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December 5, 2014

Reg.12-10/A.14-04-011
SDG&E Sycamore-Penasquitos
230kV Transmission Line CPCN

Sent Via Electronic Mail Only

Billie Blanchard
Project Manager
Energy Division, CEQA Unit
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: SXPQ ED03-SDGE Partial Response No. 2: Questions 3, 10, 13, 14, 17, 27, 34 & 35

Dear Ms. Blanchard:

Attached please find SDG&E's Partial Response Number 2 to ED's Data Request 3 issued on November 17, 2014. Included in this submittal are responses to Questions 3, 10, 13, 14, 17, 27, 34 & 35.

In summary, SDG&E has provided to the ED the following responses:

Submittal 1 – 11/25/14	5, 6, 16, 29, 30, 32, 33*, 36, & 37 *Confidential
Submittal 2 – 12/05/14	3, 10, 13, 14, 17, 27, 34 & 35

If you have any questions or require additional information, please feel free to contact me by phone at (858) 636-6876 or e-mail: ***RGiles@semprautilities.com***.

Sincerely,

Signed

Rebecca Giles
Regulatory Case Manager

Enclosures

cc:

Allen Trial – SDG&E	Jeff Thomas – Panorama Environmental Consulting
Elizabeth Cason – SDG&E	Susanne Heim – Panorama Environmental Consulting
Bradley Carter – SDG&E	Mary Jo Borak – CPUC Infrastructure Permitting and CEQA
Central Files – SDG&E	Molly Sterkel - CPUC Infrastructure Planning and Permitting
Peter Allen – CPUC	Christine Hammond – CPUC Attorney
Darryl Gruen - ORA	Frank Ghazzagh - ORA

ED03-SDGE 12/05/14 Partial Response No. 2
A.14-04-011 SXPQ 230 kV Transmission Line Project
ED Data Request #3 Issued on November 17, 2014
ED03 Questions 3, 10, 13, 14, 17, 27, 34 & 35

Q#	Data Needs Sections	**Summary of SDG&E Response Submittals**
1-21	Project Description	11/25/14 Submittal: **Q5, 6, & 16** 12/5/14 Submittal: **Q3, 10, 13, 14, 17**
22-25	Air Quality/GHG Emissions	
26-30	Biological Resources	11/25/14 Submittal: Q**29 & 30** 12/5/14 Submittal: **Q27**
31-33	Cultural Resources	11/25/14 Submittal: Q**32 & 33**
34	Hazards	12/5/14 Submittal: **Q34**
35	Noise	12/5/14 Submittal: **Q35**
36-38	Traffic	11/25/14 Submittal: Q**36 & 37**

Pending Responses: Q1, 2, 4, 7-9, 11, 12, 18-26, 28, 31, & 38.

CONFIDENTIAL ATTACHMENTS: None for partial Submittal No. 2

Question #	Question Description	SDG&E Response
3	**Re-label the topped poles in the GIS data to match the labeling in the PRR table and provide pole IDs provided in response to Item 9 (e.g., H-Frame Steel 1). Add the 69-kV topped 1 pole to the GIS.** SDG&E's response to Data Request #2 was incomplete. Provide GIS data labeling the poles proposed to be topped, as requested. We have labeled them as T1 through T7 in Attachment 1.	Revised GIS data has been included as Attachment ED03 – Q3_Topped and Pole Removal GIS.
10	**Provide the power line and transmission line structure locations in GIS where vegetation clearing will be required as indicated in SDG&E's response to Data Request #2.** SDG&E's response to Data Request #2 states that, "700 square feet (15-foot radius) is a typical area kept clear of	All required vegetation clearance around new structures is encompassed within the permanent impact areas included within the project description. No additional areas will require permanent vegetation clearance at structures sites.

Question #	Question Description	SDG&E Response
	vegetation around certain power line and transmission line structures." Identify all structures where permanent vegetation clearance would occur, and provide GIS data for the limits of the clearance area that extends past proposed structure pads, where vegetation will also be cleared.	
13	**Provide GIS data for poles proposed to be topped in removed in the Project Refinements Report.** Provide the following information: a. Topped structure GIS data with completed attributes consistent with those provided for other project structures. b. Confirm that H-Frames 2 through 6 are wood. Provide the structure type and material for the structure identified as Vertical 69-kV Topped 1. c. Steel H-Frame Structure Diagram. Provide a schematic for this structure type. d. Updated GIS data for removed structures with completed attributes listing the structure type, material, and kV rating. e. Clarify the locations of structures to be removed relative to previous submittals. Structures addressed in Table 2 of the PRR are directly adjacent to structures T1 and R43, T2 and R44, T3 and R45, T4 and R46, and T5 and R47. State whether the structures are the same, and if the removed structures identified are still accurate. f. GIS data for structure removal work areas for R2 and R72.	a. GIS data has been included as Attachment ED03 – Q3. b. Attachment ED03 – Q13(a) includes information for all topped structures. Metadata within Attachment ED03 – Q3 includes the same information. c. A typical structure diagram has been included as Attachment ED03 – Q13(b). d. Refer to Attachment ED03 – Q3. e. Structures are the same. Please utilize the attached GIS files for structure locations (Attachment ED03 – Q3). f. Structures R2 and R72 are both located within stringing sites. However, revised GIS data will be provided as part of the pending response to Question 15.

Question #	Question Description	SDG&E Response
14	**Provide additional information on existing tower 154.** Provide the tower type, kV rating, height, and Pole ID for Tower 154. Provide GIS data for the transmission line connected to Existing Tower 154 and P2 with completed attributes consistent with those provided for other project transmission lines. Identify how marker balls will be installed within this line segment (see attachment 1) and provide GIS for any additional access needed.	Structure 154 (Structure E1A) is a 230kV steel lattice tower, approximately 140 feet above ground. GIS data has been provided as Attachment ED03 – Q14. No new access would be required to install marker balls on this span. Marker balls would most likely be installed utilizing a helicopter.
17	**Clarify the pole type for P3 and provide a diagram of the structure if this pole would be different than others used on the project.** The GIS data for proposed structures identifies P3 as a both a TSP and Cable Pole.	Structure P3 is proposed to be similar to the cable poles P41 & P42 conceptually, with one circuit overhead (Ahead and Back span) and the other circuit transitioning from overhead to underground on the pole. However, for P03 the 138kV circuit is proposed to be routed underground as opposed to the 230KV circuit on poles P41 & P42. Additionally the 138kV underground cable will be routed inside the tubular steel pole instead of being banded to the outside of the tubular steel pole. A schematic showing the typical configuration of this type of pole is included as Attachment ED03 – Q17.
27	**Provide GIS data for Quino checkerspot butterfly (QCB, *Euphydryas editha quino*) localities and Mapped Areas, and provide a project-specific habitat assessment.** SDG&E's response to Data Request #2 was incomplete. SDG&E did not provide the requested GIS data and project specific habitat assessment. The Low-Effect HCP may adequately cover species avoidance and mitigation measures, but is not a replacement for the CEQA analysis. We cannot analyze the impacts of the project on suitable habitat without first understanding where suitable habitat is located in the project area. Provide GIS data identifying where QCB localities occur near the BSA or within the BSA. Confirm that the most	Refer to Attachments ED03 – Q27(a) and ED03 – Q27(b).

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	current data for the QCB Mapped Area is sourced from the USFWS. Provide a Project-specific habitat assessment for the QCB for the BSA. The assessment needs to include GIS data and mapping of potential QCB habitat.	
34	**Provide the SDG&E Fire Prevention Plan and the full text for SDG&E's Electric Standard Practice 113.1 so it can be considered in the analysis of impacts related to fire and fuels management.** PEA section 4.7 Hazards and Hazardous Materials discusses the following SDG&E standards and plans. • Project-specific Fire Prevention Plan • SDG&E's Electric Standard Practice 113.1 (Wildland Fire Prevention and Fire Safety) • SDG&E Fire Prevention Plan The Project-specific Fire Prevention Plan was provided in response the Deficiency Report; however, Standard Practice 113.1 and the SDG&E Fire Prevention Plan have not been provided to the CPUC.	The requested documents have been included as Attachment ED03 – Q34(a) and ED03 – Q34 (b).
35	**Provide additional noise measurements characterizing generalized noise environments where impacts may occur.** SDG&E did not provide the required noise measurements, but indicated that these will be provided in early December. Provide the specific date when this pending submittal will be provided.	***NOTE RESPONSE TO QUESTION 35 IS ALSO RESPONSIVE TO DATA REQUEST 2, QUESTION 113.*** Additional noise measurements were conducted along the proposed alignment at specific locations requested by the CPUC in order to characterize the overall environmental noise (i.e. transportation, corona) along the alignment near potentially sensitive noise areas (i.e. residences). Three types of data sets were collected that included five 20 minute daytime periods, four continuous 24-hour long periods, and one 24-hour measurement that measured the corona noise at an existing tower location.

Question #	Question Description	SDG&E Response
		As requested, the five daytime measurements were conducted near existing roads along the alignment in order to determine the environmental noise during construction hours. Figure 1 (see Attachment ED03 – Q35(a)) is a graphical representation of the original noise measurement locations conducted in October 2013, as well as the additional measurement locations conducted in November 2014. Two sites were in the vicinity of pole E19 (Location 7) to characterize the sound levels near a busy residential road while taken along a public walking trail (Location 7A) and nearby houses (Location 7B). Two of the daytime sites (Locations 5, 6) were taken along a busy road where the underground alignment is near residential housing. Location 4 was taken near an existing tower and proposed stringing site that was within open space and approximately 700 feet from residential development. Table 1 (refer to Attachment ED03 – Q35(b)) provides location and sound environment information about each daytime measurement location. Table 2 (refer to Attachment ED03 – Q35(b)) provides the sound levels measured during each daytime measurement. The continuous 24- hour measurements were conducted at Locations 2, 3, and 8 (Figure 1) where one Rion NL-52 (Class 1) meter took measurements at one minute intervals. The L_{eq} sound levels measured at these locations are depicted in Figures 2 through 4 (refer to Attachment ED03 – Q35(a)). Locations 3 and 8 were both taken near resident property lines near open spaces, with the lowest sound levels ranging from 25 dBA to 30 dBA. Location 2 sound levels demonstrated much higher sound levels due to the close proximity of traffic conditions. The lowest sound levels at this location were generally around 50 dBA to 55 dBA, with some very short term lows of 40 dBA between midnight and 04:00 A.M as shown in Figure 2. The sound levels depicted in Figures 2 through 4 include sound emanating from sources (e.g. ground/air traffic, wind, resident voices) other than the transmission line. When these environmental noises are at their lowest, it may be assumed that the measured sound levels during this time period may only be capturing corona noise. Therefore, with potential corona noise measuring from 25 to 40 dBA during early morning hours, the potential impacts to noise sensitive areas as a result of corona noise appears to be insignificant. The 24-hour continuous corona noise measurement was taken at an existing 230 kV tower,

Question #	Question Description	SDG&E Response
		as shown as Location 1 in Figure 1, in order to demonstrate the decrease of corona noise as one moves further away from the tower. The NL-52 meter was set up directly underneath the existing tower as requested. The tower has electrical lines installed at three distinct heights, which are also known as phases. The middle of the three horizontally parallel phases was chosen as the noise source point. The wires in the middle phase are strung approximately 70.5 feet above ground. The distance was doubled once (141 feet) and then doubled again (282 feet) as described in Data Request 2- Clarification Request for Question 113. In order to demonstrate the decrease of the assumed amount of 6 dBA at two doublings of distance, a second Rion NL-21 (Class 2) meter was placed approximately 273 feet away from the NL-52 meter and 282 feet from the determined noise source point on the existing tower. Each meter took sound readings every minute, was set at 4.5 feet above ground, and set at approximately the same elevation with clear line of sound between each meter and the determined noise source point. As shown in Figure 5 (refer to Attachment ED03 – Q35(a)), the NL-52 meter showed higher sound levels, as would be expected with the presence of corona noise. The difference between the two meters varied depending on field conditions (e.g. traffic, pedestrian voices, wind); but, on average the NL-52 meter was 8 dBA louder than the NL-21 meter. This corresponds to a 4 dBA decrease with each doubling of distance. In Data Request #1, Question 42, a 3 dBA decrease per doubling of distance was utilized to calculate cumulative corona noise. This would be considered a conservative analysis when compared to the 4 dBA decrease measured in the field. The raw data for continuous 24-hour measurements is included as Attachment ED03 – Q35(c) and GIS data for the new survey locations is provided as Attachment ED03 – Q35(d).