

August 6, 2024

To: Erin Rice, Senior Land Planner, Pacific Gas & Electric Company

From: Boris Sanchez, Project Manager, Upgrade Project Energy Division, California Public Utilities Commission

SUBJECT: CPUC Data Request 2

The California Public Utilities Commission (CPUC) is preparing an Environmental Impact Report (EIR) for the Northern San Joaquin Transmission Project (NSJTP) based upon the project description information provided in the Proponents Environmental Assessment (PEA) filed with the CPUC on September 1, 2023.

The CPUC requests clarification regarding the following construction practices so that the appropriate assumptions are used in the EIR analyses.

### **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?

### **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.

### **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.

### **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*.