

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



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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)

**EIGHTH QUARTERLY PROJECT STATUS REPORT
OF SAN DIEGO GAS & ELECTRIC COMPANY
Q4 2010**

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January 18, 2011

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Pursuant to D.08-12-058¹, San Diego Gas & Electric Company (“SDG&E”) hereby files² and serves the following quarterly project status report on the progress of the Sunrise Powerlink Transmission Project (“Sunrise”) in accordance with ordering paragraph #13.³

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,⁴ directs SDG&E to provide project status updates, answering eight questions regarding the progress of the project.

The most significant development of the past quarter was the beginning of construction on the Sunrise transmission line and Suncrest substation. In addition to the previous construction

¹ Referred to herein as the “Decision.”

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

³ 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 15th 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.

⁴ Decision at 276-277.

on non-transmission line activities, such as substation upgrades and construction yards, SDG&E began construction on the transmission underground portion in November and the Suncrest substation in December. Governor Schwarzenegger and other state and local leaders commemorated the start of construction with a groundbreaking ceremony in December. In October, the U.S. Forest Service issued a decision rejecting all appeals and upholding 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 have been no changes to the project scope. Construction began on the underground section on November 30, 2010 and on the Suncrest substation on December 17, 2010. The construction start date change from the anticipated June 2010 date is due to delays in acquiring environmental permits. The permits to begin construction on the overhead sections are expected in the first quarter of 2011.

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

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 fourth quarter 2010 (12/31/10) is \$612.9 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 2006.⁵ Under the agreement, Citizens would lease 50% of the transfer

⁵ 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 County/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 first quarter 2011.

(...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 have been moving forward in order to meet the construction start dates and needs. Equipment such as lattice towers, underground cable and transformers for the new substation have been ordered and 40% of the towers and all of the underground cable have been delivered. Other materials such as conductor, insulators, fiber optic cable, miscellaneous hardware, and steel poles have been ordered and approximately 30% have been delivered. The construction contractors, PAR Electrical Contractors for the overhead and underground sections and Beta Engineering for the Suncrest substation, have begun construction. Right-of-way and other land acquisition of private property is continuing and 90% of such property has been acquired or

orders of possession have been obtained to date. The few remaining properties are expected to be acquired by the end of the first quarter 2011.

Notices to proceed have been issued by the Commission for construction activities in SDG&E's main construction yards, in existing substations, the underground section, and Suncrest substation. Construction of field offices at the two main yards and the material yard preparation in Alpine have been completed. The material yard preparation at the other main yard is awaiting a notice to proceed from the CPUC.

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 November 10, 2010 SDG&E executed a second 25-year power purchase agreement with CSolar Development, LLC, a renewable energy company managed by Tenaska Solar Ventures. This PPA calls for CSolar Development to provide up to 130MW of solar energy from a facility located on a 900-acre site in the southern part of Imperial Valley. When operating at peak times, the ground-mounted photovoltaic solar power generating system will produce

enough electricity to meet the needs of approximately 44,000 California homes. The project is scheduled to begin deliveries in 2014.

SDG&E is poised to issue another RPS solicitation seeking additional bids for renewable energy pending Commission approval. 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 appear eager for the RFO to be issued, as SDG&E continues to field calls inquiring about timing of RFO issuance.

e. Community outreach

SDG&E remains committed to proactively and accurately disseminating information about Sunrise Powerlink activities on a timely and regular basis. With the start of transmission line construction on Link 4, SDG&E has shifted outreach priorities, placing a greater emphasis on construction-related activities and notifications. SDG&E continues to implement mitigation measure MM L-1a, the company's Construction Notification Plan.

As part of the public notification process, SDG&E and its contractors have begun distributing door hangers to property and business owners along Alpine Boulevard in Alpine. This process will continue for those directly impacted by construction as additional Notices to Proceed are issued.

On December 9, 2010, Governor Arnold Schwarzenegger, along with state and local officials and approximately 200 supporters marked the official start of construction of the Sunrise Powerlink with a groundbreaking ceremony at Rough Acres Ranch near Boulevard, California.

The recently-opened East County Community Relations office in Alpine 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, 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”) and will continue to avoid and minimize impacts throughout construction activities.

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 CPUC, BLM, 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 has received approval from the CPUC, U.S. Fish & Wildlife Service and CA Dept. of Fish & Game. Final approval is now being sought from BLM. SDG&E has proceeded with securing property rights for all properties identified in the HAP. A separate plan is being developed to specifically address the impacts on U.S. Forest Service lands.

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 end of 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. As of November 4, 2010, the project can move forward as allowed under the Appeal Reform Act. On December 3, 2010, the Forest Service issued the Special Use Permit to SDG&E for the project and is now allowing additional pre-construction activities to proceed on Forest Service lands. A Notice to Proceed with construction activities on Forest Service lands is expected in the first quarter of 2011.

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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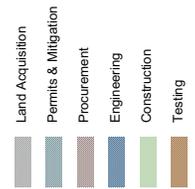
Attorney for
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January 18, 2011

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 **EIGHTH 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 18th day of January, 2011.

/s/ JOEL DELLOSA
Joel Dellosa



California Public
Utilities Commission

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