



**Pacific Gas and
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August 16, 2024

Boris Sanchez
California Public Utilities Commission
Energy Division - Infrastructure Permitting & CEQA
505 Van Ness Avenue, 4th Floor
San Francisco, CA 94102

**RE: Response to Data Request #2, PG&E Northern San Joaquin 230kV
Transmission Project (A.23-09-001)**

Dear Boris,

Pacific Gas and Electric Company (PG&E) received Data Request 2 (DR 2) from the California Public Utilities Commission (CPUC) on August 6, 2024. The CPUC requested clarification on four items, which PG&E has copied below, followed by PG&E's responses.

1. Helicopter use

Page 4-46 (and 5.13-4) of the PEA indicates: "Because helicopters are not proposed for lifting structure components, it is not anticipated that residents would temporarily be required to vacate their residences. However, in the unlikely event that final construction plans require otherwise, all FAA requirements would be met and PG&E would coordinate with potentially affected residents (providing a minimum of 30 days of advance notice)."

Elsewhere, including page 5.9-23, the PEA indicates: "The use of helicopters to lift and transport structure components, materials, or equipment is not anticipated as the helicopters will only be used to pull a small sock line during stringing activities. Operation and maintenance of the project may require inspections and routine patrols and transmission structure insulator washing via helicopter; however, helicopters would not be required to transport heavy materials for O&M activities."

Please clarify: *Is there a potential that occupants or residents will need to temporarily vacate homes or businesses due to helicopter activity? How long would this typically last?*

PG&E Response: PG&E does not propose helicopter work that will require temporary relocation of occupants or residents. Construction work areas and access as proposed will

allow ground-based construction to install tubular steel poles (TSP). The reference on PEA page 4-46 to the use of helicopters “in the unlikely event that construction plans require otherwise” is intended to acknowledge the remote and speculative circumstance in which ground-based access to construction sites are blocked or otherwise unavailable. PG&E has identified suitable access routes and material staging areas for ground-based construction activities for all project components, other than using a small sock line during conductor stringing activities as noted on PEA page 5.9-23.

2. Nighttime Construction

In Section 3.6.5, “Work Schedule,” (page 3-98) the PEA states: “Work hours generally will be 10 hours per day with construction typically occurring between 7:00 a.m. and 5:30 p.m. Occasionally, work may occur during the evening hours for activities such as monitoring the foundation curing process and testing and commissioning substation components. However, such activities would not normally generate offensive or disturbing noises or lights. Night work is not planned.”

However, on page 3-47, the PEA states “If nighttime work is necessary in the work areas, temporary flood lighting will be situated and directed away from any adjacent properties. Nighttime work may be required when electrical clearances are available or for safe completion of a construction procedure.”

Page 3-57 seems to contradict this, stating: “Clearances will be issued day to day during daylight hours and are not typically issued overnight during the summer or during peak load conditions.”

PG&E has also included APMs related to nighttime work, including APM NOI-5 (related to notification of area residents) and APM NOI-6 (related to horizontal directional drilling).

***Please clarify:** Is there potential for construction to occur after 9:00 p.m.? If yes, what activities might occur (i.e., foundation curing process and testing and commissioning substation components, conductor stringing, direction drilling)? Please provide the equipment type (e.g., truck, loader, forklift) and activity location for any activities that could occur after 9:00 p.m.*

PG&E Response: Yes, there is potential for construction to occur after 9:00 p.m. Construction activities that may occur after 9:00 p.m. include installation of guard structure netting over State Route 88 and possible over other local roads, PG&E’s horizontal directional drill (HDD) activities in South Guild Avenue, and testing and commissioning activities to place the new 230 kV source into service.

If the California Department of Transportation (Caltrans) encroachment permit requires netting between guard structures that will protect State Route 88, the permit could potentially require the netting to be installed after 9:00 p.m. If that is required, the guard structures would be installed during daytime work hours in preparation to attach netting. The netting installation would likely take no more than approximately 3-4 hours. Equipment is expected to be one heavy-duty diesel bucket truck and one light-duty truck such as a $\frac{3}{4}$ -ton pick-up truck, 4 x 4. A rolling stop is expected to be used unless Caltrans requires a temporary road closure in its encroachment permit. Removal of the netting is expected to be allowed during daytime construction hours using a rolling stop where the line will cross SR 88.

PG&E proposes its trenching and HDD work in South Guild Avenue in Lodi to occur during daytime hours to install the secondary station service to PG&E Thurman Switching Station. It is possible local encroachment permits could require PG&E's trenching and HDD work at night to minimize potential traffic impacts or for other reasons. However, the proposed work areas in South Guild Avenue would maintain at least one lane of traffic in each direction. Refer to *PG&E 12 kV Service Line Extension into PG&E Thurman Switching Station* in PEA Table 3.6-1 for equipment that will be used for this project component in South Guild Avenue.

As discussed in PEA section 3.6.4, Construction Schedule, the western extent of PG&E's Lockeford-Lodi 60 kV line, installation of the western extent of PG&E's Lockeford-Thurman 230 kV line, and testing and commissioning to place the new 230 kV source into service can only occur during an annual outage window of approximately November to March.

The final approximately 0.4 mile of the new PG&E 230 kV line (W44 to W48) will be constructed after PG&E Lockeford-Industrial 60 kV line is partially removed (pole 1 through pole 9) to allow the transmission line to reuse the power line alignment. PG&E Lockeford-Industrial Line will not be modified unless it appears there is sufficient time within the annual approximately November to March single PG&E 60 kV line outage window to remove the portion of the line and any remaining underbuild, install the 230 kV line to PG&E Thurman Switching Station, and complete testing and commissioning to place the new 230 kV source into service. Project work at PG&E Lockeford Substation, PG&E Thurman Switching Station, PG&E remote-end substations and repeater station, and LEU Industrial and LEU Guild substations also must be complete or nearing completion to support feasibility that PG&E and LEU will be able to place the new 230 kV source into service during a seasonal single PG&E 60 kV line outage. If the western end of PG&E Lockeford-Industrial Line is not removed as scheduled, the project will wait until the next outage window, likely the following November to March. Portions of existing 230 kV reconfiguration at PG&E Lockeford Substation and some site restoration

at components may be able to occur while the new 230 kV work waits for the next single PG&E 60 kV line outage window.

While this construction work only will begin if it appears sufficient time is available to place the new 230 kV source into service in an annual outage window, once this activity begins unforeseen circumstances could require construction after 9:00 p.m. to place the new source into service before demand increases going into summer. Should work be required after 9:00 p.m., the construction activity would most likely be testing and commissioning of the new 230 kV source which would occur within the project's substations or switching station. Refer to *PG&E Lockeford Substation Phase 3: Dress/Test/Wire Equipment*, *PG&E Thurman Switching Station Dress/Test/Wire Equipment*, and *LEU Guild Substation Deliveries, Installations, Testing & Commissioning 2* in PEA Table 3.6-1 for a conservative list of equipment that could be used should testing and commissioning need to occur after 9:00 p.m.

Night work for foundation curing will be unnecessary because PG&E will install temporary fencing around foundations as needed during the curing process. Conductor stringing will use rolling stops when crossing roads or use other means in road or railroad encroachment permits to conduct construction activities during daytime hours.

3. Avian Protection Plan

The project includes the following APMs related to collision or electrocution risk for birds:

APM BIO-9: Implement general resource protection measures for PG&E portion of the project. PG&E conductors and ground wires would be spaced sufficiently apart, as feasible, so that raptors cannot contact two conductors or one conductor and a ground wire, causing electrocution (APLIC 2006).

APM BIO-10: Protect birds on PG&E power lines. All PG&E transmission and power lines and PG&E switching station and substation facilities for the project will be designed to be avian-safe as appropriate and feasible, following the intent of Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (APLIC 2006, 2012).

Please clarify: *Does PG&E have an existing Avian Protection Plan that it intends to use for the project? If yes, please provide.*

PG&E Response: *The PG&E Avian Protection Plan for External Distribution (PG&E's Program to Address Avian Electrocutions, Collisions, and Nesting Birds, April 2018) is attached to this response.*

4. PG&E Conservation Programs

In addition, the PEA references two PG&E plans related to species conservation.

Please provide: *The PG&E San Joaquin Valley Habitat Conservation Plan and the PG&E Valley Elderberry Longhorn Beetle Conservation Program.*

PG&E Response: The PG&E San Joaquin Valley Habitat Conservation Plan is available on the US Fish and Wildlife Service website: https://ecos.fws.gov/ecp/report/conservation-plan?plan_id=4229

The PG&E Valley Elderberry Longhorn Beetle Conservation Program is PG&E's implementation of the U.S. Fish and Wildlife Service Biological Opinion (1-1-01-F-0114) dated June 27, 2003. Subject: *Formal Endangered Species Consultation on the PG&E Company Transmission Separation Project* which is attached to this response.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s

Erin Rice
Senior Land Planner

Enclosure(s):

Attachments 1 - 2

cc:

Heather Blair, Ascent

Mathew Swain, PG&E Law Department

Colleen Taylor, Jacobs