALTERNATIVES

Regarding the Removal of TL626 from Service Alternative please provide the following information:

- a. Under this alternative it is assumed that existing customers would continue to be served by C79. Further, it is assumed that the replaced 12 kV C79 would be fire hardened in the absence of TL626 and would use similar pole height design and conductors as outlined in Section B, Project Description of the EIR/EIS for construction of the distribution lines as well as use existing access routes. Please confirm that components and construction methods used for replacement of C79 would be as described in Section B of the EIR/EIS and that access routes and existing customers' electric service would not be affected under this alternative.
- b. Please describe the easement requirements for the fire hardening of TL6931 as proposed under Option 1 - upgrade existing TL6931.
- c. Please provide existing easements on Campo Tribal Land for TL6931 and TL629 and indicate if they are in perpetuity.
- d. A new alternative to SDG&E's TL625 Loop-in has been suggested to be constructed along Bell Bluff Road (see bookmarks D.7.ORG_11.4.14_Sierra Club (Buxton, C) and F11.IND_11.3.14_Weflen, Nate in comment letters posted on the CPUC website: http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP_PTC_DEIREIS_CommentLetters_Combined.pdf). Please describe how SDG&E would implement this new alternative to TL625 Loop-in along Bell Bluff Road. Further, please provide information on how aboveground and underground alignments would be constructed at this location.

SDG&E Response to Q2:

- a. Under the "Removal of TL626" scenario, customers presently served from C79 would continue to be served by C79. Poles that carry C79 underbuilt to TL626 would be replaced using similar pole height design and conductors as outlined in Section B of the Draft EIR/EIS, as applicable to a "distribution-only" design. This includes fire-hardening of those line segments for C79. Access routes and existing service to electric customers would not be affected, apart from the possibility of planned outages of short duration that may be necessary to accommodate certain aspects of the work.
- b. The easement requirements for fire hardening TL6931 under Option 1 (upgrade existing TL6931) would be consistent with requirements for other power lines included in the Proposed Project. Similar to the 30-foot width obtained with the U.S. Forest Service for power lines on federal land, a 24 to 30-foot width is expected to be adequate for fire hardening TL6931.

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c. Campo Tribal Land for TL6931 and TL629 Easement

<u>TL</u>	<u>ROW No</u>	<u>Rights</u>
629	159995	24-foot overhead electric easement – in perpetuity
6931	159996	24-foot overhead electric easement – in perpetuity

- d.** Because SDG&E did not propose and has not previously evaluated a potential loop-in alternative to Suncrest Substation from TL625 along Bell Bluff Truck Trail, no engineering information regarding specific pole types or sizes, pole locations, areas requiring undergrounding, or other location-specific data is available. If the California Public Utilities Commission and U.S. Forest Service select such an alternative, SDG&E would engage in site design and engineering consistent with the practices used for the Proposed Project. Based on a preliminary desktop-level evaluation, SDG&E estimates that a loop-in between TL625 and Suncrest Substation would begin at approximately pole Z272967 and proceed westerly along Bell Bluff Truck Trail for approximately 2.9 miles. Because such an alternative would relocate the majority of structures required for a loop-in between TL625 and Suncrest Substation from U.S. Forest Service lands to private lands, easements and associated rights-of-way would need to be evaluated and acquired prior to construction to ensure adequate land rights are available to safely construct and maintain the loop-in.

Without the benefit of a comprehensive feasibility study, SDG&E cannot identify a preferred alignment for this location that specifies whether overhead or underground construction, or a combination of both, would be required. According to SDG&E’s preliminary desktop-level analysis, however, one potential underground alternative alignment could follow Bell Bluff Truck Trail roughly parallel to the existing 12 kilovolt (kV) duct bank along the substation access road. Because the existing conduits and substructures installed for the existing 12 kV distribution circuit cannot support a 69 kV system, separate duct banks, vaults, and conduits would be required for the double-circuit loop-in. Construction methods for such an alternative would likely include a combination of open trench, jack-and-bore, and horizontal directional drill techniques consistent with what is described in SDG&E’s Plan of Development. If undergrounding was determined to be infeasible in this location, SDG&E could construct an overhead alignment between approximately pole Z272967 along Bell Bluff Truck Trail using a combination of helicopter- and boom truck-set poles. Geotechnical analysis would be required to identify locations where foundation poles may be required in place of direct-bury pole construction. Any overhead alignment would be constructed using materials and methods consistent with that described in SDG&E’s Plan of Development. Likely, a combination of overhead and underground construction would be used to achieve optimal placement and construction of any proposed loop-in in this location.

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In addition to the loop-in, at a minimum a new transformer and substation rack would be required to be installed within the existing footprint of Suncrest Substation to accommodate the new double-circuit 69 kV loop-in.

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Question 3:

Public comments suggest removal of C78 from the Cleveland National Forest (CNF; see bookmarks D.7.ORG_11.4.14_Sierra Club (Buxton, C) and F151.IND_11.4.14_Weflen, Nate in comment letters posted on the CPUC website:

http://www.cpuc.ca.gov/environment/info/dudek/CNF/MSUP_PTC_DEIREIS_CommentLetters_Combined.pdf). As seen in EIR/EIS Figure B.5, C78 is primarily on lands managed by CNF. Please describe how removal of C78 located on CNF lands would affect existing customer service.

SDG&E Response to Q3:

Removal of C78 facilities would impair reliability of service to those customers located east of Viejas Grade Road and Via Arturo. Service in this area originates from SDG&E's Descanso Substation, using a single 69/12 kV transformer. If C78 were to be removed along Viejas Grade Road, a failure of this single transformer would result in an outage of significant duration for the remaining customers in that area. Further, the removal of C78 would impair reliability to customers residing in the northern portion of the Viejas Indian Reservation, should a failure of the circuit from Alpine Substation, C1458, occur.

Rerouting C78 to completely avoid Cleveland National Forest is not feasible; the next drivable surface to the south is the Interstate 8 freeway. Relocating to the north would only take C78 deeper into Cleveland National Forest. The proposed line installed along Viejas Grade Road will continue to provide a backup supply from Alpine Substation for customers immediately west of Descanso Substation, as well as backup for customers residing in the northern portion of the Viejas Reservation.

The Proposed Project, as filed, relocates C78 onto a drivable thoroughfare and discontinues the use of a "cross-country" alignment within Cleveland National Forest. This reduces ongoing environmental impacts related to the operation, inspection, and maintenance of the line in that configuration.