

PUBLIC UTILITIES COMMISSION505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

September 5, 2006

Shannon Keithley
Environmental Project Manager
San Diego Gas and Electric
8315 Century Park Court, CP21G
San Diego, CA 92123-1548**RE: Otay Mesa Power Purchase Agreement Transmission Project: Variance Request #14**

Dear Ms. Keithley:

San Diego Gas and Electric (SDG&E) submitted Variance Request #14 on August 30, 2006 to utilize five stringing/pull sites not previously identified in the EIR and modify two existing stringing/pull sites to better accommodate stringing and wire pulling activities on Segment 2. SDG&E requests approval from the CPUC to use the stringing/pull sites as depicted on Attachments A through E of the variance request. **This Variance Request is approved by CPUC based on the following factors:**

- Use of the previously approved pull sites would result in a pull angle that exceeds SDG&E's design standards or would require substantial grading due to the steep slopes.
- The proposed stringing/pull site locations are on SDG&E property and/or within SDG&E's easement with the exception of sites 5 and 6 which are on San Diego Unified Port District property. SDG&E will not use stringing/pull sites 5 and 6 until written permission from the property owner to utilize workspace shown on Attachment E is provided to the CPUC.
- The proposed stringing/pull site locations were surveyed for sensitive plant and wildlife species. Site 2 is located within coastal sage scrub and was determined by SDG&E to be unavoidable during stringing activities. A pre-activity survey report was submitted to the USFWS and the CDFG for their review and approval in accordance with SDG&E's NCCP and mitigation measure MM B-2a. No other sensitive resources were identified in the other stringing sites.
- No known cultural resources have been identified within or adjacent to proposed work areas.
- **The conditions noted below shall be implemented by SDG&E and its contractors:**
 - All project mitigation measures, compliance plans, and permit conditions shall be implemented during site preparation, uses, and restoration of the stringing/pull sites.
 - SDG&E shall obtain permission in writing from the San Diego Unified Port District prior to using stringing sites 5 and 6 (adjacent to steel pole 510). SDG&E shall provide verification of landowner agreements prior to using the sites.
 - The four corners of each stringing/pull site shall be staked in the field according to the dimensions listed on pages 2 and 3 and as depicted on Attachments A through E of Variance Request #14.

- Upon completion of Segment 2, pull sites shall be returned to pre-construction contours and seeded with appropriate seed mix. If seeding cannot occur within the stipulated seeding window, appropriate stabilization measures shall be determined by the Environmental Monitor.

Sincerely,

Jensen Uchida

Jensen Uchida
CPUC Environmental Project Manager

cc: A. Keochekian, Dudek.