STATE OF CALIFORNIA Edmund G. Brown Jr., Governor

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 16, 2011

Linda Wrazen
San Diego Gas & Electric
8330 Century Park Court
San Diego, California 92123
(Email: lwrazen@semprautilities.com)

Subject: SDG&E Mira Sorrento Substation Project (Application No. 11-10-015)

Dear Ms. Wrazen:

The California Public Utilities Commission (CPUC), with technical assistance from Dudek, has reviewed San Diego Gas & Electric's (SDG&E's) Permit to Construct (PTC) application, including the Proponent's Environmental Assessment (PEA), dated October 2011, for the subject project. The CPUC's Information and Criteria List and PEA Checklist were used as a basis for evaluating completeness and ensuring that sufficient information has been provided to the CPUC to complete environmental analysis for the subject project, as required by the California Environmental Quality Act (CEQA).

After reviewing the materials submitted, the CPUC Energy Division finds that the information contained in the environmental assessment is currently incomplete. Attachment A identifies the areas of the application that were found to be deficient.

Please provide requested information in Attachment A in support of the analysis for the Mira Sorrento Substation Project to Michael Rosauer (CPUC Energy Division) and Rica Nitka (Dudek). We would appreciate your response to this completeness review no later than December 6, 2011.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.2579 or michael.rosauer@cpuc.ca.gov.

Sincerely,

M Rosauer

Michael Rosauer
CPUC Project Manager

cc: Rica Nitka, Dudek
Attachment A: PEA Completeness Review

ATTACHMENT A
Permit to Construct - A.11-10-015
Mira Sorrento Distribution Substation Project
PEA Completeness Review

ADMINISTRATIVE

1) Please provide all agency and public involvement contacts and correspondence to date, including names, addresses, phone numbers, and email addresses. In addition to property owners within and adjacent to the project, please list all other stakeholders and contacts.

2) Please provide owner mailing address and the physical address of the parcels for assessor parcel numbers (APN) 341-01-028. This APN is shown for two sites adjacent to the east and north of the proposed project site on the parcel aerial map; however, it is not included in the 300-foot parcel Excel file.

3) Please provide ArcGIS shape files and/or CAD files for the off-site underground transmission facilities within franchise positions and the 12-kilovolt (kV) electrical distribution, telecomm fiber, and telephone duct package infrastructure.

4) Please provide a list of preparers of the Proponent's Environmental Assessment (PEA) in accordance with the California Public Utilities Commission (CPUC) PEA Checklist for Transmission Line and Substation Projects.

CHAPTER 1 PEA SUMMARY

Section 1.5.1 City of San Diego

a) Section 1.5.1 states San Diego Gas & Electric (SDG&E) has had discussions with City of San Diego (City) staff regarding the City's change to the zoning classification on the project site from an industrial zoning designation to a residential zoning designation in 2006. Please indicate whether the correction to designate the site as industrial in the zoning map has been completed by City staff. Please provide the revised zoning map and correspondence from the City indicating the zoning correction has been made as presented in the PEA.

b) Section 1.5.1 states SDG&E has prepared an analysis that demonstrates the proposed project is not considered a new utility project and is consistent with the Miramar Marine Corps Air Station (MCAS) Airport Land Use Compatibility Plan (ALUCP). Please provide the consistency analysis that was completed by SDG&E.

Section 1.5.2 San Diego County Regional Airport Authority

a) Section 1.5.2, states the City of San Diego City Council will have the ultimate land use decision in the event of a conflict between the ALUCP for Miramar MCAS and the proposed project. Please clarify as to whether any permits will need to be obtained from the City that would result in the consistency determination being made by City of San Diego City Council.

Section 1.9.1 Interagency Coordination

a) Please provide an update regarding the amendment to the Airport Authority's ALUCP that is expected to be approved by the Airport Authority no later than December 2011. Please clarify whether the amendment would be specific to the Mira Sorrento Substation project.

Section 1.9.2 Community Outreach

a) Please provide a summary of the community's feedback that has been received during meeting presentations provided by SDG&E to the Mira Mesa Community Planning Group since 2004.

Section 1.9.3 Letters of Support

a) This section of the PEA states that a letter from MCAS Miramar expressing non-opposition to electrical substations is provided in Appendix A. Please provide a copy of this letter since it was not included in Appendix A.

CHAPTER 2 PURPOSE AND NEED

a) The PEA indicates a new Mira Sorrento Substation is planned for 2014 to meet the area's ultimate capacity requirements. Please indicate whether the existing electrical service in the Sorrento Mesa area meets North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) reliability requirements. Please be sure to provide a detailed explanation as to why the existing electrical service configuration meets NERC and WECC reliability requirements. Please identify at what point in time and under what contingencies the current transmission and distribution system in the Sorrento Mesa area will no longer be in compliance with NERC and WECC reliability requirements. Please provide details as to limiting system elements and associated contingency (or contingencies) as well as any supporting study work.

b) The supporting data contained within the PEA are limited to a statement regarding the number of distribution substations presently serving the area and a statement that 2013 forecasted loadings at these substations are in the 89% to 98% range. Please provide the basis for the percentage loading cited and the actual substation loadings (historical or forecasted).

c) The PEA indicates that five substations are at maximum transformer configuration. Please identify the configuration at the five respective substations and substantiate the statement that the average high substation loading is forecasted to be 90% in 2012.

d) Please provide the existing substation transformer capacity (normal and emergency) and transformer loads (historical and forecast) for all five substations mentioned in the PEA.

3.0 PROJECT DESCRIPTION

3.5.1 Mira Sorrento Substation

a) Please clarify as to whether the substation layout and site plan exhibits and profile drawing included in the PEA include the initial arrangement or ultimate arrangement. In the event the site plan exhibits and profile drawing include the initial arrangement, please provide exhibits with the ultimate configuration.

b) Please clarify the height of the substation steel racks. The PEA text indicates the steel racks will be approximately 30 feet tall; however, Figure 3-11, Mira Sorrento Substation Profile Drawing, shows a maximum height of 25 feet.

c) Section 3.5.1.1 identifies several construction practices that would be implemented by SDG&E during construction. Please clarify as to whether the identified construction practices are considered an Applicant Proposed Measure (APM). In the event the construction practices were intended to be an APM, please revise Table 3-6 accordingly. Also see item 4.2(e) below.

d) Please label each electrical facility on Figure 3-6 that will ultimately be installed at the proposed Mira Sorrento Substation. Please be sure to provide the ArcGIS files associated with the exhibits prepared in response to this data request.

e) Please indicate whether the City has reviewed the conceptual landscape plan and whether the plan meets the City requirements. Please indicate whether SDG&E will need to obtain permits from the City associated with the landscape plantings included in the landscape plan that would require City staff to review and approve the conceptual landscape plan.

f) Please provide the location of the existing water line and associated improvements that will need to be completed to provide potable water for the proposed landscaping.

g) Please provide an explanation and timing as to the phased build-out of the proposed substation in relation to constructing the "ultimate arrangement."

3.5.2 Distribution

a) Please provide a detailed map that includes the location and associated circuits that will be routed from the proposed substation to existing distribution circuits. Please provide a map that includes the location of the manholes, overhead pole tie-ins, new overhead conductor locations, etc. Please be sure to provide the ArcGIS files associated with the exhibits prepared in response to this data request. In addition, in accordance with the CPUC PEA Checklist, Chapter 7, please update the 300-foot parcel Excel spreadsheet and map to include all parcels within 300 feet of all project components. Please include the following data: APN number, owner mailing address, and physical address of parcels.

3.6 Permanent Land/Right-of-Way (ROW) Requirements

a) Table 3-1 indicates that SDG&E owns 3.74 acres; however, the text in Section 3.6.1 indicates that 0.25 acre is still under City Council consideration for transfer to SDG&E. Please confirm that SDG&E owns 3.49 acres of the substation site and provide the status of the City Council transfer of the 0.25 acre.

3.7.2 Workspace

a) Please provide a map that includes the location of the existing SDG&E storage and operations yards that would be utilized during construction.

b) Please indicate whether there are any workspace requirements for the 12 kV circuit ties described in Section 3.5.2. If there are, please describe and add to Table 3-2, Temporary Workspace Requirements. Please be sure to provide the ArcGIS files associated with these workspace areas.

c) Section 3.7.2.2 identifies traffic control plans that will be developed and approved by the City. Please clarify as to whether the identified traffic control plans are considered an APM. In the event the traffic control plans are intended to be an APM, please revise Table 3-6 accordingly.

3.7.4 Mira Sorrento Substation

a) Earthwork is estimated at 65,000 cubic yards of cut and 67,000 cubic yards of fill for the proposed construction activities. Please indicate whether the proposed project will require the import of 2,000 cubic yards of fill or whether cut material will be hauled off site and additional fill material will be required beyond the 2,000 cubic yards of fill. Please provide the number of truck trips associated with the earthwork that will be required for the project site.

3.7.5 TL 665 Loop-In

a) Please provide the dimensions of the pre-formed concrete splice vaults that will be installed for the 69 kV underground circuit along the new TL 665 loop-in trench alignment.

a) Please indicate whether the soil excavated for open cut trench operations will be hauled off site and/or used as fill within the project limits.

4.0 ENVIRONMENTAL IMPACT ASSESSSMENT SUMMARY

Section 4.1 Aesthetics

a) Please provide the locations and illumination levels for lighting that will be included at the proposed substation. In particular, the Project Description states that lights would be left on at night during "required night time work"; please characterize the nature of this work as well as the expected occurrences and duration of the work. Also, please characterize the scenario under which lights would be installed on the end of the steel rack (as discussed on page 3-15 of the Project Description).

b) Please provide the JPEGS that were utilized to create Views 1 through 4 in the PEA.

c) Please provide visual simulations (Views 1, 2, 3, and 4) that include the landscaping components included in the conceptual landscape plan.

d) Please indicate whether the selection of key observation points (KOPs)/sensitive viewing locations were based on discussions with local agencies. Please identify the methodology that was utilized for the selection of sensitive viewing locations.

e) The PEA states that private views from Sorrento Towers were considered but due to elevation differences no impacts would occur. In addition, the PEA states that impacts to the existing office complex located to the south of the project site would not be

significant because the existing viewshed would not be significantly impacted. Please provide photos and/or simulations and a viewshed map from these viewer locations.

Section 4.2 Air Quality

a) Section 3.7.4.1 of the PEA indicates that a temporary tap to an existing distribution line may be installed to provide electrical services during construction. In the event a temporary tap is not installed, up to two to three 200-kilowatt (kW) diesel generators will be utilized to provide power during construction. Please clarify whether the construction emissions modeling included a worst-case assumption that diesel generators will be utilized to provide power during construction.

b) Please substantiate the statement that the proposed project will support the delivery of additional renewable energy generation.

c) Please provide the assumptions that were utilized for the air emissions modeling that determined the worker vehicle exhaust emissions.

d) The construction schedule provided in Table 4.2-7 is inconsistent with the construction schedule provided in Table 3.3. Please clarify the anticipated construction schedule.

e) Section 4.2.1 of the PEA states, "With implementation of SDG&E's APMs (refer to Section 4.2.5), impacts to air quality as the result of construction, operation and maintenance, would be less than significant." APM AQ-1 is related to sulfur hexafluoride (SF6) controls, which would have no effect on criteria air pollutant emissions. Section 3.5.1.1 describes construction practices that would reduce construction emissions. Did SDG&E intend to propose these measures or other measures related to criteria air pollutants associated with operation and maintenance of the substation as APMs? If yes, please revise Table 3-6 and Section 4.2.5 accordingly. Also see item 3.5.1(c) above.

f) Section 4.2.4.3 of the PEA includes the reported construction GHG emissions in Table 4.2-6 that do not match the maximum daily emissions shown in Table 9 of the Air Quality Assessment (Appendix B). For example, the CO_2 emissions in Table 4.2-6 for the first year of construction are 1,471.82 metric tons per year, while in Table 9 it is shown as 1,250.19 metric tons per year. Please reconcile this discrepancy. Please clarify the inconsistency between Table 4.2-9 in the PEA and Table 9 of the Air Quality Assessment.

g) Section 4.2.3.4 of the PEA states, "Eight to fifteen workers could be on-site during the balance of construction of the transmission, substation, and distribution infrastructure…."

However, Table 3-4 indicates that up to 31 workers (plus 2 inspectors) may be required during the Site Development and Grading phase, and up to 24 workers would be required during the Substation Construction phase. Please verify the number of workers and trips assumed in the URBEMIS 2007 runs to ensure that the related emissions have not been understated.

h) The reported construction emissions in Table 4.2-8 of the PEA do not match the maximum daily emissions shown in Table 7 of the Air Quality Assessment or the URBEMIS 2007 output in Appendix B. For example, the unmitigated NOx emissions in Table 4.2-8 for the first year of construction (shown for year 2013) are 199.36 pounds per day, while the unmitigated NOx emissions in Table 7 are 154.45 pounds per day (shown for year 2011). Please clarify the inconsistency between the PEA and Air Quality Assessment.

i) Please provide a copy of SCREEN3 output and calculations of cancer risk and "chronic risk factor." A pollutant concentration is typically expressed in units of micrograms per cubic meter and not in pounds per day. Thus, it is unclear what the value of 37.69 represents. Footnote 3 to Table 4.2-9 describes an outdated calculation of cancer risk. Footnote 4 to Table 4.2-9 describes the current (per the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics Hotspots Program Risk Assessment Guidelines, August 2003) calculation of cancer risk and not the "chronic risk factor." Furthermore, the chronic risk factor is the incorrect term for assessing chronic noncancer health impacts. The value in Table 4.2-9 appears to be the chronic hazard index, which is the modeled annual concentration divided by the Reference Exposure Level of 5 g/m^3 for diesel particulate matter.

j) Section 4.2.3.4 of the PEA states, "Greenhouse gas estimations are based on energy emissions from natural gas usage, as well as automobile emissions." However, the air quality assessment in Appendix B does not include any calculations of the emissions associated with natural gas combustion. Specifically, there are no values for natural gas in the URBEMIS 2007 output, and the emission values in the tables titled "Emissions from Natural Gas Consumed by Land Uses" are all zeros. The project description does not indicate that natural gas would be used for water or space heating at the substation. Please reconcile this inconsistency.

k) Section 4.2.3.4 of the PEA states, "The electricity that would be delivered to this substation would be a non-fossil fuel-based energy source, which would have the indirect effect of displacing emissions otherwise occurring at natural gas and coal fired power

plants." Chapter 3 (Project Description) does not indicate that such energy sources would be provided via the Mira Sorrento substation. Please reconcile this inconsistency.

l) Please provide a citation to support the statement in Section 4.2.3.4 of the PEA that states, "The allowable manufacturer leakage rate for each canister is 1 percent per year."

m) Section 4.2.3.4 of the PEA states, "The changes in emissions due to the electrical consumption required to operate the Substation and the on-site SF_6-containing equipment have been calculated and are presented in Table 4.2-10…". Table 4.2-10 shows emissions from mobile sources and circuit breakers (i.e., SF_6-containing equipment). The table does not include the GHG emissions associated with electrical consumption to operate the substation. Please reconcile this inconsistency.

n) Section 4.2.3.4 of the PEA states, "This [GHG emissions] calculation reflects the Business as Usual approach; that is, with no reductions from project APMs taken into consideration." The calculation of SF_6 emissions with a 1% leakage rate appears to reflect the effectiveness of APM AQ-1 and not Business as Usual (i.e., a potentially higher leakage rate). Please provide further explanation as to whether the SF_6 emission calculation reflects Business as Usual, and if so, what the reduction due to APM AQ-1 would be.

o) Please substantiate how a 29% reduction from business as usual would be achieved "through the implementation of Renewables Portfolio Standard (RPS) and energy efficiency for nighttime lighting and other minimal electricity uses on site."

p) The equipment listed in the URBEMIS 2007 output for all phases except the Site Development and Grading phase are identical. The URBEMIS 2007 equipment lists for these phases do not match the equipment listed in Table 3-A in Chapter 3. For the Site Development and Grading phase, 25 dump trucks are mischaracterized as dumpers/tenders (i.e., dump trucks are on-road vehicles and have engines much larger than the 16-horsepower engines for dumpers/tenders). Furthermore, the URBEMIS runs, which were performed in 2010, anticipated construction in 2011 and 2012 rather than 2013 and 2014, as indicated in Chapter 3. Please correct the equipment lists to more closely match those in Table 3-A, correct the construction schedule dates, and provide revised construction emission calculations. Alternatively, if the URBEMIS 2007 runs were revised and the results match those present in Tables 4.2-6 and 4.2-8, please provide a copy of the revised output files.

Section 4.3 Biological Resources

a) Table 4.3-4 identifies the existing jurisdictional resources within the Mira Sorrento Substation Project Survey Area. Please indicate whether SDG&E has coordinated with the City and the permitting agencies regarding impacts to the habitat and avoidance requirements of the wetlands or received any feedback from the permitting agencies at this time regarding the jurisdictional determinations.

b) Please indicate whether the site plan and design has considered potential buffers that may be required from jurisdictional resources.

c) The mapping provided indicates disturbed habitat for a large portion of the site; however, the species composition is more indicative of non-native grassland (includes non-native grassland species). Please provide documentation of the calculation of percentage cover and relative percentage cover for the areas mapped as disturbed habitat. The vegetation community, if >50% cover of non-native grasses, should be changed to non-native grassland, and the mitigation changed accordingly. If the percentage cover exercise is not prepared, then please change the vegetation community to non-native grassland.

d) It does not appear that any focused surveys for special-status plant species were conducted. The site was visited in September during the time of year when sensitive annual plants cannot be detected. A description of avoidance or preconstruction surveys as well as a detailed description of the potential for special status plant species to occur should be provided. Please incorporate previous work that was conducted at the site to be able to evaluate the potential for rare plants to be present even if it is older survey information. The data can be provided with a caveat that new surveys are scheduled.

e) No focused survey of California gnatcatcher (*Polioptila californica*) was conducted. Please describe the observation of California gnatcatcher on site (2003) in greater detail and described avoidance measures. A focused survey during the breeding season should be conducted that will support whether the species appears to be using the site for breeding or not.

f) Please indicate whether the willow riparian area is suitable for riparian wildlife species. If so, please indicate whether a focused survey has been completed at the appropriate time of year or whether an adequate buffer for the special-status species has been provided. Based on the current design, which does not appear to provide a buffer, the area should be surveyed for special-status riparian species including least Bell's vireo (*Vireo bellii pusillus*).

g) Please evaluate the potential for vernal pools as well as the potential for fairy shrimp. Fairy shrimp do not strictly occur within high-quality vernal pools but can also occur within road ruts and other areas that pond periodically. Given the location in Mira Mesa, the presence of clay soils on site and the proximity of vernal pool soils *(Huerhuero*), please provide a discussion of the potential for fairy shrimp and conduct surveys as needed.

h) Please clarify whether the results from the 2003 biological surveys have been incorporated into the PEA.

i) Please provide a map that shows the California Natural Diversity Database (CNDDB) and U.S. Fish and Wildlife Service (USFWS) points mapping. A 5-mile radius should be used and species within the 5 miles should be discussed.

j) Analysis of the potential-to-occur species should be expanded to include those addressed by the Multiple Species Conservation Plan (MSCP) even though the City is not the lead agency for this project. The potential-to-occur species should also include those recorded in CNDDB, as well as other species that have special status that are not covered species with MSCP or the SDG&E Natural Community Conservation Plan (NCCP) but that could occur within the region based on soils, distribution, and habitat type. As an example *Dudleya brevifolia* is recorded within approximately 3,000 feet.

Section 4.4 Cultural Resources

a) Appendix E, Cultural and Paleontological Reports, indicates that the report is a preliminary report of the results of archaeological monitoring only and says that paleontological monitoring is ongoing. Please clarify whether the San Diego Natural History Museum provided additional recommendations/conclusions for the project.

b) Section 4.5.3, Impacts: Please provide any responses from the Native American scoping letters and any correspondence with the Native American groups. In the event responses have not been received from the Native American groups, please indicate so.

c) Please provide the Historic Resource Evaluation prepared by RECON in May 2003, and the Paleontological Survey completed by the San Diego Natural History Museum in April 2003.

d) Please provide the confidential records search conducted by SDG&E referenced in Appendix E of the PEA.

Section 4.6 Hazards and Hazardous Materials

a) Question 4.6h states SDG&E implements its Wildland Fire Prevention and Fire Safety Electric Standard Practice during all operation and maintenance procedures. Please provide measures that are included in the SDG&E Wildland Fire Prevention and Fire Safety Electric Standard Practice that would be applicable to the proposed project.

Section 4.7 Hydrology and Water Quality

a) The PEA states that the Proposed Project would involve a limited increase in the amount of impervious surfaces at the site but does not provide details. Please disclose the acreage of impervious area that will be added by the Project. Please provide the existing coefficient of runoff for the site and proposed project coefficient of runoff.

b) Page 4.7-12 states the proposed project is anticipated to provide a wetland buffer to protect adequately the functions and values of the existing wetlands within the survey area. Please provide the dimensions and location of the wetland buffer.

c) Please provide the dimensions and location of the local oil containment basin, consisting of concrete slabs and walls that will be configured to contain the total volume of oil in the proposed transformers.

d) Please indicate the improvements or design measures that will be included as part of the project design as a result of the drainage plan that will be prepared to address stormwater flows across the site and runoff from within the proposed substation limits. Please indicate whether flows will be directed to existing storm drains and if post-development flows will exceed existing flows. In the event runoff will be directed to nearby storm drains, provide the improvements that will need to be completed to meet City standards.

Section 4.9 Noise

a) Section 4.9.3.2 identifies both the Courtyard Hotel and the Marriott Courtyard, which appear to be the same hotel. Distances of 528 and 800 feet are provided for this hotel. Please clarify the hotel name/distance.

b) The City's 65 CNEL noise standard is not applicable to construction noise. Please evaluate the construction noise in terms of the City's Equivalent Continuous Noise Level (Leq) 12-hour average noise standard, and provide the calculated Leq noise level at the noise-sensitive receptors.

c) Please provide noise levels included on Pages 4.9-16 and 4.9-17 in terms of the City's Leq 12-hour average noise standard.

d) Please provide the nighttime construction activities and associated construction nighttime noise levels. Be sure to identify the noise significance of the nighttime construction activities, and provide noise abatement measures, if necessary.

e) According to the project's Technical Noise Evaluation, the project site is zoned RS-1-8. Therefore, the applicable noise limits are 50 decibels (dB) Leq daytime, 45 dB Leq evening, and 40 dB Leq nighttime. Please evaluate based on the noise level standards for the applicable land use zone.

Section 4.11 Public Services

a) Please provide response times for fire and police protection services to the project site. For Fire Protection Services, provide response times to the project site from Fire Station #41 (at 4914 Carroll Canyon Road) and Fire Station #35 (at 4285 Eastgate Mall). For Police Protection Services, provide response time to the project site from the Mira Mesa/Scripps Ranch Storefront Station (at 8450#A Mira Mesa Boulevard). In addition, are there any ambulatory services in operation in the project area that could potentially serve the project?

b) Please characterize the volume(s) of water anticipated to be used during construction and operation. If exact volume(s) are unknown, provide a range (in gallons).

Section 4.12 Transportation and Traffic

a) Table 4.12-1 provides the roadway segment level of service (LOS) and traffic volume at nearby roadways. Please provide the intersection traffic volumes and LOS for nearby intersections that would be affected by proposed construction and operational activities.

b) Question 4.12c indicates that, at this time, helicopter use is not anticipated for the proposed project. Please identify, in the event a helicopter is determined to be required, the type of activities that will need to be performed by a helicopter both during construction and operation.

Section 4.13 Cumulative Analysis

a) Please identify the research methods that were utilized to complete the Planned and Proposed Projects within One Mile of the Proposed Project Site. Please provide any

documentation that was obtained from agencies and the date the documents were obtained to support the project list provided in Table 4.13-1.

5.0 DETAILED DISCUSSION OF SIGNIFICANT IMPACTS

Section 5.2 Description of Project Alternatives and Impact Analysis

a) Please provide a map that includes the substation site alternative locations identified in Table 5-1.