Bradley S. Carter
Project Manager, Major Projects

San Diego Gas & Electric Company
8315 Century Park Court, CP21C
San Diego, California 92123

Office: 858-654-1269
Cell: 626-893-6419
BCarter@semprautilities.com

June 18, 2014

Sent Via Sempra EDT

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

Re: Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (A.14-04-11) Application for a Certificate of Public Convenience and Necessity Partial Response No. 1 to May 7, 2014 Deficiency Report

Dear Ms. Blanchard:

San Diego Gas & Electric Company (SDG&E) appreciates the initial review conducted by the California Public Utilities Commission (CPUC) of the Application for a Certificate of Public Convenience and Necessity (CPCN), including the Proponent's Environmental Assessment (PEA), for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project (Proposed Project). SDG&E has carefully reviewed the Deficiency Report dated May 7, 2014. SDG&E anticipates two data response submittals to complete the response to the May 7, 2014 Deficiency Letter. Partial data response #1 and associated information is enclosed. It answers the questions where information is currently available and for such questions, SDG&E has responded to the best of its knowledge. Partial data response #2 will provide additional information as soon as it is available.

SDG&E believes that the enclosed 34 responses currently provide (or will provide within partial data response #2) sufficient information for the CPUC to deem the Application, including the PEA, complete. SDG&E therefore requests that the CPUC deem the Application, including the PEA, complete within 30 days of receiving SDG&E's partial data response #2.

SDG&E believes that five out of the 39 questions are premature and best answered as analysis for the Proposed Project progresses and through additional data requests. Responding to these questions now would lead to inefficiencies in reviewing the Application, including the PEA, because the engineering and design of the Proposed Project is not final. The responses to these questions should not affect the completeness determination and SDG&E requests that the CPUC treat these questions as data requests after the Application, including the PEA, has been

deemed complete. SDG&E will provide responses to the remaining questions in a timely manner once the information becomes available.

Below are the five questions where SDG&E will subsequently provide responses through data requests. SDG&E has also identified two questions where SDG&E has responded within the response to the deficiency letter but believes that the requested information is unnecessary both to deem the Application, including the PEA, complete and to thoroughly analyze the Proposed Project's environmental impacts.

1. Questions Best Answered as Analysis for the Proposed Project Progresses

The following four questions are premature and best answered as analysis for the Proposed Project progresses. SDG&E will provide responses to the remaining questions in a timely manner once the information becomes available.

Question 12: Provide a copy of the project-specific fire prevention plan.

SDG&E has prepared a Draft Project Fire Prevention Plan but cannot finalize it until additional final engineering and project permitting is complete. SDG&E will provide the CPUC with the Final Project Fire Prevention Plan before obtaining a Notice to Proceed for the Proposed Project from the CPUC.

SDG&E's commitment to preparing and following the Final Project Fire Prevention Plan is sufficient for the CPUC to analyze any fire impacts from the Proposed Project, and review of the Draft Project Fire Prevention Plan is not necessary to deem the Application, including PEA, complete. Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires a project-specific fire prevention plan.

Question 13: Provide preliminary design details for screening of cable poles from adjacent roadways.

The visual simulations (PEA Figures 4.1-9 and 4.1-10) depict the current cable pole design and associated standard security fencing. SDG&E does not typically screen the cable poles but would consider potential design measures for the cable poles during final design, including any suggestions from the public or responsible agencies. The eastern cable pole (Structure No. P41) is already set back from Carmel Valley Road, thereby reducing the visibility for viewers traveling along the road.

The visual simulations are sufficient for the CPUC to analyze visual impacts. Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires preliminary design details for cable poles.

Question 15: Provide locations and details for the proposed marker balls.

The Federal Aviation Administration's (FAA) regulations require certain notifications of potential hazards to air navigation which include, among other things, proposed structures and conductor spans taller than 200 feet or within 20,000 feet of an airport. Once the FAA receives notification of these proposed structures, it conducts an aeronautical study and makes recommendations on whether the proposed structures would be a hazard to air navigation, would not be a hazard with marking and/or lighting, or would not be a hazard even without marking and/or lighting.

SDG&E will identify the structures, including conductor spans, that require FAA notification once final engineering is complete. SDG&E will then identify the locations and details for marker balls in response to FAA recommendations. SDG&E will additionally consult with the Marine Corps Air Station (MCAS) Miramar on marking, lighting, proposed structures, and spans that are on or near the base.

Identifying the locations and details for marker balls before final engineering would be premature and create unnecessary work at best, and could be misleading to the extent that final engineering requirements change the locations and details for marker balls. The PEA states on page 3-50 that SDG&E, as part of its design features and ordinary construction and operating restrictions, will consult with the FAA and MCAS Miramar on marking and lighting requirements and install marking and as applicable. This commitment is sufficient for the CPUC to analyze any aerial hazards or any impacts from the Proposed Project.

The locations and details for the proposed marker balls are therefore not necessary to deem the Application, including PEA, complete. Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires locations and details for marker balls.

Question 28: Provide documentation on the depths and locations of nearby existing (and proposed if applicable) utilities in relation to the proposed location of the new transmission line. Provide analysis related to the potential effects on any existing buried gas pipelines (whether the project will cause corrosion of nearby pipelines or create a hazard for construction workers or the public). Quantify the potential induced current and interference in any adjacent buried pipelines.

Providing documentation on the depths and locations of nearby existing utilities is premature because the Proposed Project has not yet undergone final engineering. SDG&E will prepare responsive documentation as part of its standard process for finalizing engineering and preparing for construction.

Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires documentation on the depths and locations of nearby existing and proposed utilities.

<u>Question 32</u>: Provide the estimated volume of water that would be required for project maintenance and operation. Identify the source of this water.

Maintenance and operation water is not anticipated to change from the existing conditions with the installation of the Proposed Project.

Providing documentation on the volume of water for restoration purposes of the Proposed Project is not feasible or known at this time due to the fact that the restoration plan has not been developed.

2. Questions to Which SDG&E Has Responded But Considers the Information Unnecessary to a Completeness Determination.

SDG&E has responded (or will respond) to the following two questions. Nevertheless, SDG&E considers the information unnecessary both to deem the Application, including the PEA, complete, and to thoroughly analyze the Proposed Project's environmental impacts.

<u>Question 14</u>: Provide information on the camera used to capture the Key Observation Points (KOPs).

SDG&E has provided this information but considers it unnecessary both to deem the Application, including the PEA, complete and to thoroughly analyze aesthetic impacts. Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires information on the camera used to capture KOPs.

<u>Questions 33 and 39</u>: Provide the GIS data of all parcels within 300 feet of all project areas including APN number, mailing address, and parcel physical address.

SDG&E will provide this data once it has been clarified further. SDG&E considers the data unnecessary both to deem the Application, including the PEA, complete and to thoroughly analyze aesthetic impacts. Neither the CPUC PEA Checklist nor the CPUC Information and Criteria List requires this data. Additionally, applicable notice requirements do not require notice to properties located on a cul-de-sac that are more than 300 feet away from a project.

Thank you for reviewing the 34 responses that SDG&E has provided and for foregoing review of the five remaining questions until final engineering has occurred and the relevant information is available. SDG&E looks forward to receiving a determination that the Application, including PEA, is complete and to working with the CPUC to ensure thorough and efficient environmental review of the Proposed Project.

Please note that attachments in responses to Questions 1, 25 and 27 contain information considered confidential under the provisions of PUC Section 583 and General Order 66-C as well as under the North American Electric Reliability Corporation's Rules of Procedure, Section 1500 et seq. and other applicable Federal and State Laws and

Regulations. These documents were appropriately marked confidential and should be treated as such.

Please contact me if you have questions.

Sincerely,

Bradley S. Carter
Project Manager
San Diego Gas & Electric Company

Enclosures

cc: with enclosures: Peter Allen, CPUC Legal Division
Mary Jo Borak, CPUC Infrastructure Permitting and CEQA
Nicolas Chaset, CPUC Interim Advisor to Commissioner Picker
Molly Sterkel, CPUC Infrastructure Planning and Permitting
Charlotte Terkeurst, CPUC Interim Chief of Staff to Commissioner Picker
Jeff Thomas, Panorama Environmental Project Manager
Hallie Yacknin, CPUC Administrative Law Judge
Rebecca Giles – SDG&E
Allen Trial – SDG&E
Adriana Kripke – SDG&E
Central Files – SDG&E

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in San Diego Gas and Electric Company's (SDG&E) Application (A.14-04-011) and Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity for the Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project. Deficiencies were identified using the CPUC PEA Checklist (November 2008) and the CPUC Information and Criteria List (July 2008). Deficiencies are presented in Table 1.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies

#	PEA Section(s)/ Page #	DEFICIENCY	SDG&E RESPONSE
A. Project Description			
1	Section 3.1, Page 3-2; Section 3.3.1, Page 3-3; Section 3.3.3.1, Pages 3-19 to 3-20; Section 3.3.5.3, Page 3-24	**Section 3.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding relevant substations to the project and schematic diagram of the existing system** ***Identify the locations of the Chicarita, San Luis Rey, Encina (and/or Encina Hub, if different), Palomar Energy, and Mission Substations discussed in the PEA. Describe conductor connection and transmission "upgrade" activities, the duration of work, and equipment that would be used at these substations. Identify these substations on the system diagram.*** The PEA Project Description states that minor alterations would be required at the Chicarita, San Luis Rey, Encina, Palomar Energy, and Mission Substations; however, little detail on the work required was provided in the PEA. Provide a thorough description of the activities that would be performed at these locations and the scope of proposed transmission upgrades. Please identify these substations on the existing diagram and provide GIS files of locations, as appropriate.	For the Chicarita, San Luis Rey and Mission substations, minor relay, protection and transmission line work will be required. Activities may include adjusting of the phasing configuration of transmission and power lines as-needed. This work would typically require minimal lineman crews and line/bucket trucks. These crews and trucks would typically be the same as those working within the Sycamore Canyon and Penasquitos substations. After further analysis, no work is currently anticipated at Encina or Palomar Energy stations. Locations of Chicarita, San Luis Rey and Mission Substations are included within the GIS files.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
2	Section 3.3, Table 3-2, Page 3-6; Section 3.3.3, Page 3-18; Section 3.3.3.1, Page 3-19 to 3-20; Section 3.3.6.3, Table 3.8, Page 3-25	**Section 3.7.2.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding conductor installation** ***Define conductor bundling (also referred to as "jumpered" together) and consolidation techniques in detail. Describe any specific differences between installing bundled conductor and single line stringing or reconductoring. Identify any workspace or access requirements for bundling/consolidation of TL 23001 and TL 23004 between the project corridor (from Carmel Valley Road to the San Luis Rey Substation, and Peñasquitos Junction to the Mission Substation) and substations located outside of project corridor.*** The PEA Project Description describes bundling and consolidation of TL 23001 with TL 23004 and TL 675 with TL 6906, in order to create a vacant position on existing structures for the new 230 kV transmission line. Additional information is required on the consolidation methods. The PEA Project Description states that TL 23001 and TL 23004 would be "jumpered" together to create one bundled 230 kV circuit between the San Luis Rey Substation and Carmel Valley Road, as well as between the Peñasquitos Junction and Mission Substation. Please identify the location of any work areas, access roads, and stringing sites that are outside of the project corridor as defined in the Project Description and that would be required to bundle these existing lines.	Currently, TL 23001 and TL 23004 are two separate tielines/circuits on either side of the existing transmission structures with single 1033.5 kcmil 45/7 Strands "ORTOLAN" conductor per phase. The consolidation of these two circuits will be performed by bundling these two circuits from the proposed cable pole near Carmel Valley Road and the proposed tubular steel pole structure P43 near Penasquitos Junction. The bundling of these two circuits at Penasquitos (PQ) Junction will involve adding an additional cable referred to as a "jumper" connecting both circuits on the south side of structure P43. By doing this along with running both jumpers at the deadend assembly on the east side of P43, the two circuits become one using a two-wire bundled conductor of 1033.5 kcmil 45/7 Strands "ORTOLAN" per phase. This bundled line will then be known as TL 23004 moving forward. This bundled configuration on the east side of the existing towers allows for the removal of the existing conductor on the west side of the structure and opens the position for the new SX-PQ conductor to be installed. A similar process is completed on the north side of the new cable pole which is located south of Carmel Valley Road. The two-wire bundled conductor will be un-bundled into separate circuits in a similar fashion as accomplished at PQ Junction. This allows these circuits to be independent of one another as they proceed north of the cable pole. The bundling and un-bundling of these circuits will be achieved within the same work areas established for all other installation activities. It is not anticipated that any additional work will be required outside of the Proposed Project corridor but will be confirmed during final design. In segment D, new double circuit tubular steel poles will be constructed

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
			adjacent to the existing 230 kV lattice steel towers. In order to vacate the proposed position for the new SX-PQ transmission line on the south side of the lattice steel towers, the existing wood pole H-frames currently supporting TL 675 will be removed and TL 675 will be transferred to the south side of the proposed double circuit tubular steel pole. TL 6906 will be transferred from its current position on the north side of the lattice steel tower and co-located with TL 675 on the proposed tubular steel poles. This transfer of TL 6906 allows TL 13804 to be transferred to the vacated TL 6906 position on the lattice steel towers and opens up a vacant position for the proposed 230 kV SX-PQ transmission line.
3	Section 3.4.1.1, Page 3-26; Section 3.4.6.6, Page 3-41	**Section 3.7.1.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding access road preparation** ***Clarify activities involved in the reestablishment (also referred to as "smoothing or refreshing") of existing access roads. Identify which access roads will be reestablished.*** The PEA Project Description states "existing access roads may be re-established or otherwise maintained to ensure that construction access is available." Please provide a detailed description of how access roads would be reestablished, provide details on proposed earthwork (e.g., grading or blading), and identify which access roads would be reestablished.	Existing unpaved access roads typically require work prior to commencement of construction activities. This work falls under one of two categories, as further explained below. It is important to note that the specific roads that will require preparation cannot be known with certainty until immediately prior to construction as site conditions are fluid and could change at any time prior to the actual start of construction activities. **Refreshing**: Road refreshing is necessary on maintained access roads to improve the roads that require minor maintenance in preparation for construction vehicle/equipment use. Activities would consist of: (1) vegetation clearing, trimming, or mowing of any overgrown portions of the access road using a mowing skid steer, weed whacker, hand tools, etc.; (2) minor re-surfacing and smoothing where necessary using a grader; and (3) watering using a water truck to provide moisture for optimum compaction and dust control. **Re-establishment**: Road re-establishment is necessary on unmaintained access roads to re-establish the roads for construction vehicle/equipment use. Re-establishment of the access road surface could include grading,

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
			smoothing, and the transfer, addition and compaction of fill, as well as the activities required for refreshing (listed above and including vegetation clearing, trimming or mowing, re-surfacing and smoothing, and watering). In some cases a D4 bulldozer would be used to repair access specifically for re-shaping, transferring of fill, road compaction, and re-surfacing as necessary. To avoid impacts to jurisdictional drainages during road refreshing or re-establishment activities, the following minimization measures would be implemented: • Any excess soil would be spread on site outside of jurisdictional drainages to match existing contours and properly compacted or hauled off site. • Graded areas would be stabilized to promote infiltration and reduce run-off potential. • Erosion protection and sediment control BMPs would be implemented in compliance with the General Construction Permit, Storm Water Pollution Prevention Plan (SWPPP), *SDG&E Water Quality Construction BMPs Manual* (BMP Manual), and the *SDG&E Subregional Natural Community Conservation Program (NCCP)*. • At designated jurisdictional drainage crossings locations along the access roads, the blade of the smoothing equipment would be lifted 25 feet on either side of the drainage to avoid impacts. The Proposed Project would not require the construction of any new access roads, and based upon preliminary engineering, approximately one new spur road would be required for access to Structure No. P2 (refer to PEA

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
			Section 3 and Appendix 3-B). Spur roads are a subset of access roads that connect existing access roads to single pole locations. A given access road may connect to multiple spur roads. The extent of the work needed to re-establish the roads for use will be determined by the field conditions present at the start of the Proposed Project because field conditions change.
4	Section 3.4.1.2, Page 3-27	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding maintenance pad preparation** ***Provide locations and a thorough description of retaining walls to be constructed for maintenance pads.*** The PEA Project Description states "retaining walls would be installed to ensure safety and stability of the transmission line maintenance pad where geologic and topographic conditions warrant." Please provide a detailed description of the location and the design of retaining walls.	Based on preliminary engineering completed to date, below is a summary of typical walls to be engineered and constructed and their proposed locations. As additional survey and geotechnical information is obtained and detailed engineering completed, these locations and designs are subject to change: **'Fill' walls** will be designed utilizing an MSE (mechanically stabilized earth) retaining wall approach. This wall is necessary when the proposed pad elevation is higher than the existing surrounding terrain. These walls will be constructed utilizing compacted lifts of soil stabilized with properly developed lengths of geogrid fabrics. The fabrics are attached to different types of structural components to stabilize the wall. The faces of these walls could vary based on aesthetic needs of the location. A registered geotechnical engineer will perform global stability analysis to ensure wall design is appropriate based on the soil conditions. There are seven (7) site locations currently identified that require an MSE retaining wall to allow for the construction of a properly sized maintenance pad: **Segment A - Sites P5, P24 and P25:** • P5 will require the construction of an approximately 950 SF wall • P24 will require an approximately 1600 SF wall • P25 will require an approximately 3000 SF wall

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
			Segment D - Sites P43, P47, P48 and P53: • P43 will require an approximately 1500 SF wall • P47 will require an approximately 200 SF wall • P48 will require an approximately 1000 SF wall • P53 will require an approximately 400 SF wall **'Cut' walls** (if needed) will be constructed per San Diego Regional County Standard Drawing Section C, and could range in a variety of designs depending on site needs. This could include but not be limited to masonry block or reinforced concrete wall designs. Additionally, soldier pile wall designs may be considered. Cut walls are necessary when the proposed pad elevation is lower than the existing surrounding terrain elevation. Again, a registered geotechnical engineer will perform global stability analysis to ensure wall design is appropriate based on the soil conditions. At this time there are no cut-slope walls identified for this project, but as the project develops and further survey data is collected this is subject to change.
5	Section 3.4.1.6, Page 3-29; Section 3.4.6.4; Section 3.4.7, Page 3-41; Appendix	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding work area locations** ***Confirm guard structure locations are sufficient in number and size to guard all conductor construction activities. Identify utility crossing points where any type of guard structure would be installed.*** The PEA Project Description states that different types of guard structures would be used to protect road	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies

#	PEA Section(s)/ Page #	DEFICIENCY	SDG&E RESPONSE
	3-B	crossings, existing electrical and communication facilities, or vehicle and/or pedestrian traffic in the event of an accidental fall. Confirm that guard structure installation locations in Segment A (GS1 through GS46) and Segment D (GS47 and GS48) are correct and sufficient as mapped in Appendix 3-B, including where lines would be permanently removed. Please confirm that no guard structures would be installed adjacent to Highway 56 between E4 and E5, Angelique Street between P12 and P13, Ivy Hill Drive between P19 and P20, and Village Ridge Drive between P17 and P18, or identify the locations where they would be installed. Identify existing utility crossing points and the type of guard structures that would be covering those points, in the event of an accident fall.	
6	Section 3.4.1.5, Page 3-29; Appendix 3-D	**Section 3.7.1.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding work area locations** ***Identify the temporary work area limits for proposed structure removals.*** The PEA Project Description states that "all structural removal would be completed from existing work pads (typically 35 feet by 75 feet) located at each existing pole site or using new structure temporary work areas, as-needed." In addition to the new structure work areas, existing work pad areas for structure removal need to be delineated on project maps and included in GIS data in order to confirm that no new impacts would result from structural removals. Specifically, please identify the existing work area limits for structure removals at pole locations R20, R23, R24, R25, R30, R34, R36, R39, R40, R42, R43, R44, R46, R52, R62, R63, R66, R67, and R68.	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
7	N/A	**Section 3.4, 3.7.1.2, and 3.7.1.3 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding GIS data layers, access roads, and work area locations** ***Provide GIS shape files for all project components as identified below.*** The PEA Checklist has as requirement to 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. The following information appears to be missing from the GIS files and is necessary to support the environmental review and analysis: • The locations of fiber optic/OPGW communication cables • Boundaries of the Chicarita, San Luis Rey, Encina (and/or Encina Hub, if different), Palomar Energy, and Mission Substations • Conductor paths that would be bundled between the project corridor and San Luis Rey Substation • Work areas for duct and vault trenching • Temporary work area limits for structure removal sites R20, R23, R24, R25, R30, R34, R36, R39, R40, R42, R43, R44, R46, R52, R62, R63, R66, R67, and R68. • SDG&E ROWs and Franchise Areas • Cultural survey data (included in the confidential appendix to the cultural resources survey report, but not in GIS layers)	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
8	Section 3.3.5, page 3-23	**Section 3.5.4 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding substation modifications** ***Provide plan and profile views of existing substations and proposed modifications.*** The PEA Project Description provides a description of proposed modifications to the Sycamore and Peñasquitos substations; however, plan and profile views illustrating these modifications were not provided. Please provide the plan and profile views.	*PENDING*
9	Section 3.4.1, page 3-41	**Section 3.7.1.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding vegetation clearance** ***Please provide details regarding vegetation clearing for project access, and all work areas, staging areas and yards, and maintenance areas.*** Vegetation types are included in the GIS files. However, additional details are required, as specified in the PEA Checklist, in order to perform biological and visual resources analyses: A. Describe what types of vegetation clearing may be required (e.g., tree removal, brush removal, flammable fuels removal) and why (e.g., to provide access, etc.). B. Describe how each type of vegetation removal would be accomplished. C. For removal of trees, distinguish between tree trimming as required under GO-95D and tree removal.	**A.** Vegetation clearing and/or trimming would be required within and along existing access roads and within the footprint of proposed activities at temporary workspace locations. See Response No. 3 for vegetation clearing during refreshing or re-establishing existing access roads. These activities are necessary to provide access to the work sites for construction personnel and equipment, to provide a clear temporary workspace location for parking and staging equipment, and to provide an adequate fire safety buffer between construction activities and surrounding vegetation. Clearing activities would mostly consist of overgrown brush removal and trimming, and mowing where applicable. No trees are anticipated to be removed within SDG&E ROW. SDG&E maintains a clear working space area around certain poles pursuant to requirements found within General Order 95 and Public Resources Code (PRC) Section 4292. SDG&E keeps these areas clear of shrubs and other obstructions for fire prevention purposes. In addition, vegetation that has a

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		D. Describe the types and approximate number and size of trees that may need to be removed. E. Describe the type of equipment typically used.	mature height of 15 feet or taller are not allowed to grow within 10 horizontal feet of any conductor within the ROW for safety and reliability reasons. **B.** Brush removal and trimming would be accomplished using Project equipment including a mowing skid steer, weed whackers, bladers and necessary hand tools. The removed vegetation would be removed from the project site and disposed of at an approved offsite facility or would be cut into small segments and spread nearby in order to maintain compliance with fire safety and vegetation management plans. **C.** No tree trimming would be required beyond the trimming activities that occur during routine maintenance on existing access roads. No trees are anticipated to be required to be removed within the ROW, while a minimal amount of trees within the median of Carmel Valley Road may need to be removed prior to trenching activities. The exact number of trees that may be removed within Carmel Valley Road would not be known until final engineering and design is complete. **D.** See Response No.9c (above). **E.** Vegetation clearing activities would typically involve the presence of one to two small maintenance vehicles and one or more employees to clear or trim vegetation to achieve the minimum working space within access roads and temporary workspace locations. Typical equipment used include a hand mower or mowing skid steer, weed whackers, as well as other necessary hand tools such as rakes, shovels, trimmers, etc. If major vegetation clearing is required, a blader may be also be used.
10	Section 3.4.3,	**Section 3.7.2.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding pole installation and**	Currently no shoo-fly poles are anticipated for the Proposed Project. Outages will be required to construct the Proposed Project but none of those

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
	page 3-34	**removal** ***Identify whether or not shoo-fly poles will be required to maintain customer electrical service during construction. If required, provide the number of shoo-fly poles, their location, dimensions of impact areas at each location, estimated duration of installation/use of shoo-fly poles, a description of stringing methods proposed for shoo-fly construction/disassembly and indication if helicopters would be used, and restoration details proposed at shoo-fly locations/disturbed areas. In addition, shoo-fly locations should also be included in GIS data (see comments under GIS Data above).*** The PEA Project Description identifies that service interruptions are not anticipated and that line outages would be coordinated to maintain system reliability; however, no details were provided as to how this would be achieved. Line outages and distribution underbuild is usually protected through the use of shoo-flys. Please provide the information listed above so that impacts to utilities and services can be addressed in the EIR.	outages are anticipated to result in loss of electric service to customers.
11	Section 3.4.11.2, Table 3-11	**Section 3.7.5 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding workforce and equipment** ***Identify the number of each vehicle and piece of equipment that would be used and the number of workers that would be present during each proposed work activity.*** The PEA Project Description lists standard equipment that would be used, the	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		general duration of work for work activities, and the general number of workers that may be present; however, the number of vehicles, equipment, and workers present for individual work activities was not provided. Please provide this information.	
12	Section 3.8, page 3-50	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding minimizing fire hazards** ***Provide a copy of the project-specific fire prevention plan.*** The PEA Project Description identifies that a draft fire prevention plan has been prepared for the project, but it was not included in the PEA. Please provide the fire prevention plan.	See attached SDG&E's letter (06/18/14) for information regarding Question 12. The draft Project Fire Prevention Plan cannot be finalized until further engineering and project permitting is complete. The Final Project Fire Prevention Plan will be provided prior to issuance of a Notice to Proceed from the CPUC.
13	Section 3.8, page 3-54	**Section 3.5.3.2 of the PEA Checklist and Section V(11) of the Information and Criteria List regarding cable pole screening** ***Provide preliminary design details for screening of cable poles from adjacent roadways.*** The PEA Project Description identifies that "final design of the eastern and western cable poles will consider design measures, such as landscaping installed outside of new perimeter chain-link fencing, decreased pole diameters, or increased setback from adjacent roadways, to reduce the visibility of each structure." The description is too general and more detail is needed to assess the visual impacts. Please provide preliminary design details for screening of cable poles that specifies the pole and the proposed screening method.	See attached SDG&E's letter (06/18/14) for information regarding Question 13. The visual simulations (PEA Figures 4.1-9 and 4.1-10) depict the current cable pole design and associated standard security fencing. SDG&E does not typically screen the cable poles but would consider potential design measures in final design, including potential suggestions from the public or responsible agencies. The eastern cable pole (Structure No. P41) is already set back from the road (Carmel Valley Road) thereby reducing its visibility for viewers traveling along the road.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
B. Aesthetics			
14	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding KOPs** ***Provide information on the camera used to capture the KOPs.*** Data on the camera used for the analysis was not provided but is needed to assess the accuracy of the simulations. Please provide the following data for photographs used at each of the key observation points. A. Camera make and model B. Film size or digital sensor dimensions C. Lens make and model D. Focal length used for each image E. GPS camera location	Refer to attached Table 14-1 for data responsive to parts A through D and refer to attached GIS shapefiles for response to part E.
15	Section 3.8, page 3-50; Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations** ***Provide locations and details for the proposed marker balls.*** Figure 4.1-5, 4.1-7, and 4.1-13 of the PEA's Aesthetics Section shows new marker balls (aerial marking) on the shield wires. The U.S. Department of Transportation Federal Aviation Administration Advisory Circular 7-/7460-1K discusses marker balls as it relates to the potential of perceived visual intrusion: *They should be recognizable in clear air from a distance of at least 4,000 feet…* All 3 KOPs appear to be less than 0.75 mi. (4000 feet) from the marker balls. Yet the analysis of the KOPs after project implementation states they would be "barely	See attached SDG&E's letter (06/18/14) for information regarding Question 15. The Federal Aviation Administration's (FAA) regulations require notification of proposed structures, including conductor spans, taller than 200 feet or within 20,000 feet of an airport. Once the FAA receives notification of these proposed structures, it conducts an aeronautical study and makes recommendations on whether the proposed structures would be a hazard to air navigation, would not be a hazard with marking and/or lighting, or would not be a hazard even without marking and/or lighting. SDG&E will identify the structures, including conductor spans, that require FAA notification once final engineering is complete. SDG&E will then

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		visible". Please reevaluate your 3D modeling to confirm the balls are the proper size and render the simulations accordingly. Please provide a preliminary assessment of required marker balls and lighting including the size, color, and total number per segment. Include a map that shows the location and extents of the marker balls that are required. Provide any correspondence with the Federal Aviation Administration and the Department of Defense regarding the need for marker balls or hazard lighting on the transmission line towers or the shield wires.	identify the locations and details for marker balls in response to FAA recommendations. SDG&E will also consult with the Marine Corps Air Station Miramar on any potential marking and/or lighting requirements per their review. The PEA project description and impact analysis, including visual simulations, are accurate based upon preliminary engineering and information, which did not include the agency consultations described above.
16	Section 4.1	**Section 5.1 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding visual simulations** ***Please provide a simulation showing an angle structure. Provide an elevation drawing with a side by side comparison of angle and tangent structures to assist the reader understand the differences in magnitude.*** Angle poles are typically more robust than tangent structures; therefore, they are more conspicuous to the visual receptor. Please provide a simulation showing an angle structure. The KOP from Hilltop Park would be good vantage point to demonstrate their mass. It will also serve as an excellent example of how stringing site will appear after vegetation removal.	The PEA contains two visual simulations of deadend (DE) angle structures that occur along the alignment. PEA Figure 4.1-8 depicts the proposed Structure P36, which is an approximately 170-foot 230kV DE angle structure located along Segment A. Additionally, PEA Figure 4.1-11 depicts proposed Structure P43, which is also a 230 kV DE angle structure (approximately 140 in height) located near the intersection of Segments C and D. PEA Appendix 3-C contains typical structure diagrams for Proposed Project 69 kV and 230 kV tangent structures. In order to provide comparison, SDG&E has attached typical structure diagrams for Proposed Project 69 kV and 230 kV DE angle structures.
C. Air Quality and Greenhouse Gases			
17	Appendix 4.3-A, Tables A-27 and A-	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions**	Helicopter emissions have been removed from the unmitigated emissions table for Segments C and D. The analysis is based on the maximum daily emissions based on the simultaneous activities identified in the construction

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
	28	***Update Table A-27 to include helicopter emissions for Segment C or update Table A-28 to exclude helicopter emissions for Segment C for 2016.*** Table A-27 (unmitigated emissions) includes helicopter emissions for Segment C in 2016 and D in 2017. Table A-28 (mitigated emissions) excludes helicopter emissions for Segment C in 2016 and D in 2017. Please update the tables so that Segments C and D contain the correct elements in both tables for 2016 and 2017, respectively, or provide an explanation for the apparent discrepancy. Please update Table 4.3-8 to account for changes in emissions calculations, if necessary.	schedule for all segments. The activities occurring for Segment C during the maximum day in 2016 is road/pad maintenance, which would not require helicopter support. The activities occurring for Segment D during the maximum day in 2017 are steel hauling and steel structure assembly, which are also anticipated to not require helicopter support. Updated emission tables have been provided within a revised version of Appendix 4.3-A, Air Quality Construction Emissions. An updated Table 4.3-8 has also been provided.
18	Appendix 4.3-A, Tables A-32 and B-9	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide unmitigated operational air pollutant emissions.*** Only mitigated operational emissions appear to be provided (Tables A-32 and B-9). Unmitigated operational emissions should be provided, or please clarify that mitigated and unmitigated operational emissions are the same, if that is the case.	The word "mitigated" has been removed from the table titles. There are no mitigation measures identified for operational emissions and therefore there are no differences in emissions. A revised version of Appendix 4.3-A, Air Quality Construction Emissions has been provided.
19	Appendix 4.3-A, Table B-5	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide GHG emissions calculations for 2017 or clarify the contents of Table B-5.*** Table B-5 (which is also used for Table 4.3-10 in the text of the PEA) is labeled as containing emissions for 2016 only. Construction would also occur in 2017.	The table should not have included "2016" in the title. The table has been revised to eliminate reference to 2016. Emissions of GHGs in Table B-5 were totaled for the entire project construction. A revised version of Appendix 4.3-A, Air Quality Construction Emissions has been provided.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		Please provide GHG emissions calculations for 2017, or clarify that Table B-5 (and 4.3-10) contains all construction emissions from 2016 through 2017.	
20	4.3.4.2, Table 4.3-8, pages 4.3-22 through 4.3-23	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding estimates for air quality emissions** ***Provide PM10 and PM2.5 emissions for helicopter operations or explain why PM10 and PM2.5 emissions for helicopter operations are excluded.*** Table 4.3-8 does not contain PM_{10} and $PM_{2.5}$ emissions for helicopter operations, even though helicopter operations would result in emissions of PM_{10} and $PM_{2.5}$. Further, Appendix 4.3-A, Tables B-4 and A-26, do not provide these calculations. Appendix 4.3-A , Tables B-4 and A-26, and Table 4.3-8 should be updated to include helicopter PM_{10} and $PM_{2.5}$ emissions, or please explain why such emissions were excluded.	Particulate emission factors are not available from the Federal Aviation Administration's (FAA's) Emissions and Dispersion Modeling System (EDMS), from which helicopter emission factors were obtained, due to difficulties in measuring particulate matter from aircraft engines. According to the U.S. Environmental Protection Agency (EPA), "In cases where EDMS does not include necessary emission factors, such as aircraft PM, use best available information." For conservative purposes, the emission index for particulate matter for military rotary wing aircraft, as measured by the U.S. Navy's Aircraft Environmental Support Office (AESO), for the UH-1, AH-1, and H-60 aircraft of 4.20 lbs PM/1000 lbs fuel was used. It was assumed that PM2.5 would be essentially equal to PM10. Particulate matter emissions were added to the tables.
21	4.3.4.8, page 4.3-31	**Section 5.3 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding air quality emissions** ***Provide an operation and maintenance GHG emissions summary table.*** An emissions summary table is not provided for operation and maintenance GHG emissions. Please provide a summary of the GHG emissions for operations and maintenance.	Tables B-7 through B-9 in the provided revised Appendix 4.3-A, Air Quality Construction Emissions, have been updated to include total annual GHG emissions associated with operation and maintenance. A table has been added to the text to summarize these emissions. GHG emissions associated with operation and maintenance are minor.
D. Biological Resources			
22	Section 4.4.4,	**Sections 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding biological resource**	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
	Page 4.4-39 and 4.4-40	**surveys** ***Provide survey results for spring/early summer blooming special-status species.*** The PEA states that "…because the application submittal deadline for the Proposed Project would occur prior to the spring survey period, focused surveys that target spring/early summer blooming special-status plant species could not be conducted prior to application submittal." Please provide updated spring/early summer survey results.	
23	Biological Technical Report, Appendix 4.4-A, Figures 5, 9, 11, 12, & 13	**Sections 5.4 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding survey results and potential impacts for all work areas including staging areas and access routes** ***Provide survey results and impacts for all proposed staging areas including the Carmel Mountain staging yard, Carmel Valley Road staging yard, and the Torrey Santa Fe staging yard, which were not addressed in the PEA.*** The Biological Technical Report (and the PEA) did not include biological surveys and impact assessments for all of the proposed staging areas. These staging areas were also not addressed in the wetland delineation report. In addition, there are several access routes located outside of the mapped project study area that require biological surveys and an assessment of potential impacts associated with "re-establishing" existing access roads. Please provide survey results and impacts for all proposed staging areas/yards.	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
E. Cultural Resources			
24	Section 4.5.2.3, Page 4.5-2	**Sections 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys** ***Provide survey results for all staging areas.*** The PEA states that "Only two of the five staging areas, Stonebridge and Stowe, were surveyed due to access limitations." The other three staging areas need to be surveyed, as the data are required to evaluate the potential impacts of staging. In addition, there are several access routes located outside of the mapped project study area that require cultural surveys and an assessment of potential impacts associated with "re-establishing" existing access roads. Please provide the survey data and results for all staging areas and access roads.	*PENDING*
25	Section 4.5.2.3, Page 4.5-2	**Section 5.5 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding cultural resource surveys** ***Provide copies of the previous reports that were relied upon for their survey results (i.e., Williams and Cordova 2012 and Bowden-Renna 2012).*** The Williams and Cordova (2012) and Bowden-Renna (2012) survey reports results were used for the PEA analysis. Areas surveyed in previous projects as described in these reports were not resurveyed. Since the previous surveys are being relied upon for the analysis of this project, please provide these reports so that survey locations and methods can be evaluated.	Both the Williams and Cordova 2012 report, and the Bowden-Renna 2012 report are attached. Both reports are being submitted as confidential.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
26	Section 4.5.4.2, Page 4.5-20	**CPUC ICL Section V.11; GO 131-D Section IX. A; PEA Checklist (Chapter 5.5, Cultural Resources)** ***In accordance with the outcome of the Madera Oversight Coalition v. County of Madera case, substantial evidence must be provided demonstrating that known sites that have not been evaluated for their eligibility can be avoided, or if they cannot be avoided, they must be evaluated for their eligibility for listing in the NRHP/CRHR so that the results can be included in the EIR analysis.*** The case of Madera Oversight Coalition v. County of Madera,199 Cal.App.4th 48 (2011) involved an EIR that identified certain archaeological resources as historic resources, noted that the project would have a significant impact on said resources, and imposed a mitigation measure requiring, among others, further verification that those resources were indeed historic resources. The court overturned the EIR in this regard finding that this measure constituted an impermissible deferral of analysis since environmental decisions would be made outside an arena where public officials would be accountable. Along those lines, the court noted that "[n]either CEQA nor the Guidelines authorize any mechanism or procedure for undoing an EIR's conclusion that an archaeological site is an historical resource." The court also noted that the measure violated CEQA Guidelines § 15064.5(c) (1), which requires a lead agency to first determine whether a site is a historic resource when a project will impact an archaeological site. The PEA states that nine of the proposed pole/work area locations are in the vicinity of 14 identified cultural resources that have not been evaluated for their eligibility under the	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		NRHP or CRHR. The PEA states that these 14 sites are being assumed to qualify as "historical resources" as defined by CEQA. The analysis also states that "The current design is far enough from the cultural resources locations that no direct impacts should occur, with the implementation of APMs CUL-1 through CUL-6." Not enough information is provided to validate this conclusion. The APMs include monitoring and development and implementation of a Research Design and Data Recovery Program to mitigate for any resources discovered during construction, which seems to indicate some potential for these 14 cultural resources to be impacted by the project construction. More information must be provided to show whether the project would or would not impact each of these sites (i.e., how far away is the site and from what type of construction activity, what type of site is it, what is the likelihood for associated buried sites that could be directly impacted). For all sites where there may be impacts, a very definitive statement of eligibility is needed. In some cases, this determination may not require more fieldwork, but simply requires a clear analysis of why these sites are not eligible. For other sites, though, more information is needed to either dismiss site eligibility, or to design site-specific data recovery strategies for mitigation. In some cases, this may require subsurface shovel testing within the impact areas to confirm whether anything is present below the surface, to determine what types of materials are there, and to assess whether the impact areas contain deposits with integrity. Due to the Madera case described above, the EIR will need to provide substantial evidence to support the conclusions as to whether the proposed project would significantly impact cultural resources. The administrative record will need to	

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		document that standard and thorough investigations were carried out to determine whether there are any such eligible resources impacted. Please propose an approach and a schedule for providing this information.	
F. Geology and Soils			
27	Section 4.6.2, page 4.6-2	**Section 5.6 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding site-specific geologic information.** ***Provide the geotechnical reports prepared for portions of the project alignment.*** Section 4.6 states that there are four existing geotechnical reports that have been prepared for SDG&E for other projects that cover portions of the project alignment (Benton Engineering Inc. 1972a and 1972b; Geocon Inc. 2012a and 2012b). Please provide these reports to the CPUC so that the impacts related to geologic hazards and soils can be assessed.	The referenced Geotechnical Reports are attached and listed below. Note that two of the reports (Geocon Inc. 2012a and 2012b) are being submitted as confidential due to the level of detail provided concerning the location and designation of existing SDG&E facilities. • **Geocon Inc. 2012a and 2012b** o Geotechnical Investigation – SDG&E TL 13804 Pole Foundations (July 2012) o Geotechnical Investigation – SDG&E TL 6961 Pole Foundations (September 2012) • **Benton Engineering Inc. 1972a and 1972b** o Geotechnical Report – 230 kV San Onofre to Escondido TL (February 1972) o Geotechnical Report – 230 kV San Onofre to Escondido TL (April 1972)
G. Hazards and Hazardous Materials			
28	Section 4.7	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding construction of new transmission line near existing utilities**	See attached SDG&E's letter for information regarding Question 28. Providing documentation on the depths and locations of nearby existing

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		Provide documentation on the depths and locations of nearby existing (and proposed if applicable) utilities in relation to the proposed location of the new transmission line. Provide analysis related to the potential effects on any existing buried gas pipelines (whether the project will cause corrosion of nearby pipelines or create a hazard for construction workers or the public). Quantify the potential induced current and interference in any adjacent buried pipelines. Transmission line construction involves subsurface excavation for pole and tower foundations and may interfere with existing subsurface features. Substantial evidence is needed to demonstrate that the project will not create a hazard for construction workers and the public during installation of the poles and towers and operation of the power line. Evidence is required to determine the potential for induced current and interference in adjacent buried pipelines and that the project would not cause corrosion or safety hazards. Identify the distance from the transmission line alignment to any and all existing buried pipelines and describe the methods used to determine safe operational distances, as appropriate.	utilities is premature because the Proposed Project has not yet undergone final engineering. SDG&E will prepare responsive documentation as part of its standard process for finalizing engineering and preparing for construction.
29	Section 4.7.3.3, page 4.7-9	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding hazardous materials** ***Provide a complete list of the types of hazardous materials anticipated to be used during project construction and maintenance and operation.*** The PEA includes a partial list of hazardous materials anticipated to be used during project construction. The subsection does not list any hazardous	Hazardous materials that could be utilized during operation and maintenance of the Proposed Project would be the same as those currently used along the transmission line route and at the Sycamore Canyon and Peñasquitos Substations. Specifically, these materials could include: • Vehicles and equipment fuels (gasoline, diesel, propane, etc.) • Insulating oil (transformers at substations) • General lubricants (brake fluid, hydraulic fluid, engine oils)

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		materials anticipated to be used during project maintenance and operation. Provide a list of the hazardous materials that would be used during construction and maintenance and operation.	• Battery acid (within self-contained batteries) • Methyl alcohol (electrical equipment maintenance) • Contact cleaner 2000 (electrical equipment maintenance) • Sulfur hexafluoride (insulator for substation equipment)
30	Section 4.7	**Section 5.7 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding blasting activities** ***Clarify whether blasting would be used during any aspect of project construction. Provide additional information on blasting-related procedures.*** The Project Description and Section 4.7 state that blasting may occur during project construction. Blasting agents are hazardous and also could present a hazard of injury or property damage if improperly handled. Please provide information on what portions of the project area would potentially be subject to blasting activities and the distance of these areas from the public, including residences and other receptors such as schools. Please provide additional descriptions of the appropriate best management practices (BMPs) that would be used before, during, and after all project-related construction activities to prevent erosion and off-site sedimentation during blasting activities.	No rock blasting is currently anticipated to be required for the Proposed Project. Therefore, portions of the Proposed Project that would potentially require blasting are unknown at this time and would be determined due to the site conditions encountered in the field during construction. In the event blasting is determined to be required, a noise and vibration calculation will be prepared and submitted to the CPUC and the appropriate local agency for review before blasting at each site. The construction contractor will ensure compliance with all relevant local, state, and federal regulations relating to blasting activities. For more detail on the pre-blast survey and final blasting plan, see Response No. 36. BMPs implemented to prevent erosion and off-site sedimentation during blasting would be similar to BMPs implemented for all other Proposed Project components as outlined within the SWPPP and the *BMP Manual*.
H. Hydrology and Water Quality			
31	Section 4.8.3.1,	**Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding drainage crossings**	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
	page 4.8-3	***Provide additional details on the locations of drainage crossings and how drainage crossings would be constructed to avoid impacts to state and federal jurisdictional waters.*** The PEA states that drainage crossings may be used wherever feasible or necessary. Please provide the proposed locations of drainage crossings based on the results of the jurisdictional determination. Please describe how the drainage crossings would be constructed and quantify the wetland and waterway impacts.	
32	Section 4.8	**Section 5.8 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding water use** ***Provide the estimated volume of water that would be required for project maintenance and operation. Identify the source of this water.*** Water would be required for landscaping irrigation and site restoration following completion of project construction. The amount of water that would be required for project operation is not included in the PEA. The source of the water is required to evaluate potential impacts to groundwater and municipal supplies. Provide an estimate of the amount of water required for project operation and from where the water would be obtained.	See also attached SDG&E's letter for information regarding Question 32. Maintenance and operation water is not anticipated to change from the existing conditions with the installation of the Proposed Project.
I. Land Use and Planning			
33	N/A	**Section 5.9 of the PEA Checklist and Section V(14, 15) of the Information and Criteria List regarding adjacent parcels** ***Provide the GIS data of all parcels within 300 feet of all***	*PENDING* See also attached SDG&E's letter for information regarding Question 33.

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		project areas including APN number, mailing address, and parcel physical address. This data set was not identified in the GIS information submitted. Please make sure that the 300 feet includes all nearby residences, staging areas, and access routes. In instances where the 300 feet cuts thru a cul-de-sac neighborhood, please expand the 300 feet to account for all properties located along the cul-de-sac.	
J. Noise			
34	4.10.4.2 (Question 10a)	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise** ***Provide noise generation levels that take into account construction noise combined with existing ambient noise levels listed in Table 4.10-5.*** The PEA provides measured ambient noise levels at ten locations in the project area in Table 4.10-5. The analysis presented under Question 10a only provides noise levels generated by typical construction equipment and does not provide ambient noise levels resulting from project noise combining with the existing ambient noise levels. Please provide noise generation levels that include existing ambient noise levels.	The ambient noise monitoring program conducted for the Proposed Project, as summarized in Table 4.10-5, was conducted in order to evaluate potential increases in noise associated with Proposed Project operation (corona noise). The noise monitoring program was designed to measure noise levels late at night so that extraneous sources would be at a minimum, thereby resulting in conservative (lower) ambient noise levels with which to compare potential corona noise levels. As such, it would not be a valid comparison to evaluate construction related noise, which will occur during daytime hours, to minimum ambient noise levels that occur at night. The City of San Diego and City of Poway noise ordinances limit construction related noise to an absolute level of 75 dBA, irrespective of existing ambient conditions. The PEA prepared for the Proposed Project did evaluate construction related noise at nearby noise sensitive areas, but since the ordinance levels are absolute limits, the PEA did not provide an evaluation against existing ambient conditions.
35	4.10.4.2, page 4.10-5	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise**	Rock blasting is not currently anticipated to be required for the Proposed Project. If required, rock blasting is typically performed at a sporadic duration, with intermittent noise generation. In the event rock blasting is

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		Provide estimated noise levels generated by rock blasting. The PEA states that rock blasting would reduce impacts, with noise being intermittent and short in duration. The PEA does not, however, provide an estimate of the potential noise level generated by rock blasting. Please provide estimated noise levels generated by rock blasting.	determined to be required, a noise and vibration calculation will be prepared and submitted to the CPUC and the appropriate local agency for review before blasting at each site. Data obtained from the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) indicates that blasting generates a noise level on the order of 94 dBA at 50 feet, slightly higher than the 90 dBA at 50 feet level for a concrete saw as presented in the PEA. However and as previously stated, no hydraulic rock drilling or rock blasting is anticipated to be required for the Proposed Project. If required, noise associated with these activities would occur intermittently, over very short periods of time. Rock blasting, if used, is typically performed only once per day and is a very brief impulsive type sound. Data provided in the RCNM also indicate that a very low usage factor of only one percent is applied for blasting due to its very brief duration. Utilizing a one percent usage factor results in an 8-hour equivalent sound level of 74 dBA at 50 feet, which is below the noise ordinance limit of 75 dBA as an equivalent level for an 8 hour day. In reality however, the usage factor would be much lower. If the blasting noise occurred for a full minute, which is highly overestimated, the usage factor would only be 0.2 percent, which would result in an equivalent level for an 8 hour day of only 67 dBA.
36	4.10.4.3, page 4.10-7	**Section 5.11 of the PEA Checklist and Section V(14) of the Information and Criteria List regarding noise estimates for construction noise** ***Provide a list of "ordinary construction restrictions to ensure that any blasting activities comply with applicable laws, regulations, and ordinances" that would reduce impacts to less than significant.*** There is no list of the restrictions and no	As partially discussed in Response No. 30, ordinary construction restrictions for rock blasting are as follows: In the event that rock blasting is used during construction: • A noise and vibration calculation will be prepared and submitted to the CPUC and the appropriate local agency for review before blasting at each site. • The construction contractor will ensure compliance with all

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		analysis of how the restrictions would reduce blasting impacts to less than significant. Further, the measure listed in Section 3.8, page 3-55, refers only to preparation of noise and vibration calculations and not to any specific minimization measures. Please provide the construction restrictions for blasting.	relevant local, state, and federal regulations relating to blasting activities. In addition to any other requirements established by the appropriate regulatory agencies, the pre- blast survey and final blasting plan would meet the following conditions. **Pre-blast Survey** • Shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by SDG&E or SDG&E's contractor. • Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. • Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. • The pre-blast survey shall be included in the final blasting plan. **Final Blasting Plan** • Shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. • Shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement. • Shall outline the anticipated blasting procedures for the removal of rock material at the proposed pole locations. The blasting

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
			procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. • Prior to blasting, all applicable regulatory measures shall be met. • The applicant, general contractor, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.
K. Transportation			
37	Section 4.14.4.2	**Section 5.15 of PEA Checklist and Section V (14) of the Information and Criteria List regarding traffic impacts on roads** ***Provide a traffic management plan that includes discussion of traffic impacts on SR 56 and I-15 due to installation of conductor over roadway.*** The PEA does not analyze the impact that the proposed project may have on traffic on HWY 56 and I-15. The project discussion mentions on page 3-42 that when overhead lines cross larger roads, such as SR 56 and I-15 Caltrans may require certain measures to control traffic. Please describe the methods that SDG&E would implement to control traffic (e.g., stringing at night or other protection methods).	*PENDING*
38	Section 4.14.4.2	**Section 5.15 of PEA Checklist and Section V (14) of the Information and Criteria List regarding vehicle counts during construction to assess traffic impacts**	*PENDING*

Table 1: SDG&E Sycamore-Peñasquitos 230 Kilovolt Transmission Line Project Application 14-04-xxx Deficiencies			
#	**PEA Section(s)/ Page #**	**DEFICIENCY**	**SDG&E RESPONSE**
		Provide a table that shows the maximum trips generated during construction of each segment, broken down by trip type (e.g., material or equipment delivery, worker vehicle). Provide the methods used to generate those numbers. The PEA describes generally that increased traffic volumes would be low, but does not give specific traffic volumes generated during construction of each project segment. Please provide clarification on the method used to generate vehicle trips.	
L. Other Data Needs			
39	N/A	**Chapter 7 of the PEA Checklist and Section V(15) of the Information and Criteria List regarding parcel data** ***Provide an excel spreadsheet with parcel data for all parcels within 300 feet of the project including APN number, mailing address, and parcel physical address.*** Please make sure that the 300 feet includes all nearby residences and all parcels that may be affected by the project (e.g., around staging sites, access routes, and cul-de-sac neighborhood streets).	*PENDING (Same as Q33)* See also attached SDG&E's letter (06/18/14) for information regarding Question 39.