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November 11, 2016

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

Sent Via FedEx and 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 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 responses to Energy Division's Data Request for Additional Data #2 dated November 1, 2016.

Enclosed as Attachment DREQ2 – Q10 is the Declaration of Michael M. Schneider Regarding Confidentiality of Certain Data/Documents Pursuant to D.16-08-024 for the response to EDDR 2 – Q10. As noted in the enclosed response, the confidential attachment in response to EDDR 2 – Q10 will be provided directly to Cultural Resources Management/Panorama Environmental.

As noted in the enclosed response, SDG&E will provide a follow-up response to EDDR 2 – Q11 by November 18, 2016.

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 November 11, 2016

A.16-04-022 TL 695 and 6971 Reconductoring Project (Proposed Project)

California Public Utilities Commission (CPUC) Request for Additional Data #2 Dated 11/1/2016

NOTE: CONFIDENTIAL INFORMATION IS SHADED IN GRAY – CONTAINS INFORMATION CONSIDERED CONFIDENTIAL PURSUANT TO PUC SECTION 583 AND GENERAL ORDER 66-C

#	PEA Section, Page #	Data Need	SDG&E Response
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>	<p>SDG&E is planning to construct this line during daylight hours. The only known exception is potential instances to finish unplanned delayed work and/or for public safety. As discussed on page 4.1-13 of the PEA, floodlights will be directed onto the work areas only, and away from adjacent uses. Construction during evening hours will be limited, and any potential impacts will be temporary and of short duration.</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>	<p>SDG&E plans to leave the deenergized TL 695 conductor on the existing double circuit steel poles between San Mateo Junction and a pole structure located to the west of the San Mateo Substation. The existing TL 695 is not connected to the San Mateo Substation.</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>	<p>Based on further discussions and review and accounting for some recent design changes, SDG&E expects to increase helicopter operations beyond the levels evaluated in the PEA. The total and peak helicopter use will be determined by SDG&E after the completion of field review, and SDG&E will provide revised emissions calculations after the reconnaissance and review are complete. 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 2016. 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</p>

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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>	<p>Because potential SOCRE route(s) and scope have not yet been fully approved by the CPUC, any potential changes to TL 695 would be speculative at this point. Should the approved route and construction timing impact TL 695, the team will conduct a full engineering review to determine the changes to scope.</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 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?</p>	<p>Two small sections are affected by the possible scour (Geotech Report Section 5.6). Poles 55 to 59 are direct embedded new SW poles that will be designed for the loss of embedment due to scour, i.e. effectively providing an additional embedment. Due to relatively small expected diameters of SW poles, scour depths are expected to be relatively small. Note that all poles are designed for at least 2 ft discount due to usually poor top soil conditions. Towers 31, 32, 33 & 39 are the existing structures staying in place and therefore not affected by this project.</p>
6	N/A	<p>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?</p>	<p>No.</p>
7	Deficiency Report #2, Item 5	<p>Provide existing U.S. Fish and Wildlife Services (USFWS) Biological Opinion for access road maintenance within MCBCP.</p> <p>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.</p>	<p>The SDG&E NCCP was used by MCB Camp Pendleton to generate the road grading Categorical Exclusion. There is no separate Biological Opinion (BO) other than MCBCP Riparian BO; however this does not apply to the road grading. The CPUC should already have the NCCP. Additionally, a separate BO should result from the Section 7 consultation for the Proposed Project.</p>

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8	N/A	<p>Provide GIS data for MCBCP restoration and mitigation sites. Define approach to access road reestablishment and stringing in restoration site.</p> <p>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.</p>	<p>SDG&E requested the restoration data from MCB Camp Pendleton and received the portion near the Sierra training area in which Pulling site #15 is located. SDG&E Construction Services confirmed that the stringing/ pulling site can be moved to the adjacent access road. We are currently working on getting any additional data for MCB Camp Pendleton restoration and mitigation sites and will determine with MCB Camp Pendleton if design modifications need to be applied.</p>
9	N/A	<p>Provide the testing plan for CA-SDI-6693.</p> <p>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.</p>	<p>Since the site visit on 10/26/2016 SDG&E has confirmed with engineering that Pole 21 will be constructed as a same hole set, direct buried pole. By incorporating a same hole set into the design, no impacts will occur to site SDI-6693; therefore, no testing plan or testing is needed at this site.</p>
10	N/A	<p>Provide updated GIS data for sites CA-SDI-4411, CA-SDI-13324, and CA-SDI-13325.</p> <p>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.</p>	<p>Following the 10/25/2016 meeting with MCB Camp Pendleton and CPUC staff, SDG&E requested and received site boundaries from MCB Camp Pendleton for the expanded boundaries of sites SDI-4411 and SDI-13324. The MCB Camp Pendleton archaeologist confirmed the boundary of SDI-13325 has not changed. Through coordination with MCB Camp Pendleton Cultural Resources Branch, SDG&E has received updated site boundaries for all cultural sites within the project alignment. Also, the updated records search from MCB Camp Pendleton has been provided to SDG&E. The site boundaries and updated records search are being provided directly to Panorama Environmental/Duke Cultural Resources Management. Refer to Attachment DREQ2 - Q10 for the Declaration of Michael M. Schneider Regarding Confidentiality of Certain Data/Documents Pursuant to D.16-08-024.</p>

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11	N/A	<p>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.</p> <p>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.</p>	<p>SDG&E is updating the GIS to incorporate recent design refinements, and revised GIS data, including temporary and permanent work areas, will be transmitted to the CPUC by 11/18/2016.</p>
12	4.9.3.1	<p>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.</p> <p>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 PEA shows a 100-year flood zone within the proposed project area.</p>	<p>The FEMA and SanGIS data is correct, and the statements in PEA section 4.9 describing the presence of pole structures within 100-year floodplains are incorrect.</p>
13	4.10.5	<p>Provide the MCB Camp Pendleton 2030 Base Master Plan.</p> <p>The CPUC needs to verify consistency with this plan.</p>	<p>MCB Camp Pendleton has responded that they are reviewing the request.</p>

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14	4.15.5.2	<p>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?</p>	<p>The Proposed Project alignment crosses existing access roads, which are also used for bicycling and hiking, as several points within the northern portion of the State Parks Lease Area. Potential obstructions to trail users in this area include the transport of construction equipment and materials and the establishment of pole structure work areas, stringing sites, and work/staging/turnaround areas. Temporary closure for construction vehicle access would be of short duration (e.g., the movement of construction vehicles is not expected to take more than one hour over the course of a day). In instances where pole structures will be placed immediately adjacent to access roads, the closure to recreational uses is estimated to be between one and five days, although the maximum duration could be increased to 10 days if rock is encountered and/or construction activities are delayed by things such as inclement weather, MCB Camp Pendleton training exercises, or other factors.</p>

ATTACHMENT DREQ2 – Q10

**Declaration of Michael M. Schneider Regarding Confidentiality of Certain Data/
Documents Pursuant to D.16-08-024**

**BEFORE THE PUBLIC UTILITIES
COMMISSION OF THE STATE OF CALIFORNIA**

**DECLARATION OF MICHAEL M. SCHNEIDER
REGARDING CONFIDENTIALITY OF CERTAIN DATA/DOCUMENTS
PURSUANT TO D.16-08-024**

I, Michael M. Schneider, do declare as follows:

1. I am Vice President of Operations Support & Sustainability, Chief Environmental Officer for San Diego Gas & Electric Company (“SDG&E”). I have reviewed Data Request #2 Response for the TL 695 and 6971 Reconductoring Project (A.16-04-022), submitted concurrently herewith (the “Data Request #2 Response”). I am personally familiar with the facts and representations in this Declaration and, if called upon to testify, I could and would testify to the following based upon my personal knowledge and/or belief.

2. I hereby provide this Declaration in accordance with Decision (“D.”) 16-08-024 to demonstrate that the confidential information (“Protected Information”) provided in Data Request #2 Response, Response to Q. 10, submitted concurrently herewith and as described in specificity in Attachment A, within the scope of data protected as confidential under applicable statutory provisions including, but not limited to, National Historic Preservation Act (“NHPA”), Public Law 89-665; 16 USC 470, et seq. and California Government Code Section 6254.10.

3. In accordance with the legal authority described herein, the Protected Information should be protected from public disclosure.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 10th day of November, 2016, at San Diego.

A handwritten signature in black ink, appearing to read "Michael M. Schneider", written over a horizontal line.

Michael M. Schneider
Vice President, Operations Support & Sustainability,
Chief Environmental Officer

ATTACHMENT A

SDG&E Request for Confidentiality on the following information in its response to Data Request #2 Response

Location of Protected Information	Legal Authority	Narrative Justification
Response to Q. 10 in its entirety; the protected information will be provided directly to the CPUC consultant's cultural resource specialist under separate cover	National Historic Preservation Act ("NHPA"), Public Law 89-665; 16 USC 470, et seq; California Government Code Section 6254.10	<p>The NHPA seeks to preserve historical, cultural, archaeological and paleontological sites in the U.S. Confidential treatment of the information relating to the location of these sites is required by the NHPA because public knowledge of and access to these sites could result in removal of these resources, or other activities that could destroy or jeopardize their protection.</p> <p>California Government Code Section 6254.10 exempts from disclosure requirements records that relate to archaeological site information and reports maintained by the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American heritage Commission or consultation between a California Native American tribe and a state or local agency.</p>