

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 15, 2011

Alan Colton
Manager - Sunrise Powerlink Environmental Services
San Diego Gas & Electric
8315 Century Park Ct, CP21G
San Diego, CA 92123-1548

**Subject: Violation of Communication Protocol – Sunrise Powerlink Project:
Skycrane Incidents in Imperial County**

Dear Mr. Colton,

On June 7, 2011, SDG&E's Skycrane helicopter was being used to deliver and assemble tower segments near the Plaster City Construction Yard (along Evan Hewes Highway in Imperial County). On the fifth run of the day, the four hooks holding a tower section released unexpectedly and the tower section dropped from the helicopter. After testing and repair of the helicopter hook control system, SD&GE put the Skycrane back into service on June 10, 2011, and after 4 successful tower lifts that morning, there was another incident in which three of the four hooks securing a tower section beneath the helicopter released unexpectedly, leaving the section suspended on one hook. When lowered on the single cable, the tower toppled. We understand that this Skycrane is no longer in service and has been returned to the manufacturer in Oregon for inspection, repairs, and testing, and that a replacement Skycrane is expected to arrive this week and is proposed for use on the project.

Description of Incident Events

The Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) developed by the CPUC and the Bureau of Land Management (BLM) prior to the start of Sunrise Powerlink Construction governs the agencies' monitoring processes, and defines SDG&E's responsibilities during construction. While the Skycrane incidents did not cause injuries, they certainly had the potential to do so. Among many other responsibilities, the CPUC and BLM are responsible for ensuring public and worker safety during construction, and the Skycrane incidents created serious safety hazards.

While the CPUC's Environmental Monitor was onsite at the time of the first incident, no immediate notification of this serious incident was provided by SDG&E to the CPUC or BLM, and no written information was provided. The first incident is considered to be a regrettable, but unforeseeable event resulting from mechanical malfunction. The communication with CPUC and BLM was severely deficient. After our inquiries about the June 7th incident, the CPUC Monitoring Team was informed by SDG&E field representatives that SDG&E and FAA, were investigating the incident. The agencies assumed that information would be provided before the Skycrane would be returned to service. No such information was provided.

Of greatest concern to the CPUC and BLM is that the Skycrane was returned to service on June 10 without prior notification to the agencies, without SDG&E providing a detailed explanation of the causes of the initial incident, and without explanation to the agencies of the repairs and testing procedures

implemented prior to the decision to use the Skycrane again. Aspen monitors were made aware of this decision only on the morning of June 10, when the daily schedule as provided to the Monitoring Team indicating that the Skycrane would be in service that morning. No advance notification was provided to the CPUC, BLM, or the monitoring team that this would be happening, and no explanation was provided to explain the cause of the June 7 incident and any corrective measures implemented to ensure that safe operations could resume. At 8 a.m. on June 10, the second incident occurred. For this incident, SDG&E staff informed the Aspen monitor and the CPUC Project Manager in a timely manner. However, there was no written report provided.

No detailed explanation of the causes of and SDG&E actions surrounding the two incidents was provided to the agencies by SDG&E until a June 13, 2011, 1:30 p.m. conference call. The verbal information provided during this call lacked the specificity required for the agencies to fully understand the incidents. It was not until the morning of June 14th in a CPUC requested conference call that a more detailed briefing by SDG&E's helicopter group was finally given to CPUC, BLM, and Forest Service. This lack of detailed and immediate communication and briefings surrounding these two very serious safety incidents is not consistent with the provisions of the agreed-upon MMCRP (see Chapters 3.3, Communication Protocols During Construction, and Chapter 4.1, Mitigation Compliance and Reporting). **Communication with the lead agencies in the future must be prompt and complete.**

Steps for Moving Forward

Please provide the CPUC and BLM with the following information. ***The agencies must receive a satisfactory response to this request from SDG&E before a replacement Skycrane is used on the Sunrise Powerlink project, and before the original Skycrane is returned to service on project construction.*** Additional information requests may also be submitted to SDG&E on this issue.

- (1) Review the Preliminary Incident Report No. 1 provided separately by the CPUC and confirm its accuracy.
- (2) Provide a detailed written description of the replacement helicopter, and explain the differences between this helicopter and the one used in the two incidents that occurred last week. Explain why the replacement helicopter is considered to be safe for use, given the incidents occurring with the original Skycrane.
- (3) Describe in detail the testing procedures to be used prior to the replacement Skycrane helicopter being put in service for project activities. Describe the role of the Federal Aviation Administration (FAA) in this process.

Please contact me if you have any questions at 415-703-2068 or email at bcb@cpuc.ca.gov. We appreciate your immediate attention to this matter.

Sincerely,

Billie Blanchard

Billie Blanchard
CPUC Environmental Project Manager
Sunrise Powerlink Transmission Project

Alan Colton, SDG&E
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cc: Susan Lee, Aspen Environmental Group
Vida Strong, Aspen Environmental Group
Anne Coronado, Aspen Environmental Group
Julie Fitch, CPUC Energy Division Director
Mary Jo Borak, CPUC Supervisor
Molly Sterkel, CPUC Program Manager
Fred Harris, CPUC Legal Division
Tom Zale, BLM Associate Field Manager, El Centro Office
Jennifer Stone, Supervisor Jacob's Office
Supervisor Dianne Jacob, San Diego County Board of Supervisors
Robert Brian Paul, USFS