PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 3, 2011

Mr. Kevin O' Beirne
Regulatory Case Administrator
San Diego Gas & Electric
8330 Century Park Court,
San Diego, California 92123-1530

Subject: ***Data Request No. 5 – San Diego Gas & Electric ("Applicant"), South Bay Substation Relocation Project (CPCN Application No. 10.06.007)***

Dear Mr. O' Beirne:

The California Public Utilities Commission (CPUC) has identified additional information required to complete our analysis of the South Bay Substation Relocation Project. Please provide the information requested in *Attachment A*. We would appreciate your response to this data request no later than May 24, 2011. This will help us maintain our schedule for analysis and processing of your application.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.5484 or jensen.uchida@cpuc.ca.gov.

Sincerely,

Jensen Uchida
Energy Division, Room 4A

Att: Attachment A – Data Request No. 5

ATTACHMENT A

Data Request No. 5

ATTACHMENT A
Data Request No. 5
South Bay Substation Relocation Project

Project Alternatives

*Background***:** San Diego Gas & Electric (SDG&E) provided several system alternatives and substation site alternatives in the South Bay Substation Relocation Project Proponent's Environmental Assessment (PEA) in accordance with the checklist that was issued by the California Public Utilities Commission (CPUC) in November 2008. Since the CPUC deemed the application complete on September 8, 2010, the California Coastal Commission (CCC) has requested that the CPUC provide a range of feasible project alternatives in the California Environmental Quality Act (CEQA) document that would reduce and minimize impacts to wetland habitats that have been identified within the Proposed Project footprint.

The CCC will be issuing a Coastal Development Permit (CDP) for the South Bay Relocation Project. In order for a CDP to be issued for the Proposed Project, the CCC will need to make a determination as to whether the project footprint contains areas that are considered to meet the definition of "environmentally sensitive habitat areas (ESHA)". ESHA lands are defined by the CCC as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments" (Section 30107.5).

Based on the environmental review completed to date, it has been determined that the environmentally sensitive lands on site would primarily consist of wetland habitats located within the former liquefied natural gas (LNG) secondary containment earthen berm and wetlands located just outside of the southwest corner of the earthen berm. The wetland features are included on Figure 4.4-3 of the PEA (see water features 2, 3, 4, 5, 6, 7, and 8).

Per the CPUC's understanding, SDG&E and CCC are completing further biological studies at this time to determine whether areas within the proposed development footprint could be designated as ESHA lands. In the event ESHA lands are identified within the project limits, the CCC will need to evaluate a wide range of feasible alternatives that would minimize and reduce potential impacts to sensitive habitat lands on site. The following data request is intended to provide the CPUC and CCC with project alternatives that reduce and minimize potential impacts to sensitive habitat lands in accordance with CEQA requirements.

Data Requested: CPUC requests that further evaluation be completed by SDG&E to address whether the following project alternatives would be feasible:

Reduced Project Footprint Alternative – Please indicate whether there is a project alternative that would reduce the project footprint and minimize impacts to wetland

areas within the currently proposed development footprint. At a minimum, reduced project footprint alternatives should consider whether an alternative technology is feasible, such as a Gas Insulated Substation (GIS). In the event a reduced project footprint alternative is not feasible, please provide rationale as to why the project alternatives are not feasible.

In the event a reduced footprint alternative is feasible, please provide the following data in order for the CPUC to evaluate the project alternative for purposes of CEQA:

- Project Description – Provide a comprehensive project description and site plan that identifies at a minimum the development footprint, height of the proposed structures, interconnections to existing and proposed utilities, access, and building materials. In addition, please provide an overview of the construction schedule and indicate how it would differ from that of the Proposed Project.
- Aesthetics – Provide a comparison of the bulk, scale, and height of the proposed alternatives in relation to the existing structures in the area. Indicate how views would change for nearby public viewers. Provide a visual simulation(s) from vantage points presented in the PEA and those requested through the data request process.
- Air Quality - Provide criteria pollutant and greenhouse gas emissions inventory and impact evaluation for both construction and operational emissions that would result from implementation of the project alternatives.
- Biological Resources – Provide the acreage and associated impacts to vegetation communities within the project footprint, which includes project access and utility connections that may differ from those under the Proposed Project.
- Hydrology/Drainage – Provide an overview of how drainage on site would differ from that under the Proposed Project and whether detention basins would need to be constructed to accommodate post-development runoff. The location and sizing of detention basins should be provided.
- Noise – Provide a letter report from an acoustician indicating whether the substation equipment would result in potential impacts to sensitive receptors. An overview of the construction noise levels should also be provided in the event construction equipment differs from that under the Proposed Project.
- Transportation/Traffic – Provide an overview of the change in both operational and construction trips that would result from the project alternatives in comparison to the Proposed Project.

Please provide a discussion as to whether any additional off-site alternatives have been considered by SDG&E since submittal of the PEA in June 2010. In the event additional off-site alternatives were evaluated, please provide an overview of these locations and

whether the alternatives would be feasible; indicate how the potential change in environmental impacts that would result differs from those of the Proposed Project.

CPUC requests clarification on the following project alternatives that were presented in the June 2010 PEA:

Sites located to the North of J Street – In the data request letter provided by SDG&E on August 16, 2010, areas north of J Street were not considered to be a potential project alternative due to parcel size, hazardous substance contamination, and direction provided by the Port of San Diego and City of Chula Vista that the South Bay Substation Relocation should be located toward the southern portion of the Master Plan, south of J Street.

Please clarify the location of sites that were considered but rejected from further evaluation as a feasible project alternative. The response should include a map identifying the wetland buffer areas proposed by the master plan, as well as areas known to contain serious subsurface and groundwater hazardous substance contamination in relation to sites that were considered but rejected for further evaluation. Include a discussion as to why groundwater levels would result in a project site being potentially infeasible from a design and operation perspective.

Sites located to the East of Broadway and South of Main Street – Please indicate whether alternative sites were considered east of Broadway and south of Main Street. In the event additional off-site alternatives were evaluated, please provide an overview of these locations and whether the alternatives would be feasible; indicate how the potential change in environmental impacts that would result differs from those of the Proposed Project.

Alternative Utility Connections – In the data request letter provided by SDG&E on August 16, 2010, a discussion of the general location for utility tie-in's required for each substation site alternative presented in the PEA was provided.

For each of the alternatives presented above and for any additional sites that may have been identified by SDG&E, please provide a map indicating the location of utility tie-in’s required for each site, based on a desktop-level review of a potential interconnection to the existing utilities. Please provide a summary regarding the distance for each interconnection from the existing utility lines to the alternative site location. The summary should identify the total linear feet for 69-kilovolt (kV), 138 kV, and 230 kV improvements that would be required for project alternatives.