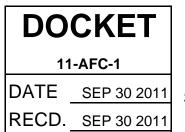
CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET SACRAMENTO, CA 95814-5512 www.energy.ca.gov





Pio Pico Energy Center, LLC David Jenkins, Project Manager 1293 E. Jessup Way Mooresville, IN 46158 September 30, 2011

RE: PIO PICO ENERGY CENTER (11-AFC-1), Data Requests 72 and 73

Dear Mr. Jenkins,

Pursuant to Title 20, California Code of Regulations, section 1716, the California Energy Commission staff requests the information specified in the enclosed data requests. The information requested is necessary to: 1) more fully understand the project, 2) assess whether the facility will be constructed and operated in compliance with applicable regulations, 3) assess whether the project will result in significant environmental impacts, 4) assess whether the facilities will be constructed and operated in a safe, efficient and reliable manner, and 5) assess potential mitigation measures.

The data requests are numbered 72(a) through 72(r) and 73(a) through 73(r), respectively. Written responses to the enclosed data requests should be submitted to the Energy Commission staff on or before October 31, 2011, or at such later date as may be mutually agreed upon.

If you are unable to provide the information requested, need additional time, or object to providing the requested information, please send a written notice to the Committee and me within 20 days of receipt of this notice. The notification must contain the reasons for the inability to provide the information or the grounds for any objections (see Title 20, California Code of Regulations, section 1716 (f)).

If you have any questions regarding the enclosed data requests, please call me at (916) 651-0966.

Sincerely,

Eric Solorio Siting Project Manager

Enclosure (Data Request Packet, Set 3) cc: Docket (11-AFC-1)

Technical Area: Transmission System Engineering

Authors: Laiping Ng Technical Senior: Mark Hesters

BACKGROUND

On September 1, 2011, Staff received a copy of the C1C2 Phase II Interconnection study report (Phase II Cluster Study); and C1C2 Projects Phase II Individual Project Report dated August 24, 2011, for interconnection of the proposed Pio Pico Energy Center (PPEC). The study was performed by the California Independent System Operator (California ISO) and San Diego Gas & Electric (SDG&E).

The report shows that the power flow study was conducted under 2014 heavy summer peak and 2014 light load system conditions with and without the C1C2 generation projects with a total of 1,716.5 MW new generating power output in SDG&E area, which also includes the proposed PPEC with 308 MW net generation output. The Phase II Study identified reliability criteria violations for new overloads on the downstream transmission facilities under normal system conditions and contingency conditions. In order to eliminate the identified overloads, preferred mitigation options include reconfigure transmission lines, reconductor existing 138 kV and 230 kV lines, and upgrade the existing 69 kV lines. The applicant, therefore, needs to comply with the CEQA requirements for environmental analysis for modification of these downstream facilities for potential indirect impacts of the proposed interconnection projects.

DATA REQUESTS

Please provide an environmental analysis describing significant impacts that would result from the necessary electrical transmission system upgrades (identified below as #72 and #73, excerpted from the Phase II Cluster Study) and propose mitigation measures that could likely be adopted by the permitting agency.

- 72. Escondido Palomar 230 kV #1 and #2 lines (see Page 17 of the Appendix A C574 Individual Project Report dated August 24, 2011).
 - Reconductor Escondido Palomar 230 kV #1 and #2 lines with 900 ACSS/AW conductor
 - Relocate two overhead 69 kV circuits and convert to underground
- 73. Friars Doublet Tap 138 kV line (see Page 17 of the Appendix A C574 Individual Project Report dated August 24, 2011).
 - Reconductor 10,500 feet Friars Doublet Tap 138 kV line with 636 ACSR/AW conductor

Please provide the following information for <u>each</u> electrical transmission system upgrade (DR-72 and DR-73):

- a) The location, rating, and age of the line.
- b) A basic, layperson's discussion of the reconductoring process for the line, identifying the techniques used, equipment required, vehicles (land and air), personnel required, parking and staging areas needed, and time needed to complete the reconductoring. This shall include:

- Candidate locations (if available) and average acreage needed for tension and pulling stations, or, alternatively, the approximate number of pulling and tension sites and the average acreage per site
- Stringing method (slack or tension)
- Need for reel or other storage near the lines
- Method and access (cherry picker, climbing tower, etc) to unclip the old conductor, install sheaves, and clip in the new conductor and "tension" lines
- General methodology for any needed tree trimming and brush clearing
- c) How access to the line and towers would be accomplished, including identifying any existing or needed access road to pull sites and staging areas.
- d) If known, the location of any tower that would need to be modified or replaced, a basic description of the work that would be done to the tower (such as depth of ground disturbance and area of ground disturbance), and a description of the potential impacts of that work.
- e) Identity of any substations that will be added, expanded, or modified as a result of the reconductoring.
- f) Recent aerial photographs (less than 5 years old) and topographic maps of the applicable line segments (i.e., the segments that would be replaced) with the transmission towers plotted on the photographs.
- g) Identification of any sensitive habitats or special-status species occurrences along the route(s) by examining aerial photographs, conducting site visits, searching available databases (such as the California Natural Diversity Database), and literature searches.
- h) Legible map(s) depicting sensitive biological resources (sensitive habitats such as wetlands and/or riparian areas, special-status species occurrences, nesting areas, etc.) within 500 feet of the outside edges of the right of way for the transmission line corridor(s).
- The results of a Class III cultural resources inventory, which includes the following: (1) a literature and records search from the California Historical Resources Information System (CHRIS) for the proposed route corridor, as well as a ½-mile radius beyond the proposed route corridor boundaries. The results of this effort should include all literature and report information, as well as the number of prior cultural resources studies and the number of previously recorded cultural resources sites within the CHRIS search area. This information should be depicted on a legible map(s) showing all prior cultural resources study areas, as well as the locations of all previously recorded cultural sites; (2) the results of a Sacred Lands File search from the Native American Heritage Commission (NAHC) to identify any potential Native American cultural resources. Consultation with the NAHC should also include a request for a list of local Native American representatives, to whom letters should be sent requesting input/feedback regarding any concerns about resources in the proposed project corridor; (3) a Class III cultural resources pedestrian field survey (for both archaeological resources and historic-era built-environment resources) for the proposed route study area to identify and record any new cultural resources and/or update

records for any previously recorded resources that were relocated during the field survey; and (4) a Class III Cultural Resources Inventory Report, which would include the results of the CHRIS search, NAHC and Native American consultations, and field survey methods and results. This information should include maps, site forms, and any other supporting documentation, and must be submitted under confidential cover.

- j) If any portion of the line is more than 45 years old, describe modifications/upgrades, if any, that have been made previously and provide any information indicative of the historic significance of the existing transmission line segment to be reconductored.
- k) If an existing substation needs to be modified as a result of the proposed project, and it is more than 45 years old, describe modifications/upgrades, if any, that have been made previously, and provide any information indicative of the historic significance of the existing substation.
- I) Legible map(s) showing existing land uses, general plan and specific plan land use designations and zoning within 500 feet of the outside edges of the right of way, including identification of any school, hospital, daycare center, other sensitive receptors, and residential and commercial areas.
- m) Legible map(s) showing locations of contiguous areas of ground disturbance, including but not limited to: parking areas, storage/staging areas, tree trimming and/or brush clearing, access roads, pull sites, tower work, and substation work. Maps should also show nearby drainages and watercourses. Describe each area with amount of acreage disturbed, extent of disturbance, potential soil and water impacts, and feasible mitigation.
- n) Identification of any additional construction workers required for the reconductoring project beyond what was identified in Table 5.10-5 in the Socioeconomics Section of the AFC. If additional workers are required, include the number of workers needed by trade type.
- o) Identification of any potentially significant impact to the environment that may occur as the result of the reconductoring, construction technologies that are available to mitigate an impact, and mitigation measures that would reduce the impact to a less than significant level, including the standard environmental mitigation measures developed generically by the transmission owner and/or the CPUC for reconductoring projects.
- p) Identity of any agency or other interested party with jurisdiction or permit approval authority over any part of the reconductoring project. Identification of applicable Laws, Ordinances, Regulations, and Standards that would have to be conformed with for the anticipated system upgrades and any permits that would be required.
- q) In general, provide facts to support conclusions about the potential for impacts and feasible mitigation, including impact avoidance measures.
- r) Discuss the effects on traffic of required netting and/or closure of the roadways for overhead transmission line installation.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

1516 NINTH STREET, SACRAMENTO, CA 95814 1-800-822-6228 - www.energy.ca.gov

APPLICATION FOR CERTIFICATION FOR THE PIO PICO ENERGY CENTER, LLC

Docket No. 11-AFC-1 PROOF OF SERVICE (Revised 8/15/2011)

APPLICANT

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David Jenkins, Project Manager Pio Pico Energy Center, LLC 1293 E. Jessup Way Mooresville, IN 46158 djenkins@apexpowergroup.com

APPLICANT'S CONSULTANTS

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COUNSEL FOR APPLICANT

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INTERESTED AGENCIES

California ISO <u>e-mail service preferred</u> <u>e-recipient@caiso.com</u>

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Jennifer Jennings
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DECLARATION OF SERVICE

I, <u>Mraia Santourdjian</u>, declare that on, <u>September 30, 2011</u>, I served and filed copies of the attached <u>Pio Pico Energy Center (11-AFC-1) Data Requests 72 and 73</u> dated <u>September 30, 2011</u>. The original document, filed with the Docket Unit or the Chief Counsel, as required by the applicable regulation, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/piopico/index.html].

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

Circu	Сан тас гүрүгү
For se	rvice to all other parties:
Х	Served electronically to all e-mail addresses on the Proof of Service list;
X	Served by delivering on this date, either personally, or for mailing with the U.S. Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses NOT marked "e-mail service preferred."
AND	
For fili	ng with the Docket Unit at the Energy Commission:
Х	by sending an original paper copy and one electronic copy, mailed with the U.S. Postal Service with firs class postage thereon fully prepaid and e-mailed respectively, to the address below (preferred method); <i>OR</i>
	by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:
	CALIFORNIA ENERGY COMMISSION – DOCKET UNIT Attn: Docket No. 11-AFC-01 1516 Ninth Street, MS-4 Sacramento, CA 95814-5512 docket@energy.state.ca.us
OR, if	filing a Petition for Reconsideration of Decision or Order pursuant to Title 20, § 1720:
	Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chie Counsel at the following address, either personally, or for mailing with the U.S. Postal Service with first class postage thereon fully prepaid:
	California Energy Commission Michael J. Levy, Chief Counsel 1516 Ninth Street MS-14

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to the proceeding.

Sacramento, CA 95814 mlevy@energy.state.ca.us

Originally Signed by
Maria Santourdjian