

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

SAN FRANCISCO, CA 94102-3298



November 10, 2010

**Advice Letter 2191-E**

Clay Faber, Director  
Regulatory Affairs  
San Diego Gas and Electric  
8330 Century Park Court, CP32C  
San Diego, CA 92123-1548

**Subject: Notice of Proposed Construction of the Warner Springs to Santa Ysabel Transmission Line 685 Wood to Steel Pole Replacement Project in the County of San Diego, CA**

Dear Mr. Faber:

Advice Letter 2191-E is effective September 23, 2010.

Sincerely,

A handwritten signature in blue ink that reads "Julie A. Fitch".

Julie A. Fitch, Director  
Energy Division



Clay Faber  
Director – Regulatory Affairs  
8330 Century Park Court  
San Diego, CA 92123-1548

Tel: 858-654-3563  
Fax: 858-654-1788  
CFaber@semprautilities.com

**August 24, 2010**

**ADVICE LETTER 2191-E  
(U 902-E)**

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**SUBJECT: NOTICE OF PROPOSED CONSTRUCTION OF THE WARNER SPRINGS TO  
SANTA YSABEL TRANSMISSION LINE 685 WOOD TO STEEL POLE  
REPLACEMENT 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 Warner Springs to Santa Ysabel Transmission Line 685 Wood to Steel Pole Replacement Project (Project) in the County of San Diego, California. The purpose of this project is to improve the reliability of the TL 685 69kV transmission line (TL685) by replacing approximately 156 wood poles with steel poles and reconductoring the line for a distance of roughly 11 miles between Warner Substation and Santa Ysabel Substation. This line traverses fire prone terrain and is located in an area with potential for high winds. The new structures will be designed for extreme wind loading, will be fabricated using fire resistant materials, and will be constructed with increased vertical and horizontal conductor spacing. The increased spacing will reduce outage potential, improve contamination resistance, reduce estimated facility maintenance, maximize equipment life span potential, and provide superior avian protection. The new structures are also designed to accommodate future 12 kV and fiberoptic facilities. The immediate and long-term benefits from these pole replacements include improved electric reliability of the above mentioned infrastructure.

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.b. – “the replacement of existing power line facilities or supporting structures with equivalent facilities or structures,” Section III.B.1.e. – “the placing of new or additional conductors, insulators, or their accessories on supporting structures already built,” and 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 replace approximately 156 wood poles with a combination of light-duty and engineered direct bury Corten steel poles as well as micropile foundation Corten steel poles, and will reconductor the transmission line for a distance of approximately 11 miles. The new steel poles will range from approximately 56-97 feet tall, with an average height increase of approximately 14 feet, and a maximum height increase of approximately 41 feet. The new steel poles will generally be located as close as possible to the existing poles. New structures will be constructed using longer insulators and increased vertical and horizontal spacing. This will reduce outage potential, improve contamination resistance, reduce estimated facility maintenance, maximize equipment life span potential, and provide superior avian protection. The existing 1/0 CU bare strand conductor will be replaced with new multi-stranded steel core 636 ACSS/AW conductor. The new structures are designed to accommodate any future 12 kV and fiberoptic facilities.

Project benefits will include:

- Hardening a key transmission tie line against wildfires and extreme wind events
- Increased reliability and performance of the electric delivery system to meet the regional growing demand for energy.
- Enhance existing transmission line efficiency without increasing voltage.
- Avoidance of environmental impacts associated with using the existing utility corridor.

All transmission project power line facilities will be located entirely within existing SDG&E right-of-way. 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 October 11, 2010 and completion of the project is expected by April 30, 2011.

**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 filing become effective on September 23, 2010 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 either in writing or by facsimile and received by September 13, 2010, which is not less than 20 days of the date this Advice Letter was filed 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:

IMC Branch Chief  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue, Room 4002  
San Francisco, CA 94102

Copies should also be sent via email to the attention of Honesto Gatchallian ([jni@cpuc.ca.gov](mailto:jni@cpuc.ca.gov)) and Maria Salinas ([mas@cpuc.ca.gov](mailto:mas@cpuc.ca.gov)) of the Energy Division. A copy could also be mailed to the Energy Division-IMC Branch, Room 4005 (at the address shown above). It is also requested that a copy of the protest be sent via both e-mail and Facsimile to SDG&E on the same date it is mailed or delivered to the Commission (at the address shown below).

Attn: Rebecca W. Giles  
Regulatory Case Administrator  
San Diego Gas and Electric  
8330 Century Park Court – CP32D  
San Diego, CA 92123-1550  
Facsimile No. (858) 654-1788  
E-mail: [RGiles@semprautilities.com](mailto:RGiles@semprautilities.com)

**Notice**

G.O. 131-D, Section XI., Subsection 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 October 11, 2010, 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 August 24, 2010, 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. Paragraph B.3.

Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1788 or by e-mail to SDG&ETariffs.com

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CLAY FABER  
Director - Regulatory Affairs

(cc list enclosed)

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

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

Company name/CPUC Utility No. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Aurora Carrillo

Phone #: (858) 654-1542

E-mail: acarrillo@semprautilities.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2191-E

Subject of AL: Notice of Proposed Construction of the Warner Springs to Santa Ysabel Transmission Line 685 Wood to Steel Pole Replacement Project in the County of San Diego, California

Keywords (choose from CPUC listing): Transmission Lines, GO 131-D

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other Periodic

If AL filed 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<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation:

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: September 23, 2010

No. of tariff sheets: 0

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 proposed<sup>1</sup>: 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 filing, unless otherwise authorized by the Commission, and shall be sent to:**

CPUC, Energy Division

Attention: Tariff Unit

505 Van Ness Ave.,

San Francisco, CA 94102

mas@cpuc.ca.gov and jnj@cpuc.ca.gov

San Diego Gas & Electric

Attention: Megan Caulson

8330 Century Park Ct, Room 32C

San Diego, CA 92123

mcaulson@semprautilities.com

<sup>1</sup> Discuss in AL if more space is needed.

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

cc: (w/enclosures)

Public Utilities Commission

DRA

D. Appling  
S. Cauchois  
J. Greig  
R. Pocta  
W. Scott

Energy Division

P. Clanon  
S. Gallagher  
H. Gatchalian  
D. Lafrenz  
M. Salinas

CA. Energy Commission

F. DeLeon  
R. Tavares

Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell  
C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

CCSE

S. Freedman  
J. Porter

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham  
E. Hull

City of Poway

R. Willcox

City of San Diego

J. Cervantes  
G. Lonergan  
M. Valerio

Commerce Energy Group

V. Gan

Constellation New Energy

W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill  
J. Pau

Dept. of General Services

H. Nanjo  
M. Clark

Douglass & Liddell

D. Douglass  
D. Liddell  
G. Klatt

Duke Energy North America

M. Gillette

Dynegy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell  
M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg  
J. Heather Patrick  
J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard  
R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

OnGrid Solar

Andy Black

Pacific Gas & Electric Co.

J. Clark  
M. Huffman  
S. Lawrie  
E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

School Project for Utility Rate  
Reduction

M. Rochman  
Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

M. Alexander  
K. Cini  
K. Gansecki  
H. Romero

TransCanada

R. Hunter

D. White

TURN

M. Florio  
M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi  
N. Furuta  
L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

## **Attachment A**

### NOTICE OF PROPOSED CONSTRUCTION

**Project Name: THE WARNER SPRINGS TO SANTA YSABEL TRANSMISSION LINE 685  
WOOD TO STEEL POLE REPLACEMENT PROJECT**

**Date: August 24, 2010**

**SDG&E Advice Letter Number 2191-E**

#### **Proposed Project:**

The Warner Springs to Santa Ysabel Transmission Line 685 Wood to Steel Pole Replacement Project (Project) will replace approximately 156 wood poles with steel poles and will re-conductor the TL 685 69kV transmission line for a distance of approximately 11 miles between Warner Substation and Santa Ysabel Substation in north central San Diego County. This existing line traverses fire prone terrain and is located in an area with potential for high winds. The steel replacement structures are designed for extreme wind loading, will be fabricated using fire resistant materials, and will be constructed with increased vertical and horizontal conductor spacing to increase reliability.

#### **Project Description:**

The Project proposes to replace approximately 156 wood poles with a combination of light-duty and engineered direct bury Corten steel poles as well as micropile foundation Corten steel poles, and will re-conductor the transmission line for a distance of approximately 11 miles. The new steel poles will range from approximately 56-97 feet tall, with an average height increase of approximately 14 feet, and a maximum height increase of approximately 41 feet. The new steel poles will generally be located as close as possible to the existing poles. New structures will be constructed using longer insulators and increased vertical and horizontal spacing. This will reduce outage potential, improve contamination resistance, reduce estimated facility maintenance, maximize equipment life span potential, and provide superior avian protection. The existing 1/0 CU bare strand conductor will be replaced with new multi-stranded steel core 636 ACSS/AW conductor. The new structures are designed to accommodate any future 12 kV and fiberoptic facilities.

Project benefits include hardening a key transmission tie line against wildfires and extreme wind events, increased reliability and performance of the electric delivery system to meet the regional growing demand for energy, enhanced existing transmission line efficiency without increasing voltage, and avoidance of environmental impacts associated with using the existing utility corridor. The immediate and long-term benefits from these pole replacements include improved electric reliability of the transmission infrastructure.

All transmission project power line facilities will be located entirely within existing SDG&E right-of-way. 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.

"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.

**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 applicable facilities operate below 200kV. It is also exempt from the requirements of GO 131-D for a Permit to Construct (PTC) because it qualifies for an exemption under Section III.B.1.b. – “the replacement of existing power line facilities or supporting structures with equivalent facilities or structures,” Section III.B.1.e. – “the placing of new or additional conductors, insulators, or their accessories on supporting structures already built,” and Section III.B.1.g. – “power line facilities ... to be located in an existing franchise ... or public utility easement.” 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 September 13, 2010 which is 20 calendar days of 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	Rebecca W. Giles SDG&E Regulatory Affairs 8330 Century Park Ct. San Diego, CA 92123 AND	Julie Fitch California Public Utilities Commission Energy Division 505 Van Ness Avenue, Rm. 4002 San Francisco, CA 94102
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For assistance in filing a protest, please call the CPUC's Public Advisor in Los Angeles at [1-866-849-8391](tel:1-866-849-8391) OR E-mail: [public.advisor.la@cpuc.ca.gov](mailto:public.advisor.la@cpuc.ca.gov)

To request further information, please contact: Juanita Hayes, Government Affairs Manager, (760) 480-7650 or email [jhayes1@semprautilities.com](mailto:jhayes1@semprautilities.com)

**Attachment B**

**Advice Letter 2191-E**

**Notice Distribution List**

**PROPOSED CONSTRUCTION OF TL 685 WOOD-TO-STEEL POLE  
REPLACEMENT PROJECT**

**California Public Utilities Commission**

Julie Fitch  
505 Van Ness Avenue  
San Francisco, CA 94102

Nicholas Sher  
505 Van Ness Avenue  
San Francisco, CA 94102

Ken Lewis  
505 Van Ness Avenue  
San Francisco, CA 94102

**County of San Diego**

Supv Bill Horn  
1600 Pacific Highway  
3<sup>rd</sup> Floor  
San Diego, CA 92101

Supv Dianne Jacob  
1600 Pacific Highway  
3<sup>rd</sup> Floor  
San Diego, CA 92101

Planning Director  
5201 Ruffin Road, Suite B  
San Diego, CA 92123-1666

**California Energy Commission**

Melissa Jones  
Executive Director  
1516 Ninth Street, Mail Stop 39  
Sacramento, CA 95814

**Community Groups**

Pala-Pauma Community Sponsor Group  
PO Box 1273  
Pauma Valley CA 92061  
Joe Chisolm, chair

Julian Community Planning Group  
PO Box 249  
Julian CA 92036  
Jack Shelver, chair

Julian Chamber of Commerce  
PO Box 1866  
Julian CA 92036  
Mike Menghini, chair of the board of directors

**Newspapers of General Circulation**

San Diego Union-Tribune  
North County Times

**Neighborhood Notification**

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