PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 19, 2016

Ms. Rebecca W. Giles
San Diego Gas and Electric Company
8326 Century Park Court, CP32-F
San Diego, CA 92123-4150

RE: Request for Additional Data #1 – Permit to Construct the TL 695 and 6971 Reconductor Project – Application No. A.16-04-022

Dear Ms. Giles:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has reviewed the San Diego Gas and Electric Company's (SDG&E) Application (A.16-04-022) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the TL 695 and TL 6971 Reconductor Project, and responses to Deficiency Reports #1 and #2. The CPUC identified a number of data needs. These data needs are identified in the attached Request for Additional Data. The information requested is necessary to prepare the CEQA document. The CPUC requests that SDG&E respond in writing to this request and provide the additional data identified in Data Needs #1 (Attachment A). The CPUC also requests that SDG&E review the Administrative Draft Project Description and provide revisions and edits to the Project Description in track-changes, where appropriate. The Administrative Draft Project Description is provided electronically as Attachment B.

Information provided by SDG&E in response to this Request for Additional Data should be filed as supplements to Application A.16-04-022. 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 October 16, 2016. Please let us know if you cannot provide the information by this date. Delays in responding to these data needs may result in associated delays in completion of the CEQA document.

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

Please direct questions related to this application to me at 415-703-2642 or william.maguire@cpuc.ca.gov.

Sincerely,

William Maguire
Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Marcelo Poirier, CPUC Attorney
Tania Treis, Project Manager, Panorama Environmental
Susanne Heim, Project Manager, Panorama Environmental

REQUEST FOR ADDITIONAL DATA: DATA NEEDS #1 FOR THE TL 695 & 6971 RECONDUCTOR PROJECT APPLICATION (A.16-04-022)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified several areas where additional information is needed to prepare a complete and adequate analysis of the potential environmental effects of the proposed project 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 A.15-04-022 Data Needs

#	PEA Section, Page #	Data Need
Project Description		
1	Project Description	**Review the attached draft Project Description and provide track change edits and comments as necessary to address identified data needs, and verify information is accurately presented.** Attachment B contains the draft Project Description for the environmental document.
2	Application Appendix F; Figure 3-2	**Does SDG&E intend to remove the existing TL 695 from power poles between San Mateo Junction and San Mateo Substation?** Figure 3-2 and the GIS data provided by SDG&E indicates that power poles will be topped and TL 695 will be removed from existing poles between the approximate location of San Mateo Substation and Basilone Substation. The maps and GIS data do not show any activity or removal of the existing TL 695 between the approximate location of San Mateo Substation and San Mateo Junction. The Magnetic Field Management Plan in SDG&E's Application includes an EMF reduction measure for removal of the existing TL 695 power line between Basilone Substation and San Mateo Junction. The current proposed project only includes power line removal between Basilone Substation and San Mateo Substation. Why is SDG&E not implementing this EMF reduction measure as part of the project? Either the Magnetic Field Management Plan or the Proposed Project description and mapping need to be revised to be consistent. If SDG&E is not adopting a no cost or low cost measure or if this measure no longer meets the standards for no cost or low cost, further explanation is needed in the Magnetic Field Management Plan consistent with the requirements of SDG&E's EMF Design Guidelines and D.06-01-042. If SDG&E intends to remove the existing power line between San Mateo Junction and San Mateo Substation, specify the construction activities that would occur in the area (e.g., conductor removal or pole structure removal) and provide updated GIS data to reflect power line removal in this area. This area was considered part of the project and was covered in surveys for biological resources, cultural resources, and the geotechnical investigation.

#	PEA Section, Page #	Data Need
3	3.9	**Provide a complete and updated list of APMs that reflect survey reports filed in response to Deficiency Report #1 and measures included in the Air Quality Modeling Results (Appendix 4.3-A, Section 3.1 Mitigation Measures Construction).** The APMs listed in Section 3.9: Application Proposed Measures of the PEA include APM BIO-01. Supplemental Surveys, APM CUL-02. Supplemental Surveys, and APM HYD-01. Supplemental Surveys. Supplemental surveys were filed in response to Deficiency Report #1. At this time, has SDG&E filed all supplemental survey data to cover all project components? Does SDG&E see a need for APM BIO-01, APM CUL-01, and APM HYD-01, or do these APMs no longer apply? The Air Quality Model Results provided in Appendix 4.3-A list three mitigation measures: *Replace Ground Cover* *Water Exposed Area* *Clean Paved Roads* Include any Air Quality measures as indicated from #24, below.
4	3.8.6	**The following information is required to determine impacts from helicopter use:** • **Maximum duration of helicopter use** • **Maximum number of helicopters that will be used concurrently** • **Types of helicopters that will be used to construct the project**
5	3.7.1 and 3.5.2.1	**Provide GIS data for poles that would be "removed from service". Will SDG&E physically remove the poles that are "removed from service", or will the conductor be removed and the pole structures remain in place?** The GIS data provided by SDG&E with the PEA did not include the locations of pole structures that would be removed during construction of the Proposed Project. The locations are needed to define all Proposed Project work areas. The PEA does not specify whether removing a pole structure from service means that the pole structure will be removed from the ground or whether the conductor would be removed and the pole structure would remain in place. Provide the applicable work area for the pole removal.
6	3.7.1	**Identify the types of structure that would be installed in the GIS data.** The GIS data provided by SDG&E with the PEA did not specify the type of pole structure that would be installed at each location. Please provide this information in the attribute table of the GIS data.
7	3.7.9 and 3.7.10	**Provide the area of temporary and permanent impact for proposed poles and helicopter landing areas (see Attachment B). Provide GIS data for work areas around poles and work areas around guard structures.** The GIS data for work areas is needed to evaluate impacts on biological and cultural resources and define the Proposed Project's permanent and temporary impact areas.
8	3.5.2.1	**Define the construction activities associated with overhead work.** The PEA states that "overhead work" would be performed at several pole locations but does not specify the construction activities that would occur during overhead work. A description of the construction activities that would occur is needed to define the Proposed Project and analyze all impacts that could occur as a result of those activities.
9	3.6.1, Appendix 3-B	**Provide SDG&E's easement for distribution line infrastructure, and confirm that "possible direct-bury locations" located outside of the TL 695 and 6971 corridors are**

#	PEA Section, Page #	Data Need
		distribution poles. Describe how work on these distribution lines is needed for the proposed project. Proposed pole structure 104 and existing poles 111, 112, 114, 115, 117, 118, 119, 120, 121, 122, 123, 128, 131, and 172 are located outside of the TL 695 and 6971 corridors. SDG&E explained on a conference call with the CPUC on September 9, 2016 that these poles are distribution poles and distribution lines are covered by a blanket agreement with MCB Camp Pendleton. The distribution line easement is needed to understand if there are any conditions or limitations on the type of work that can be conducted at distribution poles. Please provide the activities that would be conducted on these distribution circuits and the work area required at each pole.
10	Appendix 3-B	**Does SDG&E proposed to install new poles at "possible direct-bury locations"?** Several pole structure locations on the detailed route maps are labeled "possible direct-bury locations." Explain why these locations are marked as "possible." The work areas for these pole structure locations will be included in the summary of impact areas unless the pole structure locations are removed from the project by SDG&E.
11	Appendix 3-C	**Provide approximate diameters for pole bases and tops for all pole structures proposed for use in the Proposed Project.** Approximate dimensions for tangent, H-frame, and 12-kV structures were provided in Appendix 3-C to the PEA; however, dimensions for dead end and cable pole structures were not provided. This information is helpful in calculating total area of permanent impacts.
12	3.5.3.1	**Clarify whether the proposed conductors would be non-specular.** The PEA does not specify whether conductors used for TL 695 and TL 6971 would be non-specular. The information is needed to assess visual impacts of the project.
13	3.7.2.1	**Provide the depth of the splice vault that will be installed along the underground alignment.** The PEA provides the length and width of the splice vault along the underground segment of the project but does not provide the depth. The depth is needed to evaluate impacts with underground utilities and verify cut-and-fill quantities.
14	Appendix 3-C	**Provide a typical diagram of the proposed underground duct bank with a single-circuit configuration.** Appendix 3-C provides a diagram of a double-circuit 69-kV underground duct bank, but the project proposes to underground a single-circuit 69-kV underground duct bank.
15	3.7.1, Appendix-B	**Define the excavation and construction methods for pole structure sites where only footpaths are proposed for access. Update access road GIS data to reflect proposed construction access routes.** Vehicles and equipment are proposed for installation of direct-bury pole structures; however, several pole structures sites (i.e., 15, 16, 20, 25, 29, 36, 57, 76, 124, 125, 176, 135, 136, 165, 157, 158, 160) only have footpath access designated with no route for large equipment. How would excavation and foundation construction be performed at these pole locations? Does SDG&E propose delivery of equipment and poles to these areas via helicopter? Figure 3-B12 of Appendix 3-B shows an access road that would cross San Onofre Creek; however, conversations with SDG&E on September 9, 2016 indicate that the creek would not be crossed and poles would be access from either side of the creek. Would creek crossing occur? If not, provide revised access road GIS.

#	PEA Section, Page #	Data Need
16	3.7, 3.8	**Describe the construction and operation and maintenance activities that would require the use of water. Identify the total amount of water that would be used for each phase of the project and where SDG&E would obtain water for the Proposed Project.**
17	3.7.1	**Identify the facilities where waste materials would be recycled or disposed.** The PEA states that vegetation, excavated material, construction materials and debris and potentially groundwater would be disposed of off-site, but does not specify potential locations for disposal and the distance from the facility. The disposal facility locations are needed for both hazardous and non-hazardous materials to verify air quality emissions assumptions.
18	3.7.1	**Describe the construction activities associated with the use of temporary poles, and provide the height of the temporary poles and depth of their installation. Identify the maximum number of temporary poles SDG&E anticipates could be used and the types of locations or circumstances where they may be used.** The construction methods and maximum number of temporary poles that could be used are needed to understand the impacts of temporary poles and quantify project impact areas.
19	3.7.14	**Define equipment that will be used for construction. The following equipment is not listed in Table 3-3, but is listed in the air quality model: jackhammer, concrete saw, vacuum truck, rock drilling machine, hoe ram, scraper, welder, generator, and bulldozer. Provide the quantity of each piece of equipment and construction activity it would be used for if the equipment would be used or revise the air quality model for consistency.** Tables 4.12-3, 4.12-4, and 4.12-5 and Appendix 4.3-A contain different equipment than those listed in Table 3-3 of the Project Description. Equipment listed in the Project Description, Noise analysis, and Air Quality analysis need to be consistent.
Aesthetics		
20	Appendix 4.1-A	**Provide high resolution images for all visual characterization photographs.** The photographs provided in Appendix 4.1-A are highly pixelated and hard to view. The original high resolution photos are needed to characterize the baseline visual quality and scenery.
21	Appendix 4.1-B	**Provide high resolution images for all visual simulations.** The visual simulations provided in Appendix 4.1-B are highly pixelated and hard to view. The original visual simulations photos are needed to evaluate the visual change and impact on visual quality.
22	Appendix 4.1-B and Section 4.1.5.2. b)	**Provide visual simulations of proposed TL 695 and TL 6971 from Viewpoints 1 and 2 in Appendix 4.1-A.** I-5 is an eligible state scenic highway. Visual simulations are needed from I-5 to evaluate impacts of the TL 695 and 6971 reconductoring and substation activities on the eligible state scenic highway. Viewpoints 1 and 2 provide representative viewing location for travelers on I-5.
Air Quality		
23	Appendix 4.3-A	**Provide full CalEEMod output spreadsheets for both unmitigated and mitigated air quality emissions in tons/year (annual) and pounds/day. Provide helicopter emissions modeling using the Federal Aviation Administration Environmental Design Tool, or equivalent. Include helicopter emissions in the total annual and peak daily emissions estimates for the project, including fugitive dust emissions from helicopter**

#	PEA Section, Page #	Data Need
		take-off and landing activities. Update equipment use, if needed (see item 19 above). Appendix 4.3-A does not include the full CalEEMod outputs. The appendix does not include peak daily emissions to support estimated daily emissions (lbs/day) in table 4.3-5, nor does the appendix include air quality emissions from helicopter use.
24	4.3.5.1	**Describe the mitigation measures applied in the CalEEMod model, and explain why these mitigation measures were not included as applicant proposed measures (APMs).** The PEA states that no APMs would apply to air quality; however, Appendix 4.3-A shows that mitigation measures were applied in the CalEEMod model to reduce fugitive dust emissions (see also item 2, above).
25	4.3.5.1	**Define all assumptions used in the air quality model including type of equipment (e.g., use of Tier 2 or Tier 3 equipment) and the reason SDG&E believes 5 percent of the construction effort will occur in South Coast Air Quality Management District (SCAQMD) and 95 percent of the construction effort will occur within San Diego County Air Pollution Control District.**
26	Appendix 4.3-A	**Provide the basis of the estimate for daily haul truck trips during trenching.** The PEA Project Description (page 3-18) states that up to 12 truck trips per day will be required for trenching activities. However, Appendix 4.3-A included eight truck trips per day for trenching activities. Verify the trucking distance is consistent with the hauling distance for disposal of waste materials (see item 17 above)
27	Appendix 4.3-A	**Clarify whether project construction would occur five or six days a week. If construction would occur six days a week, revise the CalEEMod model to reflect the appropriate number of days of construction.** Appendix 4.3-A shows that construction activities would occur for five days per week. However, the PEA Project Description (Section 3.7.15) states construction activities would occur six days per week. Construction emission estimates should reflect the construction period.
28	Table 4.3-2	**Provide an estimate of daily lead emissions from helicopter activities, and compare daily lead emissions to the daily construction and operational threshold of significance for lead emissions for the SCAQMD and San Diego Air Pollution Control Board (New Source Review Rule 20.2).** Helicopters may include the use of aviation gasoline, which contains lead. An estimate of lead emissions is needed to understand project impacts on air quality.
Biological Resources		
29	4.4.3	**Provide MCB Camp Pendleton GIS data for plant and wildlife species occurrences and vernal pool locations within the project study area.** The Biological Technical Report states that SDG&E queried MCB Camp Pendleton data to develop a list of special-status plant and wildlife species; however, the GIS data provided by SDG&E does not appear to include MCB Camp Pendleton data. The Camp Pendleton data includes multiple years of biological resources monitoring and mapping and will provide a rich data set to help evaluate impacts on biological resources
Cultural Resources		
30	4.5.5.1	**Provide records of communication with Native American tribes.** The PEA states that SDG&E will contact Native American tribes with an interest in the project area prior to the release of the CEQA document. Records of coordination with the Native American Heritage Commission to obtain a list of Native American

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		tribes in the project area, and communication with Native American tribes is needed to understand SDG&E's existing coordination with Tribes to-date.
Greenhouse Gas Emissions		
31	Appendix 4.3-A	**Provide revised estimations of greenhouse gas emissions.** Changes to the CalEEMod model in response to data needs for Air Quality (see above) may result in changes to estimated emissions of greenhouse gases. Update the greenhouse gas emissions estimates to reflect the revised CalEEMod model outputs.
Noise		
32	4.12.5	**Provide baseline ambient noise levels for each noise environment in the project area.** The PEA describes existing noise sources in the area, but does not provide ambient noise levels in the project area.
33	Tables 4.12-3 and 4.12-4	**Provide the calculated cumulative noise level from all proposed construction equipment that will be used simultaneously for each construction activity.** Tables 4.12-3 and 4.12-4 only show the noise level from each individual piece of equipment. The cumulative noise level from all construction equipment that will be used simultaneously for each construction activity (i.e., excavation, trenching) is needed to assess impacts on sensitive receptors.
34	Table 4.12-3	**Provide estimated noise levels for light-, medium-, and heavy-duty helicopters.** Table 4.12-3 only shows one noise level for helicopter take-off at 50 feet (90 dB). The PEA describes that SDG&E anticipates that light-, medium-, and/or heavy-duty helicopters may be required. Noise levels for light-duty and heavy-duty helicopters may be significantly different.
Transportation and Traffic		
35	4.16.5	**Explain the methodology used to estimate traffic volumes provided in the PEA. Clarify whether the 50 to 60 average daily trips specified in Section 4.16.5 are passenger car equivalents or for construction equipment/delivery trucks. Would these trips occur during peak hours?**
36	4.16.5	**Identify the distribution of construction trips within the local road network.** Clarification on traffic distribution is needed to understand project impacts on traffic within public roadways and within MCB Camp Pendleton.
Utilities and Service Systems		
37	4.17.3	**Provide the location of any existing utilities within the underground segment of the Proposed Project.** Provide underground utility locations in GIS to help evaluate conflicts with existing lines.