

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 7, 2014

Mr. Michael R. Thorp
Mr. Albert J Garcia
Southern California Gas Company
555 West 5th Street, GT14E7
Los Angeles, CA. 90013

RE: Proponents Environmental Assessment Review of Southern California Gas Company and San Diego Gas Company Application (A. 13-12-013) for Authority to Recover North-South Project Revenue Requirement in Customer Rates And For Approval Of Related Cost Allocation And Rate Design Proposals.

Dear Mr. Thorp:

The Energy Division of the California Public Utilities Commission has completed its first review of Southern California Gas Company (SOCAL) and San Diego Gas Company (SDG&E) project application (A. 13-12-013) and related Proponent's Environmental Assessment (PEA).

Section 15100 of the California Environmental Quality Act requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses the Commission's Information and Criteria List (ICL) as the basic guide for determining the adequacy of project applications.

After review of SOCAL and SDG&E's application for the North South project, the Energy Division finds that the information contained in the environmental assessment is incomplete. Information gaps include:

From ICL 14 (b) more analysis and information is needed for the alternatives, including no project. "The discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly." The analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives, which will aid any appropriate CEQA alternatives screening process.

Provide GIS (or equivalent) data layers for the Proposed Project preliminary engineering including estimated locations of all physical components of the Proposed Project as well as those related to construction. For physical components, this could include but is not limited to the existing components (*e.g.*, ROWs, facility locations, wells, pipelines, transmission lines, etc.). For elements related to construction include proposed or likely laydown areas, work areas, access roads (*e.g.*, temporary, permanent, existing, etc.), areas where special construction

methods may need to be employed, areas where vegetation removal may occur, areas to be heavily graded, etc.

Please include information on Operations and Maintenance PEA Section 2.13. For example, describe the general system monitoring and control (i.e., use of standard monitoring protection equipment, pressure sensors, automatic shut-off valves, etc.), facility inspection and survey, and ongoing general maintenance.

Provide visual simulations of prominent public view locations for the compressor and limiting stations, including scenic highways to demonstrate the before and after project implementation. Additional simulations of affected private view locations are highly recommended.

According to the Agricultural Resources analysis, there are no impacts and therefore no mitigation measures. However it is noted that temporary work areas and additional right of way acquisitions may be needed. There should be measures to mitigate potential issues with these topics as the no impacts assessment may be inconsistent with the analysis.

The measures designed to address the potentially significant impacts in the Air Quality/Greenhouse Gas Emissions section do not seem to mitigate the impacts. In four of the five measures, the resolution is to identify appropriate measures to reduce the impact. For example, are there any design changes, climate action programs or offsets to purchase/retire that could be considered as measures.

Please provide a copy of special status surveys for wildlife, botanical and aquatic species, as applicable. Any GIS data documenting locations of special-status species should be provided.

There is no discussion of impacts during the operations and maintenance stages in the Biological Resources section. Please include an analysis of these activities and potential impacts post construction.

Please provide a copy of all letters and documentation of Native American consultation.

Please provide a clearer and more detailed fault and seismicity map along with shrink/swell potential map, if any, for the project area in the Geology, Soils and Seismicity section.

Please refer to PEA checklist for Hazards and Hazardous Materials, Section 4.7 and provide an impact analysis for gas and odorizing agents migration and emissions. Also include as much information from the list as possible: Environmental Data Resources report, Hazardous Substance Control and Emergency Response Plan, Health and Safety Plan, Health Risk Assessment, Worker Environmental Awareness Program (WEAP) and chemicals used during construction and operation of the Proposed Project.

For the Hydrology and Water Quality section, please provide a flood zone map, if any, for the project area. Also are there any water monitoring plans to address water quality degradation impacts from excess sediments, discharges, releases and spills during construction.

For the Transportation and Traffic section, the proposed APM does not address the inadequate emergency access impact for the community. Please provide an access plan for resident along the project alignment in case of emergencies and the timing of providing the plan.

Additional information submitted in accordance with the Energy Division's report should be filed as supplements to the above application. We request that responses to these items be provided to us no later than September 7, 2014.

Upon receipt of the supplemental information, the Energy Division will perform a second review to assess the adequacy of the data submitted--a determination of the adequacy of the application will once again be issued.

The Energy Division may request additional information at any point in the application proceeding and during any subsequent construction of the project. Questions relating to the project should be directed to Eric Chiang at (415) 703-1956

Sincerely,

A handwritten signature in black ink, appearing to read 'Eric Chiang', with a stylized flourish at the end.

Eric Chiang
CEQA Project Manager
Energy Division

Cc: Mary Jo Borak, Energy Division Supervisor