



April 23, 2013

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 #6 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. This data request is related to the air quality analysis and modeling provided in the Response to California Public Utilities Commission Data Request No. 4.

1. Panorama's air quality specialists reviewed Tables 1 through 4 in the Response to California Public Utilities Commission Data Request No. 4, and noted that PG&E identified incorrect emission results for on-road vehicles under the subheading "PEA Simulation." These emission results were identified as incorrect in a review conducted by Panorama Environmental, Inc. (Panorama) on July 16, 2012 (Data Request #1). Accordingly, PG&E made revisions on emission results for on-road vehicles that are presented in a response letter to Panorama dated July 23, 2012, for Data Request #1 Response.

Table 1 provides an example that displays the revisions for on-road vehicle emissions made by PG&E on July 23, 2012, along with the incorrect results marked with strikethroughs from the original PEA. Please revise all emissions associated with on-road vehicles in all the subject tables in the "Response to California Public Utilities Commission Data Request No. 4" to make the corrections noted in the Data Request #1 Response.

Table 1 Mitigated Construction Emission Comparison						
Category	Simulated Peak Emission Rate (pounds per day)					
	PM2.5	PM10	NOx	SOx	CO	VOCs
PEA Simulation						
On-Road Vehicles (Exhaust Emissions)	3.03 1.10	3.37 1.23	85.87 31.23	0.19 0.07	24.31 8.97	6.35 2.27

2. Panorama’s air quality specialists reviewed the on-road vehicle emission modeling that was conducted by PG&E, by comparing the modeling input data with the project data listed in the “Attachment 3.3-A: Project Emissions Calculation Methodology, On-Road Vehicle Use Summary” in the PEA. Our team’s review shows that several trucks were not entered as inputs to the model. The missing data in the modeling analysis are shown in Table 1.

Table 1 Missing Data – On-Road Trucks			
Category	Vehicles	Trips/Day	Vehicle Class
Site Development			
Site Mobilization	Flatbed Truck	2	HHDT
Site Access Roads and Drainage	Dump/Haul Truck	2	HHDT
Northern Alignment			
Foundation Installation	Concrete Truck	4	HHDT
Foundation Installation	Dump/Haul Truck	3	HHDT
TSP Installation	Semi with 40' Trailer	2	HHDT
Cox-Freedom Segment			
Foundation Installation	Concrete Truck	8	HHDT
Foundation Installation	Dump/Haul Truck	8	HHDT
TSP Installation	Semi with 40' Trailer	2	HHDT
Rob Roy Substation			
Foundation/Duct Bank Installation	Concrete Truck	3	HHDT

Equipment Installation	Semi with 40' Trailer	5	HHDT
Final Grading and Paving	Transfer Truck	5	HHDT

- a) Please identify whether or not these trucks should have been included in the modeling. If they should not be included, please provide a brief explanation as to why they are not relevant.
- b) If these trucks should have been included in the current modeling analysis, please revise the modeling analysis to include the project trucks that were missed, along with the activity data associated with the use of these trucks during project construction, as listed in the PEA.
- c) CalEEMod modeling analysis is an extensive task, especially for a project with multiple construction phases and numerous construction equipment and vehicles. According to the model developer, the current model version of CalEEMod revises some of user's input data to model default values during re-editing or re-opening processes. Therefore, it is suggested that all model input data be verified, including previously entered data and revised data, with the project construction data described in the PEA. This verification is recommended to be completed prior to deriving model outputs.
- d) After deriving the output files, please provide the revised results to Tables 1 through 4 in the "Response to California Public Utilities Commission Data Request No. 4."

Please feel free to contact me if you have any questions regarding this data request.

Sincerely,



Tania Treis, Principal
Panorama Environmental, Inc.

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