

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 17, 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 #3 – 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 and #2. The CPUC identified an additional data need 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 December 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,

A handwritten signature in blue ink that reads "Will Maguire". The signature is written in a cursive style with a large, stylized "M".

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 #3 FOR THE
TL 695 & 6971 RECONDUCTOR PROJECT
APPLICATION (A.16-04-022)**

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified one area 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 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
Cultural Resources		
1	Data Needs #2, Item 9	<p>Provide and implement a testing plan, and provide the results of the testing for CA-SDI-6693.</p> <p>In response to Data Needs #2, SDG&E stated that no impacts would occur to CA-SDI-6693 because the new pole would be constructed as a same hole set. The CPUC has identified the following issues:</p> <ul style="list-style-type: none"> • The tower and access road had already been built when the site was first recorded in 1979. Because of the grading that was done to establish the access road and work area, much of the resource is likely buried and therefore unable to evaluate without testing. • Analysis of the area indicates that CA-SDI-6693 is one of 11 sites within a relative small area. One of these sites is CA-ORA-22, which is part of the San Mateo Archaeological District (SMAD). CA-SDI-6693, as an outlier of the formal boundaries of the SMAD, may play a larger role than CA-SDI-6693 as a stand-alone resource. • It is possible that the existing pole will not be pulled out cleanly, resulting in impacts to the ground surrounding the foundation. Ground disturbance has the potential to adversely affect the resource. <p>The testing plan is needed to understand when and how testing will occur. The results of the testing plan are needed to evaluate whether the resource is eligible for listing in the California Register of Historical Resources and accurately assess impacts on CA-SDI-6693.</p>