ATTACHMENT 3

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

August 18, 2008

Mr. David Kates
The Nevada Hydro Company, Inc.
2416 Cades Way
Vista, California 92083

Re: Application Completeness Review – Talega-Escondido/Valley-Serrano 500 kV Interconnect Project Proponent's Environmental Assessment (July 2008 version) -- Application No. A.07-10-005

Dear Mr. Kates:

The California Public Utilities Commission's (CPUC) Energy Division has conducted its completeness review of The Nevada Hydro Company's (TNHC) Talega-Escondido/Valley Serrano 500 kV Interconnect Project (TE/VS) Application for Public Convenience and Necessity (CPCN) (A.07-10-005) and the Proponent's Environmental Assessment (PEA) version dated July 22, 2008. The July 22, 2008 version of the PEA was filed with the CPUC to address a CPUC March 6, 2008 completeness review letter.

The Energy Division evaluates the completeness of a PEA to ensure that sufficient information has been provided by the Project Proponent for the CPUC to initiate its environmental analysis of the project, as required by the California Environmental Quality Act (CEQA). The Energy Division has 30 days in which to assess the completeness of the Project Proponent's application.

Based on our review of TNHC's Application and the July 2008 version of the PEA, the Energy Division concludes that the PEA for the Proposed Project remains incomplete at this time. Your most recent submittal addresses many of our previous review comments noted in our review letter dated March 6, 2008. However, there are some areas that require additional information.

A major deficiency of the PEA is that the Project Description lacks sufficient detail to allow a clear and comprehensive understanding all aspects of the Proposed Project. CEQA Guidelines §15124 states that "an accurate, stable, finite project description is an essential element of an informative and legally sufficient EIR under CEQA." The Project Description is the basis for subsequent analysis of all aspects of the project. As such, it must be both robust and accurate, and include all available information that an interested party would need to comprehend the nature and magnitude of the Proposed Project. If important aspects of a project cannot be described or are missing, or if the project is still evolving and not stable, it would be premature to initiate the environmental review process.

Project Description information that is insufficient, vague, confusing, or missing will result in the need for CPUC to make data requests of the Project Proponent and await responses to those requests. This will delay the environmental review process. Also, changes to or extensive clarifications of the Project Description at a later date may jeopardize the validity or utility of analyses conducted to that point. Redefining the project would require an amendment of the original application and necessitate re-initiating the environmental review.

The Project Description must encompass the entire project, including project elements that may be constructed by others or that are remote from the main project but necessary for it to operate as intended. It must allow a minimally informed reader to grasp the nature of the Proposed Project and all of its aspects that may have an environmental effect.

Attachment 1 to this letter elaborates on the areas deemed incomplete and identifies information required to conduct our environmental analysis for the Proposed Project.

The CPUC wishes to avoid unnecessary reproduction of materials. To that end, the previously submitted July 2008 PEA does not need to be reprinted in its entirety when it is revised and amended. A supplement to the July 2008 PEA may be submitted. However, because it requires extensive revision, please provide an entire replacement for Chapter 3 Project Description. For other Chapters or Sections that you may amend, it will be sufficient to provide a supplement document identified as such. It should be organized by Chapter, and should indicate the text (referencing original pages and paragraphs), tables, and figures of the July 2008 PEA that are being supplemented or amended. For text changes, please indicated additions and deletions. For figure revisions, it is recommended that you substitute a revised figure for the original. If, in your opinion, changes are of sufficient magnitude to warrant it, you should provide replacement Chapters or Sections as needed.

One set of responses to this letter and attachment should be provided to the Energy Division and one to our consultant, Aspen Environmental Group, in both hardcopy and electronic format. The responses need to be docketed at CPUC by the applicant as well, thereby establishing that they have been delivered and made part of the project record.

Upon receipt of the information requested, we will review it within 30 days and determine if it is adequate to accept the PEA and application as complete. We are available to meet with you to discuss the matters in this letter. You are urged to arrange such a meeting to discuss any aspects of this letter that you feel require clarification or elaboration.

At any point in the review process, the CPUC reserves the right to ask for additional information in the form of data requests. Any questions on the completeness review should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP
PURA V
Project Manager for TE/VS Interconnect
Energy Division CEQA Unit

cc: Ken Lewis, Acting CPUC Energy Division Director
Victoria S. Kolakowski, Administrative Law Judge
Chloe Lukin, CEQA Unit Supervisor
Nicholas Sher, CPUC Legal Division
Fritts Golden, Aspen Project Manager

Attachment 1. Completeness Review Details

TE/VS 500 kV Interconnect Project A.07.10.005

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Project Purpose and Need		
1. The Project Purpose and Need and Objectives section provides supporting documentation for why some of the features of project could achieve the project objectives, and then lists the project objectives. The section is generally repetitive in its provision of documentation supporting transmission and pumped storage generally, and lacking in analysis specific to the project. More detailed analysis is required to demonstrate how the specific features of the Proposed Project achieve each Project objective. Pumped storage is not part of the Proposed Project and is not relevant to the purpose and need of the project as presented. Refer to the Sunrise Powerlink Project PEA, Section 2 as an example of a statement of needs and objectives.	Please see Chapter 2. Chapter has been revised extensively	Chapter 2 is improved with regard to readability and substantiation of the achievement of project objectives. However, there remains a lack of technical support for Project Objectives 2 and 3. These two objectives state that the Proposed Project would "Provide 1,100 MW of incremental transmission import capability to San Diego." In the CPUC Sunrise Powerlink proceedings, the CAISO only credited the TE/VS Project with reducing local capacity requirements in San Diego by 625 MW. Since this concern was raised by the entity that will have operational control of the TE/VS Project, it needs to be addressed in a revised Chapter 2. Please provide modeling or other information to substantiate achievement of Project Objectives 2 and 3 as described in the PEA.
2. The Project Purpose and Need and Objectives section lacks organization to facilitate review. For the sake of clarity, and to ensure completeness, the section should state each project objective and provide documentation and analysis of how the project specifically satisfies each objective, in turn.	Please see revised Section 2.1.1	See item 1, above.

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1. Many of the figures supplied for the purposes of illustrating the project components do no correspond to written descriptions in the text. It is unclear to CPUC which project is being proposed: the project described in the text, or the project described in the figures. These two elements must be harmonized to represent accurately what project components are being proposed.		The text of Chapter 3 and the figures throughout the PEA still lack internal consistency. The Project Description is generally lacking in descriptive detail on critical project components. The Project Description should be based on text, with reference to figures for clarification or illustration. In many instances, the text is silent regarding components shown on figures. Figures should be checked for consistency with the text and with each other. All project-related elements shown on a figure should be labeled or a legend should be provided. The north orientation on the figures changes from figure to figure, yet the north indicator on the figures is difficult to read in most cases. This can lead to confusion. Please correct this problem in a revised Chapter 3. The proposed tower locations presented in PEA Chapter 3 and attachments differ substantially from the tower locations provided in the earlier draft of the PEA (submitted February 8, 2008).The text of Chapter 3 is unclear about whether the US Forest Service has been consulted regarding these new tower locations. Similarly, the text of Chapter 6 (Alternative No. 6) acknowledges that the Case Springs Substation site may not be acceptable to the Department of the Navy, Marine Corps Base Camp Pendleton. CPUC requests confirmation of agency concurrence or anticipated concurrence with the Proposed Project's facility locations on land under the agency's jurisdiction. A lack of concurrence from the U.S. Forest Service on the tower locations and from the Marine Corps on the substation site brings into question the feasibility of the project and the accuracy of the Project Description and will cause delays in the CEQA process.
a. Figure 3-6 shows a segment of the Talega-Escondido 230 kV transmission line that would be removed and replaced as a component of the proposed TE/VS project, yet the text describes a requirement to bundle the existing circuit rather than remove and replace it. This figure does not show the new 69 kV towers that would likely be required per the text.		a. Concerns about the accuracy of Figure 3.6.2 remain. Aspen provided TNHC with GIS files for the Talega-Escondido centerline. Please provide a figure that accurately represents the Talega-Escondido upgrades, including the Lilac Substation and the 69 kV line relocation discussed in the text.
b. Figure 3-6 (plate 8) on page 3-26 shows a "Rainbow Substation", which does not currently exist, and is not described in the text of Section 3 as being a component of the Talega-Escondido 230 kV transmission upgrades associated with the proposed TE/VS project.		b. Figure 3.6.3-2 (plate 8) on page 3-113 of the PEA still contains the non-existent "Rainbow Substation" and still contains figure text describing removal and replacement of the existing conductor, which is not the project as described in the text. Figure 3.6.3.1 also shows a Rainbow Substation and the previously proposed Valley-Rainbow transmission line. Figure 4.6.1-14 (plate 4) shows a "Proposed Rainbow Substation". The PEA should not include graphic and non-graphic references to non-existent, non-proposed system elements.

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c. Figure 3-14 shows one set of towers, rather than two, for the looped interconnection between the Northern (Lake) substation and SCE's Valley-Serrano transmission line, which is described in the text (page 3-36) as requiring two sets of towers. In addition, this figure depicts tower spans at greater distances (some more than 2,000 feet) than described in the text (page 3-7) as the approximate maximum tower span. Finally, this figure depicts the Southern substation in a different location than what is represented on other figures and in the text.	c. Please see Attachment 1 for revised tower placement details. Text has been revised to match.	c. Figure 3.1.1-1 provides an improved graphical representation of the Proposed Project. However, this figure, the GIS database provided by TNHC, and Attachments 1 and 3 of the PEA create new inconsistencies between the description of the project in the text and the representation of the project on the figures. No explanation is given why the Proposed Project appears to begin at Milepost 0.5 rather than MP 0.0. The location of the SCE Valley-Serrano line to which the Proposed Project would connect is not shown. In discussions with CPUC, the Project Proponent represented that the project would be constructed and put into operation in phases, and that the connection between the 500 kV Interconnect transmission line and the proposed Santa Rosa Substation would temporarily be on overhead transmission lines until a future date, when they would be reinstalled underground. The PEA fails to convey this information or to provide any detail; if it is overhead lines, as indicated in a meeting with CPUC on March 20, 2008, please discuss. Also, identify and describe the transition tower that would be required to transition from underground to overhead. Figure 4.6.1.7 shows an alignment similar to the Proposed Alignment plus several alternative alignments and substation locations that are not part of the Proposed Project. Please eliminate figures or the elements in figures that depict alternate project alignments and facility locations that are not part of the Proposed Project for which CPUC approval is being sought. .

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2. Graphic items that are required:		
a. Map(s) that show the locations and dimensions of ancillary facilities including laydown, pulling stations, storage yards, and fly yards.	a. Please see Attachment A, and relevant sections in Chapter 3.	a. It is assumed that the Applicant meant to refer to Attachment 1 rather than "Attachment A". As no symbol legend is provided for Attachment 1, it is unclear whether the required construction elements have been identified. Please provide a symbol legend and any other missing information in a revised Attachment 1.
b. Map(s) that show more clearly, and at a more appropriate scale, proposed access roads.	b. Please see Attachment 3	b. Please provide an index map for the figures in Attachment 3. Attachment 3 currently contains a collection of detailed tower and work area locations on individual aerial photos; however there is no overall key showing the location and orientation of each sheet and the relative location of towers to one another. Confirm whether all sheets are oriented with north at the top. In the absence of information to the contrary, it is assumed that the entire area indicated on these illustrations will be permanently disturbed.
c. Map(s) that show any anticipated trees to be removed.	c. Please see Attachment 3	c. See item 2b above.
d. Detailed maps that show individual tower locations and the locations of specialty poles/towers at a scale of no less than 1 inch equals 400 feet (1" = 400')	d. Please see Attachment 1	d. Attachment 1 provides detailed location and vegetation impact data for Tower Nos. 1 through 138 and associated access roads but does not provide data for towers 1001 through 1021, 2001 through 2006, nor 3001 through 3005. In addition, Attachment 1 does not include a symbol legend. Please provide the missing information identified as an addendum to Attachment 1.
e. Maps and diagrams that show required and anticipated SCE and SDG&E system upgrades, areas of temporary and permanent impacts, and facility dimensions.	e. Please see available	e. Maps for all non-Talega-Escondido upgrades must be provided. Please obtain these from SCE and SDG&E through a data request, indicating that the CPUC environmental document is required to have maps for these facilities.
f. Maps identifying specific towers that would require helicopter construction.	f. Please see Attachment 1	f. Concern sufficiently addressed, unless the Forest Service does not agree with tower locations and the towers designated for helicopter construction.

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g. Maps showing details of the right-of-way in the vicinity of settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route and facilities. Maps should be of an appropriate scale that potential impacts may be identified.	g. Please see Chapter 4.11	g. Figures in Section 4.11 show settled and recreational areas in the project vicinity, but do not show details of the proposed project ROW in the vicinity of all settled areas, parks, recreational areas, scenic areas, and existing electrical transmission lines within one mile of the proposed route and facilities. None of the maps in Section 4.11 show project facilities overlain on existing land uses as requested. Please provide the requested figures as an addendum to Chapter 4.11.
h. Temporary and permanent disturbance areas should be clearly marked on all impact maps.	h. Done	h. Areas from the construction of helipads and/or helicopter staging/refueling areas are not identified on any figures. If they are within Construction Work areas, this should be indicated. If helipads are required at any tower locations, these should be indicated. The text of Section 3.8.1.4 states "Final siting of staging areas for the TE/VS Interconnect line would be conducted with the input of the helicopter contractor, and affected private landowners and land management agencies. The size of each staging area would be dependent upon the size and number of towers to be installed. Staging areas would likely change as work progresses." However, it is critical to an adequate description of the Proposed Project to identify areas of temporary impact due to helicopter use. Please identify helipads and/or helicopter staging/refueling areas on Figure 3.1.1-1 and in Attachment 3, at a minimum. In addition, please provide GIS shapefiles for helipads if not previously provided. Please clarify whether Attachment 3 identifies temporary and permanent impacts or only permanent impacts.
i. GIS data layers for the Proposed Project preliminary engineering and locations of temporary and permanent disturbance are not provided.	i. Please see disks, attached	i. Certain GIS data conflict with the in-text Project Description. Please see item 1c above.
j. Please include mile markers ("Mileposts") on all figures and in all in-text references to specific project features. For the sake of clarity, please number Mileposts from north to south, consistent with the Sunrise Powerlink Project DEIR/DEIS Section E.7.1.	j. Done	j. In-text references to Mileposts in the Project Description and Environmental Impacts sections were not made as requested. Please provide detailed description of the project in a Milepost-by-Milepost fashion, commensurate with the discussion of the Sunrise Powerlink Imperial Valley Link in Section B.2.1 and the LEAPS Transmission-Only Alternative in Section E.7.1.1 of the Draft EIR/EIS, each of which provides a mile-by-mile description of the route and includes a description of relevant land uses, road crossings, and important landmarks. Refer to specific pole/tower numbers when describing transition towers and elsewhere, as relevant. Include the portion of the project that links the main portion of the TE/VS Interconnect in the vicinity of South Main Divide Road with the Santa Rosa Substation and sub-transmission lines connecting to the local distribution system.

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3. Please provide unique pole/tower identification numbers on all maps and for all in-text discussions, where relevant.	Please see Attachment 1	Project description discussions rarely mention pole/tower numbers and never mention project Mileposts, as requested above. See item 2j above. Attachment 1 uses stationing to indicate tower locations. Please provide Mileposts as well to allow for cross-referencing to other figures and the text. These can be on the figures or in a look-up table.
4. Please provide the approximate distances between conductors (both horizontally and vertically) and from the ground to the lowest conductor.	Please see Chapter 3	Text of Chapter 3 states "Minimum design clearance from conductor to ground is 14' vertical, 11'3" horizontal, 33' phase to phase horizontal and 37' vertical." This sentence is confusing. Please confirm that the statement means that phase-to-ground clearances are 14 vertical feet and 11.25 horizontal feet, and that phase-to-phase clearances are 33 horizontal feet and 37 vertical feet.
5. Please explain whether lighting would be required at the new substation facilities.	Please see Chapter 3	There is no discussion of outdoor lighting requirements at the Lake Switchyard or the Santa Rosa Substation. Please correct this deficiency in a revised Chapter 3.
6. Please identify the proposed towers that would be installed via helicopter, what type of helicopter is to be used for what activity, and where helicopters would be staged and refueled.	Please see Figure 1.1.1-1	It is presumed that the applicant meant to refer to Figure 3.1.1-1. It is unclear from Figure 3.1.1-1 where helicopters would be staged and refueled. Please clearly identify in the text and on the figure where helicopters would be staged and refueled. In addition, please see item 2h above. Section 3.8.2.2.2 Foundations describes tubular steel pole foundations as being typically up to 10 feet in diameter and 60 feet in depth (yielding approx. 4,700 cu. ft or 160 cu. yds of excavated rock). In Section 3.8.2.2.4 Tower and Pole Erection, the text states that all construction work would be completed by hand at remote work sites where helicopter installation would occur. Please explain the construction of the foundation and whether all necessary equipment could be lifted to the site by helicopter. Also, discuss disposal of the excavated material.
7. Please define what types of vegetation clearing may be required (including the approximate number and size of trees that may need to be removed), how each type of vegetation removal would be accomplished, the type of equipment typically used for vegetation clearing, and how restoration would be carried out for areas of temporary disturbance.	Please see Attachment 3	Please see item 2h above regarding disturbance areas for required helipads and/or helicopter staging areas.

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8. Please provide the locations and general or average distance between pull and tension sites, the estimated length, width, and area of pull and tension sites, and the type of equipment required at these sites.	Please see Attachment 1	Attachment 1 does not include a legend explaining the symbols used on the strip maps at the top of each sheet. Please provide a legend sheet. In addition to apparent tower locations, there are various rectangles shown. Please identify what these represent. Pull sites are identified in Attachment 3, however these sites appear inadequate to pull and tension the transmission line as designed, and these sites are not included in Attachment 1. In addition, for <u>every figure presented in the PEA the text should describe what the figure is intended to illustrate.</u> Figures ought to accompany and accurately represent text, not substitute for it. Please also clarify whether conductors at helicopter-constructed towers would be helicopter-tensioned.
9. Please provide a description of the method of pole/tower installation, including types of equipment required, actions taken to maintain a safe work environment, what would be done with soil removed from a hole/foundation site, details of any excavations (e.g., auger holes) required, how poles/towers and associated hardware would be assembled, and the total permanent footprint for all poles/towers.	Please see Chapters 3.6.1.1 and	Concerns about pole/tower installations remain. It is unclear where tubular steel poles would be installed and where lattice steel towers would be installed. Figure 3.1.1-1 should identify which towers are TSPs and which are LSTs. Please clarify whether any of the TSPs would be constructed by helicopter. If so, please explain the mechanism of tower foundation drilling/excavation of up to 10 feet in diameter and up to 60 feet deep as stated in Chapter 3.8.2.2.2. It is unclear whether equipment capable of drilling/excavating such a large hole could be delivered to the site by helicopter. In addition, please clarify whether an additional construction staging area beyond the area of disturbance shown for each structure in Figure 3.1.1-1 and Attachment 3 would be required for each helicopter-constructed structure. This information should be provided in a revised Chapter 3.
10. Please quantify the approximate cubic yardage of material to be removed from trenches or excavations, the amount to be used as backfill, and the amount and location of offsite disposal.	Please see Chapter 3	Please quantify the approximate cubic yardage of material to be removed from boring the 1.7-mile underground GIL (including any additional underground segment that would be required between the main portion of the Interconnect southwest of South Main Divide Road and a transition station to the northeast of South Main Divide Road). Please discuss how the material would be used onsite or removed and disposed of offsite.
11. Please include a table detailing all project components and facilities including number of poles, number of towers, distance of project segments, structure type, height, ROW details, number of helipads, and miles of proposed access roads. Please include details related not only to the TE/VS transmission line, but all reasonably foreseeable future projects, related projects, and required system upgrades.	Please see Attachment 1	Concern adequately addressed for the Proposed Project, however this information is required as well for all required system upgrades including upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site.

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12. Please include a table detailing all project equipment to be used during construction, including time and duration of use. See Sunrise Powerlink Project DEIR/DEIS, Section B.4.7, Table B-14 as an example of the detail required.	Please see Chapter 3.8.5	Please revise this table to also provide the number of hours per day and the number of days per week vehicles would be in use, as is listed in the sample Table B-14 and requested previously.
13. Table 3-8 (page 3-120), Construction Schedule, appears to be partially in German (e.g., Tage, Do, Mi) and uses European-style dating. Please provide a U.S. English version of this table. Please include a schedule for ROW acquisition.	Modified. Please see Chapter 3.8.6	Concern adequately addressed for this submittal. However, please revise the schedule according to when the revised PEA sections requested in this completeness review are to be submitted to the Docket Office.
14. Please describe project operation and maintenance activities in detail. Refer to Sunrise Powerlink Project DEIR/DEIS, Section B.5 for an example of the detail required.	Please see Chapter 3.9	Section 3.9.1.2.1 states "climbing inspections of transmission structures would be conducted annually." Please clarify what percentage of the transmission structures would be inspected by climbing on an annual basis and how towers would be selected for climbing inspections.

Subject	July 2008 PEA Location per Proponent	CPUC Response August 2008
Alternatives		
1. The Applicant rejects certain alternatives based on the alternatives' "failure to substantially fulfill the identified objectives for the proposed projects." However, no explanation of which objectives are fulfilled, if any, is provided. Furthermore, the only objective identified as being unfulfilled is expansion of the State's backbone transmission and generation systems, making it difficult to evaluate whether these alternatives indeed "substantially" fail in meeting project objectives. Alternatives are required to be considered under CEQA if they would feasibly attain <u>most</u> of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the proposed project.	Please see revised Chapter 6	Chapter 6 is much improved; however, little explanation of which of the Proposed Project's individual objectives are fulfilled or not fulfilled by an alternative is provided. Although Table 6.2-1 identifies each retained alternative's ability to fulfill the identified project objectives, the applicant must substantiate (in the text of Chapter 6) how each retained alternative fulfills most project objectives <u>and how each rejected alternative fails to fulfill most project objectives</u>. Please provide this information. Chapter 6 repeatedly states that an alternative "would not allow for the attainment of the Project's primary goals and objectives." Please explain and substantiate how identified alternatives fulfill or fail to fulfill each of the eleven TE/VS and LEAPS project objectives stated in Chapter 2.
2. The SRPL is eliminated by the applicant as a reasonable alternative to the Proposed Project (TE/VS) for failing to meet project objectives. However, all of the TE/VS project objectives, as identified in Section 2 of the PEA, would be satisfied by SRPL. The applicant notes that SRPL would not "facilitate the transmission of hydroelectric energy." However, transmission of hydroelectric energy is not one of the stated objectives of the TE/VS project, but rather one of the stated objectives of the LEAPS project, which is not part of the application before the CPUC. If the SRPL were to be rejected as an alternative to the TE/VS project, it ought to be rejected on the grounds that it does not eliminate or substantially lessen any of the significant environmental impacts of the Proposed Project, should that be the case.	Please see revised objectives in Chapter 2	Please see item 1 above.

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Detailed Discussion of Environmental Effects		
1. System upgrades and reasonably foreseeable future phases identified in the PEA are not given adequate impact analysis. Impact analysis must be performed for all project components, including reasonably foreseeable and related project components. a. For example, the text (page 3-36) notes that the Northern substation will be constructed to accommodate SCE's future expansion circuits. However, environmental impacts analysis is not performed in Section 6 for these reasonably foreseeable future expansion projects, as required per the PEA checklist. b. Similarly, environmental impacts analysis is not performed for the reasonably foreseeable SDG&E system future transmission expansion that is built into the design of the Southern substation. As identified on page 3-58, the arrangement of the substation allows for a future fifth bay. c. Upgrades to the SCE system, as identified on pages 3-60 and 3-67 as being reasonably foreseeable future phases, are not evaluated for their potential environmental impacts. These required projects include upgrades to the Etiwanda-San Bernardino 220-kV, the San Bernardino-Vista 220-kV, and the Etiwanda-Vista 220-kV transmission lines. In addition, the three single-circuit overhead transmission lines possibly required as a part of the SCE system upgrades, as identified in Table 3-3 on page 3-82, are not described adequately nor is impact analysis performed. d. Finally, upgrades to SDG&E's system, including upgrades at Escondido and Peñasquitos substations, are not evaluated for their potential environmental impacts.	Please see Chapters 5 and 6.	Impacts for system upgrades other than the Talega-Escondido 230 kV upgrades are not discussed. It is anticipated based on the description of upgrades that impacts would be minimal; however, impacts from all required system upgrades must be addressed. Please provide a discussion of impacts related to upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site. Please include this information as an addendum to Chapter 5. Please provide the CPUC with copies of the final Facilities Study for the SCE system interconnection. SCE provided the CPUC with a copy of the preliminary Facilities Study for the interconnection of the Lake Elsinore Advanced Pumped Storage Project that was provided to Nevada Hydro Company on December 1, 2006 as a part of the SRPL EIR/EIS process. SCE indicated that the Facilities Study was preliminary because although SCE had received comments from TNHC, comments had not been received from the CAISO and a Facilities Study review meeting had not been held at the time of submittal. Please provide any update of this Facilities Study. Please also provide any Facilities Study update for the SDG&E system interconnection since the February 27, 2006 version (indicated as a final version on its cover letter) provided to CPUC from SDG&E.

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Affected Property Owners		
1. A list of property owners within 300 feet of the TE/VS transmission line and LEAPS generation facilities is provided in the CPCN application. However, the list does not appear to and must include landowners within 300 feet of the Talega-Escondido transmission upgrades and any other upgrades to the adjacent utility systems required as a part of the Proposed Project.	Please see Chapter 7	Please confirm in a cover letter submitted with the Final PEA that the Mailing List in Chapter 7 contains landowner information for all components of the project, including required system upgrades at SDG&E's Peñasquitos Substation and SCE's Serrano, Valley, and Mira Loma Substations, the Etiwanda Generating Station, and SCE's Santiago Peak Communications Site. Supplement or replace Chapter 7 in the PEA submittal, as required.