



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

January 9, 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 #2 for PG&E's Moraga to Oakland X 115 Kilovolt Rebuild Project (A.24-11-0005)

Dear Mr. Liddell,

The California Public Utilities Commission (CPUC) Energy Division 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, at the same time, issued Data Request #1, identifying information needed from PG&E to supplement and inform the environmental review.

While awaiting PG&E's response to Data Request #1, the Energy Division has identified additional data requests related to PG&E's activities associated with the Project (see Data Request #2 attached to this letter). Please provide the requested information or explain why it cannot be provided by January 24, 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,

A handwritten signature in black ink that reads "Tharon Wright". The signature is written in a cursive, flowing style.

Tharon Wright
Public Utilities Regulatory Analyst IV
California Public Utilities Commission

cc: Michelle Wilson, CPUC CEQA Unit
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.2024-11-005)

Data Request No. 2

Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (MOX or Project) Data Request (DR) No. 2 includes requests related to the following issue area(s):

- Aesthetics

Aesthetics

PEA Section 5.1.4.3, Analysis of Visual Change

AES-1 PEA Figure 5.1-1a identifies the following KOPs, which should be updated to reflect the terminology in Table 5.1-3, as follow:

- a. KOPs 3 and 3b, should be changed to 3a and 3b to reflect the text in Table 5.1-3.
- b. KOPs 6 and 6b, should be changed to 6a and 6b to reflect the text in Table 5.1-3.
- c. KOPs 8 and 8b, should be changed to 8a and 8b to reflect the text in Table 5.1-3.

AES-2 In the Analysis of Visual Change (see CPUC Pre-Filing Comment Letter, page ref 5.1-20), the narrative repeatedly refers to the change in structure heights but never specifically identifies the different heights (as requested). Instead, PG&E's tracked revisions to the comment refer to Tables 3.3-4 and 3.3-5. The changes to the referenced tables are unclear, and it would be time-consuming to identify which towers are in question in the KOP views (presumably by cross-checking a KMZ) and then cross-check them with the height table(s). As initially requested, please identify the referenced structure heights in the text.

AES-3 The CPUC's pre-filing comments requested that Tree Trimming and Removal be addressed in the analysis of visual change. In the PEA, tree trimming/removal is referred to only once in the discussion of KOP 16 on Estates Drive near Sandringham Road. PG&E's tracked revisions (page 5.1-31) state that PG&E reviewed Table 3.5-5 (which identifies tree trimming/removal locations) and revised the simulations and discussion concerning vegetation management. The Project work area generalizes the locations of tree removal, and it is difficult to ascertain if KOP 16 is the only impacted view. Please confirm whether KOP 16 is the only KOP affected by tree removal/trimming and provide information on any other affected KOPs.