



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

June 5, 2025

VIA EMAIL

Brandon Liddell, Principal Land Planner
Environmental Management- Transmission
Pacific Gas and Electric Company
300 Lakeside Drive
Oakland, CA 94612

Subject: CPUC Data Request #10 for PG&E's Moraga to Oakland X 115 Kilovolt Rebuild Project (A.24-11-005)

Dear Mr. Liddell,

The California Public Utilities Commission (CPUC) Energy Division, California Environmental Quality Act (CEQA) Unit, is continuing its review of Pacific Gas and Electric Company's (PG&E's) application for a Permit to Construct (PTC) (A.24-11-005) and Proponent's Environmental Assessment (PEA) for the proposed Moraga to Oakland X 115 Kilovolt (kV) Rebuild Project (Project) relative to the CPUC's *Guidelines for Energy Project Applications Requiring CEQA compliance: Pre-filing and Proponents Environmental Assessments* (Version 1.0, November 2019) and the Commission's Information and Criteria List. On December 11, 2024, the Energy Division deemed PG&E's application complete and is in the process of its environmental review of the Project under CEQA.

The Energy Division has identified additional data requests related to PG&E's activities associated with the Project to supplement and inform the environmental review (see Data Request #10 attached to this letter). Please provide the requested information or explain why it cannot be provided by June 19, 2025. Please note that as the environmental review progresses, the Energy Division may submit clarifying questions or request additional data, as necessary, to prepare a complete and adequate analysis of the potential environmental effects of the proposed Project in accordance with the requirements of CEQA.

Please do not hesitate to call me at (916) 594-4699 if you have any questions.

Sincerely,

Tharon Wright

Tharon Wright
Public Utilities Regulatory Analyst IV
California Public Utilities Commission

cc: Michelle Wilson, CPUC CEQA Unit
Greg Heiden, CPUC Attorney
Hedy Koczwar, Aspen Environmental Group
Erica Schlemer, PG&E
Colleen Taylor, Jacobs
Andrea Gardner, Jacobs

PG&E Moraga-Oakland X 115 kV Rebuild Project (A.24-11-005)

Data Request No. 10

Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (MOX or Project) Data Request (DR) No. 10 includes requests related to the following issue area(s):

- Project Description

PEA Chapter 3, Project Description

- PD-16** The relationship of the proposed MOX Project to the PG&E's 2019 proposal to rebuild the four Moraga–Oakland X 115 kV lines with three lines remains unclear. The PEA is clear that the rebuild described in the CAISO 2019-2020 Transmission Plan was modified to arrive at the proposed MOX Project. Accordingly, the PEA (p.2-4) indicated that: “*PG&E plans to submit the revised project scope...*” to rebuild the Moraga–Oakland X 115 kV four-line path with four lines to the CAISO. This submittal did not occur as part of the CAISO 2024-2025 Transmission Planning Process. Because the proposed MOX Project represents a change from the design in the CAISO 2019-2020 Transmission Plan, please describe whether PG&E still plans to request CAISO consideration of the proposed MOX Project, and when will PG&E request that consideration.
- PD-17** In rationalizing the change from the design in the 2019-202 Transmission Plan, the PEA (p.2-4) says: “*Since 2020, modern cable type technology allows rebuilding four lines instead of three lines within limited ROW and city franchise streets...*” Please elaborate on how the proposed “modern” cable can be placed closer together, and how the proposed 115 kV cable of a copper cross-linked polyethylene (XLPE) triplex type can be placed closer together than the previously considered option.
- PD-18** Please clarify the expected capacities of system changes related to the proposed MOX Project. The PEA Section 3.2.2.1 stated: “*the proposed project's four-path rebuild does not include line rerating and there are no reasonably foreseeable plans to increase existing capacity.*” However, the claim of no plan to increase capacity is contradicted by PG&E's January 31, 2025, response to our Data Request #1. In response to Item PD-2, PG&E indicated that “*... the project will increase transmission capacity in the North Oakland area, where significant load growth is expected.*” More recently, the CAISO Board approved the North Oakland Reinforcement Project on May 30, 2025. Given the upgrades proposed with the MOX Project and those receiving CAISO Board approval in 2025, please update PG&E's statement on reasonably foreseeable plans to increase existing capacity.
- PD-19** Please describe whether implementation of the proposed MOX Project is necessary for the viability of the North Oakland Reinforcement Project as approved by the CAISO Board on May 30, 2025. This response should discuss the actions that PG&E could be expected to take to ensure the viability of the North Oakland Reinforcement Project if the proposed MOX Project is not approved.