ATTACHMENT 2

STATE OF CALIFORNIA ARNOLD SCHWARZENEGGER, *Governor*

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

March 6, 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 -- 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 Proponent's Environmental Assessment (PEA) filed on February 8, 2008 with CPUC's Docket Office.

The Energy Division uses the CPUC's Information and Criteria List and the CPUC's PEA Checklist as the basis for evaluating the completeness of the PEA and ensuring that sufficient information has been provided for the CPUC to complete its environmental analysis for the project as required by the California Environmental Quality Act (CEQA). Section 15100 of the CEQA Guidelines provides the lead agency 30 days to assess the completeness of the project proponent's application.

After completing our review of TNHC's Application and PEA for the Project, the Energy Division concludes that the PEA is incomplete.

Attachment A presents specific CPUC rules and regulations applicable to completeness review and defines which items were found to be incomplete. Attachment B provides additional details on issue areas that were found incomplete and points out information required to conduct our environmental analysis for this project. Appendix C is a copy of the CPUC's PEA Checklist that identifies in more detail the information required to be in the PEA.

Revised text should be provided in an easy-to-follow strikeout/insert format so as to indicate changes from the original submittal. Any figures that are added or revised should be clearly identified as such. One set of responses should be sent to the Energy Division and one to our consultant, Aspen Environmental Group, in both hardcopy and electronic format.

Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items. At any point in this 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: Sean Gallager, CPUC Energy Division Director
Chloe Lukin, CEQA Unit Supervisor
Ken Lewis, CPUC Energy Division
Nicholas Sher, CPUC Legal Division
Arnold B. Bodgorsky, Esq., TNHC Attorney
Fritts Golden, Aspen Project Manager

Table 1. Information Criteria List Requirements

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
Sec. I. General Application Requirements				
Form and Size	Rule 2	Docket Office	Yes	Checked by Docket Office
Title and Docket Number	Rule 3 per ICL (Rule 2.1 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Signatures	Rule 4 per ICL (Rule 2.2 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Verification	Rules 5 & 6 per ICL (Rule 2.4 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Copies	Rule 7 per ICL (Rule 2.5 per Rules of Practice and Procedure)	Docket Office	Yes	Checked by Docket Office
Contents	Rule 15	Docket Office	Yes	Checked by Docket Office
Articles of Incorporation	Rule 16	Docket Office	Yes	Checked by Docket Office
Financial Statement	Rule 17	Docket Office	Yes	Checked by Docket Office
Sec. II. Applications for CPCN				
Construction Or Extension of Utility Facilities	Rule 18	CPUC Energy Division/ Aspen	No	Please refer to comments in Attachment B.
Exercise of Franchise Rights	Rule 19	N/A	N/A	Rule 19 or like section on exercise of franchise right not included under Rules of Practice and Procedures
Exercise of Franchise Rights Not Yet Granted	Rule 20	N/A	N/A	Rule 20 or like section on exercise of franchise right not yet granted not included under Rules of Practice and Procedures

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
Common Carrier Certificates	Rule 21	N/A	N/A	Does not apply to Proposed Project
Warehouses	Rule 22	N/A	N/A	Rule 22 or like section on warehouses not included under Rules of Practice and Procedures
Sec. V. Environmental Information Requirements				
4. Significance				
In evaluating significance, both primary or direct and secondary or indirect effects shall be considered. Primary effects are those immediately related to the project. Secondary effects are consequences associated more closely with the primary effects than to the project itself. New suburban growth may be a primary effect of an electric transmission line extension for example, whereas possible effects, such as traffic congestion and consequent air pollution, would be secondary effects.	CPUC ICL Section V.4	CPUC Energy Division/ Aspen	No	Certain effects of the project are not clearly defined. Please refer to Attachment B.
5. Incorporation by Reference				
The PEA may incorporate material by reference when to do so would reduce bulk without impeding agency or public review. Any such incorporation shall, however, include a summary of the matter to which reference is made and an explanation of its relevance to the project. No material may be incorporated by reference unless it is reasonably available, or is made reasonably available for inspection by the Commission and potentially interested members of the public.	CPUC ICL Section V.5	CPUC Energy Division/ Aspen	No	Although cross-references are provided, materials incorporated by reference are not adequately summarized with regard to their relevance to the project.
7. Format for PEA				
Cover Sheet	CPUC ICL Section V.7	CPUC Energy Division/ Aspen	Yes	Included in PEA
Table of Contents			Yes	Included in PEA
PEA Summary			Yes	Included in PEA
Project Purpose and Need			Yes	Included in PEA
Project Description			Yes	Included in PEA
Environmental Setting			Yes	Included in PEA
Environmental Impact Assessment Summary			Yes	Included in PEA
Detailed Discussion of Significant Impacts			Yes	Included in PEA
Appendices (if any)			Yes	Included in PEA

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
8. Cover Sheet				
The cover sheet shall consist of a single sheet containing: • the title "Proponent's Environmental Assessment," • the caption of the proceeding for which the PEA has been prepared, • the docket number of the proceeding, and • the name, address, and telephone number of the project proponent.	CPUC ICL Section V.8 [PEA Checklist p. iii]	CPUC Energy Division/ Aspen	No	The PEA must accurately present the project that is in the CPNC Application. The CPCN Application is for the TE/VS 500 kV Interconnect Project. The Lake Elsinore Advanced Pumped Storage Project (LEAPS) does not seek certification through the CPUC process. Inclusion of LEAPS on the PEA cover, in page headers, and elsewhere in the PEA in ways that suggest it is the project for which the applicant seeks certification is confusing. Discussion of the LEAPS project should be clearly defined as a sub-part of the Proposed Project: a “related” or “reasonably foreseeable consequence” of the TE/VS Interconnect Project.
9. PEA Summary				
Each PEA shall contain a summary, which shall briefly state the major conclusions, areas of controversy, and major issues, which must be resolved (including the choice among reasonably feasible alternatives and mitigation measures, if any). The summary should normally be two to ten pages in length, but may be shorter or longer depending upon the complexity of the project and the number and significance of the project's impacts.	CPUC ICL Section V.9 [PEA Checklist p.1-1]	CPUC Energy Division/ Aspen	No	The choice among reasonably feasible alternatives is not identified as a significant issue to be resolved.

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
10. Project Purpose and Need				
All PEAs shall contain an explanation of the objective or objectives of the project. This shall be accompanied by an analysis of the reason why attainment of these objectives is necessary or desirable. The analysis should normally not exceed a page or two in length except where significant or potentially significant project impacts have been identified in the Environmental Impact Assessment Summary required by Section V, 13. Where such impacts have been identified, the analysis of project purpose and need must be sufficiently detailed to permit the Commission to independently evaluate the project need and benefits in order to accurately consider them in light of the potential environmental costs. This requirement may be satisfied by reference to specific portions of the project application, which address this issue.	CPUC ICL Section V.10 [PEA Checklist p. 2-1]	CPUC Energy Division/ Aspen	No	TNHC's objectives are listed, but are insufficiently analyzed. Please refer to comments on Project Purpose and Need in Attachment B.
11. Project Description				
The description of the project shall contain the following information, but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact. (a) The precise location and boundaries of the project shall be shown on a detailed map, preferably topographic. The location shall also be shown on a regional map. (b) A general description of the project's technical, economic, and environmental characteristics considering the principal engineering proposals and supporting public service facilities. The requirements of this section may be satisfied by reference to specific portions of the project application, which address these issues and include this information.	CPUC ICL Section V.11 [PEA Checklist pp. 3-1 through 3-13]	CPUC Energy Division/ Aspen	No	Please refer to comments on the Project Description in Attachment B for deficiency comments. Data requests may be required for further clarification of the Project components.
12. Environmental Setting				
The PEA must include a description of the environment in the vicinity of the project and within the potential range of impact as it exists before commencement of the project. Both local (site-specific) and regional perspectives must be provided. The description should include some discussion of the topography, land use patterns, and general biological environment. Detailed descriptions should be limited to those elements of the environment, which may be subject to a potentially significant impact. The setting must, however, be sufficiently described to permit an independent evaluation by the Commission of elements, which could be impacted by the project. All elements of the environmental setting necessary to fully understand impacts identified as significant or potentially significant in the Environmental Impact Assessment Summary required by Section V, 13 shall be described in detail.	CPUC ICL Section V.12 [PEA Checklist p. 4-1]	CPUC Energy Division/ Aspen	No	The environmental setting for the entire project, including required system upgrades, must be provided. Similarly, the environmental setting for reasonably foreseeable future and related projects must be provided.

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
13. Environmental Impact Assessment Summary				
Every PEA shall contain an Environmental Impact Assessment Summary in the form attached [CEQA Initial Study Checklist]. This summary shall be employed as an aid in determining the scope and detail of the environmental setting and impact analyses. All impacts identified as significant or potentially significant must be explained in detail in accordance with the criteria stated in Section V, 14. All elements of the environmental setting necessary to fully understand such impacts shall be described in detail in accord with Section V, 12. All other answers provided on the form should be briefly explained in the space provided or on additional sheets attached to the Summary as necessary. These brief explanations should contain no detailed studies, research, or analysis. Each enumerated question shall be answered "yes," "no," "potential," or "unknown" in column 1 labeled "IMPACT" to indicate whether the project involved will result either directly or indirectly in any impact of the type identified. If it is felt that there will or may be an impact of the type listed, an attempt to quantify the impact must be made by the proponent and indicated in column 2 labeled "SIGNIFICANCE." If it can be seen with certainty that the impact or potential impact will be significant, the answer "significant" shall be given. If the impact or potential impact is difficult to quantify but a substantial body of opinion can be expected to consider the impact to be significant, the answer "potentially significant" shall be given. If despite good faith efforts the proponent is unable to provide any reasonable estimate of the significance of the impact the answer "unquantified" shall be given. If it can be seen with certainty that the impact or potential impact under consideration will not be significant, the answer "insignificant" shall be given.	CPUC ICL Section V.13	CPUC Energy Division/ Aspen	Yes	The checklist is included in Appendix A.
14. Detailed Discussion of Significant Impacts				
The PEA shall include a detailed discussion of all project impacts and potential impacts of significance. The cumulative effect of the project's impacts shall also be discussed in detail where such cumulative effect is significant. Impacts should be discussed in the order of importance or significance. Any data and analyses shall be commensurate with the importance of the impact, with less important material summarized, consolidated, or incorporated by reference in accord with Section V, 5. Distinctions between factual findings and assumptions or subjective judgments should be made clear. In addition to the analyses of individual project impacts, the PEA for all projects which may have a significant effect on the environment shall address the following:	CPUC ICL Section V.14 [PEA Checklist pp.6-1 through 6-2]	CPUC Energy Division/ Aspen	No	Please refer to specific comments under Detailed Discussion of Environmental Effects in Attachment B.

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(a) Mitigation Measures Proposed to Minimize the Significant Effects. Describe significant, avoidable, adverse impacts, including inefficient and unnecessary consumption of energy, and measures to minimize these impacts. The discussion of mitigation measures shall distinguish between the measures, which are proposed by project proponents to be included in the project and other measures that are not included but could reasonably be expected to reduce adverse impacts. This discussion shall include an identification of the acceptable levels to which such impacts will be reduced, and the basis upon which such levels were identified. Where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Energy conservation measures, as well as other appropriate mitigation measures, shall be discussed when relevant.	CPUC ICL Section V.14a [PEA Checklist pp.6-1 through 6-2]	CPUC Energy Division/ Aspen	No	Mitigation measures may be required for impacts of the full project, including required system upgrades, reasonably foreseeable future phases, and related projects. Please refer Project Description and Detailed Discussion of Environmental Effects in Attachment B.
(b) Alternatives to the Proposed Action. Describe all reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project, and why they are rejected in favor of the ultimate choice. The specific alternative of "no project" must also always be evaluated, along with the impact. The discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any significant environmental effects, even if these alternatives substantially impede the attainment of the project objectives, and are more costly.	CPUC ICL Section V.14b [PEA Checklist pp.6-1 through 6-2]	CPUC Energy Division/ Aspen	No	Please refer to specific comments on Alternatives in Attachment B.
(c) The Growth-Inducing Impact of the Proposed Action. Discuss the ways in which the proposed project could foster economic or population growth, either directly or indirectly, in the surrounding environment. Included are projects, which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may further tax existing community service facilities so consideration must be given to this impact. Also, discuss the characteristics of some projects, which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.	CPUC ICL Section V.14c [PEA Checklist pp.6-1 through 6-2]	CPUC Energy Division/ Aspen	Yes	Discussed in PEA Section 9
(d) Organizations and Persons Consulted. The PEA shall include a list of persons, and their qualifications, responsible for compiling the detailed information for each area of environmental concern, and a discussion of the methods used to produce such information.	CPUC ICL Section V.14d	CPUC Energy Division/ Aspen	Yes	PEA Chapter 11 includes a List of Preparers, and CPCN Appendix D supplements preparers' qualifications.
15. Affected Property Owners				

Requirement from CPUC Information and Criteria List (ICL)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
The names and mailing addresses of all owners of land over, under or on which the project, or any part of the project, may be located, and owners of land adjacent thereto, shall be listed in an appendix to the PEA.	CPUC ICL Section V.15	CPUC Energy Division/ Aspen	No	A mailing list for owners within 300 feet was included in Appendix G. However, it is believed that this list lacks names of landowners within 300 feet of all related project facilities. See Attachment B, Affected Property Owners for details.

Table 2. GO 131-D Requirements

PEA Requirements (from GO 131-D)	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
(a) A detailed description of the proposed transmission facilities, including the proposed transmission line route and alternative routes, if any; proposed transmission equipment; such as tower design and appearance, heights, conductor sizes, voltages, capacities, sub-stations, switchyards, etc.; and a proposed schedule for certification, construction, and commencement of operation of the facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Please refer to comments on Project Description in Attachment B.
(b) A map of suitable scale of the proposed routing 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.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	The PEA includes general maps of the items listed. Items to be included on more detailed supplemental maps are defined in the Project Description section of Attachment B.
(c) A statement of facts and reasons why the public convenience and necessity require the construction and operation of the proposed transmission facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Refer to Project Purpose and Need in Attachment B for specific comments.
(d) A detailed statement of the estimated cost of the proposed facilities.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	Yes	Cost of the proposed facilities is not a CEQA issue. Cost esti-mates are provided in the CPCN Application.
(e) Reasons for adoption of the route selected, including comparison with alternative routes, including the advantages and disadvantages of each.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Refer to comments on Alternatives in Attachment B.
(f) A schedule showing the program of right-of-way acquisition and construction.	GO 131-D Section IX. A.	CPUC Energy Division/ Aspen	No	Refer to item 19, Project Description in Attachment B.

Table 3. PEA Checklist Requirements

CPUC PEA Checklist for Transmission Line and Substation Projects (January 8, 2008)[a]	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments

Cover Sheet
- Should be a single sheet with the following information:
  - Title "Proponent's Environmental Assessment";
  - Proceeding for which the PEA has been prepared;
  - Docket number of the proceeding; and
  - Name, address, and telephone number of the project proponent.
	PEA Checklist p. iii [CPUC ICL Section V.8]	CPUC Energy Division/ Aspen	No	The PEA must accurately present the project that is in the CPNC Application. This is the TE/VS Interconnect Project. It does not include the Lake Elsinore Advanced Pumped Storage Project (LEAPS). Inclusion of LEAPS on the PEA cover, in page headers, and elsewhere in the PEA in ways that suggest it is part of the project is confusing.

Table of Contents	PEA Checklist p. iv	CPUC Energy Division/ Aspen	Yes	Complete (revise as necessary if PEA is revised).

1. PEA Summary
- Typically from two to ten pages in length depending on complexity of the project and the number and significance of the project's impacts.
- PEA summary should include, but is not limited to, the following:
  - The major conclusions of the PEA;
  - Any areas of controversy;
  - Any major issues that must be resolved including the choice among reasonably feasible alternatives and mitigation measures, if any;
  - A description of inter-agency coordination, if any; and
  - A description of public outreach efforts, if any.
	PEA Checklist p. 1-1 [CPUC ICL Section V.9]	CPUC Energy Division/ Aspen	No	The choice among reasonably feasible alternatives is not identified as a significant issue to be resolved.

2. Project Purpose and Need - Analysis of project objectives, purpose and need must be sufficiently detailed to permit the Commission to independently evaluate the project need and benefits in order to accurately consider them in light of the potential environmental impacts. - Explanation of the objective(s) and/or Purpose and Need for implementing the Proposed Project. - Analysis of the reason why attainment of these objectives is necessary or desirable. Such analysis must be sufficiently detailed to inform the Commission in its independent formulation of project objectives, which will aid any appropriate CEQA alternatives screening process.	PEA Checklist p. 2-1	CPUC Energy Division/ Aspen	No	TNHC's objectives are listed, but are insufficiently analyzed. Please refer to comments on Project Purpose and Need in Attachment B for deficiency comments.

CPUC PEA Checklist for Transmission Line and Substation Projects (January 8, 2008)[a]	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
3. Project Description	PEA Checklist pp. 3-1 through 3-13	CPUC Energy Division/ Aspen	No	Refer to comments in Attachment B, Project Description.
3.1 Project Location - Geographical Location: County, City (provide project location map[s]). - General Description of Land Uses within the project site (e.g., residential, commercial, agricultural, recreation, traverses vineyards, farms, open space, number of stream crossings, etc.) - Describe if the Proposed Project is located within an existing property owned by the Applicant, traverses existing rights of way (ROW) or requires new ROW. Give the approximate area of the property or the length of the project that is in an existing RO"W or which requires new ROWs.			No	Project location of required system upgrades, reasonably foreseeable future phases, and related projects are not described in detail.
3.2 Existing System			Yes	The existing system is described.
3.3 Project Objectives			No	Refer to Attachment B, Project Purpose and Need.
3.4 Proposed Project			No	The Proposed Project must include descriptions of all reasonably foreseeable future phases or other reasonably foreseeable consequences of the Proposed Project. Refer to items 2.i, 17, 21 in Attachment B, Project Description.
3.5 Project Components (Transmission Line, Poles/Towers, Conductor/Cable, Substations)			No	Refer to items 1-3, 5, 6, 9, 14, 16, and 17 in Attachment B, Project Description.
3.6 Right-of-Way Requirements			No	Refer to item 22 in Attachment B, Project Description.
3.7 Construction Staging Areas, Work Areas, Access Roads and/or Spur Roads, Helicopter Access, Vegetation Clearance, Erosion and Sediment Control and Pollution Prevention during Construction, Cleanup and Post-Construction Restoration, Pull and Tension Sites, Pole Installation and Removal, Conductor/Cable Installation, Trenching, Trenchless Techniques, Substation Construction, Construction Workforce and Equipment, Construction Schedule			No	Refer to items 4, 7, 8, 10-15, 19, and 21 in Attachment B, Project Description.

CPUC PEA Checklist for Transmission Line and Substation Projects (January 8, 2008)[a]	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments

3.8 Operation and Maintenance
- Describe the general system monitoring and control (i.e., use of standard monitoring and protection equipment, use of circuit breakers and other line relay protection equipment, etc.).
- Describe the general maintenance program of the Proposed Project, include items such as:
  - Timing of the inspections (i.e., monthly, every July, as needed);
  - Type of inspection (i.e., aerial inspection, ground inspection); and
  - Description of how the inspection would be implemented. Things to consider, who/how many crew members; how would they access the site (walk to site, vehicle, ATV); would new access be required; would restoration be required, etc.
- If additional full-time staff would be required for operation and/or maintenance, provide the number and for what purpose.
				Refer to items 14 and 21 in Attachment B, Project Description.

3.9 Applicant Proposed Measures			Yes	APMs are listed in Appendix B.

4. Environmental Setting
- For each resource area discussion, the PEA must include the following:
  - A description of the physical environment in the vicinity of the project (e.g., topography, land use patterns, biological environment, etc.)
  - Local environment (site-specific)
  - Regional Environment
  - A description of the regulatory environment/context
  - Federal
  - State
  - Local
- Detailed descriptions should be limited to those resource areas which may be subject to a potentially significant impact.
	PEA Checklist p. 4-1 [CPUC ICL Section V.12]	CPUC Energy Division/ Aspen	No	The environmental setting for the entire project, including required system upgrades, must be provided. Similarly, the environmental setting for reasonably foreseeable future and related projects must be provided.

5. Environmental Impact Assessment Summary	PEA Checklist pp. 5-1 through 5-4	CPUC Energy Division/ Aspen	Yes	Incorporated by reference. (Resource-specific data requests will be made once the PEA is complete.)
6. Detailed Discussion of Significant Impacts	PEA Checklist pp.6-1 through 6-2 [CPUC ICL	CPUC Energy Division/ Aspen	No	Please refer to specific comments under Detailed Discussion of Environmental Effects in Attachment B.

CPUC PEA Checklist for Transmission Line and Substation Projects (January 8, 2008)[a]	Authority	Person(s) Responsible For Review	Complete?	Deficiency Comments
6.1 Mitigation Measures Proposed to Minimize Significant Effects - Within the Environmental Impact Assessment Summary, for impacts where a number of mitigation measures are available to reduce impacts, each mitigation measure should be discussed and the basis for selecting a particular mitigation measure stated.	Sections V.14a-c]		No	Mitigation measures may be required for impacts of the full project, including required system upgrades, reasonably foreseeable future phases, and related projects. Please refer Project Description and Detailed Discussion of Environmental Effects in Attachment B.

6.2 Description of Project Alternatives and Impact Analysis
- Provide a summary of the alternatives considered that would meet most of the objectives of the Proposed Project and an explanation as to why they were not chosen as the Proposed Project.
- Alternatives considered and described by the Applicant should include, as appropriate:
  - System or facility alternatives
  - Route alternatives
  - Route variations
  - Alternative locations.
- A description of a "No Project Alternative" should be included.
- If significant environmental effects are assessed, the discussion of alternatives shall include alternatives capable of substantially reducing or eliminating any said significant environmental effects, even if the alternative(s) substantially impede the attainment of the project objectives, and are more costly.
			No	Please refer to specific comments on Alternatives in Attachment B.

6.3 Growth-Inducing Impacts			Yes	Provided in Section 9.
7. Other Process-Related Data Needs - Excel spreadsheet that includes all parcels within 300 feet of any project component with the following data: APN number, owner mailing address, and parcel's physical address.	PEA Checklist	CPUC Energy Division/ Aspen	No	Landowners within 300 feet of Talega-Escondido upgrades and other system upgrades not included. Spreadsheet not provided in Excel format.

a The CPUC PEA Checklist is included for reference as Attachment C.

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.
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.

Project Description

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.

    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.

    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.

    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.

    d. Figures depicting transmission hardware show a vacant position for a “future” circuit (e.g., Figures 3-11 and 3-32). Figure 3-13 shows a future overhead line. However, the text does not describe a future additional 500 kV circuit as a reasonably foreseeable future phase as required per the PEA checklist. A description of any future phase of the TE/VS project must be provided in the PEA, including an estimated schedule of construction and preliminary engineering work. Figures that do not accurately represent the project should be omitted or amended and explained in the text.

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.
   b. Map(s) that show more clearly, and at a more appropriate scale, proposed access roads.
   c. Map(s) that show any anticipated trees to be removed.
   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')
   e. Maps and diagrams that show required and anticipated SCE and SDG&E system upgrades, areas of temporary and permanent impacts, and facility dimensions.
   f. Maps identifying specific towers that would require helicopter construction.
   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.
   h. Temporary and permanent disturbance areas should be clearly marked on all impact maps.
   i. GIS data layers for the Proposed Project preliminary engineering and locations of temporary and permanent disturbance are not provided.
   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.
3. Please provide unique pole/tower identification numbers on all maps and for all in-text discussions, where relevant.
4. Please explain whether guying would be required across a road.
5. Please provide the approximate distances between conductors (both horizontally and vertically) and from the ground to the lowest conductor.
6. Please explain whether lighting would be required at the new substation facilities.
7. 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.
8. 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.
9. 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.
10. Please provide a description of how construction crews and equipment would be transported to and from the pole site location, including vehicle type, number of vehicles, and estimated number of trips and hours of operation.
11. 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.

12. 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.
13. Please provide a description of Hazardous Waste and Spill Prevention Plans and a discussion of how construction waste would be disposed.
14. Please provide a description of night lighting requirements and controls for both construction and operation.
15. Please provide a description of how cleanup and post-construction restoration would be performed, including personnel, equipment, and methods.
16. The Talega-Escondido upgrade is described as both approximately 47 miles long and approximately 51 miles long. Please correct this inconsistency.
17. 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.
18. 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.
19. 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.
20. 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.
21. Please identify who would be responsible for designing, constructing, and maintaining upgrades.
22. Please explain why a 500-foot wide right-of-way is considered necessary, and whether, where, and when future expansion of facilities proposed in the ROW is anticipated.

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.
2. The use of Sunpath is incorrect: (page 8-19) "Sunrise (Sunpath) Powerlink Project (SDG&E Proposed Alignment)." Sunpath is generally reserved as a name for a combination of the Sunrise Powerlink (SRPL) and the Greenpath Transmission Projects, and it should not be applied in reference to the Sunrise Powerlink Project alone.
3. 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.

4. Page 8-27 states "Any transmission route that identifies the Imperial Valley as either a starting or end point would not serve to increase capacity to or facilitate the generation or transmission of hydroelectric energy. Since the SRPL project fails to meet the Applicant's objectives, the Tehachapi transmission project is not a feasible alternative," and then goes on to state that the Tehachapi transmission project is a "related" project rather than an "alternative". Please explain the reference to the Imperial Valley and SRPL in this statement. Furthermore, if the Tehachapi Renewable Transmission Project is a related project, as identified, potential cumulative effects of the proposed project in combination with the Proposed Project must be evaluated specifically in Section 6.

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.
2. Per the PEA checklist, either Section 5 or Section 6 must include a list of projects (i.e., past, present and reasonably foreseeable future projects) within the Project Area that the applicant is involved in and a list of projects that have the potential to be proximate in space and time to the Proposed Project. Cumulative impacts analysis must be performed specifically with regard to these lists.
3. The Detailed Discussion section does not make clear what specific contribution the Proposed Project would have toward cumulative environmental impacts. For example, in the Agricultural Impacts section, there is no mention whatsoever of the Proposed Project, yet there is a determination made about the level of cumulative impact of the Proposed Project plus other reasonably foreseeable development. In addition, it is unclear how the Proposed Project would avoid contributing to a cumulatively significant impact on aesthetic resources, noise, recreation, and traffic based on the impact conclusions presented in the Sunrise DEIR. In addition, the geographic scope of cumulative impacts must be specifically defined for each issue area.

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.

Attachment C is the January 11, 2008 PEA Checklist for Transmission Line Projects available in Portable Document Format (PDF) at the following location:

http://docs.cpuc.ca.gov/Published/Graphics/77813.PDF