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

In The Matter of the Application of SAN DIEGO
GAS & ELECTRIC COMPANY (U 902 E) for a
Permit to Construct Electrical Facilities: Cleveland
National Forest Power Line Replacement Projects

Application 12-10-009
(Filed October 17, 2012)

**PROTEST AND REQUEST FOR HEARING OF THE PROTECT OUR COMMUNITIES
FOUNDATION**

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July 26, 2013

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I. INTRODUCTION

Pursuant to Rule 2.6 Commission’s Rules of Practice and Procedure, the Protect Our Communities Foundation (“POC”) protests San Diego Gas and Electric’s (“SDG&E’s”) Amended Application and requests party status in the instant proceeding. POC further protests SDG&E’s request that its application be granted on an ex parte basis, and requests that evidentiary hearings be held in this proceeding.

II. PROCEDURAL BACKGROUND

On October 17, 2012 SDG&E submitted an Application for a Permit to Construct (“PTC”) the Cleveland National Forest Power Line Replacement Project. This project is to

reconstruct five 69 kV power lines running through the Cleveland National Forest, replacing the existing wood poles with steel poles on a one-to-one ratio.

On June 26, 2013 SDG&E submitted an Amended Application adding an alternative study corridor and additional details regarding potential alternatives for the CPUC's environmental review process.

In both its Application and its Amended Application, SDG&E asks that its request be granted on an ex parte basis without hearings.

III. BASIS FOR PROTEST

Although SDG&E frames its requested PTC as involving the in-kind replacement of existing 69 kV wood poles with safer and more reliable steel ones, the project actually represents a significant upgrade in the potential capacity, cost, and environmental impact of the lines in question. Standard 69 kV poles generally run from 50 to 70 feet in height. SDG&E's proposed steel poles, in contrast, will have a maximum height of 100 to 120 feet, with a 3 to 5 foot diameter base. This significant increase in size, cost, and environmental impact is not reasonable or justifiable as part of a one-to-one replacement of existing poles. Further, SDG&E has failed to justify the replacement process on a cost or necessity basis.

POC respectfully requests evidentiary hearings and a full reasonableness review of the cost, necessity and environmental impact SDG&E's proposed replacement project and pole upgrade. POC disputes SDG&E's assertion that Commission General Order 131-D precludes hearings regarding the project's cost and necessity, and requests that the parties be given the opportunity to submit briefs on this threshold legal issue.

