



Rebecca Giles
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December 16, 2016

Reg.12-10/A.16-04-022
SDG&E TL695and 6971 PTC

Sent Via Electronic Mail

Mr. Will Maguire
Project Manager Energy Division, CEQA Unit
California Public Utility Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

**Re: SDG&E Response to EDDR-3 Q1. Permit to Construct the TL 695 and 6971
Reconductoring Project – Application No. A.16-04-022**

Dear Mr. Maguire:

Attached please find SDG&E's response to Energy Division's Data Request 3 Q 1 dated November 17, 2016. Please let me know if Mr. Duke does not receive the WESTEC Report from CPEN within a reasonable time.

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

Sincerely,

Signed

Rebecca Giles
Regulatory Case Manager

Enclosures

cc: Elizabeth Cason – SDG&E
Brian Roppe – SDG&E
Tania Treis, Project Manager, Panorama Environmental
Susanne Heim, Project Manager, Panorama Environmental

**San Diego Gas & Electric Company (SDG&E) Response dated December 16, 2016
A.16-04-022 TL 695 and 6971 Reconductoring Project (Proposed Project)
California Public Utilities Commission (CPUC) Request for Additional Data #3 Dated 11/17/2016**

Table 1 Application No A.16-04-022 Data Needs

#	PEA Section, Page #	Data Need	SDG&E Response
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>	<p>A Summary of the conference call between SDG&E, CPUC and CPEN Cultural Resources staff on 12/12/2016 is provided as an attachment to EDDR#3.</p> <p>A confidential testing report that addresses SDI-6693 was discovered, prepared by WESTEC in 1980. SDG&E understands that CPEN cultural resources branch will provide the confidential WESTEC report to Curt Duke.</p>

A conference call was set up to discuss this request for data on 12/12/2016. Attendees on the call included: Susanne Heim (Panorama), Kimmi Worrel (Panorama), Curt Duke (Duke CRM), William Maguire (CPUC), Andie Biggs (CPUC), Nina Harris (CPEN), Kelly Brasket (CPEN), Rebecca Giles (SDG&E), Rachel Ruston (SDG&E), Eden Nguyen (SDG&E), and Kristin Tennesen (HDR).

During the conference call, a dialogue was developed surrounding this data request and bullets listed below. Notes in *Blue* are summary of what was discussed for each bullet during the call:

Provide and implement a testing plan, and provide the results of the testing for CA-SDI-6693.

In response to Data Needs #2, SDG&E stated that no impacts would occur to CASDI-6693 because the new pole would be constructed as a same hole set. The CPUC has identified the following issues:

- 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. *Nina Harris (CPEN) indicated that a confidential cultural resources report was recently discovered at the South Central Coastal Information Center (SCCIC) at Fullerton, during research conducted by Kristin Tennesen at HDR. The report was not on file at CPEN or the South Coastal Information Center (SCIC) during the original records search efforts. The report was prepared by WESTEC in 1980 and includes information about several sites, including CA-SDI-6693. The testing at SDI-6693 included two 1 meter X 1 meter test units and a surface collection. Excerpts of the confidential WESTEC report will be provided to Curt Duke from Nina Harris. Curt indicated he considers this new information that they had not considered and will review the report, which could address this data request.*
- 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 standalone resource. *Per the discussion of this bullet, SDG&E understands that this was not intended to be sent to us and that a response is not required.*
- 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. 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. *The methodology of the pole removal was briefly discussed by Eden Nguyen (SDG&E). Through further discussion regarding testing, Curt Duke indicated that this question may also be addressed through further review of the WESTEC report.*