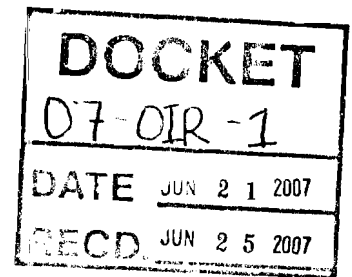


**San Diego Electric & Gas Company Recommendations  
to the California Energy Commission  
June 21, 2007**



**Recommendation 1)** SDG&E needs the ability to designate (or have the CEC designate) existing transmission line right-of way (ROW) for future expansion. These ROWs must be shown in the CEC Strategic Plan to make this possible. Therefore, Recommendation 1 is:

*Request CEC to include the SDG&E-requested designated transmission line ROWs in the CEC Strategic Plan. This would allow any SDG&E or CEC initiative to designate existing ROWs for future expansion to meet the consistency requirements.*

**Recommendation 2)** SDG&E needs to minimize the complexity and cost of designating existing transmission line ROWs. The CEC is proposing that it prepare a complex EIR for the designation. The CEC could simplify this complexity through the use of CEQA tools such as exemptions and the Program EIR. The benefits of a Program EIR are as follows:

- The CEC could designate existing transmission line ROWs with less third party resistance because it would defer key issues to the CPUC for resolution in the project-specific CEQA process required for a CPCN or PTC under the CPUC's General Order 131-D.<sup>1</sup>
- The CPUC could authorize new transmission lines in designated ROWs with a project-specific or tiered EIR rather than the more complex EIR. The less stringent project-specific or tiered EIR could address particular issues and possibly avoid excessive "alternative route" analysis.

Therefore, Recommendation 2 is:

*Request the CEC to allow the designation of new and existing transmission line ROWs using CEQA exemptions and the Program EIR process. This would improve the transition of and ease the complexity from planning to permitting.*

**Recommendation 3)** Due to changing conditions, the CEC or an applicant may desire to amend the Strategic Plan under unexpected or unusual circumstances. Regulations should allow for an applicant to request adjustment as soon as there is a likely necessity for new lines. Therefore, Recommendation 3 is:

*Request the CEC to allow for strategic Plan amendment every 2 years or upon request by applicant to request adjustment when unusual circumstances exist.*

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<sup>1</sup> General Order 131-D governs the construction, repair, upgrade, etc. of electric transmission and substation facilities.

**Recommendation 4)** An applicant who requests designation is required to pay the cost for environmental document preparation and any review fees by local jurisdiction. This could be a financial and strategic loss to the applicant if another party uses the designated corridor first. Therefore, Recommendation 4 is:

*Request the CEC preclude third party use of designated corridors without consulting with original applicant, considering priority, and compensating the prior applicant for any sunk costs.*

**Recommendation 5)** There may be some designated corridors where transmission line upgrades could occur with no or minimal impact to the environment, for example, transmission structures originally designed and built to carry larger, higher voltage lines with minimal or no structural changes. Therefore, Recommendation 5 is:

*Request the CEC to include an exempt project category for line upgrades where there are minimal or no improvements required for structures, pull sites and ancillary work areas located in developed or disturbed areas, or where the utility has an approved Habitat Conservation Plan (or equivalent) and a cultural resource protection plan. Furthermore, structure heights should be limited to changes which do not exceed 20 vertical feet and any structure replacements or intersets that do not exceed 20% of the total number of structures.*