APPENDIX A UTILITY COORDINATION LETTERS



January 27, 2010

Mr. Harry Persaud Project Manager County Of Orange, Public Works 300 N. Flower Street Santa Ana, Ca 92703

Subject: La Pata Road Proposed Alternative Route Extension San Onofre-Santiago Nos. 1 and 2 (220kv T/L R/W)

Reference: Memorandum dated September 29th, 2009 - Technical Analysis of Alternative La Pata Alignment (Talega Alternative).

SCE has completed its review of the proposed alternative alignment as identified by Exhibit B in the referenced Memorandum.

SCE has determined that the proposed alternative would cause significant adverse impact to SCE's existing transmission system and its right-of-way corridor. As the County of Orange is aware this transmission system and right-of-way is the only SCE link between Orange County and The San Onofre Nuclear Generating Station. The proposed alternative would require the relocation of at least two, and possibly up to four towers because of the increase in length necessary to span the grading and roadway. Outages for the 220kv system in question are controlled by the California Independent System Operators. Because outages of these 220kv systems impact the operations of San Onofre and the SCE transmission system to Orange County, outage windows are seasonal and outages for these four circuits cannot all be obtained in one calendar year. Outage windows, even when scheduled, are not guaranteed and may be cancelled creating the need for a third year of circuit outages and tower relocations.

In addition to the relocations required by the alternative the physical impact to the SCE right-of-way is very significant. The alternative introduces substantial side-slope and roadway area within the SCE right-of-way which would restrict our use of the right-of-way in the future. As stated above this is the only SCE transmission corridor linking San Onofre to Orange County and one which could not be replaced.

As the County of Orange is aware of, the integrity of SCE's transmission system to support its customers is paramount, and based on the adverse effects and acceptable alternative routes present we do not find this to be an acceptable alternative.

If you have any questions please call me at contact me at <u>Anjeanette.barrett@sce.com</u> or (714) 934-0829.

Sincerely

Anjeanette Barrett Land Services Agent

cc: Steve Nelson – SCE

Jennifer Ward – SCE

 $Pam\ Thomas-SCE$

Martin Mauch - SCE

Marty Peterson – Utility Specialists



Michael Hardesty Land Management Rep.

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January 19, 2010

Mr. Harry Persaud Public Works Department County of Orange 300 North Flower Street Irvine, CA 92072-4048

Re: Avenida La Pata – Project Variation

Dear Mr. Persaud:

San Diego Gas & Electric Company (SDG&E) has reviewed the information provided by the County of Orange (County) for the Project Variation (previously referred to as the Talega Alignment) that the County is analyzing in its Environmental Impact Report (EIR) for the proposed Avenida La Pata project. SDG&E does not support the Project Variation for the following reasons:

- 1) The Project Variation adversely impacts a greater number of SDG&E electric facilities thus causing longer transmission outages. Accordingly, electric customers will be without electric service for a longer duration. In addition, the Project Variation impedes facility access.
- 2) Based on engineering requirements, the Project Variation will require SDG&E to obtain new easements for the facilities. The acquisition of land rights to accommodate this alignment results in additional time and cost incurred by SDG&E.
- 3) Structures beyond the immediate area and the scope of the Project Variation may also be affected. Taller, more visible structures may be required to meet conductor to ground clearances. The County should include the potential aesthetic impacts of the Project Variation in its environmental analysis.

- 4) In order for SDG&E to perform the work required for the Project Variation, SDG&E must obtain a Permit to Construct (PTC) from the California Public Utilities Commission (CPUC) as well as authorization from the CPUC under what is known as Section 851. These regulatory processes alone would likely take a minimum of 18-24 months. Additional time would be needed to obtain other requisite permits and complete the work.
- 5) All impacts associated with the relocation of utility facilities as well as long term impacts with regards to structure pads and access roads must be analyzed in the EIR. SDG&E should not bear the burden of mitigation resulting from impacts associated with this alternative. Also, mitigation cannot be located within SDG&E's right-of-way. Also, the mitigation must be consistent with the CPUC's General Order 95 vegetation clearance requirements for SDG&E's facilities.

Sincerely,

Michael Hardesty

Land Management Representative

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