

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 8, 2006

Mr. Kevin O'Beirne
Regulatory Affairs
San Diego Gas & Electric Company
8330 Century Park Court, CP32D
San Diego, CA 92123

Re: Application Completeness - Sunrise Powerlink Project Proponent's Environmental Assessment -- Application Nos. A.06-08-010 / A.05-12-014

Dear Mr. O'Beirne:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has conducted a completeness/deficiency review of the proposed Sunrise Powerlink (SRPL) Proponent's Environmental Assessment (PEA) and Application (A.05-12-014 and A.06-08-010) that was filed on August 4, 2006. According to the requirements of the CPUC's Information and Criteria List, the CPUC Energy Division concludes that the PEA/Application is now complete.

After SDG&E filed its amended application and PEA on August 4, 2006 with the CPUC's Docket Office, the CPUC conducted a completeness/deficiency review of the PEA and determined that it was incomplete. A deficiency letter was sent to SDG&E on August 16, 2006. As indicated in the letter, Section 15100 of the California Environmental Quality Act (CEQA) Guidelines requires that the lead agency assess the completeness of the project proponent's application within 30 days of its submittal. The Energy Division used the CPUC's Information and Criteria List, as well as the requirements outlined in General Order (GO) 131-D¹ as its basis in evaluating the completeness of the PEA and determining whether or not sufficient information had been provided for the CPUC to complete its initial environmental assessment of the project as required by CEQA.

On September 1, 2006, SDG&E filed a Supplement to the application, responding to the CPUC's August 16, 2006 letter. Each item provided in the Supplement has been reviewed. The information provided in the Supplement fell into three categories.

- Many responses (especially regarding the Project Description) provided exactly the information that was requested.
- Some responses (especially regarding alternatives) provided partial answers and explanations. While the EIR/EIS Team may not agree with the conclusions reached by SDG&E, the responses comply with the Information and Criteria list requirements and the EIR/EIS Team has adequate information with which to begin our own analysis of alternatives and reach independent conclusions.

¹ GO 131-D is entitled "Rules Relating to the Planning and Construction of Electric Generation, Transmission/Power/Distribution Line Facilities and Substations Located in California."

- A number of requests were satisfied by SDG&E's provision of detailed Map Books illustrating locations of biological resources, land use and sensitive land uses, cultural resources, and land ownership. Each book also shows the locations of all project components (transmission towers, access roads, construction yards and conductor pull sites, width of right-of-way).
- A few responses referenced work still in progress (especially as related to biological and cultural resources surveys). The EIR/EIS Team will continue to coordinate with SDG&E to obtain the necessary information for EIR/EIS analysis.
- Some responses did not provide complete information (e.g., with regard to potential impacts to bighorn sheep), but the Information and Criteria list requirements are not detailed by resource area. In these cases, the EIR/EIS Team is confident that adequate information can be obtained directly from resource agencies (e.g., California Department of Fish and Game, U.S. Fish & Wildlife Service, Anza-Borrego Desert State Park, etc.).

While the PEA and Application are considered to be complete based on CPUC requirements, the EIR/EIS Team will still require substantial information of SDG&E in order to prepare a complete and adequate EIR/EIS. This information will include additional details of the project description, engineering design details for alternatives that may be developed by the EIR/EIS Team, and other resource information identified during EIR/EIS preparation. The CPUC Energy Division will submit these needs in the form of data requests to SDG&E during the course of the CEQA and NEPA processes. In addition, as described above, SDG&E's consultants are completing additional cultural and biological resources surveys along the proposed project route, and data from these surveys will be provided to the EIR/EIS Team.

As a result of the processes described above, the CPUC has found the PEA and Application for the Sunrise Powerlink to be complete and will initiate EIR/EIS preparation with issuance of a Notice of Preparation/Notice of Public Scoping Meetings. Should you have any questions, please call me at (415) 703-2068 or email at bcb@cpuc.ca.gov.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division CEQA Unit

cc: Ken Lewis, CPUC Supervisor CEQA Unit
Sean Gallagher, CPUC Energy Division Director
Nicholas Sher, CPUC Legal Division
Steve Weissman, ALJ
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