



July 14, 2025

Tharon Wright  
Public Utilities Regulatory Analyst III  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
VIA EMAIL

**RE: CPUC Data Request #11 for PG&E's Moraga to Oakland X 115 Kilovolt Rebuild Project (A.24-11-005)**

Dear Ms. Wright,

This letter is in reply to your June 26, 2025, letter in which you request certain additional information regarding Pacific Gas and Electric Company's (PG&E's) application (A.24-11-005) for a Permit to Construct (PTC) and Proponent's Environmental Assessment (PEA) for the Moraga-Oakland X 115 kilovolt (kV) Rebuild Project (project). The original text for each data request item from the California Public Utilities Commission (CPUC) is included, followed by PG&E's response.

### **PEA Chapter 3, Project Description**

**PD-20** For further clarification regarding PG&E's responses to CPUC Data Request #10, please provide responses to the following:

- a. What aspects of project design/cost/ratings/etc., require CAISO approval?
- b. When would CAISO approval occur and for what purpose (e.g., rate recovery)?
- c. Please cite applicable CAISO policies, regulations, and other relevant requirements related to the request, including the tariff language that states that CAISO approval is not required for maintenance projects and that the MOX Project qualifies as maintenance.

### **PG&E's Response**

- a. No aspects of the proposed project, including design, cost, and ratings, require CAISO approval.
- b. PG&E would inform CAISO of the CPUC project approval after it occurs. No CAISO approval of the proposed project is required.
- c. The CAISO's transmission planning process is set out in Section 24<sup>1</sup> of the FERC ISO tariff<sup>2</sup>, transmission facilities. CAISO Tariff §24 (Transmission Planning Process) requires CAISO review and Board approval only for "transmission solutions," defined in §24.1 as "new transmission facilities or upgrades/additions to existing facilities proposed in the Transmission Plan to meet an identified CAISO need." and it does not include routine maintenance projects that do not constitute a transmission solution. Since the MOX project rebuilds existing lines in kind, it is a maintenance project, not a transmission solution, so CAISO approval is not required.

Please find below tariff and policy citations showing why CAISO approval is not required for a "maintenance project":

1. Only "transmission solutions" trigger CAISO review
  - CAISO Tariff §24.1 (Overview) states:

<sup>1</sup> <https://www.caiso.com/library/conformed-fifth-replacement-california-iso-tariff-section-24>

<sup>2</sup> <https://www.caiso.com/generation-transmission/transmission/transmission-planning#tariff-bpm>

"For purposes of this Section 24, \*\*transmission solutions include both entirely new transmission facilities and *upgrades or additions* to existing transmission facilities that are proposed ... in the comprehensive Transmission Plan during Phase 2 to meet an identified need determined by the CAISO." CAISO

- The MOX project that rebuilds existing lines does not create a new facility, upgrade, or addition; therefore it is outside the definition of a transmission solution and outside the scope of the Transmission Planning Process (TPP).
- 2. Maintenance and asset-management work is outside the TPP
  - In 2023 comments to FERC (Docket AD22-8), the CAISO clarified:  
"Planning for \*\*asset management and capital maintenance projects is outside the scope of the CAISO's transmission planning authority... maintenance and asset-management projects are *not evaluated* in the CAISO's transmission planning process." CAISO
- 3. The Business Practice Manual (BPM) corroborates that maintenance projects are not part of the TPP request window
  - BPM §4.3.1 lists the only project categories that may be submitted to the TPP request window—Reliability projects, Merchant projects, LCRIF projects, Demand-Response/Generation alternatives, and CRR feasibility projects. Maintenance work is not listed, confirming it is not subject to CAISO approval. BPM CM
- 4. Transmission Control Agreement (TCA) division of duties
  - Under the TCA, Participating Transmission Owners (PTOs) "have responsibility for all maintenance-related activities; the CAISO is responsible only for system expansions." CAISO (footnote on page 3)

We trust the information provided herein is fully responsive to your requests. However, should you have any further requests, please contact me at **415-990-6001** or **BXLG@pge.com**.

Sincerely,



Brandon Liddell  
Principal Land Planner

cc:

Michelle Wilson, CPUC CEQA Unit  
Erica Schlemer, PG&E Law Department  
Colleen Taylor, Jacobs  
Hedy Koczwara, Aspen Environmental Group