

SDG&E 9/14/11 Response
A. 10-06-007 South Bay Substation Relocation Project PTC
Energy Division Data Request 08 Dated September 7, 2011
SDGE-ED-008: Questions 2-9

Question 1:

GIS Alternative: Section 2.1 of the GIS Substation Alternative Description and Preliminary Impact Analysis (May 2011) includes a description of the proposed transmission line interconnections that would be required with implementation of the GIS Substation Alternative. Please provide a map of the location of all transmission line interconnections that would be required with implementation of the GIS Substation Alternative. Please be sure to identify transmission infrastructure that would differ from the improvements identified under the Proposed Project (Air Insulated Substation).

SDG&E Response:

SDG&E will provide this response soon.

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Question 2:

Onsite Seasonal Ponds: Please clarify the number of seasonal ponds located on the Proposed Project site. Both the June 22, 2010 Biological Resources Surveys Summary memorandum and the 90-Day Report for the Listed Branchiopod Wet-Season Survey indicate that 16 seasonal ponds are located onsite, however; in the Executive Summary and Section 5.0.0 (Seasonal Wetlands) of the Biological Resources Technical Report (May 2011) text indicates that 17 seasonal wetlands are located onsite. Please indicate whether the identification of 17 seasonal wetlands is a typographical error or, if not, please explain why only 16 of the 17 seasonal ponds/wetlands were surveyed.

SDG&E Response:

The Proposed Project area contains 17 seasonal wetland features and 15 seasonal ponds. Table 1 below describes the basis for this determination as provided in the Biological Resources Technical Report. The Biological Resource Surveys Summary memorandum and 90-Day Report for the Listed Branchiopod Wet-Season Survey, which were submitted in response to Data Request Number 6 on June 22, 2011, both describe the 16 aquatic resources that were surveyed during the wet-season as seasonal ponds. However, one of those aquatic resources—feature number 23—is an ephemeral swale rather than a seasonal pond; therefore, only 15 seasonal ponds are present within the Proposed Project area. The Biological Resources Technical Report accurately describes the Proposed Project area as containing 17 seasonal wetland features. As shown in Table 1, feature number 22 and feature number 26 are considered seasonal wetland features, not seasonal ponds, and each possesses only one of the three wetland parameters. These two water features will not be impacted by construction of the Proposed Project; thus, they were not surveyed as part of the listed branchiopod wet-season surveys.

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Table 1: Wetland and Water Resources

Feature Number	Approximate Total Acreage	Seasonal Wetland	Seasonal Pond	Description
1	0.366	--	--	Drainage feature containing an emergent wetland that includes a total of approximately 0.099 acre under the ordinary high water mark (OHWM) and approximately 0.267 acre from the OHWM to the top of the bank of the drainage feature. Two small sections of the drainage are considered water rather than an emergent wetland. This drainage feature has connectivity to navigable waters.
2	0.136	✓	✓	Moderate-sized seasonal wetland feature with no surface and groundwater connectivity.
3	0.027	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
4	0.003	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
5	2.141	✓	✓	Large feature that contains mule fat scrub, seasonal wetland, and disturbed wetland scrub. The wetland feature has no surface or groundwater connectivity.
6	0.030	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
7	0.007	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
8	0.062	✓	✓	Moderate-sized seasonal wetland feature with no surface and groundwater connectivity.
9	0.003	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
10	<0.001	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.
11	<0.001	✓	✓	Small seasonal wetland feature with no surface and groundwater connectivity.

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Feature Number	Approximate Total Acreage	Seasonal Wetland	Seasonal Pond	Description
12	0.027	--	--	Ephemeral drainage feature that includes approximately 0.015 acre under the OHWM and approximately 0.012 acre from the OHWM to the top of the bank of the drainage feature. This drainage feature has connectivity to navigable waters.
13	0.406	--	--	Moderate-sized ephemeral drainage feature that includes approximately 0.082 acre under the OHWM and approximately 0.324 acre from the OHWM to the top of the bank of the drainage feature. This drainage feature has connectivity to navigable waters.
14	0.021	--	--	An approximately one-foot-wide roadside drainage ditch with connecting approximately 0.5-foot-wide ephemeral swale. The drainage feature includes approximately 0.021 acre under the OHWM. The drainage feature has no connectivity to navigable waters.
15	0.011	--	--	Ephemeral swale drainage feature that includes approximately 0.011 acre under the OHWM. This drainage feature has connectivity to navigable waters.
16	0.013	--	--	A series of concrete-lined drainage features that include approximately 0.013 acre under the OHWM. This drainage feature has connectivity to navigable waters.
17	0.005	--	--	Ephemeral swale drainage feature that includes approximately 0.005 acre under the OHWM. The drainage feature has no connectivity to navigable waters.
18	1.653	--	--	Intermittent drainage (Telegraph Creek) feature that includes approximately 0.432 acre under the OHWM and approximately 1.221 acres from the OHWM to the top of the bank of the drainage feature. This drainage feature has connectivity to navigable waters.

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Feature Number	Approximate Total Acreage	Seasonal Wetland	Seasonal Pond	Description
19	0.050	✓	✓	Seasonal wetland feature that has no surface and groundwater connectivity.
20	0.036	✓	✓	Seasonal wetland feature that has no surface and groundwater connectivity.
21	0.059	✓	✓	Seasonal wetland feature that has no surface and groundwater connectivity.
22	0.005	✓	--	Wetland feature that meets only one of the three wetland parameters. This feature includes a small area of mule fat scrub. The drainage feature has no connectivity to navigable waters.
23	0.002	--	--	Ephemeral swale drainage feature that includes approximately 0.002 acre under the OHWM. The drainage feature has no connectivity to navigable waters.
24	0.072	✓	✓	Moderate-sized seasonal wetland feature that has no surface or groundwater connectivity.
25	0.015	✓	✓	Small seasonal wetland feature that meets only two of the three wetland parameters. The wetland feature has no surface or groundwater connectivity.
26	0.012	✓	--	Small seasonal wetland feature that meets only one of the three wetland parameters. The wetland feature has no surface or groundwater connectivity.
TOTAL	5.162	--	--	Not Applicable (NA)

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Question 3:

San Diego Fairy Shrimp: Please provide a status update regarding the results of the U.S. Fish and Wildlife Service protocol-level dry-season soil sampling surveys that were scheduled to be completed by July 2011.

SDG&E Response:

The listed branchiopod dry-season surveys for the Proposed Project have not yet been conducted. We anticipate dry-season surveys will be initiated by October 1, 2011, prior to the start of the rainy season.

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Question 4:

Wetland Jurisdiction Determination: Please provide a status update as to whether SDG&E has received any written correspondence from the USACE, RWQCB, CDFG, CCC and/or the City of Chula Vista regarding whether the permitting agency will be taking jurisdiction of wetland and non-wetland water features within the Proposed Project limits.

SDG&E Response:

USACE – There has not been written correspondence from the USACE on whether they will take jurisdiction of wetland and non-wetland features within the Proposed Project area. A site visit with USACE staff was held on August 31, 2011, and a Preliminary Jurisdictional Determination form was submitted to the USACE on September 6, 2011. Based on discussions with Robert Smith, USACE Project Manager, the USACE plans on taking jurisdiction of all wetland and non-wetland water features within the Proposed Project limits, and will regulate them through Section 404 of the Clean Water Act.

RWQCB – On November 8, 2010, the RWQCB responded via email that they intend to take jurisdiction over all wetland and non-wetland water features within the Proposed Project limits, including the ponds within the LNG containment berm. RWQCB staff indicated that they would regulate either through the Section 401 process, if the USACE takes jurisdiction through Section 404, or through an individual Waste Discharge Requirement (WDR). The email indicating their stance is included in Attachment A: RWQCB Correspondence.

CDFG – There has been no written correspondence from the CDFG regarding their jurisdiction over wetland and non-wetland water features within the Proposed Project limits.

California Coastal Commission – The California Coastal Commission has jurisdiction over all aspects of the Proposed Project, including the wetland and non-wetland water features, by virtue of its location within the coastal zone.

City of Chula Vista – There has been no written confirmation from the City of Chula Vista regarding jurisdiction over the Proposed Project, and SDG&E does not expect the City of Chula Vista to assert jurisdiction over the wetland and non-wetland water features within the Proposed Project site.

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Question 5:

Projected Load Growth: Section 2.1.3 of the SDG&E South Bay Substation Relocation Project Proponent’s Environmental Assessment (PEA) (June 2010), identifies the load growth in the South Bay region is forecasted to be approximately nine megawatts (MW) by 2016. Further, the PEA states redevelopment growth in the South Bay Region is expected to further impact ultimate load growth by 80 MW beyond 2016. Please clarify whether the above statements accurately reflect the load growth in the South Bay region.

SDG&E Response:

The projected load growth described in the PEA was correct as of the time the PEA was developed (Second Quarter 2010). Table 2: Updated Load Growth provides updated load growth information for the South Bay region through 2016.

Table 2: Updated Load Growth

Substation	Actual (MW)		Forecast (MW)					
	2009	2010	2011	2012	2013	2014	2015	2016
Imperial Beach	41.1	41.5	41.7	42.0	42.2	42.5	42.8	43.0
Montgomery	43.4	45.6	45.9	46.3	46.6	46.9	47.2	47.5
Otay	34.5	36.2	36.5	36.8	37.1	37.3	37.6	38.2
Sweetwater	49.5	47.3	47.6	47.9	48.2	48.4	48.7	48.9
Total South Bay Regional Load	168.5	170.6	171.7	173.0	174.1	175.1	176.3	177.6
Total Load Growth (MW)	--	2.1	3.2	4.5	5.6	6.6	7.8	9.1

The extent and timing of redevelopment around South Bay is dependent on numerous factors, including relocation of the substation to another site; however, load additions in excess of normally anticipated growth of 80 MW are possible.

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Question 6:

Substation Site Alternatives: Section 5.2.5 of the SDG&E South Bay Substation Relocation Project PEA (June 2010), provides an overview of the feasibility for an Air Insulated Substation at the Broadway and Palomar Site. Please indicate whether construction of a Gas Insulated Substation (GIS) would be feasible at this alternative site location. Please be sure to identify whether the GIS alternative would be feasible with consideration given to technical feasibility and legal and regular feasibility.

SDG&E Response:

A Gas Insulated Substation (GIS) that meets the technological specifications of the Proposed Project would not be feasible at the Broadway and Palomar site, primarily due to technological and social factors, as well as time delays.

- Project Objective two would not be met as a flexible system could not be developed in such a limited space. This is because equipment dimensions and spacing restricts the layout and electrical access of the substation and limits the ultimate connection to the 230 kV transmission system.
- The Broadway and Palomar site does not utilize the parcel of land that has been identified by the City of Chula Vista, Unified Port of San Diego, California State Lands Commission, and SDG&E as the appropriate site for the new substation, and therefore does not implement Objective 3 or achieve the purpose of the Exchange Agreement. The MOU states that the City of Chula Vista is to provide SDG&E with a site at no cost that will be adequate for a new switchyard and at an acceptable location. Development of the Broadway and Palomar site would impose social and economic burdens on ratepayers that are not feasible in light of the availability of the Proposed Project site.
- Project Objective four would not be met as only minimal growth could occur at this site, including the need for a distribution substation which has been identified as necessary to accommodate area redevelopment and the Bayfront Master Plan. Therefore, this would require SDG&E to find another parcel of land for the future transmission and/or distribution needs.
- In addition, a GIS substation located at the Broadway and Palomar location is not feasible because it could not be developed within a reasonable period of time, would not meet the in service date and would unnecessarily increase project costs, mostly due to the rerouting of transmission lines.

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Question 7:

Bayfront Enhancement Alternative: SDG&E has requested the Environmental Impact Report being prepared for the Proposed Project consider the feasibility of the Bayfront Enhancement Alternative. As defined by SDG&E, the Bayfront Enhancement Alternative includes a five-million-dollar fund that would be used to provide direct environmental benefits within the Chula Vista Bayfront area. Possible projects identified by SDG&E include creation, restoration, and/or enhancement of wetlands; enhancement of coastal resources, protection and preservation of biological resources, water quality improvements, and aesthetic enhancements, such as landscaping and lighting improvements. In order for the CPUC to determine the feasibility of the Bayfront Enhancement alternative, a more defined program of actual projects, responsible parties, environmental and permit requirements and timing needs to be developed. In lieu of a more defined program, please indicate programs that are currently in place where these funds could be contributed that will result in improvements such as those provided above. A defined program where SDG&E contributions can be contributed may include a program such as the U.S. Fish and Wildlife Service Coastal Wetland and Enhancement Project for the South San Diego Bay. Please also indicate whether these funds would be included as part of a potential endowment to manage wetland mitigation sites for project-related wetland impacts or if these funds would be in addition to the endowment required for the wetland mitigation sites.

SDG&E Response:

Because the Bayfront Enhancement component is not “mitigation”, SDG&E has not proposed a defined program of actual projects, responsible parties, environmental and permit requirements and timing needs. Rather, SDG&E proposes to provide \$5 million of funding for any projects and activities that will create net environmental benefit within the Bayfront as a “less environmentally damaging” alternative to development within the containment basin wetlands.

As proposed by SDG&E, the Bayfront Enhancement Alternative would fund projects that are yet to be identified based on stakeholder input. The categories of potential projects previously identified by SDG&E are based on Coastal Act policies as well as concerns raised in connection with the City of Chula Vista and Unified Port of San Diego’s Bayfront Master Plan. In order for this alternative to be feasible, SDG&E must be able to meet its in service date; therefore, substation construction cannot be contingent on identification or implementation of specific projects that would be implemented with the Bayfront Enhancement funding. Consequently, it is possible that specific project(s) may not be identified or completed until after construction of the substation has commenced.

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SDG&E would support a determination by the CPUC and/or California Coastal Commission that the funds must be contributed directly to one or more existing programs identified by the CPUC and/or California Coastal Commission (such as the U.S. Fish and Wildlife Service Coastal Wetland and Enhancement Program for the South San Diego Bay or the Chula Vista Nature Center) in order to ensure that direct environmental benefit is created by this alternative. The CPUC might also consider whether funding could be directed to the City of Chula Vista and Unified Port of San Diego in connection with their efforts to redevelop the Bayfront. SDG&E understands that the City of Chula Vista and Unified Port of San Diego are developing a Natural Resources Management Plan (NRMP) and have convened a Wildlife Advisory Group (WAG) charged with overseeing the development of the NRMP and implementing projects that will result in environmental benefits. SDG&E does not know the timing or status of the NRMP or the WAG's activities.

SDG&E welcomes direction from the CPUC and California Coastal Commission with respect to any additional programs that would, in the view of the agencies, create a net environmental benefit if provided a portion of the Bayfront Enhancement funding.

To clarify, the Bayfront enhancement funds would be in addition to any endowment required for wetland mitigation sites.

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Question 8:

Public Access Restrictions: Please provide a description of how both existing fencing and proposed fencing will impact public access to areas located adjacent to the perimeter screening wall within the current limits of the South Bay Power Plant Property fencing. Identify whether access restrictions such as fencing and signage will be placed between the U.S. Fish and Wildlife National Wildlife Refuge and the proposed Bay Boulevard Substation screening wall. Please be sure to indicate whether the current fencing between adjacent properties and the Bay Boulevard substation will be retained and maintained by SDG&E and how public access will be controlled upon project implementation.

SDG&E Response:

Existing and proposed fencing will have no impact on public access. Currently, the entire parcel in which the Proposed Project is located is bounded by a perimeter fence that extends outside of the Proposed Project site and encloses more than just the Proposed Project site. Any current access to this fenced area by the public occurs by trespass. SDG&E plans to construct a wall that encloses its substation within the Proposed Project site. The existing perimeter fence would remain in its current location and SDG&E has no plans at this time to remove it. Segments of the fence (along the west side and a portion of the east side) will remain on SDG&E-owned land once the property exchange with the California State Lands Commission is finalized, and SDG&E will maintain those segments of the fence. The fence segments along the east side and north side will not be on SDG&E-owned land and therefore will not be affected by the Proposed Project.

SDG&E does not propose to create new public access within the Proposed Project site. Public access to a public utility substation is not appropriate. The Proposed Project will nonetheless facilitate public access consistent with the Coastal Act by removing the existing substation from the Bayfront Master Plan area and allowing for public access to be created in suitable areas, consistent with the City of Chula Vista and Unified Port of San Diego's master planning efforts.

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Question 9:

Visual Simulations – Gas Insulated Substation Alternative – Data Request #7 identified that SDG&E should clarify why no landscaping improvements were included in the Gas Insulated Substation Alternative visual simulations. Please identify why no landscaping improvements have been included in the Gas Insulated Substation Alternative visual simulations.

SDG&E Response:

SDG&E did not provide landscaping improvements in the GIS simulation as final landscape plans have not yet been developed. SDG&E anticipates that the California Coastal Commission will provide direction on landscaping requirements in connection with its review of the project. In addition, SDG&E plans to solicit input from the City of Chula Vista as well as the Unified Port of San Diego regarding landscaping. A conceptual landscape plan was included in the PEA for the AIS design. As indicated in APM AES-1, some form of landscaping will be installed. However, the south driveway will not be in existence for the GIS design; therefore, that design would not include any additional landscaping located along the entry drive.

ATTACHMENT A: RWQCB CORRESPONDENCE.

Subject: FW: SDGE South Bay Sub Relocation RWQCB e-mail

From: Eric Becker [mailto:EBecker@waterboards.ca.gov]

Sent: Monday, November 08, 2010 12:47 PM

To: Spear, Tamara A

Cc: Kmerkel@merkelinc.com; Terzich, Chris; Turek, Shannon; Robert.R.Smith@usace.army.mil; Chiara Clemente; Jody Ebsen

Subject: SDGE South Bay Sub Relocation

Hi Tamara-

After our meeting on November 1, we discussed the details of the project with State Board 401 program staff and our legal staff. They confirmed what we thought, the proposed project will impact waters of the state that require individual waste discharge requirements (WDRs). Individual WDRs need Regional Board approval and could greatly extend the length of time for permit approval.

If you have any further questions, please contact Jody Ebsen. Thanks.

Eric Becker, P.E.
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SDG&E October 3, 2011 Response
A. 10-06-007 South Bay Substation Relocation Project PTC
Energy Division Data Request 08 Dated September 7, 2011
SDGE-ED-008: Q 1

Question 1:

GIS Alternative: Section 2.1 of the GIS Substation Alternative Description and Preliminary Impact Analysis (May 2011) includes a description of the proposed transmission line interconnections that would be required with implementation of the GIS Substation Alternative. Please provide a map of the location of all transmission line interconnections that would be required with implementation of the GIS Substation Alternative. Please be sure to identify transmission infrastructure that would differ from the improvements identified under the Proposed Project (Air Insulated Substation).

SDG&E Response:

SDG&E has not yet conducted a detailed analysis of the transmission infrastructure for the Gas-Insulated Switchgear (GIS) Substation Alternative. In order to reduce the overall costs associated with the GIS Substation Alternative, SDG&E would propose not to underground the 138 kV transmission line (as is proposed with the Air-Insulated Switchgear [AIS] Substation proposed project), so long as not undergrounding the 138 kV transmission line is technologically feasible. Since detailed engineering for the GIS Substation Alternative is not yet available, it is uncertain whether it would be technologically feasible for the 138 kV transmission line to remain overhead based on the relocation of the 69 kV transmission line (TL644) outside of the wetland area.

It is estimated that the following actions would occur as a result of the 138 kV transmission line remaining overhead:

- Two steel structures would still be removed from the existing South Bay Substation
- No new steel structures would be installed for the 138 kV transmission line
- One new 138 kV three-wood cable pole structure would be relocated from its current position near the existing South Bay Substation getaway area onto an existing SDG&E right of way.

Figure 1: Detailed GIS Substation Project Components Map provides the GIS substation footprint and the proposed 69 kV, 138 kV, and 230 kV transmission line configurations, including existing transmission pole locations, as well as those which would be removed, replaced, or installed. Figure 2: GIS Versus AIS Interconnection Comparison Map provides a side-by-side comparison of the proposed GIS and AIS substation footprints and their associated transmission line interconnections.

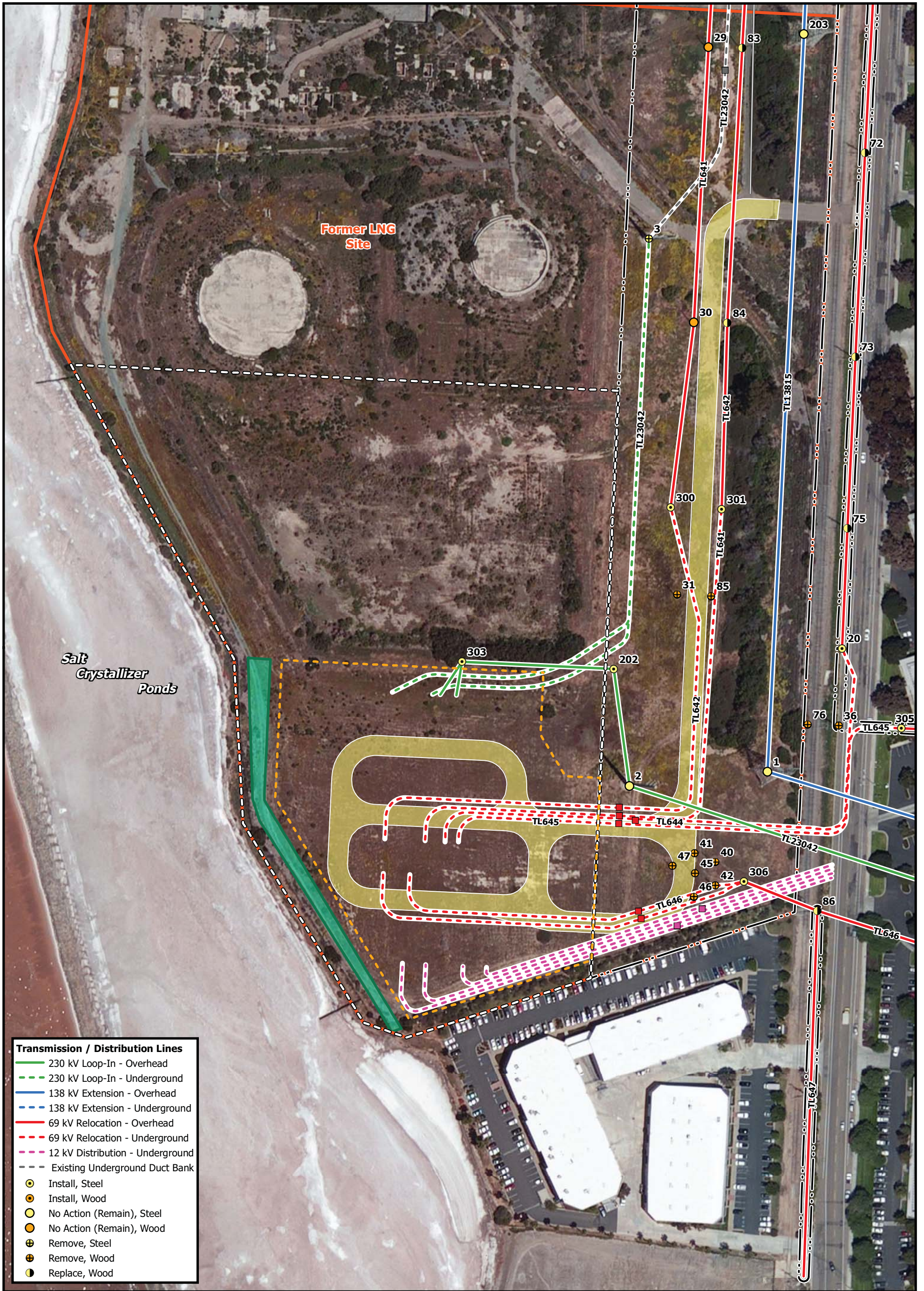
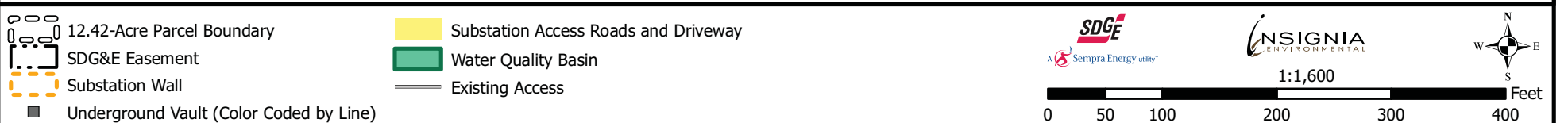
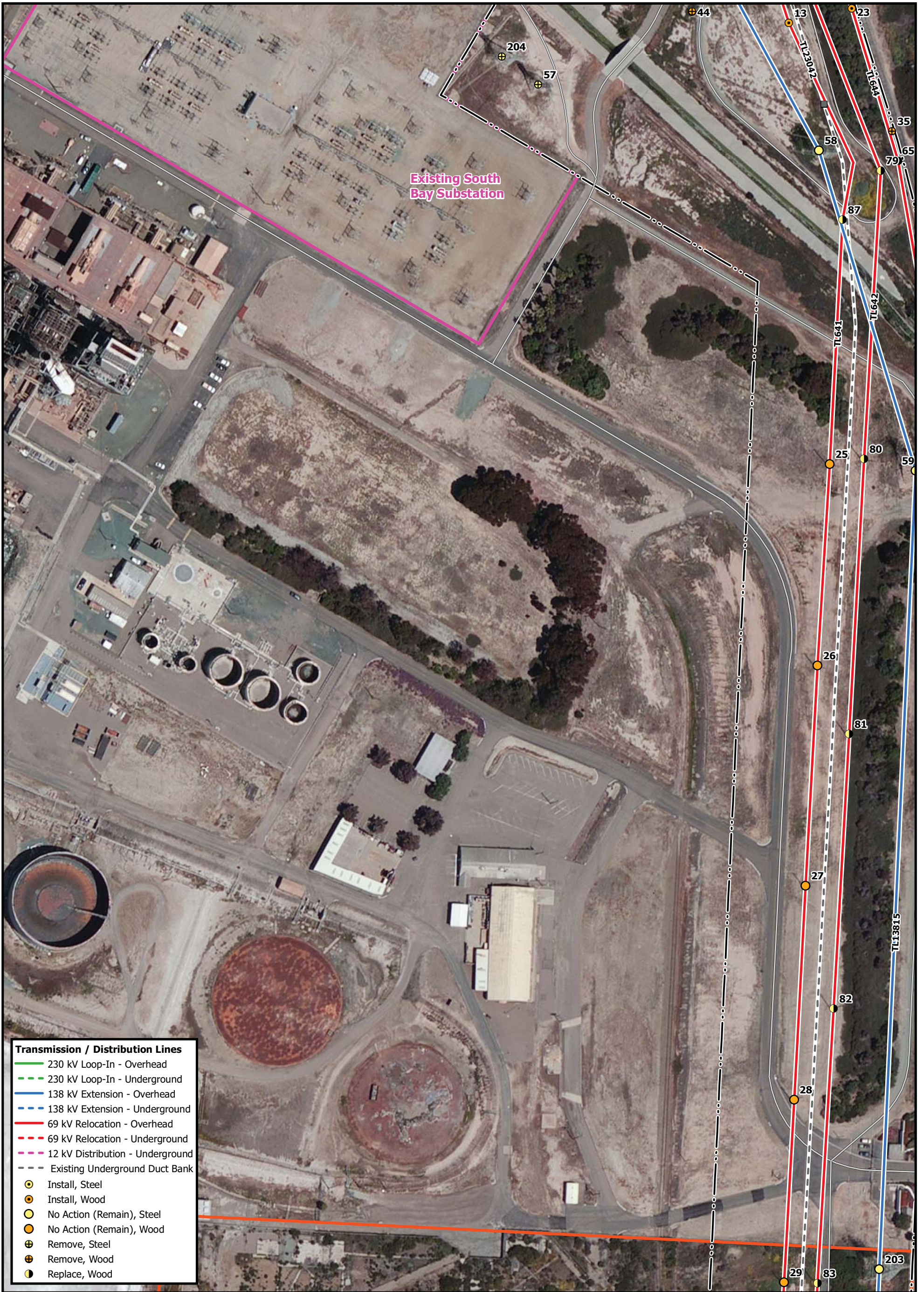


Figure 1: Detailed GIS Substation Project Components Map 1 of 3

South Bay Substation Relocation Project








- Transmission / Distribution Lines**
- 230 kV Loop-In - Overhead
 - - 230 kV Loop-In - Underground
 - 138 kV Extension - Overhead
 - - 138 kV Extension - Underground
 - 69 kV Relocation - Overhead
 - - 69 kV Relocation - Underground
 - - 12 kV Distribution - Underground
 - - Existing Undergound Duct Bank
 - Install, Steel
 - Install, Wood
 - No Action (Remain), Steel
 - No Action (Remain), Wood
 - ⊕ Remove, Steel
 - ⊕ Remove, Wood
 - Replace, Wood

Figure 1: Detailed GIS Substation Project Components Map 2 of 3

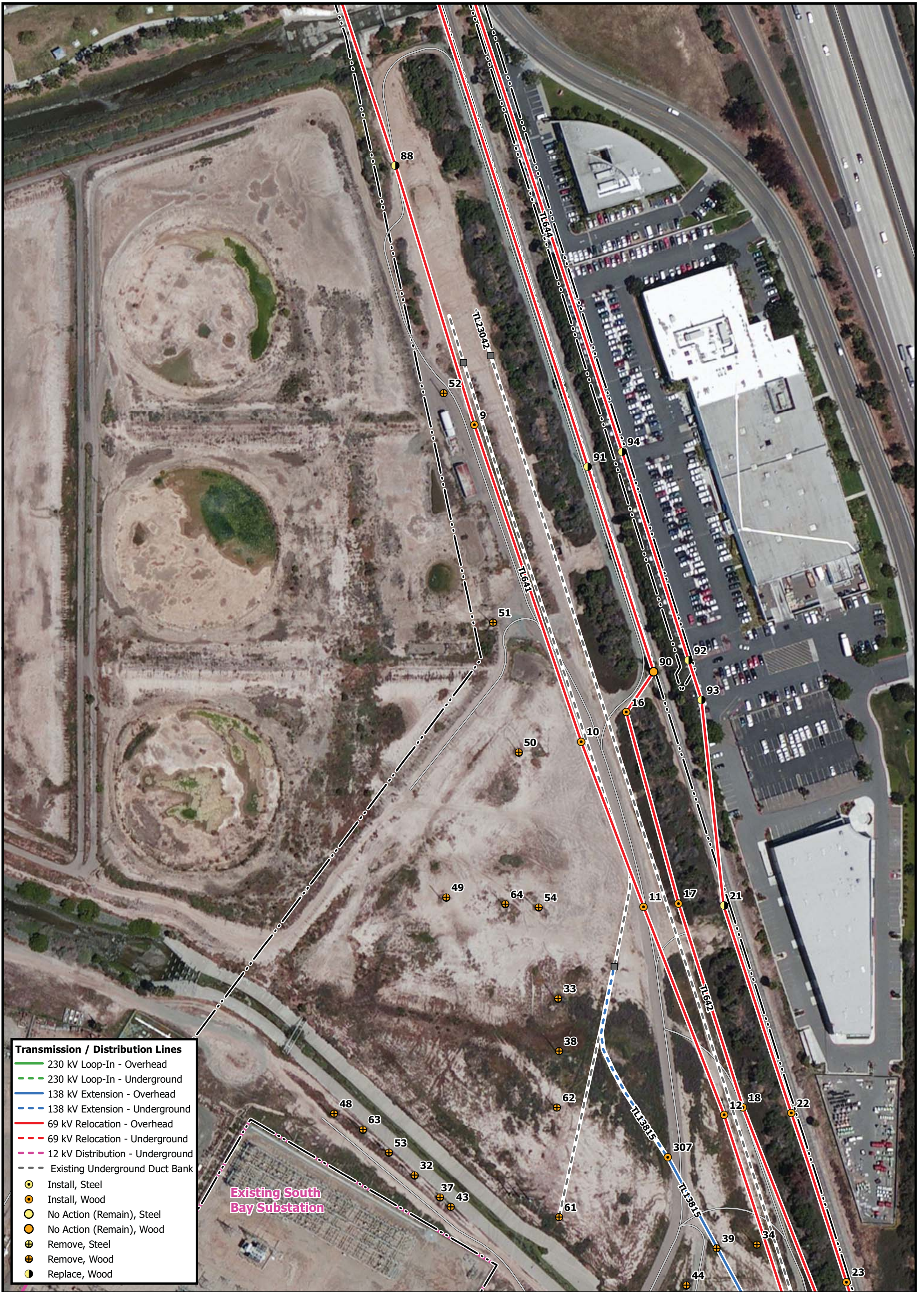
South Bay Substation Relocation Project

- 12.42-Acre Parcel Boundary
- SDG&E Easement
- Substation Wall
- Underground Vault (Color Coded by Line)
- Substation Access Roads and Driveway
- Water Quality Basin
- Existing Access

1:1,600

0 50 100 200 300 400 Feet






- Transmission / Distribution Lines**
- 230 kV Loop-In - Overhead
 - - 230 kV Loop-In - Underground
 - 138 kV Extension - Overhead
 - - 138 kV Extension - Underground
 - 69 kV Relocation - Overhead
 - - 69 kV Relocation - Underground
 - - 12 kV Distribution - Underground
 - - Existing Underground Duct Bank
- Install, Steel
 - Install, Wood
 - No Action (Remain), Steel
 - No Action (Remain), Wood
 - ⊕ Remove, Steel
 - ⊕ Remove, Wood
 - Replace, Wood

Existing South Bay Substation

Figure 1: Detailed GIS Substation Project Components Map 3 of 3

South Bay Substation Relocation Project

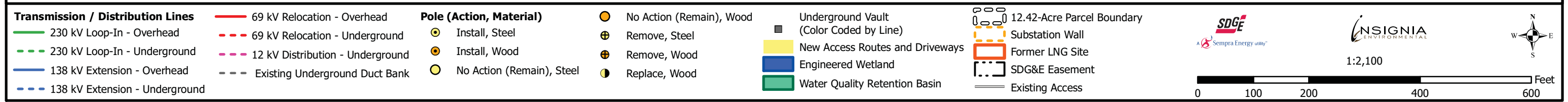
- 12.42-Acre Parcel Boundary
- SDG&E Easement
- Substation Wall
- Underground Vault (Color Coded by Line)
- Substation Access Roads and Driveway
- Water Quality Basin
- Existing Access

1:1,600
 0 50 100 200 300 400 Feet



Figure 2: GIS Versus AIS Interconnection Comparison Map



South Bay Substation Relocation Project

