



Robert C. Jackson
General Manager & Director
Construction & Engineering
Sunrise Powerlink Project

1010 Tavern Road
Alpine, CA 91901

Tel: 858.654.6451
Fax: 858.503.5078

RCJackson@semprautilities.com

February 7, 2012

Mr. Donn Christiansen, District Ranger
U.S. Department of Agriculture, Forest Service
Descanso Ranger District
3348 Alpine Boulevard
Alpine, CA 91901

Subject: Response to the Notice of Non-Compliance Dated February 2, 2012:
Sunrise Powerlink Project
Failure to Make Timely Notification after a Serious Accident/Incident

Dear Mr. Christiansen:

San Diego Gas & Electric Company (SDG&E) is in receipt of the formal notice of noncompliance with the terms and conditions of the Sunrise Powerlink Transmission Project (Project) Special Use Permit (SUP) issued by the Forest Service (FS) on February 1, 2012. SDG&E takes this and any noncompliance very seriously. The notice of noncompliance is for SDG&E not making timely notification after an incident where the stringing rope broke and the conductor wire and rope dropped/sagged to the ground between Project transmission structures CP95 and CP100. The purpose of this letter is to provide factual clarifications and address the specific corrective actions required in the notice of noncompliance.

Factual Clarifications

The notice states that "during this incident a conductor and wire dropped between CP100 and CP99 during construction of the Sunrise Powerlink Project on the Cleveland National Forest." SDG&E would like to clarify that while conductor dropped/sagged to the ground between CP95 and CP99, only the rope leader (and not the conductor) came in contact with FS lands. No injuries occurred to anyone involved with the work or observing the work nor was there a threat to public health and safety as a result of the protective safety measures that are in place during wire stringing activities.

According to all eyewitnesses, the pull progressed normally and without incident until the running board (the interface connection between the pulling rope and the conductor) was approximately 200 feet past CP99, at which point the rope suddenly broke.

Since the FS boundary is very close to Structure CP99 toward CP100 and the break was somewhere between 100 and 200 feet into FS lands, it was important to determine whether the conductor also touched down on FS lands. SDG&E confirmed it did not. Since the conductor was under tension, the rope and conductor shifted in opposite directions with only the rope landing on FS lands. Given this recoil effect, the actual rope on the ground amounted to about 2500 feet of rope; however, it all came to rest within 600 feet of CP100 which is on FS land.

Corrective Actions

The February 1, 2012, notice of noncompliance included four corrective action items. The letter stated that SDG&E had five days from receipt of the notice to respond and take corrective actions. The deadline was

extended by one day via telephone approval by Brian Paul of the FS. SDG&E has implemented the corrective actions identified in the notice of noncompliance. Please find below SDG&E's response to these items.

Corrective Action Item 1 – Provide a written account of the measures SDG&E took prior to the accident/incident to ensure the health and safety of the public, and SDG&E's employees and agents, with an after action review identifying how the accident/incident occurred and what steps SDG&E has taken or will take to reduce the likelihood of a repeat accident/incident.

Safety Measures in Place:

Prior to starting any work activities, a detailed and thorough tailgate meeting was held by the General Foreman of United Power Contractors (UPC) and SDG&E Contract Administrator (CA) at approximately 6:30 a.m. The tailgate was an open forum involving everyone working, observing, or monitoring the operations present. In addition to construction personnel, the tailgate included all Fire Watch, environmental and safety personnel. Operational steps for the day's activity were covered as well as environmental mitigation requirements, fire prevention measures, USFS considerations, and safety of all parties.

After the tailgate, a Certified Occupational Safety Specialist (COSS) and Sunrise Field Safety Advisor (FSA), spoke with the environmental monitors about the safety concerns involved in wire stringing operations. They had been monitoring the wire stringing for some time but the SDG&E safety representatives make a practice of re-emphasizing the potential hazards involved at the commencement of any new wire stringing operation. Safety representatives and Fire Watch personnel also ensure that the potential hazards of wire stringing activities are reviewed with any new personnel onsite and with anyone who enters the jobsite after the morning tailgate meeting. PAR Fire Watch personnel have always assisted with this process with visitors and new personnel onsite. The safety representative remained on the site in his capacity as FSA for the entire day.

There were two Fire Watch personnel assigned to the wire stringing activities on this day. Both individuals are trained and fully equipped with all required fire suppression tools, equipment, available water, and communication devices. One Fire Watch was positioned at CP100 and the other at CP99.

Public access to the jobsite was restricted and controlled. Personnel were positioned at the entrance to the wire pulling site near CP95 to prevent any non-authorized personnel from entering the work area. The opposite end of the stringing operation was not accessible by anyone on the ground as there is no secondary road to this site except from the entrance to the wire pulling site near CP95.

Prior to the conductor pull a qualified SDG&E Contract Administrator (CA) and experienced inspector made an inspection of the equipment positioning and grounding precautions as well as route security surveys and other environmental and cultural disturbance precautions. PAR was in compliance with all SDG&E requirements as outlined in the Project Safety Plan and Exhibit 9 of the SUP.

After Action Report:

A wire and rope dropped to the ground during wire stringing activities at CP95/CP96 to CP100. The rope being used to pull in the conductor broke and that rope fell on FS land between CP99 and CP100. The conductor fell to the ground between CP95 and CP99, which is not located on FS lands. Monitors were onsite and immediately began surveying the area for any harm to environmental resources including habitat and/or bird nests. Fire Watch personnel also observed the rope break at which point they searched the area for potential sources of ignition and found none.

In a follow-up report shortly thereafter, the CA reported that UPC (contractor) was pulling in the bottom phase to circuit number 23055 when the puller rope broke and the conductor and rope dropped. The wire reels and appropriate equipment were set up at the cable poles (CP95 and CP96) and the wire pulling equipment was positioned at CP100. After the running board (the interface connection between the pulling rope and the conductor) passed through CP99 and traveled about 100 to 200 feet (heading toward CP100) the rope unexpectedly broke CP100 dropping the conductor between CP95 and CP99. There were no injuries. After safely securing the area, the Environmental Monitors were released to inspect the affected area between CP95/CP96 and CP100 for any environmental resource damage. Additionally, both on site Fire Watch personnel surveyed the area for potential ignition of vegetation and found nothing. They remained on site during the rope and wire removal to monitor for potential problems.

The SDG&E Project Manager over avian monitoring activities dispatched a lead avian biologist to CP95/CP96 and CP100 to review the results of the biological monitor's survey of the immediate impact area for any damage to nests or nesting birds in the area. The field report indicated that no impacts to wildlife were observed, including general or listed bird species and their nests, or any other sensitive species. The findings are contained in the report attached to this letter.

The Link Lead reported similar findings. The spans between CP100 and CP95/CP96 were surveyed after the dropped rope and conductor incident and no wildlife or nesting birds or species of concern were observed. There was minimal damage to vegetation where it was struck by the conductor, and no FS land was touched by the conductor. There was no damage or discernible impact to FS land where the rope dropped. While all 2500 feet of the rope came to rest within 600 feet of CP100, the impacted area on FS land was assessed as approximately 2500 square feet. All conductor that was damaged and "cut out" was removed for disposal/recycling as appropriate and the frayed ends were secured to prevent additional damage as the conductor was replaced onto spools. UPC pulled the wire out after approval by the monitors. The pulling activities were completed by the end of the day by using the remaining conductor from the onsite reels.

Reducing Likelihood of a Repeat:

When the incident occurred, all safety measures discussed during the tailgate meeting were in place. Linemen in the tower and in aerial buckets were clear of the line and the conductor. Environmental monitors were clear and were in no danger of any equipment or line falling on them. The extensive level of supervision and compliance with the safety measures in place ensured that no one was injured during this incident and all safety measures were adhered to. There were three UPC General Foremen, two SDG&E CAs, two Fire Watch personnel, and an SDG&E FSA onsite for the duration of the operations. After the incident occurred the UPC safety representative came to the site to conduct the incident investigation along with the PAR safety representative.

In conclusion, all effective safety measures were in place and were being followed by everyone onsite and there was no threat to public health or safety. In addition to standard safety measures for wire stringing operations, pulling ropes and conductor will continue to be closely inspected before, during, and after these operations. To further mitigate against the possibility that an incident like this could occur again, in addition to the operator on the rope machine who has the responsibility to watch for defects in the rope, another

inspector will be assigned to watch the rope payout from the machine and stop the operation if a defect is observed.

Corrective Action Item 2 – Provide a report documenting the extent of environmental harm on National Forest System lands and the methods used to determine whether or not environmental harm occurred. Include biological assessments and fire prevention measures taken.

Please see the After Action Report identified above in Corrective Action Item 1 and the attached report from the avian biologist on the extent of environmental harm on National Forest System lands.

Please see Attachment 1 for the report prepared by the avian biologist. The field report indicates that there were no observed impacts to wildlife, including general or listed bird species and their nests, or any other sensitive species. The avian biologists' findings are contained in the report attached to this notification form.

All applicable fire prevention measures were followed on Forest Service lands as discussed in the After Action Report identified above in Corrective Action Item 1. A more detailed description of the measures SDG&E adhered to during this incident can be found in the SUP, Exhibit 9 – SDG&E Sunrise Powerlink Transmission Line Construction Fire Plan.

Corrective Action Item 3 – Provide a written list of all agencies notified of the incident and related correspondence.

When the incident occurred, field personnel made notifications to the SDG&E management team. The information that was provided was that wire had dropped between CP95 and CP99. Upon looking at the project maps it was determined that this area was not on FS lands. Since all appropriate safety measures were in place it was determined that no threat to public health or safety was created. An environmental resource survey was also conducted by the on-site environmental monitor and the avian biologist. This information was provided in response to Corrective Action Item 1 above. In accordance with the Mitigation Monitoring Compliance and Reporting Program (MMCRP), SDG&E notified the CPUC Environmental Monitor at approximately 1:19 p.m on the day of the incident.

An Unanticipated Event Form was then prepared and submitted on January 25 to a larger distribution including the following agencies (this report is included in Attachment 2 to this letter).

- California Public Utilities Commission
- Bureau of Land Management
- U.S. Forest Service
- California Department of Fish and Game
- U.S. Fish and Wildlife Service

It was determined later that the pull rope had landed on FS land. Therefore, FS staff should have been notified in a timely manner of this incident. SDG&E will ensure that FS staff will be notified of any incidents in the future that concern FS lands, and will commit to providing FS with notification of events as required by the SUP and additionally any events that do not occur on FS lands but impact lands immediately adjacent to FS lands.

Corrective Action Item 4 – Provide a written description of the actions SDG&E has taken to ensure that this noncompliance does not occur in the future.

SDG&E understands that this noncompliance concerns a failure to make timely notification after incidents. In the future, SDG&E is committed to notifying the FS of any event that occurs either on FS lands or immediately adjacent in a timely manner. SDG&E understands that these events may not result in a deviation or violation of a mitigation measure or permit condition, but it is important that these events are reported to the appropriate agencies so they may respond to questions or concerns from the public. Accordingly, SDG&E will report these events in a timely manner to the FS upon verification of such information. To ensure that this noncompliance does not occur in the future, SDG&E will ensure that Attachment Q of the MMCRP, Protocol for Reporting Environmental & Safety Events, is followed with the FS.

We hope that through the actions identified in the responses above and continued coordination and communications between SDG& E and the FS staff that the FS understands SDG&E's commitment to completing Project construction in the FS in compliance with the SUP conditions. If the FS has any additional questions or concerns regarding SDG&E's corrective actions in response to this noncompliance matter, please do not hesitate to contact me. Thank you in advance for your consideration.

Sincerely,



Robert C. Jackson
General Manager & Director
Construction & Engineering
Sunrise Powerlink Project

cc:	Billie Blanchard, CPUC	Fritts Golden, Aspen	Alan Colton, SDG&E
	Tom Zale, BLM	Vida Strong, Aspen	Art Holland, SDG&E
	William Metz, USFS	Gerry Akin, SDG&E	Tim Knowd, SDG&E
	Brian Paul, USFS	Molly Amendt, SDG&E	Laura McDonald, SDG&E
	Cassandra Garza, Aspen	Rachel Romani Briles, SDG&E	Ed Sullivan, SDG&E
	Anne Coronado, Aspen	Dayle Cheever, SDG&E	Phil Brand, Bureau Veritas

Attachment 1
Report from Avian Biologist



Aaron Franz
Avian Team Project Manager
Sunrise Powerlink Environmental Services
1010 Tavern Road, SD1116
Alpine CA, 91901

Subject: Assessment of incidental impacts resulting from wire drop in tower spans between CP95/CP96 and CP100

Dear Mr. Franz:

Per your request I contacted the biologist (Nate Bazydlo, TRC) monitoring wire pulling operations between CP95/CP96 and CP100 regarding an incidental wire drop that occurred at approximately 1130.

Impacts due to the wire drop occurred over approximately 2500 square feet (1x2500) of the ROW in the form of crushed and/or broken vegetation, primarily between CP98 and CP100. Immediately following the drop, the monitor walked the entire span of the area impacted by the wire drop, searching for dead and/or injured wildlife as well as damaged and/or impacted nests of avian species. 100% visual coverage was obtained.

No impacts to wildlife, including general or listed bird species and their nests, or sensitive species were observed.

If additional photos or information is required or you would like to discuss this document further, please do not hesitate to request clarification.

Respectfully,

CHAMBERS GROUP, INC.

Ian Maunsell

REDLANDS

302 Brookside Avenue
Redlands, California 92373
909 • 335 • 7088
909 • 335 • 6318 fax

SAN DIEGO

9909 Huennekens Street, Suite 206
San Diego, California 92121
858 • 541 • 2800
858 • 565 • 8950 fax

CORPORATE OFFICE

5 Hutton Centre Drive, Suite 750
Santa Ana, California 92707
949 • 261 • 5414
714 • 545 • 2255 fax

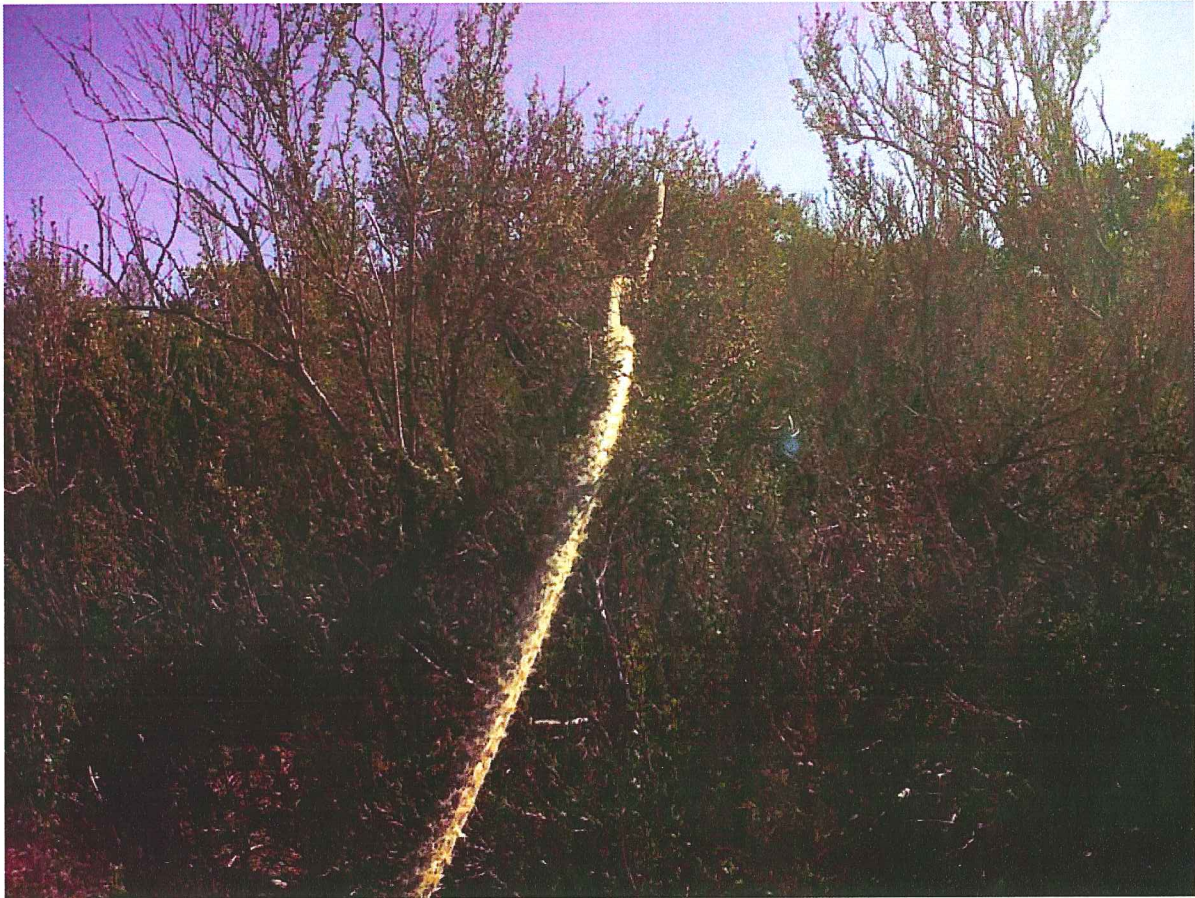
RENO

1755 E. Plumb Lane, Suite 260
Reno, Nevada 89502
775 • 323 • 3555
fax 775 • 323 • 3554

COACHELLA

36-953 Cook Street, Suite 103
Palm Desert, California 92211
760 • 779 • 0108













Attachment 2
Unanticipated Event Form with Distribution List



**SUNRISE POWERLINK:
FINAL – Unanticipated Event Notification Form**

**Corps of Engineers File Number: SPL-2007-00704-SAS
State Water Resources Control Board File Number: SB09015IN
Department of Fish and Game Notification Number: 1600-2009-0365-R5**

Date Filed:	1.24.2012
Preliminary Notification Date	1.20.2012
Date/Time of Event:	1.20.2012 at ~11:30 a.m.
Event Location	CP95/CP96 to CP100 at the Loritz Property
Reported by:	Robert Jackson General Manager and Director – Construction and Engineering Sunrise Powerlink 1010 Tavern Road; Alpine, CA 91901 – SD1116 rcjackson@semprautilities.com
Originator/ Reporter:	Gerry Akin Project Manager 760-535-7864 - gakin@semprautilities.com
Witnesses:	Donald Richards, Inspector drichards@semprautilities.com
Responsible Department(s)	<input type="checkbox"/> Aviation (Beige section below) <input checked="" type="checkbox"/> Construction/Operations <input checked="" type="checkbox"/> Environmental <input type="checkbox"/> Public Affairs <input checked="" type="checkbox"/> Safety <input type="checkbox"/> Waters of the U.S./State (Environmental) (Blue section below)
Aviation	N/A
Aircraft Involved:	Company Tail Number Type Pilot Name(s)



Waters of the U.S./State	Must be submitted within 24 hours of incident. N/A		
Effect on Waters of the U.S. and/or Waters of the State			
Location:	Mapsheet #	Structure or Facility	Water #
UTM or Other Coordinates			
Detailed Description of Event:	<p>Bob Jackson and Alan Colton were informed that a wire dropped to the ground during wire stringing activities at CP95/CP96 to CP100 at the Loritz Property. The rope being used to pull in the conductor broke and the conductor fell to the ground. Monitors were onsite and immediately began surveying the area for any harm to habitat and/or bird nests.</p> <p>Alan Colton left a message with Cassandra Garza at approximately 1:19 p.m.</p> <p>In a follow-up report shortly thereafter, Mark Foster (CA) reported that UPC (contractor) was pulling in the bottom phase to 23055 when the puller rope broke and the conductor dropped. Wire was set up at the cable poles and the puller was positioned at CP100. After the Gator passed through CP99 and traveled about 100 to 200 feet (heading toward CP100) the rope broke or came free at CP100 dropping the conductor. There were no injuries and the Environmental Monitors inspected the affected area between CP95/96 and CP100 for damage; as of the report time from Mark Foster (1:24 p.m.) everything looked good.</p> <p>Aaron Franz, Project Manager/Avian Monitoring, dispatched Ian Maunsell, lead avian biologist, to CP95/CP96 and CP100 to review the results of the bio monitor's survey of the immediate impact area for damage to any nests or nesting birds in the area. The field report indicates that Mr. Maunsell observed no impacts to wildlife, including general or listed bird species and their nests, or any other sensitive species. Mr. Maunsell's findings are contained in the report attached to this notification form.</p> <p>The Link Lead, Jim Redmoon, reported similar findings. The spans between CP100 and CP95/CP96 were surveyed after the dropped conductor incident and no wildlife or nesting birds or species of concern were observed. There was minimal damage to vegetation where it was struck by the conductor. The impacted area was assessed as approximately 2500 square feet (1 foot x 2500 feet). All conductor that was damaged and "cut out" was reeled up for disposal/recycling as appropriate and the frayed ends</p>		

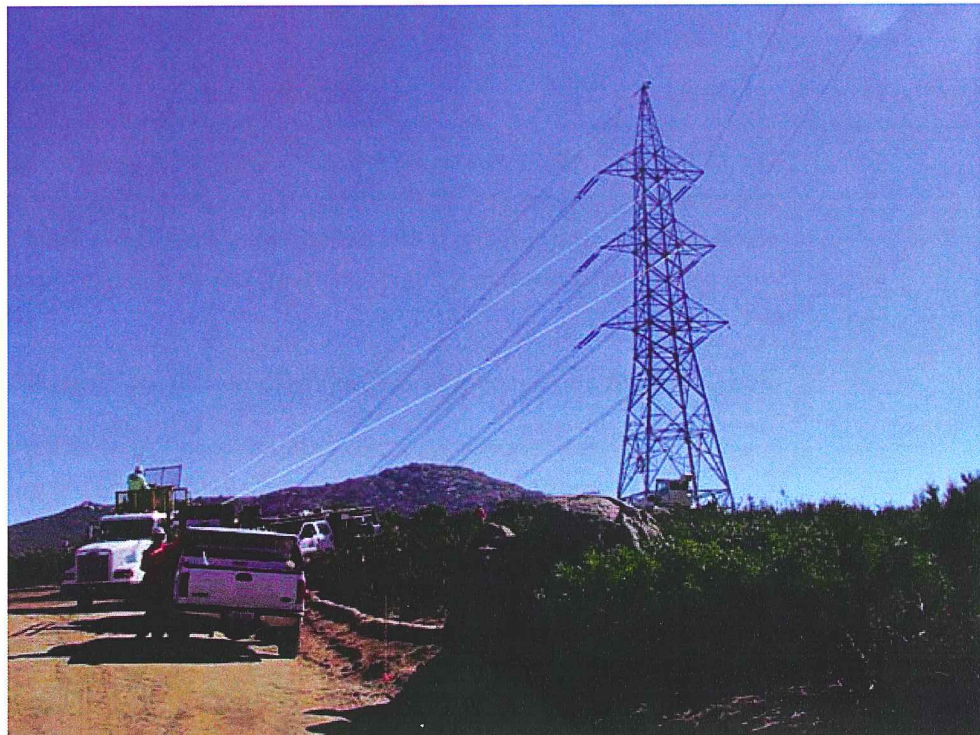


SUNRISE POWERLINK™

were “socked” to prevent additional damage as the conductor was reeled onto spools. In addition to the photographs provided below, additional photographs of the impacted area can be found at the back of the attached report from Mr. Maunsell.

UPC pulled the wire out after approval by the monitors. The pulling activities were completed by the end of the day with the remaining conductor on the reel.

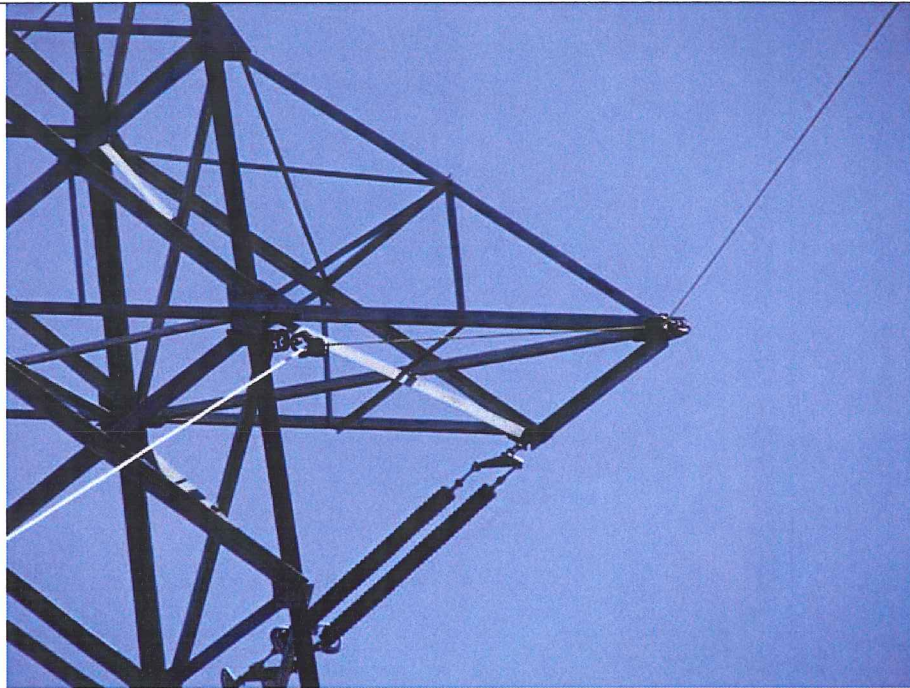
These photos were taken immediately following the conductor drop.



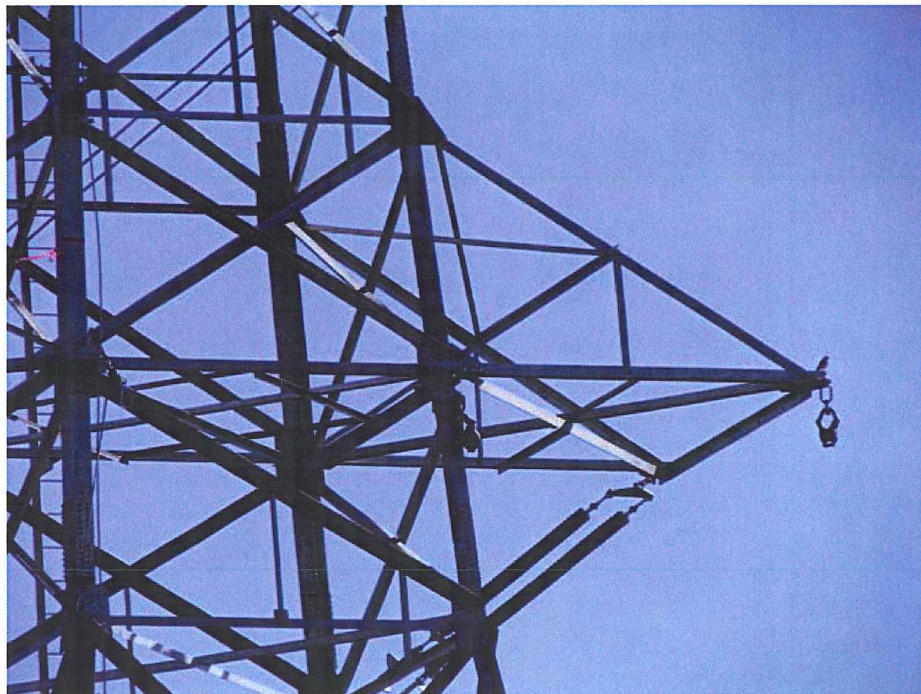
CP100



SUNRISE POWERLINK™



CP100



CP100



SUNRISE POWERLINK™

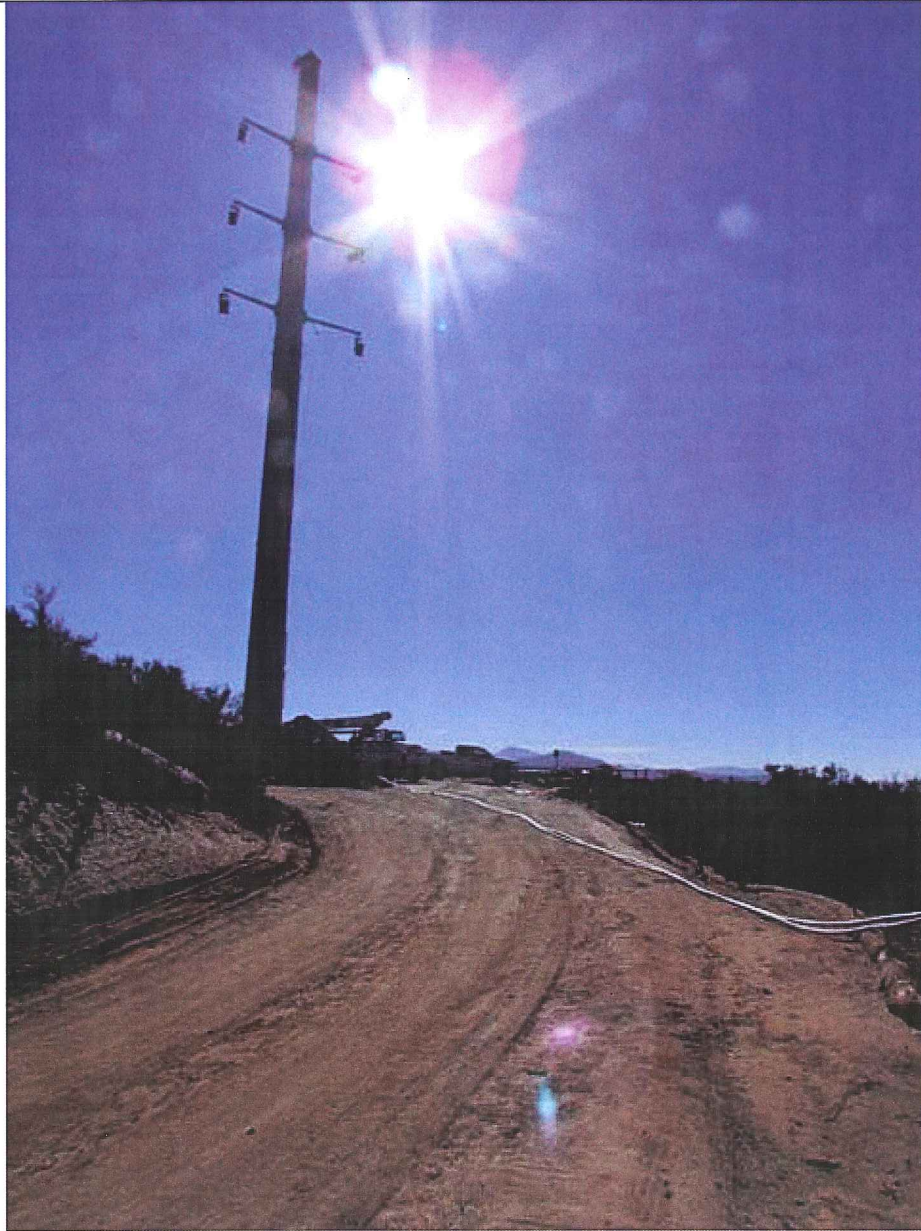


CP99/CP98





SUNRISE POWERLINK™



CP99



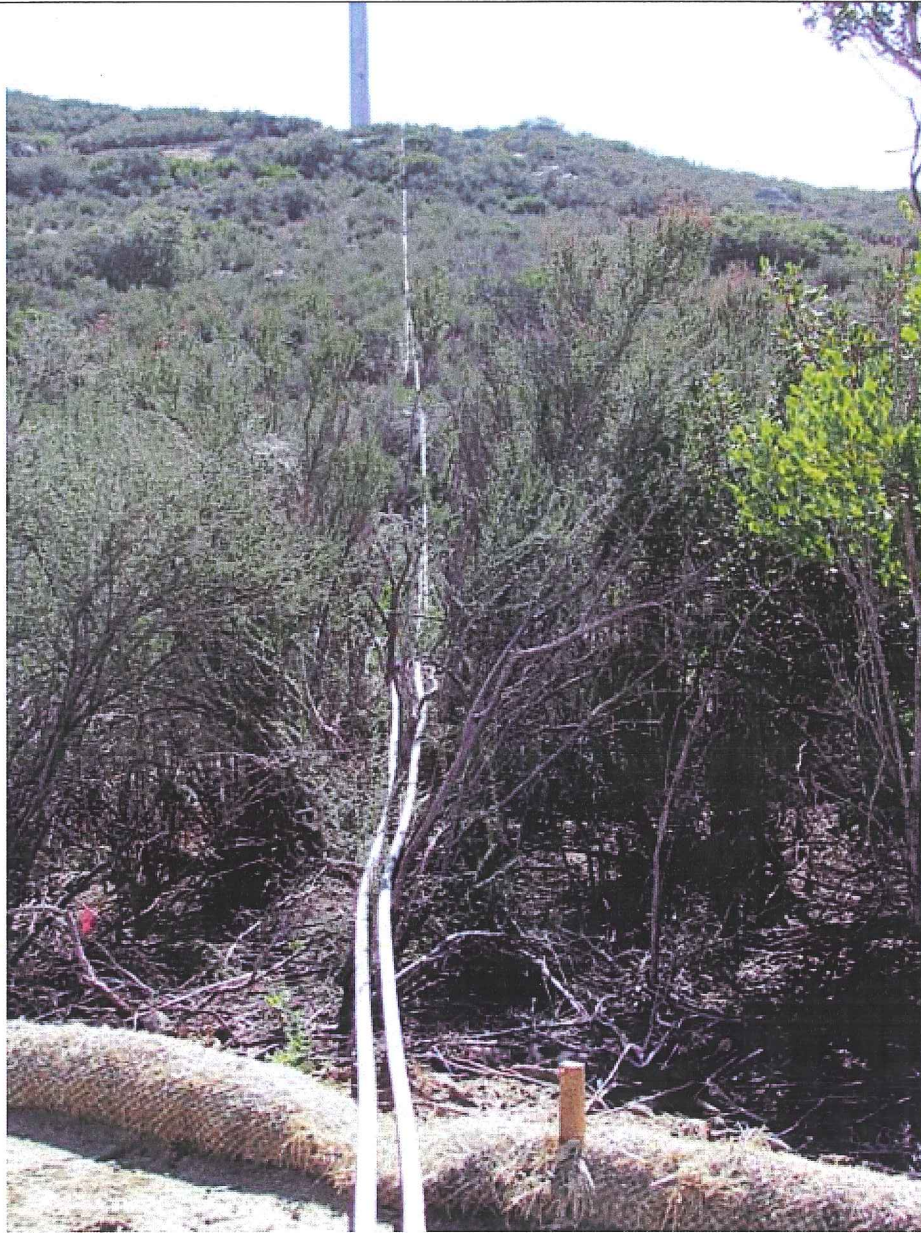
SUNRISE POWERLINK™



Looking up at CP99



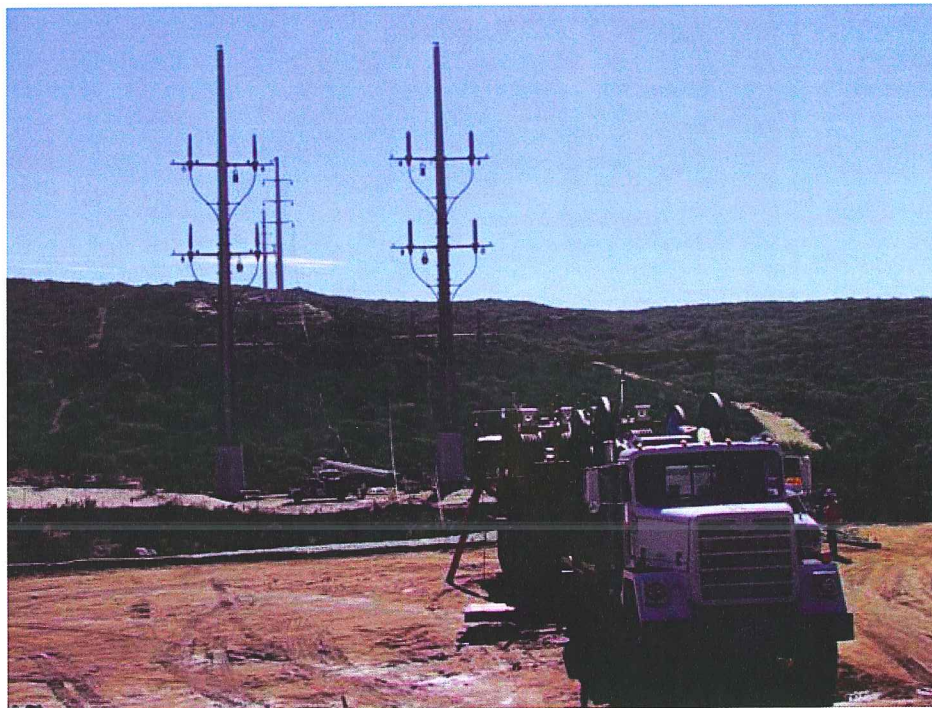
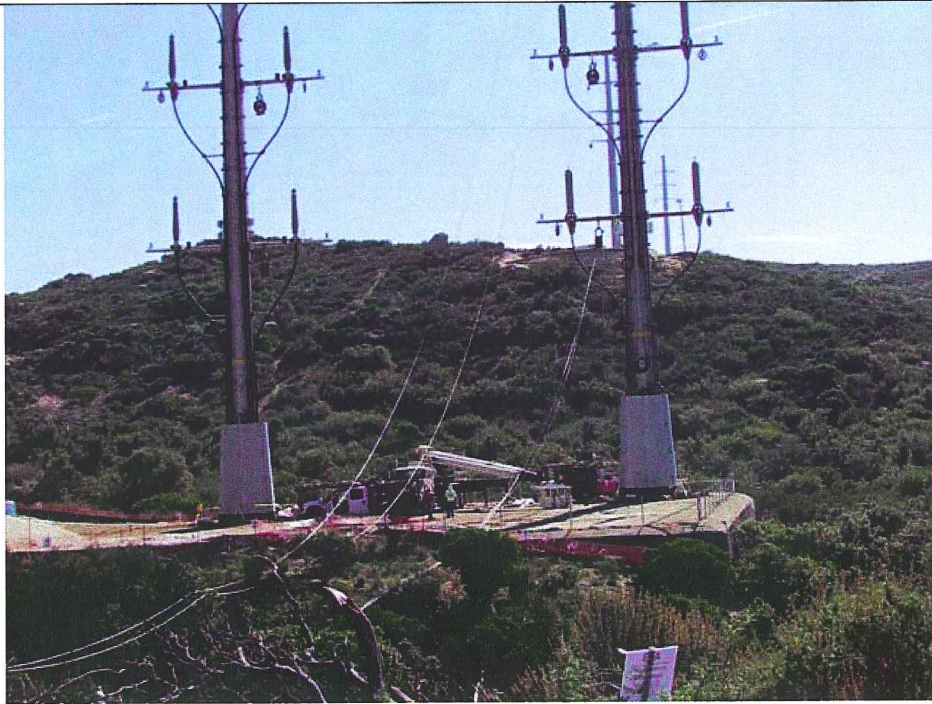
SUNRISE POWERLINK™



Looking up at CP99



SUNRISE POWERLINK™



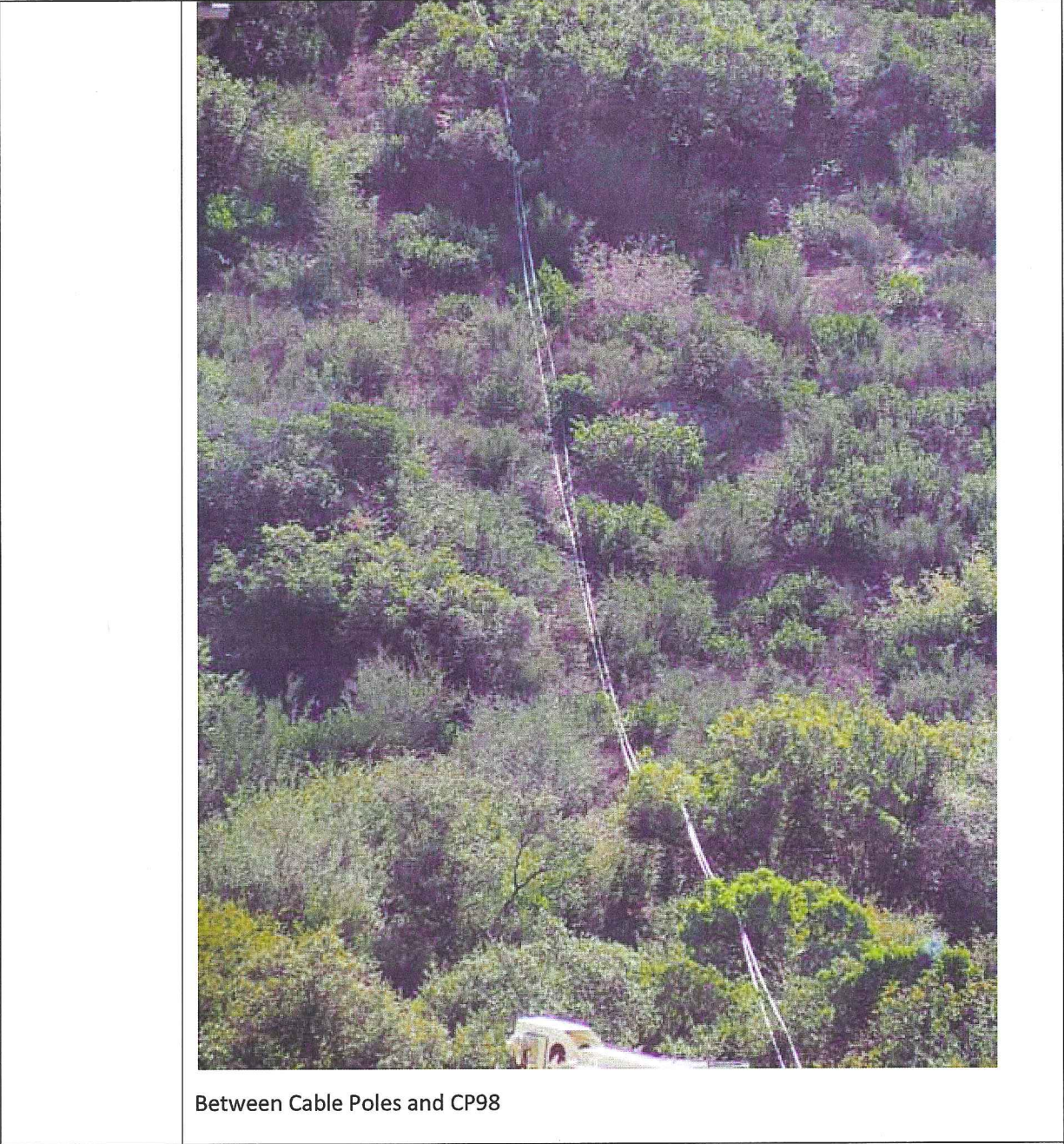
Wire Setup



SUNRISE POWERLINK™



Wire Setup



Between Cable Poles and CP98

<p>Type of Project Impact Associated with incident</p>	<table> <tr> <td><input type="checkbox"/></td> <td>Permanent impact</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Temporary impact</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other (None)</td> </tr> </table>	<input type="checkbox"/>	Permanent impact	<input checked="" type="checkbox"/>	Temporary impact	<input type="checkbox"/>	Other (None)
<input type="checkbox"/>	Permanent impact						
<input checked="" type="checkbox"/>	Temporary impact						
<input type="checkbox"/>	Other (None)						



Injuries or Property Damage	No
Applicable Permit/Mitigation Measure	MM B-1c
Compliance Level	Level 0
Corrective Action(s)	SDG&E takes this event very seriously and is committed to staying in compliance on this Project. The following corrective actions have occurred: 1. An investigation has been started to determine the cause of this wire drop. Pending the outcome of the investigation, other actions may be determined that can be implemented to ensure this does not occur in the future.
Follow-up Required	No further action required.
Attachments	Impact assessment performed by the lead avian biologist.
Confirmation of Receipt	If you acknowledge receipt of this form and no further action is needed, please retain for your records. If, however, you would like additional information to determine regulatory action needed, please contact Rachel Romani Briles, SDG&E, Environmental Compliance Project Manager, Sunrise Powerlink Project: 858-636-6865 (office) 858-750-0754 (cell) rromani@semprautilities.com

Distribution List:

- | | | | | | |
|-------------------------------------|------------------------|-------------------------------------|------------------------|-------------------------------------|--------------------|
| <input checked="" type="checkbox"/> | Billie Blanchard, CPUC | <input checked="" type="checkbox"/> | Anne Coronado, Aspen | <input checked="" type="checkbox"/> | Vida Strong, Aspen |
| <input checked="" type="checkbox"/> | Tom Zale, BLM | <input checked="" type="checkbox"/> | Cassandra Garza, Aspen | <input type="checkbox"/> | Erinn Wilson, CDFG |
| <input type="checkbox"/> | Brian Paul, USFS | <input checked="" type="checkbox"/> | Fritts Golden, Aspen | <input type="checkbox"/> | Eric Porter, USFWS |