



Clay Faber - Director
CA & Federal Regulatory
8330 Century Park Court
San Diego, CA 92123-1548

cfaber@sdge.com

November 13, 2019

**ADVICE LETTER 3460-E
(U 902-E)**

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: NOTICE OF PROPOSED CONSTRUCTION OF THE TL 6926 FIRE
HARDENING PROJECT IN THE COUNTY OF SAN DIEGO CALIFORNIA**

General Description and Purpose

Pursuant to General Order (G.O.) 131-D, Section XI., Paragraph B.4., San Diego Gas & Electric Company (SDG&E) hereby submits a notice of construction of the TL 6926 Fire Hardening Project (Project) in the County of San Diego, California. The Project is located in the community of Valley Center in unincorporated San Diego County.

The Project will remove approximately 7 miles of an existing powerline alignment, tie-line (TL) 6926, from the Rincon Substation to Valley Center Substation and leave the existing distribution circuits in place. In addition, approximately 6 miles of TL 6926 would be installed in an underground alignment within franchise position in road right-of-way (ROW) from Valley Center Substation to a cable pole located on Pauma Heights Road. From there, approximately 3 miles of TL 6926 would be installed in a double-circuit overhead configuration on an existing powerline alignment (TL 683) from the cable pole located on Pauma Heights Road to Rincon Substation. The Project is part of SDG&E's fire hardening efforts.

The existing line traverses fire prone terrain and is located in an area with potential for high winds. The Project is located within Tier 2 (elevated) and Tier 3 (extreme) of the CPUC High Fire-Threat District.

The Project is exempt from G.O. 131-D, Section III.A., Certificate of Public Convenience and Necessity (CPCN) requirements because all of the facilities are designed to operate below 200 kilovolts (200kV). The Project is also exempt from a Permit to Construct (PTC) because it qualifies for an exemption under G.O. 131-D, Section III.B.1.g. – "power line facilities ... to be located in an existing franchise ... or public utility easement.," and there are no exceptions to the exemptions.

In compliance with the noticing requirements found in G.O. 131-D, Section XI., Subsections B and C, this informational Advice Letter provides a copy of the Notice of Proposed Construction (Attachment A) and the Notice Distribution List (Attachment B).

Project Description:

The Project will remove approximately 7 miles of powerline and associated hardware from the TL 6926 pole structures (i.e., topping) between Rincon Substation and Valley Center Substation. The existing underbuilt distribution Circuits would remain on those poles. Of the 134 poles located on the existing TL 6926 between the Rincon and Valley Center Substations, 67 pole structures would be topped above the distribution circuit, 53 would be replaced with direct-buried steel poles (including 2 new pole locations), 9 pole locations would involve overhead work only, and 5 pole structures would be removed from service. The existing TL 6926 converts from an overhead to an underground position at Location 6926-110, and the powerline continues into Valley Center Substation underground. Location 6926-110 would be topped, and the existing TL 6926 underground cables would be removed, while the underground duct package into Valley Center Substation would be abandoned in place.

From Valley Center Substation, approximately 6 miles of 69 kV underground duct package and cable system would be installed within Vesper Road, Valley Center Road, Cole Grade Road, and Pauma Heights Road. At approximately the intersection of Pauma Heights Road and Pauma Heights Lane, a new cable pole would be installed to convert TL 6926 from the underground to the overhead position. East from the cable pole, existing single circuit TL 683 would be rebuilt as a double circuit TL 6926/683 by installing approximately 23 direct-buried steel poles, approximately 10 micropile foundation steel poles, and approximately 5 pier foundation steel poles to connect the line to Rincon Substation. The Project includes the following components:

- Remove approximately 7 miles of 69 kV conductors and associated hardware.
 - "Top" or replace poles between Rincon Substation and Location 6926-110.
 - Remove 69 kV underground cables between Location 6926-110 and Valley Center Substation.
- Install approximately 6 miles of 69 kV underground package between Valley Center Substation along Vesper Road, Valley Center Road, Cole Grade Road, and Pauma Heights Road.
- Rebuild existing single circuit TL 683 as a double circuit overhead line TL 6926/683.
- Add fiber optic cables to the powerline alignment and into the substations.
- Conduct work within the Rincon Substation and Valley Center Substation to accommodate the new power and fiber optic cables.

Areas outside of the existing SDG&E right-of-way will be used on a temporary basis during construction to serve as staging yards, stringing sites and helicopter landing sites.

Project Schedule (Conceptual)

SDG&E plans to begin construction on January 30, 2020 and completion of the project is expected by November 15, 2022.

Potential Environmental Impacts

SDG&E has reviewed the project for potential environmental impacts, including temporary construction impacts occurring outside of the right-of-way (within staging yards, stringing sites and helicopter landing sites), and found that this project will not create any significant direct, indirect or cumulative effects. Further, the results of the environmental review do not find any exceptions to the exemptions from a PTC, as described in G.O. 131-D.III.B.2.

No cost information is required for this advice filing. This informational filing will not result in an increase in any rate or charge, conflict with any rate schedule or rules, nor cause the withdrawal of service or result in more restrictive conditions.

Magnetic Field Management:

The CPUC requires utilities to consider "no-cost" and "low-cost" magnetic field management measures on all new transmission projects. SDG&E will implement magnetic field management measures on this Project, as appropriate, in accordance with its *EMF Design Guidelines for Electrical Facilities* (Guidelines), as filed with the CPUC in compliance with D.93-11-013 and updated in compliance with D.06-01-042.

"No-cost" measures are those that will not increase overall project costs but will reduce the magnetic field levels. "Low-cost" measures are those costing in the range of 4% of the total budgeted project cost which would reduce the magnetic field levels by at least 15% at the edge of Right-of-Way.

SDG&E will provide a Magnetic Field Management Plan for this project upon request.

Effective Date

Because this Advice Letter is being filed in accordance with the specific noticing requirements described in G.O. 131-D, Section XI.B.4., no resolution is required for approval pursuant to GO 96-B. SDG&E respectfully requests that this submittal become effective on December 13, 2019 which is not less than 30 days after the date filed.

Protest

Anyone may protest this Advice Letter to the California Public Utilities Commission. The protest must state the grounds upon which it is based, including such items as financial and service impact, and should be submitted expeditiously. The protest must be made in writing and must be received by December 3, 2019, which is 20 days after the date this Advice Letter was submitted with the Commission. There is no restriction on who may file a protest. The address for mailing or delivering a protest to the Commission is:

CPUC Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102

Copies of the protest should also be sent via e-mail to the attention of the Energy Division at EDTariffUnit@cpuc.ca.gov. A copy of the protest should also be sent via e-mail to the address shown below on the same date it is mailed or delivered to the Commission.

Attn: Megan Caulson
Regulatory Tariff Manager
E-mail: mcaulson@sdge.com

Notice

G.O. 131-D, Section XI.B. requires that this Advice Letter be filed not less than 30 days before the date such construction is intended to begin. Construction of the project is scheduled to begin on January 30, 2020, which is not less than 45 days from the date notice was first published in the newspaper. In accordance with Section III.G. of G.O. 96-B, SDG&E has, on November 13, 2019, served a copy of this filing on the parties shown on the attached list including the parties listed in G.O. 131-D, Section XI., Paragraphs B.1. and B.2., by providing them a copy hereof, either electronically or via the U.S. mail, properly stamped and addressed. A copy of the attached Notice will also be posted on site in accordance with G.O. 131-D, Section XI.B.3.

Address changes should be directed to SDG&E Tariffs by e-mail to SDG&ETariffs@sdge.com.



CLAY FABER
Director - Regulatory Affairs

(cc list enclosed)



ADVICE LETTER SUMMARY

ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: San Diego Gas & Electric Company (U902-E)

Utility type:

- ELC GAS WATER
 PLC HEAT

Contact Person: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@sdge.com

E-mail Disposition Notice to: acarrillo@sdge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas WATER = Water
 PLC = Pipeline HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 3460-E

Tier Designation: 2

Subject of AL: Notice of Proposed Construction of the TL 6926 Fire Hardening Project in the County of San Diego California

Keywords (choose from CPUC listing): G.O. 131-D

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: N/A

Summarize differences between the AL and the prior withdrawn or rejected AL: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required? Yes No

Requested effective date: 12/13/19

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Megan Caulson
Title: Regulatory Tariff Manager
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx: (858) 654-1748
Facsimile (xxx) xxx-xxxx:
Email: MCaulson@sdge.com

Name: SDG&E Tariff Department
Title:
Utility Name: San Diego Gas & Electric Company
Address: 8330 Century Park Court; CP 31D 92123
City: San Diego State: California
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: SDGETariffs@sdge.com

Clear Form

General Order No. 96-B
ADVICE LETTER SUBMITTAL MAILING LIST

cc: (w/enclosures)

<u>Public Utilities Commission</u> <u>Office of Ratepayer Advocates (ORA)</u> R. Pocta <u>Energy Division</u> M. Ghadessi M. Salinas L. Tan R. Ciupagea Tariff Unit	<u>Clean Power Research</u> T. Schmid G. Novotny <u>Davis Wright Tremaine LLP</u> J. Pau <u>Douglass & Liddell</u> D. Douglass D. Liddell <u>Ellison Schneider Harris & Donlan LLP</u> E. Janssen C. Kappel <u>Energy Policy Initiatives Center (USD)</u> S. Anders <u>Energy Regulatory Solutions Consultants</u> L. Medina <u>Energy Strategies, Inc.</u> K. Campbell <u>EQ Research</u> General <u>Goodin, MacBride, Squeri, & Day LLP</u> B. Cragg J. Squeri <u>Green Charge</u> K. Lucas <u>Hanna and Morton LLP</u> N. Pedersen <u>JBS Energy</u> J. Nahigian <u>Keyes & Fox, LLP</u> B. Elder <u>Manatt, Phelps & Phillips LLP</u> D. Huard R. Keen <u>McKenna, Long & Aldridge LLP</u> J. Leslie <u>Morrison & Foerster LLP</u> P. Hanschen <u>MRW & Associates LLC</u> General	<u>NLine Energy</u> M. Swindle <u>NRG Energy</u> D. Fellman <u>Pacific Gas & Electric Co.</u> M. Lawson M. Huffman Tariff Unit <u>RTO Advisors</u> S. Mara <u>SCD Energy Solutions</u> P. Muller <u>Shute, Mihaly & Weinberger LLP</u> O. Armi <u>Solar Turbines</u> C. Frank <u>SPURR</u> M. Rochman <u>Southern California Edison Co.</u> K. Gansecki <u>TerraVerde Renewable Partners LLC</u> F. Lee <u>TURN</u> M. Hawiger <u>UCAN</u> D. Kelly <u>US Dept. of the Navy</u> K. Davoodi <u>US General Services Administration</u> D. Bogni <u>Valley Center Municipal Water Distr</u> G. Broomell <u>Western Manufactured Housing Communities Association</u> S. Dey <u>Interested Parties in:</u>
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Attachment A

NOTICE OF PROPOSED CONSTRUCTION

Project Name: THE TL 6926 FIRE HARDENING PROJECT IN THE COUNTY OF SAN DIEGO CALIFORNIA

Date: November 13, 2019

SDG&E Advice Letter Number 3460-E

Proposed Project:

San Diego Gas & Electric Company (SDG&E) hereby submits a notice of construction of the TL 6926 Fire Hardening Project (Project) located in the community of Valley Center in unincorporated San Diego County.

The Project will remove approximately 7 miles of an existing powerline alignment, tie-line (TL) 6926, from the Rincon Substation to Valley Center Substation and leave the existing distribution circuits in place. In addition, approximately 6 miles of TL 6926 would be installed in an underground alignment within franchise position in road right-of-way (ROW) from Valley Center Substation to a cable pole located on Pauma Heights Road. From there, approximately 3 miles of TL 6926 would be installed in a double-circuit overhead configuration on an existing powerline alignment (TL 683) from the cable pole located on Pauma Heights Road to Rincon Substation. The Project is part of SDG&E's fire hardening efforts. The existing line traverses fire prone terrain and is located in an area with potential for high winds. The Project is located within Tier 2 (elevated) and Tier 3 (extreme) of the CPUC High Fire-Threat District.

Project Description:

The Project will remove approximately 7 miles of powerline and associated hardware from the TL 6926 pole structures (i.e., topping) between Rincon Substation and Valley Center Substation. Of the 134 poles located on the existing TL 6926 between the Rincon and Valley Center Substations, 67 pole structures would be topped above the distribution circuit, 53 would be replaced with direct-buried steel poles (including 2 new pole locations), 9 pole locations would involve overhead work only, and 5 pole structures would be removed from service. The existing TL 6926 converts from an overhead to an underground position at Location 6926-110, and the powerline continues into Valley Center Substation underground. Location 6926-110 would be topped, and the existing TL 6926 underground cables would be removed, while the underground duct package into Valley Center Substation would be abandoned in place.

From Valley Center Substation, approximately 6 miles of 69 kV underground duct package and cable system would be installed within Vesper Road, Valley Center Road, Cole Grade Road, and Pauma Heights Road. At approximately the intersection of Pauma Heights Road and Pauma Heights Lane, a new cable pole would be installed to convert TL 6926 from the underground to the overhead position. East from the cable pole, existing single circuit TL 683 would be rebuilt as a double circuit TL 6926/683 by installing approximately 23 direct-buried steel poles, approximately 10 micropile foundation steel poles, and approximately 5 pier foundation steel poles to connect the line to Rincon Substation. The Project includes the following components:

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- Rebuild existing single circuit TL 683 as a double circuit overhead line TL 6926/683.
- Add fiber optic cables to the powerline alignment and into the substations.
- Conduct work within the Rincon Substation and Valley Center Substation to accommodate the new power and fiber optic cables.

Areas outside of the existing SDG&E right-of-way will be used on a temporary basis during construction to serve as staging yards, stringing sites and helicopter landing sites.

Magnetic Field Management:

The California Public Utilities Commission requires utilities to consider "no-cost" and "low-cost" magnetic field management measures on all new transmission projects. SDG&E will implement magnetic field management measures on this Project, as appropriate, in accordance with its *EMF Design Guidelines for Electrical Facilities (Guidelines)*, as filed with the CPUC in compliance with D.93-11-013 and updated in compliance with D.06-01-042.

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SDG&E will provide a Magnetic Field Management Plan for this project upon request.

Exemption from CPUC Authority:

The Project is exempt from G.O. 131-D, Section III.A., Certificate of Public Convenience and Necessity (CPCN) requirements because all of the facilities are designed to operate below 200 kilovolts (200kV). This project is also exempt from a Permit to Construct (PTC) because it qualifies for an exemption under G.O. 131-D, Section III.B.1.g. – "power line facilities ... to be located in an existing franchise ... or public utility easement;" and there are no exceptions to the exemptions.

SDG&E reviewed the project for potential environmental impacts and found that the project would not result in any significant direct, indirect or cumulative environmental impacts. Further, the results of the environmental review do not find any exceptions to the exemptions from a PTC, as described in G.O. 131-D.III.B.2.

Public Review Process:

Persons or groups may protest the proposed construction if they believe the utility has incorrectly applied for an exemption or believe there is a reasonable possibility that the proposed project or cumulative effects or unusual circumstances associated with the project may adversely impact the environment. Pursuant to CPUC GO 131-D, Section XIII., protests must be filed by December 3, 2019 which is 20 calendar days following the date this informational Advice Letter was filed with the Commission. All protests must be filed formally at the CPUC and SDG&E concurrently in accordance with the CPUC's Rules of Practice and Procedure to those listed below.

California Public Utilities Commission
Docket Office, Room 2001
505 Van Ness Avenue
San Francisco, CA 94102

AND

Megan Caulson
SDG&E
Regulatory Affairs
8330 Century Park Ct.
San Diego, CA 92123

AND

Ed Randolph
California Public Utilities Commission
Energy Division
505 Van Ness Avenue,
Rm. 4002
San Francisco, CA 94102

For assistance in filing a protest, please call the Commission's Public Advisor in San Francisco at 866-849-8390 or email: public.advisor@cpuc.ca.gov.

To request further information about the project, please contact: SDG&E Regional Public Affairs Manager, Todd Voorhees at (619) 756-3578 or email tvoorhees@sdge.com.

Attachment B

Advice Letter 3460-E

Notice Distribution List

PROPOSED CONSTRUCTION OF THE TL6926 FIRE HARDENING PROJECTPROJECT

California Public Utilities Commission Ed Randolph 505 Van Ness Avenue San Francisco, CA 94102	County of San Diego Department of Public Works Mr. Rich Crompton County Operations Center 5510 Overland Avenue, Suite 410 San Diego, CA 92123
Jason Reiger 505 Van Ness Avenue San Francisco, CA 94102	County of San Diego Planning and Development Services Mr. Mark Wardlaw County Operations Center 5510 Overland Avenue San Diego, CA 92123
Jack Mulligan 505 Van Ness Avenue San Francisco, CA 94102	Tribal Governments and Commission Rincon Band of Luiseno Indians Mr. Bo Mazzetti, Chairman One Government Center Lane Valley Center, CA 92082
Molly Sterkel 505 Van Ness Avenue San Francisco, CA 94102	San Pasqual Band of Mission Indians Mr. Stephen Cope, Chairman P.O. Box 365 16400 Kumeyaay Way Valley Center, CA 92082
Mary Jo Borak 505 Van Ness Avenue San Francisco, CA 94102	California Native American Heritage Commission 1550 Harbor Blvd., Ste. 100 West Sacramento, CA 95691
Lonn Maier Infrastructure Permitting and CEQA Section 300 Capital Mall, Suite 518 Sacramento, CA 95814	Community Groups Pala/Pauma Community Sponsor Group PO Box 1273 Pauma Valley, CA 92061
California Energy Commission Drew Bohan Executive Director 1516 Ninth Street, Mail Stop 39 Sacramento, CA 95814	Valley Center Community Planning Group PO Box 127 Valley Center, CA 92082-0127
County of San Diego Supervisor Jim Desmond, District 5 1600 Pacific Highway, #335 San Diego, CA 92101	

Newspapers of General Circulation

San Diego and North County Union Tribune

Neighborhood Notification

The Attachment A Notice will be posted in public viewing areas such as on SDG&E utility poles, along the project route and existing overhead site and substations