PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

November 25, 2015

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court
San Diego, CA 92123-4150

RE: Request for Additional Data #18 – Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project – Application No. A. 14-04-011

Dear Ms. Giles:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has reviewed San Diego Gas and Electric Company's (SDG&E) comments on the Draft Environmental Impact Report (EIR) for the Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project (Proposed Project) and SDG&E's responses submitted to date for Data Requests #1 through #17.

The CPUC requests additional data and clarifications to some of SDG&E's comments as indicated in the attached data needs Table 1 below.

Information provided by SDG&E in response to this Request for Additional Data should be filed as supplements to Application A. 14-04-011. One set of responses should be sent to the Energy Division and one to our consultant, Panorama Environmental, in both hardcopy and electronic format. We request that SDG&E respond to this request no later than December 10, 2015. Please let us know if you cannot provide the information by this date. If you can provide partial responses sooner, please do so for the sake of continuing our work. Delays in responding to these data needs will continue to result in associated delays in preparation of the Final EIR. If a conference call to clarify any of our questions is helpful, please let us know.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the Proposed Project should SDG&E's CPCN be approved.

Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager
Marcelo Poirier, CPUC Attorney

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Jeff Thomas, Project Manager, Panorama Environmental
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REQUEST FOR ADDITIONAL DATA: DATA NEEDS #18 FOR THE SYCAMORE-PEÑASQUITOS 230-KILOVOLT TRANSMISSION LINE PROJECT APPLICATION (A. 14-04-011)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified additional areas where more information is needed to adequately respond to SDG&E's comments on the Draft EIR in accordance with the requirements of the California Environmental Quality Act (CEQA). Data needs are identified in bold. Clarifying information is provided below the data need.

Table 1: Application No. 14-04-011 Data Needs #18

#	Reference Source, Page #	Data Need
1	Attachment A, Comments 30 and 33, pg. 12 and 13	**Provide results of protocol level surveys conducted for Coastal California gnatcatcher and Least Bell's vireo.** SDG&E identified in their comments that protocol level surveys were performed for Coastal California gnatcatcher (comment 33) and Least Bell's vireo (comment 30); however, these survey reports were not provided to the CPUC. The CPUC requests copies of the surveys to review survey results and incorporate results into the Final EIR.
2	Attachment A, Comment 11	**Identify the upgrades that would occur as part of the No Project Alternative.** As defined in the Draft EIR, the No Project Alternative includes upgrades that are reasonably foreseeable to occur if the Proposed Project or an Alternative is not approved. The Draft EIR states that the No Project Alternative would not meet project objectives; however, the aforementioned upgrades still must be defined pursuant to CEQA. Comment 11 states that the upgrades specified in the Draft EIR "are not correct." If the upgrades in the Draft EIR are incorrect, SDG&E must define the reasonably foreseeable actions that would occur in lieu of the Proposed Project or an Alternative.
3	Attachment A, Comment 10, pg. 5, paragraph 3	**Clarify the planning status of the MS-PQ project and the connection between the MS-PQ and SX-PQ projects.** The Sycamore-Peñasquitos 230-Kilovolt Transmission Line Project Draft EIR analyzes the MS PQ Project as a cumulative scenario project. The transmission line was approved by CAISO in the 2014-2015 Transmission Plan and is therefore considered a reasonably foreseeable project. SDG&E's comments on the Draft EIR raise questions about the status of the MS-PQ project. Specifically, SDG&E states in comment 10: "…for the final build out of both projects (SX-PQ and MS-PQ) the combination of Alternatives 3 and 4 would result in full utilization of the 230 kV towers in

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		Segment D (i.e., two 230 kV lines on the same tower structures), and would likely be the most feasible, cost-effective, and have the least overall environmental impact in this area of any of the alternatives." This comment raise questions about the planning status of the MS-PQ project and the connection between the MS-PQ project and SX-PQ project that need to be reconciled. 1. Have circumstances changed since SDG&E responded to Question #1 of Data Request #14? Having reviewed the Draft EIR, is SDG&E aware of efficiencies that may now exist to building these two projects together? Is SDG&E now proposing this approach? 2. Provide any updated information regarding the anticipated routing and design of the MS-PQ project for inclusion and consideration in the EIR's cumulative analysis.
4		**Provide GIS of mapped hybrid Nuttall's scrub oak.** The California Native Plant Society (CNPS) commented that the DEIR incorrectly identified some Nuttall's scrub oak individuals as hybrids. Busby Biological Services, Inc. did not include these hybrid species in the mapped data presented in the report (dated June 27, 2015) for the focused special-status plant surveys in September/October 2013, April 2014, and May 2014. CNPS commented that the plants identified as hybrid species by Busby are in fact Nuttall's scrub oak. Please provide the GIS locations of the plant species identified as hybrids of Nuttall's scrub oak.
5	Attachment A, Comment 13	**Provide a summary of the structural analysis results for the existing double-circuit structures in "Segment C" of Alternative 5. The structural analysis should assume the structures are loaded with the following:** • **One circuit utilizing bundled 1033.5 KCMIL ACSR "Ortolan" conductor (existing)** • **One circuit using bundled 900 KCMIL ACSS (proposed)** • **One optical ground wire (proposed OPGW)** SDG&E's comment states that "these structures were designed to carry an overhead shield wire much smaller than the proposed optical ground wire required for communication between the substations". The comment does not state whether or not structural analysis was ever performed to evaluate the feasibility of adding the Proposed Project lines.
6	Attachment A, Comment 13	**Provide the results of a ground clearance check, for the existing spans in "Segment C" of Alternative 5, for the existing bundled 1033.5 KCMIL ACSR "Ortolan" and the proposed bundled 900 KCMIL ACSS. In addition, provide the results of a clearance check between the proposed OPGW and both the 1033.5 KCMIL ACSR and the 900 kCMIL ACSS. If the results of the structural analysis in response to Question 5 above indicate that the structures cannot support the optical ground wire, provide the results of a ground clearance assessment for an ADSS underbuild.**
7	Attachment A, Comment 13	**In the event that the analysis in response to data request Items 5 and 6 above identify that the structures in "Segment C" of Alternative 5 do not**

<table>
<tr><th colspan="3">Table 1: Application No. 14-04-011 Data Needs #18</th></tr>
<tr><th>#</th><th>Reference Source, Page #</th><th>Data Need</th></tr>
<tr><td></td><td></td><td>provide adequate strength or ground clearance to make use of the existing towers feasible, identify the locations of all structure modification and/or replacements that would be necessary to construct Alternative 5 in Segment C. Identify the construction and disturbance areas associated with the structure modifications or replacements.
The CPUC needs to assess the impacts from construction and operation of Alternative 5. SDG&E's comments indicate that there could be a need for greater construction in Segment C, which could result in greater impacts than analyzed in the Draft EIR. This additional engineering analysis is required to verify whether Alternative 5 can be constructed as proposed in the Draft EIR or whether additional construction could be required in Segment C.</td></tr>
<tr><td>8</td><td>Comment letter p. 7</td><td>Provide a description and figures showing how SDG&E would configure the 230-kV transmission line within the existing bridge over I-15.
In SDG&E's Attachment B – Minor Design Refinements, SDG&E identifies undergrounding the 230-kV transmission line within the existing Pomerado Road bridge as the preferred option for the Alternative 5 crossing of Interstate 15. SDG&E also states in its Draft EIR comment letter that, "it may be feasible to construct the crossing underground through vacant cells in the Pomerado/Miramar Bridge that spans over I-15". Additional details are required to verify the feasibility of this approach and to determine the construction impacts of this option.</td></tr>
<tr><td>9</td><td>Data Request #10, Response #1</td><td>Provide EMF modeling for the Proposed Project and alternatives using the same load case.
There is a difference noted between the original FMP and in the magnetic field calculations report submitted in response to DR #10. The EMF information in the original FMP was based on current flows for a 2017 Heavy Summer Load Case. The later report provided by SDG&E for DR#10 is based on current flows for a 2018 Heavy Summer Load Case. The resulting EMF values are not consistent (e.g., for example Segment C is now shown as West 121.9, East 92.6 versus originally West 122.3 and East 91.0).</td></tr>
<tr><td>10</td><td>Data Request #10, Response #1</td><td>The discrepancy between Proposed Project values in Tables 3 and 5 of the magnetic field calculations report provided by SDG&E in response to DR#10 requires explanation or correction.
For Segment D the information from SDG&E is confusing as it does not appear to match previously provided information (reference the table below). It is unclear what SDG&E means by the heading "ALT 5 with 69 kV." If this is the existing configuration, columns 1 and 3 below should be the same, SDG&E indicated that the current flow modeled for the existing fields is the same as for the FMP for the proposed project. If this is the proposed project configuration, columns 2 and 3 should be the same?
Segment D EMF Info –
<table>
<tr><td>ED03-11 Existing Fields</td><td>Orig. FMP Proposed Project (Dbl 69 kV)</td><td>DR#10 – FMP Alt 5 with 69 kV</td></tr>
<tr><td>North 21.2 mG</td><td>North 9.5 mG</td><td>North 71.8 mG</td></tr>
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</td></tr>
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Table 1: Application No. 14-04-011 Data Needs #18		
#	**Reference Source, Page #**	**Data Need**
		South 2.6 Mg | South 135.9 mG | South 1.8 mG
11	Comment Letter Appendix B, Exhibit 5	**Confirm and provide explanation for height of the Alternative 1 cable pole presented in SDG&E Draft EIR comments (Appendix B, Exhibit 5).** Exhibit 5 identifies that the cable pole would need to be 210 feet tall; however, the Appendix B GIS data provided by SDG&E indicates that the cable pole would need to be 199.5 feet tall. Please confirm which value is correct. In either case, a more detailed explanation is needed for the increase in pole height over the 160-foot tall pole depicted in the Draft EIR.