



# California Public Utilities Commission



December 4, 2024

VIA EMAIL

Erin Rice  
Pacific Gas & Electric  
77 Beale Street  
San Francisco California 941055

**SUBJECT:** Rescission of CPUC Data Request 1

Dear Mr. Rice,

**Summary:** CPUC received PG&E's response to Data Request #1 (DR 1) and, as noted by PG&E in its response, participated in a conference call with PG&E to discuss the request. CPUC has since gathered yet additional information about the feasibility of DERI alternatives to the Northern San Joaquin 230kV Transmission Project, as proposed, and based on that information, rescinds DR 1.

**Background:** CPUC transmitted DR 1 requesting additional information regarding DERI alternatives because the level of detail was not consistent with the other alternatives presented in the PEA and because the PEA contained insufficient information and rationale to justify the rejection of Distribution Energy Resources Improvement (DERI) alternatives. The response from PG&E presents evidence that DERI or non-wires alternatives would not feasibly attain the basic objectives of the project. As a general matter, a DERI alternative would be inconsistent with the project scope identified by CAISO, which is to bring a new 230 kV source into the City of Lodi. In addition, DERI alternatives would not result in sufficient load reduction to address voltage issues and thermal overloads occurring on PG&E's 60kV system during Category P1 and P6 contingency scenarios, and if such load reductions were achievable, they would need to be achieved in the City of Lodi, over which neither PG&E has control, nor CPUC has jurisdiction.

The City of Lodi also provided data to CPUC demonstrating the infeasibility of a DERI or non-wires alternative within its jurisdiction. Based on actual and projected loads of approximately 200 MW within 20 years, the City assessed construction of a new 200 MW utility-grade solar system with battery backup within Lodi and found it infeasible because of excessive land requirements and infrastructure cost. Such a system would require approximately 1,440 acres (equivalent to 2.25 square miles) of land in a city of 13.8 square miles and would cost approximately \$470 million for infrastructure and battery storage alone, excluding land acquisition, compared to approximately \$30 million for the new Lodi Electric Utility Guild Substation proposed as part of the project. The

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Northern San Joaquin 230kV Project

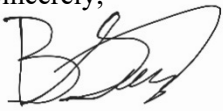
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explanation of feasibility and supporting evidence will be presented in the Alternatives Screening Report, which will be released for public review with the Draft Environmental Impact Report for the proposed project.

Please do not hesitate to call me at (408) 705-6030 if you have any questions.

Sincerely,



Boris Sanchez

Project Manager for the Northern San Joaquin 230 kV Upgrade Project  
Energy Division

cc: Michelle Wilson, CPUC CEQA and Energy Permitting Group Program and Project Supervisor  
Matthew Swain Senior Attorney, PG&E  
Heather Blair, Ascent  
Jessica Babcock, Ascent