

**ORA DATA REQUEST**  
**ORA-SDG&E-DR-054-GAW**  
**SDG&E 2016 GRC – A.14-11-003**  
**SDG&E RESPONSE**  
**DATE RECEIVED: JANUARY 29, 2015**  
**DATE RESPONDED: FEBRUARY 12, 2015**

**Exhibit Reference:** SDG&E-9, page JDJ-89

**Subject:** Subtransmission and Substation Projects

**Please provide the following:**

1. Table 10, on page JDJ-89 of Exhibit SDG&E-9, shows a list of 20 reliability/improvements capital projects. Based on the project descriptions provided by SDG&E, at least some of these capital projects appear to involve substation work, and possibly subtransmission work. General Order (GO) 131-D states, in part, the following in Section III.B:

*“No electric public utility shall begin construction in this state of any electric power line facilities or substations which are designed for immediate or eventual operation at any voltage between 50 kV or 200 kV or new or upgraded substations with high side voltage exceeding 50 kV without this Commission’s having first authorized the construction of said facilities by issuance of a permit to construct in accordance with the provisions of Sections IX.B, X, and XI.B of this General Order.”*

In later portions of GO 131-D, there is a list of a number of exemptions to this Order.

- a. For each of the 20 projects listed on page JDJ-89, please indicate whether or not GO 131-D is applicable.
- b. If SDG&E has concluded that a project does not fall under GO 131-D, please explain how that conclusion was reached.
- c. If SDG&E has concluded that a project does fall under GO 131-D, but that project is considered to be exempt, please provide the exemption that SDG&E believes is applicable.
- d. For those projects for which GO 131-D is applicable (and for which there is no exemption), please provide the date on which the Permit To Construct (PTC) or the Certificate of Public Convenience and Necessity (CPCN) was approved by the Commission. Please also provide the decision number pertaining to the approval.
- e. If no PTC or CPCN was approved, please provide the Commission-approved Advice Letter (AL).
- f. If no PTC, CPCN, or AL was approved by the Commission, please explain under what authority SDG&E proceeded with construction or is planning on proceeding with construction.
- g. Please provide ORA with any changes to the proposed operational dates of any of these 20 projects.

**SDG&E Response:**

All of the projects listed are exempt either by being less than 50kV or by being a modification of a current substation within the existing fence perimeter. Please see the attached spreadsheet “SDG&E Response to Data Request ORA-SDGE-054-GAW” for responses to the other questions in this data request.