

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 1, 2016

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

VIA EMAIL: RGiles@semprautilities.com

**RE: Request for Additional Data #2 – 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, responses to Deficiency Reports, and responses to Data Needs #1. The CPUC identified additional data needs during the site visit to Marine Corps Base Camp Pendleton (MCBCP) and during preparation of the CEQA document. These data needs are provided in the attached Request for Additional Data (Attachment A). The CPUC requests that SDG&E respond in writing and provide the additional data requested (Attachment A).

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 November 11, 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.

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

Sincerely,

/s/ 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 #2 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.16-04-022 Data Needs

#	PEA Section, Page #	Data Need
Project Description		
1	Section 3	<p>Specify potential uses of night lighting.</p> <p>The PEA Project Description does not discuss the use of any lighting at night for construction or operation of the project. During a meeting with Marine Corps Base Camp Pendleton (MCBCP) on October 26, 2016, SDG&E stated that construction may occur at night to avoid daytime power outages. Provide information on the potential uses of night lighting and the maximum potential duration of night lighting so that this potential impact can be analyzed in the CEQA document.</p>
2	Data Needs #1, Item 2	<p>Will SDG&E deenergize TL 695 and leave the deenergized line in place between San Mateo Junction and San Mateo Substation? Or will SDG&E remove the deenergized TL 695 conductor in this segment?</p> <p>The CPUC needs to verify the scope of the proposed project and activities that will be conducted between San Mateo Junction and San Mateo Substation, if any.</p>
3	Data Needs #1, Item 4	<p>Specify the anticipated duration of helicopter use for conductor stringing and other activities.</p> <p>SDG&E response to Data Needs #1 states that helicopter will be used for up to 6 hours per day, but the response does not provide an expected duration (days, weeks, or months) that helicopters could be used over the duration of construction. The air quality modeling assumes 12 hours of helicopter use per day and appears to assume helicopter use for the entire 8-month duration of construction. The total duration of helicopter use per day and over the construction period needs better definition to evaluate impacts from helicopter noise and traffic.</p>
4	N/A	<p>Define potential design modifications that may be implemented if the SOCRE project proceeds before the proposed project or if the proposed project is constructed first.</p> <p>During the site visit on October 26, 2016, SDG&E discussed that engineering modifications may be required depending on which project proceeds first in the transmission corridor near Talega Substation.</p>
5	Geotechnical Report	<p>Could SDG&E require use of retaining walls or other structure modifications along creeks where there is a potential for scour?</p> <p>The geotechnical report for the proposed project states that the poles were not</p>

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#	PEA Section, Page #	Data Need
		assessed for scour potential. Is there a possibility that retaining walls or other design modifications could be made to address scour at pole locations along San Onofre or San Mateo Creeks?
6	N/A	Are any design modifications required for the underground duct bank to avoid the grounding grid at SCE's towers and avoid scour along the drainage?
Biological Resources		
7	Deficiency Report #2, Item 5	Provide existing U.S. Fish and Wildlife Services (USFWS) Biological Opinion for access road maintenance within MCBCP. SDG&E provided the MCBCP Categorical Exclusion for access road grading in response to Deficiency Report #1. During the meeting with the MCBCP on October 26, SDG&E referenced measures contained in the Biological Opinion for access road maintenance. The CPUC needs a copy of the Biological Opinion to understand the USFWS conditions that are being applied to access road maintenance.
8	N/A	Provide GIS data for MCBCP restoration and mitigation sites. Define approach to access road reestablishment and stringing in restoration site. SDG&E's design shows an access road and stringing site in an area that was recently restored/revegetated by MCBCP adjacent to the Sierra Training Area. Please coordinate with MCBCP to discuss the approach to access and destringing in the restoration/revegetation area and to obtain GIS for any additional restoration or mitigation sites that fall within the project impact area. Provide any design modification or agreed upon conditions for access and stringing in the restoration and mitigation area(s) to the CPUC.
Cultural Resources		
9	N/A	Provide the testing plan for CA-SDI-6693. At the site visit on October 26, 2016, SDG&E stated that they would be performing testing on CA-SDI-6693. The testing plan is needed to understand when and how testing will occur.
10	N/A	Provide updated GIS data for sites CA-SDI-4411, CA-SDI-13324, and CA-SDI-13325. MCBCP archaeologists discussed the expansion of these sites during recent surveys. The GIS data for these sites that was provided to the CPUC is out of date. Please obtain the corrected site boundary data and records from MCBCP for these resources and any other resources where the site boundary data has changed and provide this data to CPUC.
11	N/A	Provide GIS data of all temporary and permanent work areas including, but not limited to, staging yards, stringing sites, temporary work pads, permanent work pads, access roads, overland travel, and footpaths to the Pechanga Tribe to support the CPUC's consultation under AB 52. The Pechanga Tribe has requested GIS data for all SDG&E proposed areas of disturbance including staging yards. The Pechanga Tribe has a number of significant resources and potential Tribal Cultural Properties in the vicinity of the proposed project.
Hydrology		
12	4.9.3.1	Provide the 100-year flood zone GIS data used to define the 100-year flood zone and impacts in the PEA. Define the source of the data. The data included in the PEA does not match the Federal Emergency Management Agency (FEMA) or SanGIS 100-year flood zone GIS data. No 100-year flood zone was mapped in the proposed project area in either FEMA or SanGIS data; however, the

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#	PEA Section, Page #	Data Need
		PEA shows a 100-year flood zone within the proposed project area.
Land Use and Planning		
13	4.10.5	Provide the MCB Camp Pendleton 2030 Base Master Plan. The CPUC needs to verify consistency with this plan.
Recreation		
14	4.15.5.2	Describe the “temporary access limitations” for trail users that would occur during pole removal and installation, conductor stringing, and for construction access to work areas. How long (i.e., number of days) would trail closures last? Where would trail closures occur?