



Rebecca Giles
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8330 Century Park Court
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December 21, 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 Follow-up Response to CPUC Request for Additional Data #2; 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 follow-up responses to Energy Division's Data Request for Additional Data #2 dated November 1, 2016 and response to Susanne Heim's question regarding the project schedule in the air emissions model and the project schedule in the Project Description received via email on December 8, 2016 (Request No. 9 in the attached response matrix).

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: Susanne Heim, Project Manager, Panorama Environmental

San Diego Gas & Electric Company (SDG&E) Response dated December 21, 2016
A.16-04-022 TL 695 and 6971 Reconductoring Project (Proposed Project)
California Public Utilities Commission (CPUC) Request for Additional Data Follow Up Questions Dated 11/18/2016 and 12/8/2016

#	Energy Division Request	SDG&E Response																																													
1	GIS data of project work areas provided to Pechanga Tribe – this is needed for our compliance with AB 52	<i>Attachment AD-1 contains GIS shapefiles that include an impacts layer for distribution to the Pechanga Tribe.</i>																																													
2	Any updates to the GIS data provided to Panorama	<p><i>Attachment AD-2 contains GIS shapefiles that update the GIS data previously provided. The following changes to the Proposed Project components since the April 2016 PEA filing are included in these shapefiles:</i></p> <table border="1"> <thead> <tr> <th><i>Pole #</i></th> <th><i>Previous Pole Designation</i></th> <th><i>Current Pole Designation</i></th> </tr> </thead> <tbody> <tr> <td>11</td> <td><i>Remove from Service</i></td> <td><i>Overhead Work Only</i></td> </tr> <tr> <td>57</td> <td><i>Pier Foundation Pole</i></td> <td><i>Direct Bury Pole</i></td> </tr> <tr> <td>76</td> <td><i>Pier Foundation Pole</i></td> <td><i>Micropile Foundation Pole</i></td> </tr> <tr> <td>80</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>Overhead Work Only</i></td> </tr> <tr> <td>109</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>111</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>Overhead Work Only</i></td> </tr> <tr> <td>112</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>113</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>114</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>115</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>117</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>118</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>119</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> <tr> <td>120</td> <td><i>Possible Direct Bury Work Location</i></td> <td><i>No Work Required (no longer part of Proposed Project)</i></td> </tr> </tbody> </table>	<i>Pole #</i>	<i>Previous Pole Designation</i>	<i>Current Pole Designation</i>	11	<i>Remove from Service</i>	<i>Overhead Work Only</i>	57	<i>Pier Foundation Pole</i>	<i>Direct Bury Pole</i>	76	<i>Pier Foundation Pole</i>	<i>Micropile Foundation Pole</i>	80	<i>Possible Direct Bury Work Location</i>	<i>Overhead Work Only</i>	109	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	111	<i>Possible Direct Bury Work Location</i>	<i>Overhead Work Only</i>	112	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	113	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	114	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	115	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	117	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	118	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	119	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>	120	<i>Possible Direct Bury Work Location</i>	<i>No Work Required (no longer part of Proposed Project)</i>
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		121	Possible Direct Bury Work Location	No Work Required (no longer part of Proposed Project)
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		172	Possible Direct Bury Work Location	Overhead Work Only; also includes revised anchor locations
		173	Possible Direct Bury Work Location	No Work Required (no longer part of Proposed Project)
		174	Possible Direct Bury Work Location	No Work Required (no longer part of Proposed Project)
		<p><i>Additional editorial changes to the GIS include updating Pole numbers, correcting the graphical representation of some poles (e.g., showing three poles instead of two), assigning a number to a stringing site (i.e., 32), and assigning numbers to work/staging/turnaround areas.</i></p> <p><i>The Proposed Project's shapefiles have been revised to relocate Stringing Site 15 away from an existing restoration/mitigation site on MCB Camp Pendleton; removal of a footpath to Stringing Site 15 (because the stringing site has been shifted to an existing access road); adding a footpath to Pole 133; and realigning an overland travel route to Pole 175 (due to the removal of other poles in this area).</i></p> <p><i>The Proposed Project's shapefiles have also been expanded to encompass the following non-pole elements:</i></p> <ul style="list-style-type: none"> • <i>Two underground conduit intercepts at Pole 83</i> • <i>Removal of pad-mounted regulator station west of SONGS Mesa</i> • <i>12 kV underground removal along the northeastern boundary of SONGS Mesa</i> <p><i>The GIS data has been revised to remove footpaths or overland trail routes that were associated with poles that are no longer part of the Proposed Project, as shown in the table above, and to include work areas for the non-pole components listed in the bullets above. Also, because Pole 21 will be set into the existing hole, there will be no permanent impacts at this location.</i></p>		
3	Verification of the number of poles that will be removed and installed	Attachment AD-3 is an updated version of the CEQA Project Description provided by Panorama as part of Data Request #1. SDG&E has incorporated further revisions into this file to address the changes listed above, including updated pole counts and impact calculation.		
4	Full CalEEMod output file and helicopter emissions output file	Attachment AD-4 contains the full CalEEMod input and output files, while Attachment AD-5 includes the updated impact calculation spreadsheets, including the helicopter emissions calculations.		
5a	Peak daily emissions (not average daily emissions)	Attachment AD-5 contains the summer and winter peak day emissions for criteria pollutants.		
5b	Updated GHG emissions consistent with the revised use	Attachment AD-5 contains the summer and winter peak day emissions for greenhouse gases.		

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5c	Helicopter fugitive dust emissions (take-off and landing) and other emissions consistent with the revised use of helicopters	<i>The Helicopter Emissions tab in Attachment AD-5 provides helicopter particulate matter emission factors for cruising and Landing and Takeoff Operations (LTOs) for light-duty helicopters and heavy duty helicopters.</i>												
6	Further definition of helicopter use based on site walk (types of helicopters, duration of use both per day and total extent)	<p><i>After review and internal discussion and analysis, SDG&E developed the helicopter use assumptions, which have been incorporated into the air quality calculations:</i></p> <table border="1"> <thead> <tr> <th><i>Helicopter Class</i></th> <th><i>Assumed Helicopter Model</i></th> <th><i>Peak Daily Use (Cruising hours/LTOs)</i></th> <th><i>Estimated Days of Use during Construction</i></th> </tr> </thead> <tbody> <tr> <td><i>Light Duty</i></td> <td><i>Hughes 500E</i></td> <td><i>4 hours/6 LTOs</i></td> <td><i>Approx. 4 Days</i></td> </tr> <tr> <td><i>Heavy Duty</i></td> <td><i>Sikorsky Skycrane</i></td> <td><i>5 hours/6 LTOs</i></td> <td><i>Approx. 10 Days</i></td> </tr> </tbody> </table> <p><i>As was discussed in the Response to Data Request #1, the maximum duration, the maximum number, and the types of helicopters to be used will be determined by the construction contractor. For the purposes of the PEA, SDG&E assumed that the peak day for light-duty helicopter use for conductor stringing operations during construction will be approximately 4 hours of cruising time plus 6 LTOs and the peak day for heavy-duty helicopter use for pole construction activities will include 5 hours of cruising time plus 6 LTOs. It is estimated that conductor stringing may require approximately 4 days of light-duty helicopter use, while pole construction may require approximately 10 days of heavy-duty helicopter use. However, the number of days may be increased or decreased based on factors, such as inclement weather, training exercises at MCB Camp Pendleton, contractor methods, and other considerations.</i></p> <p><i>In general, it is expected that only one type of helicopter would be used for construction at a time during any given day. However, it is possible that both types of helicopters could be used on-site. For example, the light duty helicopter might ferry crews to remote locations, followed by the heavy duty helicopter installing/removing poles. Therefore, to provide maximum flexibility in the construction approach, a conservative peak helicopter emissions calculation was assumed that summed the peak daily usage for both heavy-duty and light-duty helicopters.</i></p> <p><i>Regarding duration of use, light-duty helicopter operations will occur intermittently during the 60-day conductor stringing phase, which is scheduled to begin in May 2018. Heavy- and medium-duty helicopter operations will occur intermittently during the pier foundation and direct bury construction phases, which will last for 90 days and start in February 2018. The times of day and days of week for helicopter use will be controlled by the construction contractor and will be subject to change. Helicopter use will be scheduled during daylight hours, and the air quality model assumed a nine-hour working day for helicopter use which consists of cruising time and LTOs.</i></p>	<i>Helicopter Class</i>	<i>Assumed Helicopter Model</i>	<i>Peak Daily Use (Cruising hours/LTOs)</i>	<i>Estimated Days of Use during Construction</i>	<i>Light Duty</i>	<i>Hughes 500E</i>	<i>4 hours/6 LTOs</i>	<i>Approx. 4 Days</i>	<i>Heavy Duty</i>	<i>Sikorsky Skycrane</i>	<i>5 hours/6 LTOs</i>	<i>Approx. 10 Days</i>
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7	GIS data for MCBCP restoration or mitigation sites	<i>Provided December 7, 2016.</i>												
8	Site testing in data Response #3	<i>Provided December 16, 2016.</i>												
9	Request dated December 8, 2016: We came across one additional item we need corrected when we receive the	<i>As shown in Attachment AD-5, the CalEEMod inputs have been revised to reflect the 8-month construction schedule.</i>												

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<p>air quality emission data. The project schedule in the Project Description includes construction from January – August 2018, or a period of eight months. The air quality model you provided for the project using CalEEMod included a nine month construction period. When you provide the revised air model, please check that the project schedule in the air emissions model matches the project schedule in the Project Description. If there will be any changes to the project schedule in the Project Description, please let us know.</p>	
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