

January 22, 2012

Mr. Brandon Liddell
Sr. Land Planner
Pacific Gas and Electric Company
77 Beale Street
Post Office Box 7442, B30A
San Francisco, CA 94120-7442

RE: Data Request #4 for the Pacific Gas and Electric Company's Application for a Permit to Construct the Santa Cruz 115 Kilovolt Reinforcement Project (A. 12-01-012)

Dear Brandon:

The California Public Utilities Commission (CPUC) requests additional data related to the Santa Cruz 115 kV Reinforcement Project (A.12-01-012) as identified here.

Cultural Resources

1. A few proposed project work areas were not surveyed for cultural resources. Please provide the survey methods and results for these areas:
 - A short overland route near Rob Roy substation
 - A short overland route near pole C-52
 - A tension and pull site and improved access road near pole C43
 - A short overland route near Green Valley Substation
2. Please provide an explanation of the visual surveys performed for the horse coral, and why cultural resources are not anticipated in that area (i.e., existing extensive ground disturbance)
3. Please provide the GIS data for the survey boundaries for the areas listed here

Biological Resources

4. Please provide the GIS files and correspondence with USFWS regarding the Critical Habitat area boundary for Monterey spineflower. The GIS data available on the USFWS website conflicts with the data presented in the PEA and shows Critical Habitat with the proposed work areas.

Air Quality Modeling

5. EMFAC2007 model was used by PG&E; however, this model is not the most recent version. Also, an outdated version of the UREMIS model was also used. EMFAC2011 and URBEMIS 2011 are the most recent models accepted by the air district. CalEEMod is the recommended comprehensive model by the air district. Please remodel the air quality impacts using CalEEMod 2011 (or most recent version) and provide the results of the modeling for CPUC review.

Project Description

6. How do the project designs reflect the guidelines in these documents? Provide more details and explanation:
- Mitigating Bird Collisions with Power Lines: The State of the Art in 1994–Avian Power Line Interaction Committee (APLIC), 1994
 - Avian Protection Plan Guidelines–APLIC and U.S. Fish and Wildlife Service, April 2005
 - Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006–APLIC, 2006 (explain why impacts to birds from electrocution are not significant even though equipment recommended in this standard is not manufactured and therefore not implementable)

Cumulative Resources

7. Provide additional information on the timing of the construction and upgrades to the Green Valley Substation and the Watsonville power line for areas within ~1,000 feet of the Green Valley Substation.
8. Is it feasible to avoid construction of the proposed project in the Green Valley substation area while the other two projects are constructed in that area?

Alternatives

9. Provide GIS layers of the alternative alignments presented in the PEA.

Sincerely,



Tania Treis, Principal
Panorama Environmental, Inc.

cc. Matthew Fogelson, PG&E
Lisa Orsaba, CPUC