

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



**FILED**

10-15-10  
04:59 PM

In the Matter of the Application of San Diego  
Gas & Electric Company (U 902-E) for a  
Certificate of Public Convenience and Necessity  
for the Sunrise Powerlink Transmission Project

Application No. 06-08-010  
(Filed August 4, 2006)

**SEVENTH QUARTERLY PROJECT STATUS REPORT  
OF SAN DIEGO GAS & ELECTRIC COMPANY  
Q3 2010**

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October 15, 2010

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Q3 2010**

Pursuant to D.08-12-058<sup>1</sup>, San Diego Gas & Electric Company (“SDG&E”) hereby files<sup>2</sup> and serves the following quarterly project status report on the progress of the Sunrise Powerlink Transmission Project (“Sunrise”) in accordance with ordering paragraph #13.<sup>3</sup>

**I. THE DECISION DIRECTS SDG&E TO PROVIDE THE FOLLOWING INFORMATION**

Ordering paragraph #13, as well as in discussion in the body of the Decision,<sup>4</sup> directs SDG&E to provide project status updates, answering eight questions regarding the progress of the project.

The most significant developments of the past quarter were additional regulatory developments and the beginning of construction of non-transmission line facilities. As for

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<sup>1</sup> Referred to herein as the “Decision.”

<sup>2</sup> D.09-12-004 (finding of fact 1, ordering paragraph 1) clarified that these quarterly status reports should be filed.

<sup>3</sup> While the ordering paragraph does not specifically identify a date for the quarterly reports, as described on p. 1 of its first quarterly project status report submitted herein, SDG&E is planning to serve the quarterly reports on the 15<sup>th</sup> day of the month following each natural end of the calendar quarter, *i.e.*, April 15, July 15, October 15 and January 15. This allows the reports to capture the quarter-ending financial data that is not available on the final day of the quarter, but is available in the early part of each following month. SDG&E believes that this schedule will provide the Commission with the most current and accurate information available.

<sup>4</sup> Decision at 276-277.

regulatory developments, in September, the Commission and the U.S. Bureau of Land Management (“BLM”) approved the final Project Modification Report (“PMR”), accepting all modifications to the approved route and determining that no further environmental review was required.<sup>5</sup> Notices to proceed have been issued by the Commission and construction began in September on substation upgrades and construction yards. In addition, the U.S. Forest Service has rejected all appeals to its Record of Decision (“ROD”).

**1. Comprehensive project development schedule, including estimated project in-service date;**

SDG&E’s current project development schedule is attached to this report as Appendix A. The estimated project in-service date remains approximately June 2012.

**2. Any changes in project scope and schedule, including the reasons for such changes;**

There are no changes to the project scope, but the construction start date is now estimated to be Fall 2010. The construction start date change is due to delays in acquiring environmental permits.

**3. Specifically address the need for the Encina transformer, the cost of undergrounding in Alpine Boulevard, and the amount of undergrounding contemplated;**

The California Independent System Operator (“CAISO”) confirmed the need for the Encina transformer in a letter to ALJ Vieth and the Sunrise service list on April 28, 2009. The transformer is scheduled to be in-service on or before June 2012.

The undergrounding in Alpine Boulevard from Peutz Valley to the entrance to the Star Valley Option is approximately 5.85 miles in length under the current design. The Forest Service ROD selected the revised Star Valley Option for the eastern terminus of the underground line, which comprises an additional .35 miles of underground. The total estimated cost of

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<sup>5</sup> The Forest Service ROD (July 9, 2010) approving the Sunrise project also approved the PMR.

undergrounding in Alpine Blvd is \$244M for the Peutz Valley to the revised Star Valley Option. These costs do not include AFUDC, support costs or mitigation costs.

**4. Any engineering difficulties encountered in constructing the project;**

The terrain for much of the alignment is challenging. The inability to design access roads in certain areas due to environmental concerns has increased the need to access towers via helicopter. However, the engineering difficulties have not currently caused any change in cost, scope, or schedule.

**5. Total estimated project costs;**

The total estimated cost of the project remains unchanged at \$1.883 billion.

**6. Actual spending to date;**

The actual project spending through the end of the third quarter 2010 (9/30/10) is \$447.3 million.

**7. Any and all filings submitted to FERC for ultimate cost recovery through transmission rates; and**

No such filings have been submitted to date.

**8. Any additional information SDG&E believes relevant and necessary to accurately convey the status of the Sunrise project.**

**a. SDG&E-Citizens Energy agreement**

SDG&E and Citizens Energy (“Citizens”) reached a development and coordination agreement on May 11, 2009. This agreement is the result of discussions that follow from an earlier memorandum of agreement (“MOA”) regarding joint participation in the project, which was executed in 2006.<sup>6</sup> Under the agreement, Citizens would lease 50% of the transfer

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<sup>6</sup> The original MOA was executed March 16, 2006 between SDG&E, Imperial Irrigation District (“IID”), and Citizens Energy. IID subsequently withdrew from this agreement in November 2007. The MOA, and IID’s withdrawal, was described in SDG&E’s prepared testimony admitted into the record of this proceeding. See Ex. SD-4 at 8-9; Ex. SD-5 at I-22 to I-24; Ex. SD-6 at IV-10 to IV-11 (describing MOA); Ex. SD-5 at Appendix I-2 (executed MOA and supplement); Ex. SD-5, *(footnote continued onto next page...)*

capability of the Sunrise Powerlink from the Imperial Valley substation to the Imperial/San Diego County line for a term of 30 years. Citizens will prepay a lease amount for the 30 year term. Citizens agrees to request the CAISO to treat Citizens as a Participating Transmission Owner (“PTO”), turn over operational control of that capacity to the CAISO, and to seek acceptance by the Federal Energy Regulatory Commission (“FERC”) of transmission rates substantially similar to the rate SDG&E could recover if SDG&E constructed Sunrise without Citizens’ participation. Citizens’ transfer capability will revert back to SDG&E at the end of the 30 year lease.

The agreement does not change SDG&E’s renewable energy commitments, Citizens has agreed to use a rate substantially similar to the rate that would be charged by SDG&E, and Citizens agrees to invest at least 50% of its profits from the agreement in low-income programs in the Imperial Valley.

SDG&E filed an application (also signed and verified by Citizens Energy) on October 9, 2009 with the Commission under Section 851 of the Public Utilities Code for approval of the development and coordination agreement with Citizens (A.09-10-010). Also on October 9, SDG&E and Citizens Energy each filed petitions for a declaratory order with the FERC for approval of certain ratemaking and accounting treatment for the lease under this agreement (Docket Nos. EL10-2-000 and EL10-3-000). On December 17, 2009, FERC issued an order approving the ratemaking principles requested by Citizens (129 FERC ¶ 61,242), and a separate order acceptable to SDG&E approving an accounting treatment for the lease applicable to SDG&E’s transmission rates (129 FERC ¶ 61,233). A final decision on SDG&E’s Section 851 application is expected in the fourth quarter 2010.

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*(...footnote continued from previous page)* Appendix II at II-36; Ex. SD-35 at 1.31-34 (addressing effects of IID’s withdrawal). *See also*, Ex. ID-3 at 8-9 (describing IID’s withdrawal).

### **b. Import limitation at Miguel Substation**

Currently, imports into Miguel substation can be limited by the amount of generation that is being produced by the TDM and Intergen generators in Mexico. Low levels of generation restrict the amount of power that can be imported into Miguel substation because there is less generation that can be tripped—via a Special Protection Scheme (“SPS”)—in the Imperial Valley to mitigate an overload of one 500/230 kV transformer at Miguel substation for the loss of the other transformer.

In coordination with the CAISO, IID, CFE, and APS, SDG&E has modified the existing SPS to eliminate the need to limit imports into Miguel substation when the output of the TDM and Intergen plants is low. With the modified SPS, the maximum level of imports into Miguel substation is 1800 MW, regardless of how much power the TDM and Intergen plants are producing.

The SPS modifications were placed in service on August 3, 2009.

### **c. Procurement activities**

As detailed in previous quarterly reports, pre-construction activities such as procuring long-lead equipment, land right acquisition, environmental surveys, and detailed engineering design are moving forward in order to meet the construction start date. Equipment such as lattice towers, underground cable and transformers for the new substation have been ordered and deliveries of the towers and cable began in the second quarter of 2010. Other materials such as conductor, insulators, fiber optic cable, miscellaneous hardware, and steel poles have been ordered. A construction contractor was selected after careful evaluation of the RFP responses and a contract signed with PAR Electrical Contractors, Inc. in April 2010 to construct the overhead and underground portions of the transmission line. Right-of-way and other land

acquisition of private property is continuing and 70% of such property has been acquired to date. The majority of the remaining land acquisition is estimated to be completed by December 2010.

Notices to proceed have been issued by the Commission for construction activities in SDG&E's main construction yards and in existing substations. The activities in the main construction yards include installation of field offices and preparing material yards. The activities in the existing substations are related to upgrades required to accommodate the new Sunrise transmission line.

**d. Efforts to fulfill Sunrise renewables requirement**

In June 2009, SDG&E issued a Request for Offers ("RFO") seeking bids for renewable projects. As part of the RFO, SDG&E conducted targeted outreach for projects located in and surrounding the Imperial Valley. The results were robust, with SDG&E receiving more offers from the Imperial Valley and areas surrounding the Sunrise Powerlink than in any previous renewable solicitation. In total, the offers far exceeded the carrying capacity of the Sunrise Powerlink. The 2009 shortlist includes projects that require Sunrise to access the market and SDG&E is currently negotiating with those shortlisted bidders. Although the solicitation has closed, SDG&E continues to receive inquiries from Imperial Valley developers who did not participate in the 2009 RFO.

On July 29, 2010 SDG&E executed a second 20-year power purchase agreement with Centinela Solar Energy LLC. This PPA calls for Centinela to provide 45MW of solar energy from a facility to be located 90 miles east of San Diego in California's Imperial Valley. The new contract, combined with a 20-year agreement SDG&E signed in May for up to 130 MW of power from the Centinela project, will provide for a combined total of up to 175 MW that will flow over the Sunrise Powerlink. Both PPAs are scheduled to begin deliveries in 2014 and are awaiting Commission approval.

SDG&E's PPA with Imperial Valley Solar, LLC (IVS) continues to move forward along the path of project development. On August 12, 2010, by way of Resolution E-4352, the Commission approved SDG&E's amended and restated PPA with IVS. Generation from the 300 MW solar facility is expected to contribute an average of 650 GWh annually towards SDG&E's Annual Procurement Target beginning in December 2012. The facility will be located near Plaster City, California in the Imperial Valley. On September 29, 2010 the California Energy Commission, in a 5-0 vote, approved the IVS application to construct and operate the solar trough plant. On October 5, 2010 the Secretary of Interior Ken Salazar and California Governor Arnold Schwarzenegger announced that the Federal Bureau of Land Management is authorizing IVS to site the project on BLM land. Major environmental organizations such as The Natural Resources Defense Council, Defenders of Wildlife and The Wilderness Society issued supportive press releases.

SDG&E is poised to issue its 2010 RPS solicitation seeking additional bids for renewable energy pending Commission approval of its 2010 RPS Plan. The Plan was initially submitted to the Commission in December 2009. For the solicitation, SDG&E will place special emphasis on projects that will flow over the Sunrise Powerlink by (1) hosting a special Pre-Bid Conference in El Centro to lend support to developers in and around the Imperial Valley; (2) extending the solicitation's closing date by two weeks for projects that will flow over the Sunrise Powerlink; (3) waiving the required bid fee for shortlisted projects; and, (4) while shortlisting, applying locational preferences (as permitted by the Commission-approved least cost best fit evaluation methodology) for such a project if it scores high in the viability test and scores competitively relative to other non-Sunrise Powerlink projects. Market participants, including those who are planning projects in areas served by the Sunrise Powerlink are eager for the RFO to be issued, as SDG&E continues to field calls inquiring about timing of RFO issuance.

**e. Community outreach**

Moving into the fourth quarter 2010, SDG&E has shifted outreach priorities, placing a greater emphasis on construction-related activities and notifications. SDG&E continues to implement MM L-1a, the company's Construction Notification Plan. Prior to construction, SDG&E placed door hangers notifying residents of the imminent activities in areas surrounding the Temporary Alpine Field Offices and Alpine Main Construction Staging Yard.

The Sunrise Powerlink Public Affairs Team has opened an East County Community Relations office along Alpine Boulevard in the community of Alpine. Since construction on non-transmission infrastructure has begun, the office has been staffed full-time. The office will remain staffed at 40-hours per week levels for the duration of construction. SDG&E will continue to provide informative presentations, construction updates and project briefings to elected officials, key stakeholders and interested residents for the duration of the project.

**f. Environmental mitigation**

SDG&E continues to implement the construction and environmental mitigation measures identified in the Final Environmental Impact Report/ Environmental Impact Statement ("FEIR/EIS"). These measures cover a multitude of issue areas including biological, cultural, water, air, noise, land use, wilderness and recreational and agricultural resources.

As a first level of mitigation, SDG&E has attempted to avoid and minimize impacts to these issue areas through final design refinements as described in SDG&E's Project Modification Report ("PMR"). The PMR presents final engineering and design of the project and identifies the modifications that have been made since the adoption of the FEIR/EIS and approval of the project by the Commission and BLM. The modifications described in the PMR are the result of SDG&E's implementation of mitigation measures to avoid and minimize impacts to sensitive

resources, reduce or eliminate engineering constraints, and accommodate landowner location preferences where possible. On September 22, 2010, the Commission and BLM issued a determination finding that the changes proposed in the PMR are within the scope of the Certificate of Public Convenience and Necessity, and thereby incorporated the modifications into the approved project.

One of the significant mitigation measures requires that, after minimizing impacts to biological resources and prior to incurring any project impacts, a Habitat Acquisition Plan (“HAP”) must be prepared. The HAP details how the remaining impacts must be mitigated by the purchase of off-site habitat—often at an increased ratio of two or three to one. This plan identifies properties to be preserved and/or restored in areas along the project alignment. These properties are being coordinated with the governing wildlife and jurisdictional agencies. A Habitat Management Plan (“HMP”) has been prepared for the long-term management of the properties identified in the HAP. A second draft of the HAP was issued in February 2010, for review and comment by the relevant agencies, including the Commission, BLM, U.S. Forest Service, U.S. Fish & Wildlife Service, and CA Dept. of Fish & Game. SDG&E has negotiated the HAP and HMP requirements with each of the responsible agencies and is now awaiting final approvals as required by the appropriate mitigation measures.

A second set of significant mitigation measures address cultural and paleontological resources along the project alignment. To date, field surveys of the alignment have been completed and the final survey report has been finalized and approved by the appropriate agencies and Native American Tribal representatives. A second report, the Historic Properties Management Plan, which details how resources will be managed if impacted by the project construction, has been reviewed and approved by the appropriate agencies and Native American Tribal representatives. A third report, the Historic Properties Treatment Plan, is being prepared

to detail the few locations which will be impacted by the project construction and how those resources will be treated. This report is expected to be completed and approved by the appropriate agencies and Native American Tribal representatives by the first quarter of 2011.

**g. Project permitting**

The U.S. Forest Service issued its ROD approving the project on July 9, 2010. There were twelve timely appeals of the ROD filed by the public during the statutory appeal period provided under the Appeal Reform Act. The Forest Service conducted individual local informal disposition hearings for appellants on September 10-13, 2010. These hearings yielded no proposals to settle the appeals. On October 14, 2010, the Forest Service issued a decision rejecting all twelve appeals and upholding the ROD without additional conditions. Under the Appeal Reform Act, the project can go forward 15 business days after the date of the decision resolving appeals. Given the rejection of all appeals, the Forest Service is expected to issue a Special Use Permit for the project in the fourth quarter of 2010.

Significant efforts are continuing to obtain all other permits and approvals from jurisdictional agencies. The remaining outstanding permits and approvals are focused on water resource impacts and biological resource impacts.

Respectfully submitted,

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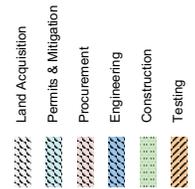
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October 15, 2010

# Appendix A

**Sunrise Powerlink Project  
Schedule Summary**

Activity	2007				2008				2009				2010				2011				2012							
	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D	Q1 J F M	Q2 A M J	Q3 J A S	Q4 O N D				
Land Acquisition																												
Permits																												
Mitigation																												
Procurement/Equipment Deliveries																												
500kV OH Transmission																												
Link 1 (Imperial Valley)																												
Link 2 (San Diego County)																												
Link 3 -Suncrest Substation																												
Link 4 - 230kV UG Transmission																												
Link 5 - 230kV OH Transmission																												
69kV Reconductoring																												
Substation Modifications																												



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the foregoing **SEVENTH QUARTERLY PROJECT STATUS REPORT OF SAN DIEGO GAS & ELECTRIC COMPANY** on all parties identified in Docket No. A.06-08-010 by U.S. mail and electronic mail, and by Federal Express to the assigned Commissioner(s) and Administrative Law Judge(s).

Dated at San Diego, California, this 15<sup>th</sup> day of October, 2010.

/s/ JOEL DELLOSA  
Joel Dellosa



California Public  
Utilities Commission

CPUC Home

## CALIFORNIA PUBLIC UTILITIES COMMISSION

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FILER: SAN DIEGO GAS & ELECTRIC COMPANY (U902E)  
LIST NAME: LIST  
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