

## DOCKETED

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<b>TN #:</b>	203383
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November 26, 2014

VIA E-FILING

Power of Vision  
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Carlsbad Energy Center Project (07-AFC-06C)  
Karen Douglas, Commissioner and Presiding Member  
Andrew McAllister, Commissioner and Associate Member  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Re: **Carlsbad Energy Center Project, 07-AFC- 06C**  
**Response to Power of Vision Petition to Committee for Order Directing Applicant**  
**to Supply Responses to Data Requests 8, 9, and 11 – 13**

Power of Vision and CECP Siting Committee:

On October 7, 2014 Power of Vision (“**POV**”), intervenor in the Petition to Amend (“**PTA**”) proceeding for the Carlsbad Energy Center Project (“**CECP**”), filed data request set 2 with the California Energy Commission (the “**Commission**”). Pursuant to Title 20, California Code of Regulations, sections 2025 and 1716, Carlsbad Energy Center LLC, CECP project owner, (“**Project Owner**”) objected to POV’s data request set 2. On November 17, 2014, POV filed a Petition to the Committee for an Order Directing the Applicant to Supply Responses to POV Data Request Numbers 8, 9, 11, 12, and 13 (the “**Petition**”). Project Owner herein responds to the Petition and respectfully requests the Committee reject the Petition.

**A. GENERAL OBJECTION TO PETITION**

POV petitions for responses to five of the POV Data Requests all of which relate to the design of the generator tie-in transmission lines, the view of those lines relevant to I-5, and the possible future changes to I-5. Project Owner is confident that all necessary and useful information regarding the visual resources effects of the project, including design information for the generator tie-in transmission lines and renderings from all Key Observation Points (“**KOPs**”) has been provided. As shown in **Exhibit 1** attached hereto, Project Owner has provided numerous new or revised renderings, drawings, viewpoints and diagrams for the project. Further, Project

Owner recently agreed, after meetings with POV, to move two poles that connect the power transmission lines coming from the generators to the switchyard (generator tie-in lines). This move, west and down into the bowl, further reduces the visibility of those lines. Revised renderings showing this enhancement have even been provided.

The fundamental fact, however, is that the Approved CECP did not have any significant visual impacts and the Amended CECP has a significantly lower visual profile that Project Owner is certain further reduces impacts. While it is accurate that some generator tie-in lines have moved closer to the I-5 freeway, that characteristic is included in the revised visual renderings provided with the PTA and revised further to show the enhancements. While POV certainly has a right to disagree with the visual assessment of Project Owner, and other parties, POV does not have a right to require information that is not necessary for the Committee to reach a decision on the PTA. Some of the information that POV seeks in the five data requests is simply not available (detailed engineering information) or not really capable of being created (design and renderings based on a non-existent project). The remainder of the information (renderings and drawings) would be significantly burdensome both on a time basis and a cost basis to respond to and provide.

Project Owner believes that the primary disconnect between the position of POV and that of the Project Owner is over the potential visual impact significance of CECP, whether in its currently approved form or in the amended form proposed in the PTA. POV has always maintained a position the project would have a significant visual impact. The Commission reached the opposite conclusion in approving CECP and the PTA significantly reduces visibility of the project from that baseline.

Set forth below are POV's original data request numbers 8, 9, and 11 - 13, Project Owner's original objections to those data requests, POV's data request-specific argument in the Petition and Project Owner's specific additional response regarding each of the data requests.

## **B. OBJECTIONS SPECIFIC TO EACH DATA REQUEST**

### **1. POV Data Request 8**

#### **a. Original Data Request 8**

*Please provide four dimensioned cross-section drawings (one for each pair of power units), looking north, and extending from the west at the upper rim road through the gas turbine units, transformers, circuit breakers, H-frames, transmission poles to the anticipated future freeway I-5 roadway. These cross section drawings should show the upper and lower rim roads, pit slopes, gas turbine units, stacks, transformers, circuit breakers, H-frames, power poles, safety berm adjacent to the widened I-5 freeway, future visual screening (trees?) after I-5 widening, property fence after freeway widening, and the relocated I-5 freeway. Horizontal distances between each of these items should be clearly stated, as well as the vertical heights of each item.*

**b. Original Objection to Data Request 8**

Project Owner objects to this data request because it seeks information that is not necessary to reach a decision on the PTA. Further, some of the information sought is not known at this time because it is only capable of being determined when detailed final engineering is completed, a stage that occurs after a project design is approved. Other aspects of the information sought would be costly and time consuming to prepare. The final decision for the currently-approved CECP has already authorized a visual profile and in making such a decision, the California Energy Commission has already addressed the potential for significant visual impacts from this and all viewpoints.

The data request is also fundamentally problematic because it presumes that a certain design of a widened I-5 has been completed and is also certain to occur at some date in the near future. While a widened I-5 is anticipated to occur at some time, the final decision on the currently-approved PTA already has conditions of certification in place to ensure that the project accommodates the reasonably expected scope of changes to I-5. Further, the PTA does not propose any changes relevant to those conditions. Thus this inquiry about I-5 detailed information seems not only incapable to being responded to, but also unnecessary to reach a decision on the PTA.

**c. POV Data Request 8 Petition Argument**

The applicant's states: "The final decision for the currently-approved CECP has already authorized a visual profile and in making such a decision, the California Energy Commission has already addressed the potential for significant visual impacts from this and all viewpoints." This statement is not valid since the PTA, by changing the previously approved location of the transmission line from the western edge of the project to a position on the east side of the project adjacent to the I-5 freeway, has introduced a completely new and dominant visual impact, thereby creating the necessity for additional information to facilitate the Committee in reaching a decision on the PTA. The approved VIS requirements never contemplated a transmission line next to the freeway and new VIS requirements are necessary for this new transmission line location. The applicant tacitly acknowledged this when they responded to our data request #4 by providing a cross section drawing of their PTA proposed units 8 & 9, transformer, circuit breaker, H-frame, power pole located near the upper rim road, visual screening and I-5 freeway (TN#203058, Figure DR POV 4-1). At the September 24-25 workshop, this cross section drawing proved to be very useful for understanding the potential visual impacts. At the workshop the applicant then indicated that they were changing the location of two of the power poles from the upper rim road to the lower rim road and would also add an additional pole near the lower rim road. Because of this revised location of the power poles, we submitted our data request #8. The applicant did not express problems with providing information for the upper rim road pole location so we do not understand why they cannot provide similar cross section drawings with the most recent routing of the transmission line. We believe the information requested will help the Committee and other interested parties to this proceeding ascertain if there are simple and inexpensive ways to reduce the visual impact of the transmission line.

Our data request #8 has many features similar to CEC Staff's data requests #79 & #80, docketed on October 2, 2014 (TN#203149). Both of our data requests ask for elevation

drawings incorporating the cumulative impacts of the foreseeable I-5 widening. However, in order to avoid the contentious issue surrounding the future I-5 widening, we can drop all reference to the "widened" or "widening" freeway from our data request #8. We urge the Committee to approve our petition for an order directing the applicant to supply a response to POV's data request #8, using whatever I-5 highway location the applicant chooses.

**d. Project Owner's Data Request 8 Petition Response**

POV's argument in the Petition fails to address the core flaws in POV Data Request 8, namely that the request seeks information that is not necessary for the Committee to reach a decision on the PTA and that the necessary related information has been provided. As explained in the original objection to the Data Request, the detailed engineering information is not available. Further, there are renderings (simulations) of the image and projected view of the project from all of the KOPs. These KOPs provide for the assessment of the visual impacts of the project. Some information sought in this data request has been provided in response to CEC Staff data requests. Figure DR22-2R1, filed in response to Data Request 74e, shows the revised profile with the pole in the berm, Figures DR74-1 and DR74-3, filed in response to Data Request 74f, show the profiles of the plant in the bowl. But these figures and all the other renderings and views in this proceeding do not show all the information sought in this data request.

POV seems to be insisting upon some form of a revision to the project's projected view based on varying versions of the possible future I-5 widening and realignment. The simple fact is that the project has Conditions of Certification that require the project to raise landscaping and other visual aspects of I-5 widening if or when such widening occurs. The renderings from the various KOPs combined with many of the other renderings, drawings, and data, provide more than enough information for the Committee to assess the effect that the PTA could have on the overall project's potential impacts.

**2. POV Data Request 9**

**a. Original Data Request 9**

*Please provide an elevation drawing along the route of the proposed transmission line from the northern-most pole adjacent to the widened I-5 to the southern-most pole adjacent to the widened I-5. Show all clearances (vertical and horizontal) along the way from the (sagged) transmission cables to the ground, embankments, roadways, buildings and final stage vegetation (under wind conditions).*

**b. Original Objection to Data Request 9**

Project Owner objects to this data request because it seeks information that is not necessary to reach a decision on the PTA. Further, some of the information sought is not known at this time because it is only capable to being determined when detailed final engineering is completed, a stage that occurs after a project design is approved. Other aspects of the information sought would be costly and time consuming to prepare. The final decision for the currently-approved CECP has already authorized a visual profile and in making such a decision, the California Energy Commission has already addressed the potential for significant visual impacts from this and all viewpoints.

**c. POV Data Request 9 Petition Argument**

All of the responses made by POV to the applicant's objections to our data request #8 above also apply here to our data request #9. Providing the requested information should not be overly burdensome to the applicant. The applicant did not express problems in providing (TN#203327) similar elevation drawings of a different section of the transmission as requested by Staff's data request #76 (TN#203149), so we do not understand why they cannot provide similar cross section drawings for the section of the transmission line requested in our data request #9. We believe the information requested will help the Committee and other interested parties to this proceeding ascertain if there are simple and inexpensive ways to reduce the visual impact of the transmission line. For example, one concern is the potential additional visual impact that may be created by the added new pole in the pit. The requested cross section drawing in this area may reveal that sufficient ground clearances are achievable without the additional pole. However, in order to avoid the contentious issue surrounding the future I-5 widening, we can drop all reference to the "widened" freeway from our data request #9. We urge the Committee to approve our petition for an order directing the applicant to supply a response to POV's data request #9, using whatever I-5 highway location the applicant chooses.

**d. Project Owner's Data Request 9 Petition Response:**

Project Owner maintains its objection that this information is burdensome and not necessary to reach a decision on the PTA. Even with POV's change to this data request to require choosing some new alignment of I-5, the requested information is very burdensome. CEC Staff's data request asks for the relevant and useful information regarding the basic design and location of the generator tie-in line transmission lines. This data request seeks much more detailed engineering information and also seeks to reference it to some possible future project that is not certain in its design nor its timing. Potential cumulative visual impacts are adequately addressed by CoCs VIS-1 through VIS-5. The KOPs provide a visual assessment of the project that satisfies the environmental impact assessment requirements under the Warren Alquist Act and the California Environmental Quality Act. The possible future I-5 widening was included as a potential project under Cumulative Impacts in the original proceeding and is considered again in this PTA.

**3. POV Data Request 11**

**a. Original Data Request 11**

*Please provide three visual renderings (SB, NB, and SNB) of how the proposed new location of the transmission line will look from points on the modified I-5 freeway, as shown on the attached "FIG DR POV 5-1 Modified by POV". These renderings should show the visual screening (trees?) available at the time immediately after the transmission poles are erected, a time when visual impacts will be most severe.*

**b. Original Objection to Data Request 11**

Project Owner objects to this data request because it seeks renderings from locations that are not Key Observation Points, nor locations that would qualify to represent the project's potential for significant impacts. Moreover, the viewpoints listed represent a view threshold that is significantly benefited by the PTA, meaning that the PTA provides substantial visual benefits to the project by lowering the visual profile of the project as seen from the east. The final decision for the currently-approved CECP has already authorized a visual profile and in making such a decision, the California Energy Commission has already addressed the potential for significant visual impacts from this and all viewpoints. Here, the view is clearly benefitted by the PTA. Finally, Project Owner has recently agreed to provide further concessions by moving several generator tie line transmission poles west. As a result of that movement and also in response to another request, Project Owner is completing revised renderings from the Key Observation Points. Renderings from these viewpoints, however, would not be necessary to make a decision on the project.

**c. POV Data Request 11 Petition Argument**

Key Observation Points were established for the approved CECP. By moving the transmission line from the west side of the project to the east side of the project adjacent to the I-5 freeway, the PTA introduces a completely new set of visual impacts not anticipated by prior proceedings. New observations points are necessary to evaluate the visual impacts of the new transmission line location. The applicant tacitly acknowledged this when they responded to POV's data request #4 and provided new data points SB and NB on their Figures DR POV 5-1, DR POV 5-2 & DR POV 5-3 (TN#203058). Subsequently, the applicant changed the configuration of the transmission line, lowering two of the poles into the pit. Our data request #11 is similar to our data request #4 and will allow the Committee and other interested parties to view renderings of this latest transmission line configuration. We urge the Committee to approve our petition for an order directing the applicant to supply a response to POV's data request #11.

**d. Project Owner's Data Request 11 Petition Response**

Project Owner maintains its objection to this data request because it seeks renderings from locations that do not present potentially significant adverse visual impacts. Project Owner also greatly disagrees with the described character and significance of the movement of the generator tie-in transmission lines from the west side of the bowl to the east side of the bowl. The change is not significant. Additionally, the agreement to move two of those poles down into the bowl itself was done as a concession, and not in any way as a concession of the potential of significant impacts. Further, the small movement of several generator tie-in lines does not in any way alter the view shed of the project nor the selection of the KOPs. Finally, this data request repeats the error of requesting viewpoint renderings from some theoretical final design for the possible/future I-5 widening.

#### **4. POV Data Requests 12 and 13**

Project Owner is merging the treatment of data request 12 and 13 together because of their similarity and virtual identity of argument on both sides. They essentially only differ in which of the generator tie-in lines they apply to and the related design references they cite.

##### **a. Original Data Requests 12 and 13**

*POV DATA REQUEST 12: For the 138kV transmission line please show in side-by-side tables (one side being the values in the PTA cited "Electric Power Institute. 1978 Transmission Line Reference Book, 115-138kV Compact Line Design. Palo Alto, California", the other side being the more current "EPRI Transmission Line Reference Book: 115-345 kv Compact Line Design, The Blue Book" published 05-Nov-2008.) the following recommended design values:*

- a. Vertical clearances of conductors above ground and roadways.*
- b. Vertical clearances of conductors from other supporting structures and buildings.*
- c. Vertical separation between phases of the same circuit.*
- d. Number of insulators and length of the string.*

*POV DATA REQUEST 13: For the 230 kV transmission line please show in side-by-side tables (one side being the values in the PTA cited "Electric Power Institute. 1975. Transmission Line Reference Book, 345-kV and Above. Palo Alto, California", the other side being the more current EPRI AC Transmission Line Reference Book – 200kV and Above, 2013 Edition") the following recommended design values:*

- a. Vertical clearances of conductors above ground and roadways.*
- b. Vertical clearances of conductors from other supporting structures and buildings.*
- c. Vertical separation between phases of the same circuit.*
- d. Number of insulators and length of the string.*

##### **b. Original Objections to Data Requests 12 and 13**

Project Owner objects to this data request because the request appears to either seek information equally available to the asking party or seeks detailed engineering design details that are not known at this time. Further, the information is not reasonably necessary to make a decision on the PTA, because it seeks information that does not have a bearing on the project's ability to comply with applicable regulations or standards.

##### **c. POV Data Request 12 Petition Argument**

Unfortunately, the 1978 Electric Power Institute version for 115-138Kv transmission line reference book is no longer in print or publicly available. However, since the applicant cited this reference on page 3-8 of the PTA, the applicant presumably has an access to this reference which is not available to POV. Similarly, the current 2008 version of the EPRI transmission line reference book should be readily available to the applicant or their consultants, whereas POV could not find any public availability of this reference book. The clearance information in POV's data request is crucial in determining if the 138Kv transmission line has been overdesigned, substantially contributing to its visual impact. Other similar gas turbine plants recently approved by the CEC (Panoche Energy Center, 06-AFC-5 and Pio Pico 11-AFC-01) have transmission lines in the area contiguous the generating units that are approximately forty feet lower than

those shown in the PTA. We therefore urge the Committee to approve our petition for an order directing the applicant to supply a response to POV's data request #12.

**d. POV Data Request 13 Petition Argument**

Unfortunately, the 1975 Electric Power Institute version for 230Kv transmission line reference book is no longer in print or publicly available. However, since the applicant cited this reference on page 3-8 of the PTA, the applicant presumably has an access to this reference book which is not available to POV. Similarly, the current 2013 version of the EPRI transmission line reference should be readily available to the applicant or their consultants, whereas POV could not find any public availability of this reference book. The clearance information in POV's data request is crucial in determining if the 230Kv transmission line has been overdesigned, substantially contributing to its visual impact. Other similar gas turbine plants recently approved by the CEC (Panoche Energy Center, 06-AFC-5 and Pio Pico 11-AFC-01) have transmission lines in the area contiguous to the generating units that are approximately forty feet lower than those shown in the PTA. We therefore urge the Committee to approve our petition for an order directing the applicant to supply a response to POV's data request #13.

**e. Project Owner's Data Request 12 and 13 Petition Response**

Project Owner maintains its objection to these data requests because they seek detailed engineering design specifics that are not known at this time. Further, the information is not reasonably necessary to make a decision on the PTA because it seeks information that does not have a bearing on the project's ability to comply with applicable regulations or standards.

It appears that POV seeks to confirm the design of or perhaps even redesign the transmission lines. POV should understand that basic design of a project for assessment purposes is very different than final engineering design that is used for construction purposes. Reference guides such as the ones referred to in these data requests are consulted and also held out as the standards to which final design is intended to comply with. It is not the duty or function of a project owner to assist an intervening party in attempting a detailed engineering-based design of power transmission lines. Further, such detailed design is not required. Instead, what is required and necessary to assess this PTA is a general description of the features of a project such that its visual resources impacts can be assessed. That information has been provided.

Finally, Project Owner notes that the request for these particular sources of technical reference appear to reflect a lack of complete understanding of the engineering and design standards and systems for power transmission lines. For example, the data requests seek information from sources that are not actually applicable or are not the only governing source of standards or design criteria. Design requirements for electrical power transmission lines vary significantly depending on the function of the line and its location. This disconnect between the required underlying education, knowledge and understanding of the requesting party and the complexity and meaning of such information to the requesting party, makes it very difficult to respond to the requesting party without engaging in a treatise on transmission line engineering and design.

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**Conclusion**

Because data requests 8, 9, and 11 – 13 seek information that is not reasonably necessary to make a decision on the PTA and/or that is not reasonably available to Project Owner, Project Owner respectfully requests the Committee reject POV's Petition.

Locke Lord LLP

By:  \_\_\_\_\_

John McKinsey

Attorneys for Carlsbad Energy Center LLC

## Exhibit 1

<b>CEC DR Set # 1 (1-30) – Responses Filed 8/15/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR21-1	Conceptual One-Line Diagram	DR-21	Replaced by Figure DR28-4R1 in CEC Data Set #4 filed on 11/21/2014
DR22-1	Electrical Arrangement Generator to GSU	DR-22	--
DR22-2	Takeoff Structure	DR-22	Replaced by Figure DR22-2R1 in CEC Data Set #3 filed on 10/31/2014
DR23-1	Transmission Lines	DR-23	Replaced by Figure DR23-1R1 in CEC Data Set #3 filed on 10/31/2014
DR23-2	Transmission Lines	DR-23	Replaced by Figure DR23-1R1 in CEC Data Set #3 filed on 10/31/2014
DR24-1	Transmission Line Pole Cross Section Dead-end Steel Pole	DR-24	Replaced by Figure DR 24-1R1 in CEC Data Set #3 filed on 10/31/2014
DR24-2	Transmission Line Pole Cross Section Double-circuit Configuration Steel Pole	DR-24	Replaced by Figure DR24-1R2 in CEC Data Set #3 Supplemental Request 76 filed on 11/13/2014
DR24-3	Transmission Line Pole Cross Section Double-circuit Dead-end Configuration	DR-24	Replaced by Figure DR24-3R1 in CEC Data Set #3 filed on 10/31/2014
DR26-1	230kV XLPE Cable Cross Section Typical Details	DR-26	--
DR26-2	230kV Cable Riser	DR-26	--
DR26-3	Termination Stand Grounding Elevation	DR-26	--
DR27-1	Typical 2x2 Duct Bank Details	DR-27	--
DR28-1	138kV Switchyard One Line Diagram (Preconstruction)	DR-28	--
DR28-2	230kV One Line Diagram (Preconstruction)	DR-28	Replaced by Figure DR28-5 in CEC Updated Responses to Requests 28 to 30 filed on 9/19/2014
DR29-1	General Physical Arrangement of the Switchyard	DR-29	--

**POV Data Set #1 (1-5) Responses Filed 9/12/2015**

<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR POV 4-1	Cross-Section Looking North at the Unit 9 Transformer and Interstate Highway I-5	POV-4	--
DR POV 5-1	Aerial View of Project Site and Locations of Key Observation Points and Supplemental Viewpoints	POV-4	Replaced by Figure DR58-1 in CEC Data Set #2 Request 58 filed on 11/4/2014
DR POV 5-2	Southbound View of the Amended CECP From Highway I-5 Looking Toward the Transmission Structure Proposed to Serve Units 8 and 9	POV-5	--
DR POV 5-3	Northbound View of the Amended CECP From Highway I-5 Looking Toward the Transmission Structure Proposed to Serve Units 8 and 9	POV-5	--

**CEC DR Set 1 - Updated Responses to Requests 28 to 30**

**Responses Filed 9/19/2014**

<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR28-3	138kV for CECP COD One Line Diagram	DR -28	--
DR28-4	230kV for CECP COD One Line Diagram	DR -28	Replaced by Figure DR28-4R1 in CEC Data Set #4 filed on 11/21/2014
DR28-5	138kV Switchyard Ultimate One Line Diagram	DR -28	--
DR28-6	230kV Ultimate One Line Diagram	DR -28	--

DR29-2	Ultimate Arrangement for CECP COD	DR -29	--
DR29-3	Ultimate Arrangement	DR -29	--
<b>CEC Data Set #2 Request 58 (Visual)</b>			
<b>Responses Filed 11/4/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR58-1	Aerial View of Project Site with Locations of Key Observation Points and Supplemental Viewpoints	DR-58	--
DR58-2	KOP 1 – View from Carlsbad Boulevard Looking South	DR-58	--
DR58-3	KOP 2 – View from Pannonia Trail at Capri Park	DR-58	--
DR58-4	KOP 3 – View from the End of Cove Drive	DR-58	--
DR58-5	KOP 3A – View from Adams Street	DR-58	--
DR58-6	KOP 4 – View from the End of Hoover Street	DR-58	--
DR58-7	KOP 5 – View from the End of Harbor Drive	DR-58	--
DR58-8	KOP 6 – View from Southbound I-5 at Agua Hedionda Lagoon	DR-58	--
DR58-9	KOP 7 – View from Northbound I-5 North of Cannon Road	DR-58	--
DR58-10	KOP 8 – View from Carlsbad Boulevard at the Encina Power Station Outfall	DR-58	--

DR58-11	KOP 9 –View from Passenger Rail Car on the Tracks Adjacent to the Project Site	DR-58	--
DR58-12	KOP 10 – View from Inside the Encina Site	DR-58	--
DR58-13	KOP 11 – View from Railroad Tracks at the Crossing of the Agua Hedionda Channel	DR-58	--
DR58-14	KOP CP – View from Cannon Park	DR-58	--
<b>CEC Data Set #3 (Requests 67-76) (noise and T/L)</b>			
<b>Responses Filed 10/31/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
2.0-1R1	Site Plan	DR-74	--
2.1-1R1	Plot Plan	DR-74	--
3.1-1R1	Transmission Line Routing	DR-74	--
DR22-2R1	Takeoff Structure	DR-74	--
DR23-1R1	Transmission Lines	DR-74	--
DR23-2R1	Transmission Lines	DR-74	--
DR24-1R1	Transmission Line Pole Cross Section Deadend Steel Pole	DR-75	--
DR24-2R1	Transmission Line Pole Cross Section Double-circuit Configuration Steel Pole	DR-75	Replaced by Figure DR24-1R2 in CEC Data Set #3 Supplemental Request 76 filed on 11/13/2014
DR24-3R1	Transmission Line Pole Cross Section Double-circuit Deadend Configuration	DR-75	--
DR74-1	Position of GE LMS100 Unit to Transmission Line Pole	DR-74	Replaced by Figure DR74-2 in CEC Data Set #3 Supplemental Request 74 filed on 11/4/2014

DR74-2	CECP Overlay on Existing Site Features	DR-74	--
DR76-1a	NCTD Rail Corridor Cross Section	DR-76	--
DR76-1b	NCTD Rail Corridor Cross Section	DR-76	--
<b>CEC Data Set #3 Supplemental Request 74</b>			
<b>Responses Filed 11/4/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR74-1	CECP Oblique Rendering	DR-74	--
DR74-2	Position of GE LMS100 Unit to Transmission Line Pole	DR-74	--
<b>CEC Data Set #3 Supplemental Request 76</b>			
<b>Responses Filed 11/13/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR76-1c	NCTD Rail Corridor Cross Section	DR-76	--
DR24-2R2	Transmission Line Pole Cross Section Double-circuit Configuration Steel Pole	DR-76	--
<b>CEC Data Set #4 (Requests 86-92)</b>			
<b>Responses Filed 11/21/2014</b>			
<b>Figure Number</b>	<b>Figure Title</b>	<b>Corresponding Data Request</b>	<b>Notes</b>
DR 86-1	Water Balance Diagram Average Use Case	DR-86-90	--
DR 86-2	Water Balance Diagram Maximum Use Case	DR-86-90	--
2.1-1R	Plot Plan	DR-86-90	--
2.0-1R	Site Plan	DR-86-90	--

3.1-1R	CECP Transmission Lines	DR-86-90	--
DR21-1	Conceptual One-Line Diagram	DR-86-90	--
DR28-4R1	One Line Diagram	DR-86-90	--