

Sent via email from Mike Monasmith, May 1, 2019

MAY 1

We are following up on missing data requested in Data Request Set No. 4, including (CR-4) and questions listed in an email sent on April 30, 2019. The email requested an updated General Arrangement figure and aerial Site Plan for the modifications at Howland Road Substation. We are requesting clarification on project details following receipt of Data Responses, Set No. 4, initially received on April 17, 2019, then updated with supplemental information on April 25, 2019.

We hope you will be able to clarify the conflicting data and missing information for Data Responses Set No. 4 by COB on Friday, May 3, 2019. We may also need to schedule a conference call once we receive your responses and clarifications if we have questions. We apologize for the rush, but we need the conflicts resolved, and the missing information provided, so we can finish the remaining sections of the Administrative Draft IS/MND and submit to the CPUC for review.

Air Quality

1. Expanded TSP foundation requiring 100 cubic yard of fill for the percolation basin east of D'Arcy Parkway: We are not sure if this is accounted for in the emissions estimates. PG&E's responses to Data Requests Set No. 4 were initially received on April 17th and then supplemented on April 19th with a site plan and updated single line diagram. This was then supplemented with clarifying information dated on April 24th and received April 25th. In the April 25th Supplement, PG&E added emissions based on a phase called "Telecom: Vierra Substation". For this phase, PG&E would use 28 one-way trips (14 round-trips). If each load is 25 cubic yard, the total volume these truck trips can handle would be 350 cubic yards (=14x25). We don't know if this accounts for the 100 cubic yards of fill for the percolation basin, or the TSP installation, or clearing of the Vierra Substation expansion site. Please clarify.

Response: Yes, the emissions estimates included the percolation basin fill utilizing an onsite 250HP dump truck (10 cubic yards). The project will utilize onsite excavated material from the other TSPs (see also Question 2 and response below) as the source for the 100 cy of fill at the percolation basin.

2. TSP installation: Initial Vierra Substation Expansion activity including the relocation of 3 TSPs and the clearance of 2.6 acres of crops and debris that they indicate will be first placed in a stockpile and removed to a, "PG&E disposal facility" according to the PEA (Section 2.7.6). The construction equipment list and emissions provided together with Table 1 from the Data Responses Set No. 4 Supplement received on April 25th included a dump truck for TSP installation. The dump truck would be 250 hp, operated 6 hours per day, 2 days per week for 8 weeks. However, there was no explanation of how much volume of soil the dump truck could handle. The Vierra Input Run Full Project 14 excel file (received on Friday, April 26th) did not include haul trips for the TSP installation in the Trips and VMT sheet. The current information we have about soil excavation for the TSPs is that the soil would either be feathered around the base of the TSP or loaded into a dump truck to be disposed of off-site (PEA Section 2.7.7.1). If

Clarifications and Follow-up Data Requests from Data Responses Set No. 4 and Emails

the excavated soil from the TSPs are disposed of off-site, how many truck haul trips would be required, and what would be the haul trip distance?

Response: The excavated soils from the TSP construction will be reused onsite as fill for the D-Arcy Parkway relocated TSP and for the fill used for the expanded Vierra Substation. The onsite dump trucks were assumed to have a capacity of 10 cy.

3. We do not have a good sense of the extra fill that would be generated at each of the TSP sites themselves following auguring activity during the creation of the 4 to 6 feet in diameter and 18-30 feet deep foundation footings. Please provide a range of the cubic yards that would be excavated and maximum volume of export that could result should the soil be disposed of off-site instead of feathered around each TSP exclusively.

Response: A conservative estimate of soil generated at each TSP site is 40 cubic yards. As discussed above, the plan is to reuse soil onsite.

Soil Export and Truck Trips

1. When PG&E reviewed and approved the draft Project Description for the environmental document, PG&E updated the 18 cubic yards of soil export for the remote substations to 575 cubic yards and included the modifications at the Howland Road Substation to the already existing Kasson, Manteca, and Tracy substation modifications. PG&E clarified that the 18 cubic yard of export would be for each of the remote substations with new monopoles. That clarification came in the April 25th clarification letter for Data Responses Set No. 4. Also in that clarification letter, Table A presented Howland Road Substation Material Hauling Summary notes that trenching would generate 556 cubic yards of export and equipment foundations would generate 18.5 cubic yards of export. For a total of 574.5 cubic yards of export from Howland Road Substation. Adding the 18 cubic yards for each of the three remote substations with monopoles with the 574.5 cubic yards for Howland Road Substation, a total of 628.5 cubic yards (rounded to 629) of export at the four remote substations would be generated. Is 629 a correct estimation of export for these remote substations? Please confirm.

Response: Correct, the remote substation modifications, when combined, would result in approximately 629 cy of exported materials. Also note that the Howland Road Substation trenching would also require approximately 444 cy of fill material.

2. Was the bulking and shrinkage factor taken into consideration for the calculations of soil disposal and fill placement for project activities and how that would affect truck trips? If so, what percent was assumed?

Response: No, we did not utilize a bulking and shrinkage factor. However, we overestimated the trench size by a factor of 2-3 to be extra conservative and to account for changes in engineering.

General Arrangement figure update and Site Plan for Howland Road Substation

We believe this figure to be the as-built plans for the substation and assume the location of the proposed modifications are noted with the red wavy lines. We have the following requests:

Clarifications and Follow-up Data Requests from Data Responses Set No. 4 and Emails

1. We cannot confirm the length of the duct bank trench on the General Arrangement figure or confirm where the voltage transformer or its foundation would be located. There is no unit of measurement on the figure. See attached updated drawing.

Response: [The trench length is approximately 228 feet long.](#)

2. It also appears that trenches will extend outside of the substation fence line along two routes. It appears that a combination of new trenching (within the fence line) and digging along a previously disturbed route to access existing trenching is proposed in the General Arrangement figure. Is this correct?

Response: [The trench is entirely within the substation boundary. See updated figure.](#)

3. We also note that the control building dimensions on the figure don't match what appears to be the control building within the fence line of the substation. What appears to be the control building based on aerials is much smaller in size. We cannot find a building that meets the measurements shown on the figure. Please indicate where the existing control building is situated on-site.

Response: [The control building does not exist currently and is scheduled to be built prior to the Vierra Project.](#)

4. We need the General Arrangement figure updated to show the location of the voltage transformer and its foundation, the location of the circuit switcher foundation, unit of measurements on the figure for the modifications (especially the trenching), and clearly mark the area to be trenched. Please provide a better legend that is more descriptive of the modifications and existing structures.

Response: [See attached.](#)

5. The General Arrangement figure doesn't seem to show how the substation relates to the surrounding environment. An aerial noting the location of proposed modifications will assist technical staff in their analysis and understand the nature of potential impacts. The General Arrangement figure does not provide context with the setting of the substation so an aerial is important. We also want to present this aerial in the environmental document to readers and decision-makers so they can visualize where the modifications would occur, and the surrounding environment in which they would be constructed.

Response: [See attached.](#)

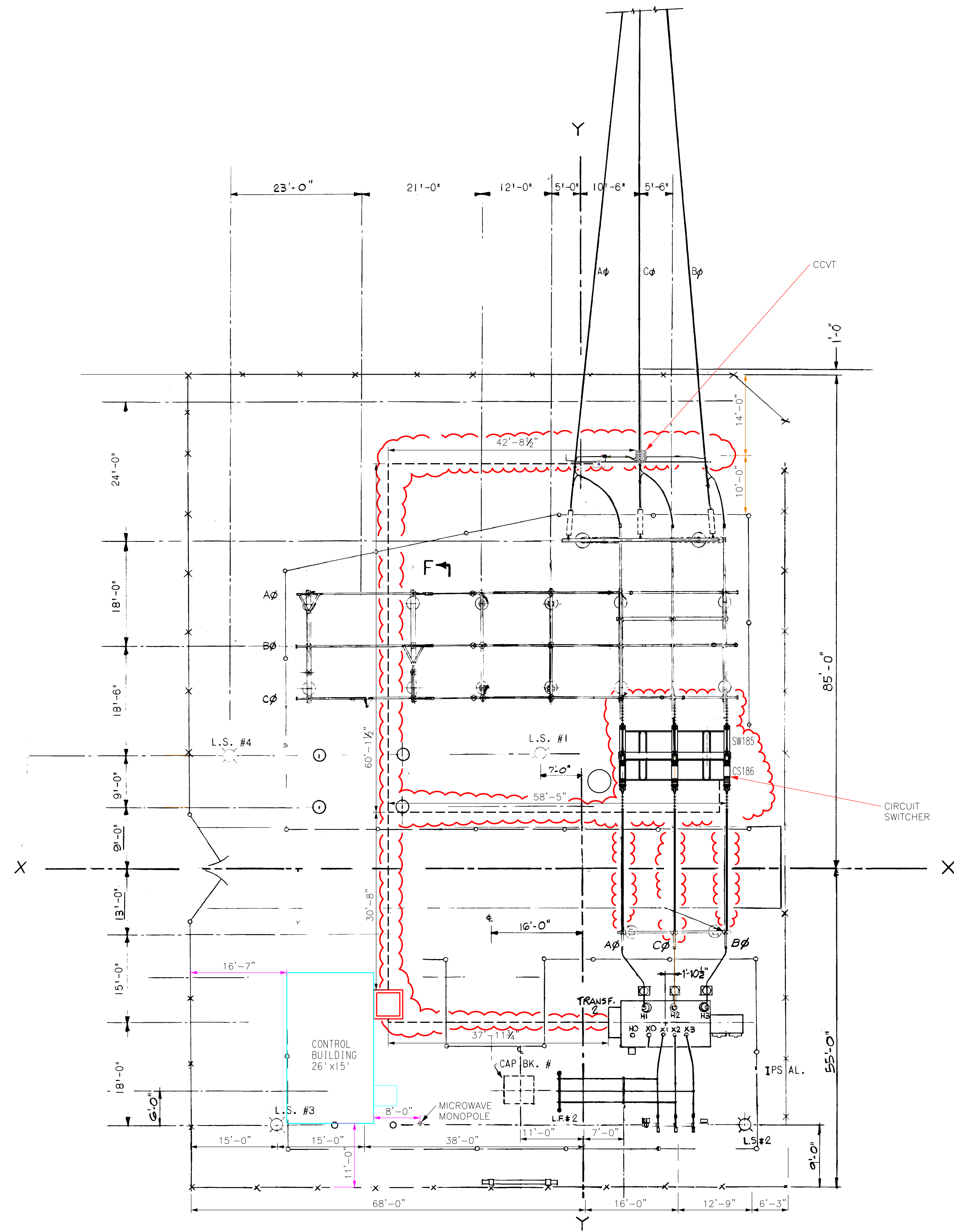
Cultural Resources

Regarding Cultural Resources question CR-4 from Data Request Set No. 4, we have not received the requested setting information for the Howland Road Substation.

1. Specifically, in order for staff to complete their analysis, staff requires a general description of the Howland Road Substation facility, including any on-site buildings, and of the setting including but not limited to: rural setting, commercial/industrial setting, inclusion of or adjacency to any historic structures or districts.

We had hoped that the Walker Background Research would contain the answers to these necessary questions, but it did not. We therefore ask again, as we do not have the ability to access the Howland Road Facility, and need to know these facets of the substation to complete our analysis.

Response: Howland Road Substation is a small electric substation comprised of electrical equipment and does not contain any on-site buildings. The substation is located in an industrial area and is surrounded by an industrial products company, the J.R. Simplot Company. All work will be completed within the existing substation and have no impacts to buildings or facilities on the J.R Simplot Company property.



PLAN

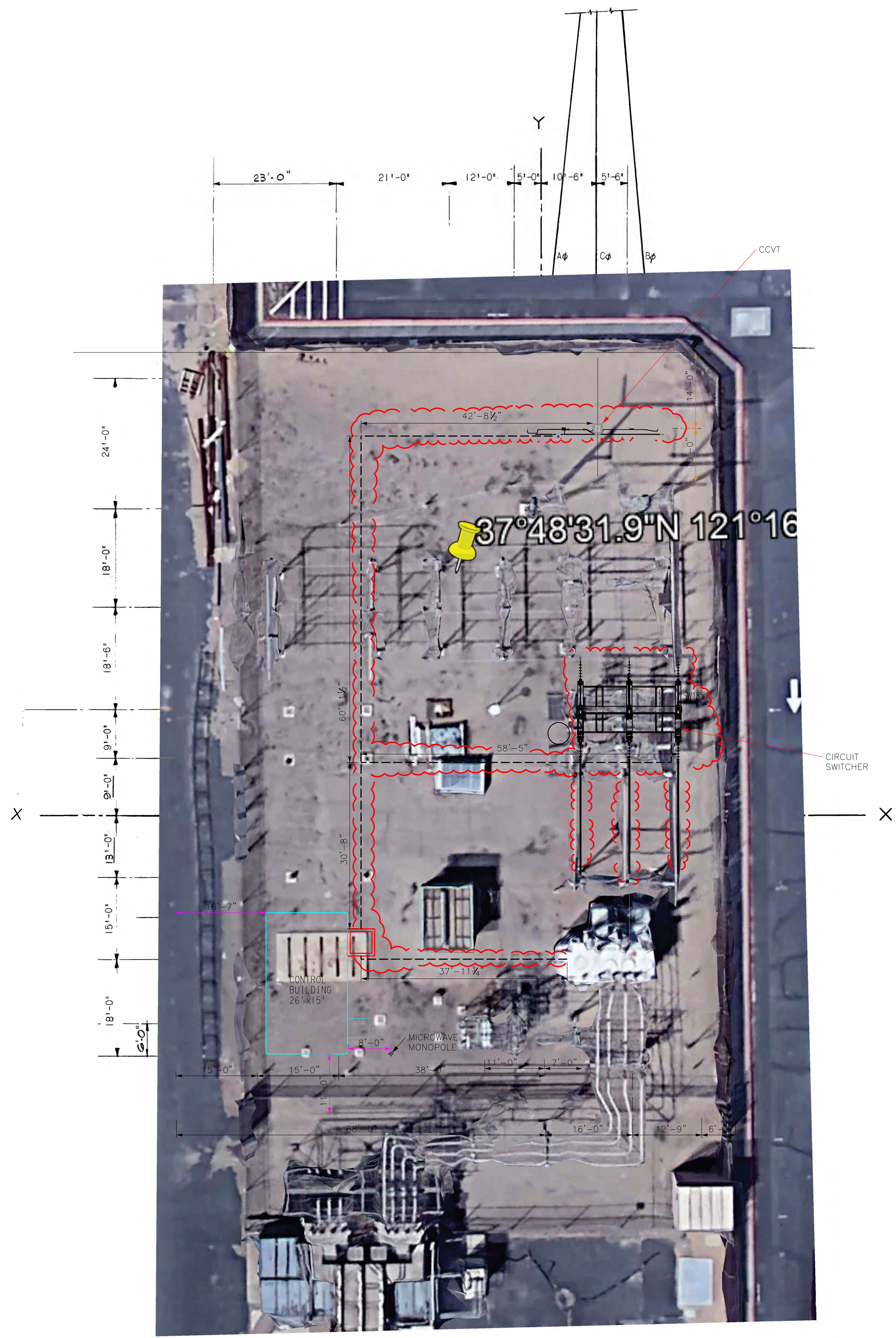
LEGEND

--- TRENCHING FOR DUCTBANK

NOTES

1. FOUNDATIONS NOT SHOWN. LOCATED DIRECTLY BENEATH EQUIPMENT.
2. DUCTBANK LENGTHS ARE AS FOLLOWS:
 TRANSFORMER 1 TO CONTROL BUILDING PULLBOX---- 37'-11³/₄"
 CIRCUIT SWITCHER TO CONTROL BUILDING PULLBOX- 88'-1"
 CCVT TO CONTROL BUILDING PULLBOX----- 102'-10"

		HOWLAND ROAD GA SKETCH	



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