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June 24, 2016

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

Sent Via Sempra EDT

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 - Application Completeness – 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 Deficiency Letter dated May 25, 2016. Please note that the attachments to Questions 7, 8 and 9 contain **confidential information produced pursuant to CPUC G.O. 66-C and CA. Pub. Util. Code § 583**. Per the instructions of Mr. Maguire, due to their highly confidential nature, these three confidential attachments are being sent directly to Ms. Treis at Panorama in a separate EDT simultaneously with this submittal. This completes the utility's response to the request for information.

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) 6/24/16 Response
A.16-04-022 TL 695 and 6971 Reconductoring Project (Proposed Project)
California Public Utilities Commission (CPUC) Deficiency Letter 01 Dated 5/25/16

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Def. #	Request	SDG&E Response
1.	<p>Information Necessary to Complete an Adequate CEQA Document for Public Review is Marked Confidential. Every page of both the hardcopy and digital copy of the PEA provided to the CPUC is marked as confidential under Public Utility Code Section 583 and General Order 66-C. The majority of the confidential version of the PEA is identical to the public version also provided to the CPUC; it is therefore unclear which information is confidential and which is not. Much of the information contained in the PEA (e.g., Project Description, objectives, maps, environmental and regulatory setting for all environmental parameters) must be presented in the CEQA environmental document, which is a public review document. Please re-submit the PEA materials removing any notation regarding confidential under Public Utilities Code Section 583 and General Order 66-C for those sections that are not confidential. Generally, confidential materials include cultural resource site locations, detailed substation schematics, detailed utility pole information (i.e., SDG&E-designated pole numbers), and regional system maps.</p>	<p><i>SDG&E submitted an amended motion to file under seal the confidential portions of the PEA and provided a CD-ROM of the “Confidential Materials” found within the Confidential PEA. On June 2, 2016 the ALJ issued a ruling providing that the following appendices are confidential and are protected under seal; 1-A, 1-B, 1-F, 3-A, 4.4-A, 4.5-A and 4.6-A.</i></p> <p><i>A copy of the ruling is available at: http://docs.cpuc.ca.gov/SearchRes.aspx?docformat=AL&docid=162654484</i></p>
2.	<p>Provide a summary of SDG&E’s communication with California Department of Parks and Recreation. Figure 3-2 of the PEA shows that the project would be located on lands leased by the Department of the Navy (DoN) to the California Department of Parks and Recreation (California State Parks). Coordination with California State Parks is particularly important for this project given the popularity of the San Onofre State Beach to recreationalists. Input from California State Parks could influence project construction methods or the project design. Please provide a summary of your coordination with California State Parks.</p>	<p><i>Camp Pendleton as property owner maintains federal jurisdiction over the State Park Lease Area. Project planning and construction will be coordinated with respective Marine Corps organizations for NEPA compliance, access to training areas and the State Park Lease Area, therefore the State Parks will not have input over project design or construction methods. SDG&E will provide courtesy notification to the local State Parks office and Security Police prior to construction to avoid conflicts with campers, staff and bicyclists.</i></p>
3.	<p>Provide a Copy of SDG&E’s Existing Easement with MCB Camp Pendleton. The conditions of SDG&E’s existing easement with the DoN are needed to assess whether the proposed project would comply with easement restrictions and land uses. Please provide the existing</p>	<p><i>Easements provided, see attachments: DEF1 Q03 - SDG&E 80432 – Navy NF(R) 23763 DEF1 Q03 - SDG&E 45959 – Navy NOy(R) 67817</i></p>

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	easement (or relevant language) or provide a thorough and complete list of restrictions from the easement. Provide a cross section showing how the new alignment fits within the easements. Provide an explanation of the relationship, if any, between the DoN's lease to California State Parks and SDG&E's easement going through San Onofre State Beach.	<i>DEF1 Q03 - SDG&E 5783- Private Property</i> <i>DEF1 Q3 - Survey Sketch 65563-144079</i>
4.	Define Access Roads. The project maps show footpaths to access several steel pole sites. Many of these sites are designated as direct bury pole sites, which would likely require the use of an auger to drill a hole before placement of the foundation. Clarify if and which pieces of equipment would be required at these pole sites and any improvements to the footpaths that would be required to accommodate equipment access.	<i>Equipment required at these pole sites include compressors, jack-hammers, helicopter, and shovels. While the footpaths may require vegetation trimming, no improvements to the footpaths would be required to accommodate equipment access.</i>
5.	Define Pole Heights and Locations. The Project Description describes a large range in pole heights (25 to 105 feet) but does not adequately describe the heights of each type of pole that will be used for the project or the heights of the new poles at each location. Additionally, Appendix 3-C, which provides typical drawings of poles, provides height approximations outside of the range (i.e., 110 feet tall for proposed steel cable pole) described in the Project Description. Revise the typical pole drawings to reflect the approximate height range of the proposed project poles and define pole heights by their location along the alignment.	<i>A structure height table is provided as attachment DEF Q05 – Pole Heights Table_20Jun16 to this Deficiency response table. The structure height table describes the location and the heights of all Project poles, including proposed new poles, and existing poles that will be affected by the Project (i.e., overhead work, pole topping, and possible work locations).</i> <i>SDG&E would like to provide a correction regarding the proposed height above ground. The maximum pole height for proposed poles is 110 feet, and not 105 feet as stated in the Project Description. Therefore, the drawing is consistent with the approximate maximum height above ground for the proposed steel cable pole. The minimum pole height above ground for proposed poles is 23 feet. In addition, the light pole structure at public pole structure number 94 will have a height above ground of approximately 31 feet, and not 9 feet as stated in the Project Description.</i>
6.	Define Marker Ball and Lighting Requirements. The PEA states that SDG&E would coordinate with the Federal	<i>All Project poles and catenaries were reviewed for FAA compliance under Title 14 CFR Part 77. Each project</i>

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	Aviation Administration regarding the placement of marker balls and lighting to mark obstructions. The location of marker balls and lighting is required to analyze visual impacts from these project elements. Provide the location(s) of marker balls and lighting.	<i>pole was processed through the FAA's Notice Criteria Tool (NCT) located on the FAA's OE/AAA Web site to determine notice requirements. The results of the NCT indicate that none of the poles exceed notice criteria and therefore noticing of the Project poles to the FAA is not required. In addition to reviewing the Project poles, each of the Project catenary spans was also reviewed for noticing requirements. None of the Project Catenary spans exceed 200 feet above ground level (AGL) and therefore noticing of the Project catenary spans is not required.</i>
7.	Provide Supplemental Cultural Report and GIS. The PEA states that several project areas located outside of the Project Study Area (PSA) have not been surveyed for cultural resources. Complete these cultural surveys and provide the cultural resources survey report for these areas. Additionally, the PEA submittal did not include GIS data for any cultural resources, which is needed to evaluate the cultural resource sites in proximity to project elements. Provide GIS data from all cultural resource surveys conducted for the project that includes the survey areas and the boundaries of the resources found. Note that the submission of several aspects of the cultural reports will need to be made public. These aspects include the historic setting, a general summary of the records search, survey methods and survey area, and a general description of the outcome of the surveys (but not revealing locations of resources found). This information will need to be submitted in a format that can be used to support the environmental document, which will be released to the public. Locations of cultural resources should be kept confidential.	<i>Intensive level pedestrian surveys of the additional project components and project areas outside the Project Study Area were completed by HDR in March 2015 and are summarized and provided as an attachment to this deficiency response table (Tennessee 2015). See DEF1 Q07- CONFIDENTIAL TL 695 Additional Areas_062216_HDR. Confidential GIS data is included in attachment DEF1 Q08 – CONFIDENTIAL CR RS, and includes all documented cultural resources within proximity to all project components. GIS data from all cultural resources surveys, including the survey areas and the resources found during the surveys are provided as attachment DEF1 Q07 – CONFIDENTIAL TL 695 Cultural Survey_Site_Polygons.</i> <i>The historic setting, a general summary of the records search, survey methods and survey area, and a general description of the outcome of the surveys are described in Cultural Resources Section 4.5 of the PEA.</i>
8.	Provide Cultural Resources Records Search. A copy of the records search requested from the South Coastal Information Center and South Central Coastal Information Center is needed to evaluate the adequacy of the effort to identify all previously recorded cultural resources in the	<i>A records search was conducted by SDG&E cultural resources staff using data from the South Coastal Information Center (SCIC) in 2011, under a subscription/contract with the SCIC. The DPR site forms and shapefiles from the 2011 RS is provided as an</i>

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	project area. Provide a copy of the records search as well as all associated DPR forms.	<p><i>attachment to this Deficiency Response Table. A records search was done at the South Central Coastal Information Center (SCCIC) in 2011, and updated (under contract) in 2015.</i></p> <p><i>Additionally, Camp Pendleton Archaeological site information was acquired from CPEN Environmental Security, Cultural Resources Branch, and includes site data, reports, and shapefiles from the Camp Pendleton Archaeological Geographic Information System. The CPEN CPAG site data has been incorporated into the GIS data that is provided as an attachment to this Deficiency Response Table. See attachment DEF1 Q08-CONFIDENTIAL CR RS</i></p>
9.	<p>Provide Cultural Resource Eligibility Determinations. Since the court decision was issued for Madera Oversight Coalition, Inc. v. County of Madera, the CPUC has required that all resources that are within the project area of effect and cannot be entirely avoided, be tested for eligibility for listing on the California Register of Historic Resources (CRHR) or National Register of Historic Places (NRHP). Provide a report that provides eligibility determinations for all resources within the project area that have not been previously tested.</p>	<p><i>Site eligibility determinations were completed for all sites within the Project Study Area and are listed within Table 4 of Appendix 4-A of the PEA (Cultural Resources Inventory Report, Marine Corps Base Camp Pendleton, San Diego County, California).</i></p> <p><i>The San Mateo Archaeological District has been identified as the only National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) eligible site within the project footprint.</i></p> <p><i>A testing work plan addressing all project components within the San Mateo Archaeological District has been developed, and will be submitted to Camp Pendleton's Cultural Resources Branch, and is provided as an attachment to this Deficiency Response Table. See attachment DEF1 Q09 – CONFIDENTIAL Eligibility and Testing Work Plan_TL695_HDR</i></p>
10.	<p>Provide Supplemental Biological Resource Report and GIS. The PEA states that several project areas located</p>	<p><i>The Supplemental Biological Resources report and GIS data are provided as an attachment to this Deficiency</i></p>

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	<p>outside of the PSA would be surveyed for biological resources in spring 2016. Complete the surveys and provide the biological resources survey report for these areas. Additionally, the PEA submittal did not include GIS data showing the survey locations, survey results, and habitat mapping of biological resources, which is needed to evaluate the resources in proximity to project elements. Provide GIS from all biological resource surveys conducted for the project. Biological information, including survey methods, locations, and results is needed for preparation of the CEQA document and will be made public as part of the environmental analysis. The biological reports should not be confidential, as they are needed to disclose to the public and agencies, for review and comment, the methodologies used and results upon which the CEQA analysis is based.</p>	<p><i>Response Table. See attachments: DEF1 Q10 -25240 TL695 BTR Supp Letter_062316_Pangea DEF1 Q10 AECOM 2010 Bio DEF1 Q10 –BBI 2015 Bio DEF1 Q10_Cardno Bio_Revised06242016 DEF1 Q10 – Pangea 2016 Bio_Revised06242016</i></p>
11.	<p>Provide Supplemental Wetland Delineation. The PEA states that several project areas located outside of the PSA will require supplementation jurisdictional wetland surveys. Complete these delineations and provide the wetland delineation survey report for these areas, including GIS data files.</p>	<p><i>The Supplemental Wetland Delineation and GIS data are provided as an attachment to this Deficiency Response Table. See attachments: DEF1 Q11 -25240 TZL695 Supp Jurisdictional Definition_062316_Borcher DEF1 Q11 –Pangea 2016Aquatic Revised06242016</i></p>
	<p>SDG&E would like to provide corrections to the Proposed Project Detailed Route Map. Pole number 11 on Figure 3-B1 should be symbolized as overhead work and not as Remove From Service as currently depicted. Pole number 80 on Figure 3B-17 should be symbolized as overhead work and not as Possible Direct Bury Work Location.</p> <p>The project description under the TL 695 Steel Pole Line section on page 3-11 should indicate construction activities along this segment will also involve the removal of four, instead of three, existing pole structures from service; and overhead work only at two, instead of three, pole structures.</p> <p>The project description under the TL 695 and TL 6971 Double Circuit Steel Pole Line on pages 3-11 and 3-12</p>	

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	should indicate construction activities along this segment will also include overhead work only on four, instead of three, existing pole structures, and the installation of 26, instead of 27, pole structures, of which 16, instead of 17, will be direct-bury structures.	
	<p>SDG&E would like to provide an update in regards to the cultural resources records search and analysis for the Talega Substation and Talega Staging Yard. During the analysis and review of the additional survey areas, HDR identified one previously recorded site (CA-ORA-916) in the most recent 2016 records search from the South Coastal Information Center. Please refer to this information and updated recommendations on pages 13 & 14, and page 22 in the <i>Cultural Resources Survey of Additional Project Components for the TL 695/6971 Project Report</i> (Tennesen June 22, 2016). This report is provided in response to Deficiency Item #7.</p> <p>Additionally, the 2016 records search from the SCCIC included updated site information for sites at the Talega Substation (CA-ORA-362 and CA-ORA-363). The site boundaries and site eligibility determinations and recommendations at these locations have been updated on pages 3, 4 and page 22 in the recent supplemental survey report (Tennesen 2016). This site information supplements the initial survey report prepared by HDR (Tennesen 2015)</p>	