

**PUBLIC UTILITIES COMMISSION**505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

September 25, 2026

Dear Mr. Liddell:

On August 10, 2026, Pacific Gas and Electric Company (PG&E) submitted a revised Notice to Proceed Request (NTPR) #1 to the California Public Utilities Commission (CPUC) focused on three replacement structure foundation installations within the overhead power line replacement portion of the Moraga-Oakland X (MOX) 115 kV Rebuild Project (Project), and an additional revision was submitted on September 23, 2026. NTPR #1 includes three replacement structure foundation installations within the overhead power line replacement portion of the Project. PG&E anticipates requesting additional NTP authorizations in a phased approach. Given that the MOX Project has been approved by the CPUC, as described above, this phased construction review process allows PG&E to proceed with individual project components where compliance with all applicable mitigation measures and conditions can be documented. The September 23 revision includes the addition of access road improvements to RS16 which is accessed off West Circle Road.

The Project would upgrade approximately 5 miles of overhead 115 kV power lines between Moraga Substation and Oakland X Substation. The CPUC issued a decision granting PG&E a Permit to Construct to authorize construction of the Project (Application A.24-11-005) pursuant to General Order 131-D<sup>1</sup>. The CPUC Decision adopted the Final Environmental Impact Report (EIR), released in January 2026, in its entirety. The CPUC also adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure compliance with all mitigation measures imposed on the MOX Project during implementation. Work proposed under NTPR #1 is a subcomponent of the larger project.

This letter documents the CPUC's thorough evaluation of all activities covered in this NTP, including the mitigation measure requirements applicable to the subject NTP Request. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the NTP are implemented, as required in CPUC's Decision.

CPUC grants NTP #1 for the replacement of three structure foundation installations and access road improvements at RS16 based on the factors described below.

PG&E provided the following information:

---

<sup>1</sup> GO 131-E became effective on January 1, 2025. The application was filed prior to the enactment of GO 131-E and therefore was reviewed under GO-131D.

## PUBLIC UTILITIES COMMISSION

## Notice to Proceed Request Summary

PG&E's NTP #1 request focuses on access road improvements needed for construction activities at RS16, which is accessed from West Circle in Oakland, and three replacement structure foundation installations within the overhead power line replacement portion of the Project. These new structures include RN14, RS14, and RS16. Construction started on September 8, 2026, at Saroni Court and is expected to begin on October 2, 2026, at West Circle and will continue for approximately three to four weeks. Construction hours will be between 7am and 7pm, Monday through Saturday. No work is planned to occur at night. No helicopters will be used. These activities are part of and consistent with the project described in the Final EIR. The three replacement structure foundations are:

- Structures RN14 and RS14, accessed from the end of Saroni Court in Oakland, CA
- Structure RS16, accessed from the end of West Circle Road in Oakland, CA

The work sites are in an urban residential area on ornamental landscaping (RN14/RS14) and non-native grassland (RS16). Equipment will be offloaded on to paved areas and used on paved areas (RN14/RS14) or non-native grassland (RS16). Table 1 shows work areas of disturbance which includes site preparation, fence removal (Structures RN14/RS14), access road improvement (RS16), and micropile foundation installation (RN14, RS14, and RS16).

**Table 1. Approximate Disturbance Acreage for NTP#1**

| Proposed Improvement                                     | Area of Disturbance     | Depth of Micropile Excavation |
|----------------------------------------------------------|-------------------------|-------------------------------|
| RN14 and RS14 Foundation Installation                    | Approximately 0.08 acre | Approximately 15 to 30 feet   |
| RS16 Foundation Installation and Access Road Improvement | Approximately 0.4 acre  | Approximately 15 to 30 feet   |

### Construction Activities

Construction crews and equipment will drive to work locations using Shepherd Canyon Road. From Shepherd Canyon, Paso Robles Drive/Saroni Drive connects to Saroni Court, and Balboa Drive connects to West Circle. From Saroni Court, the work area will be accessed from a paved residential driveway. From West Circle, equipment will use an unpaved access road to access the RS16 work area. No staging areas are proposed for work covered in NTP#1 outside of existing PG&E facilities.

Site preparation may include flagging the replacement structure locations, removing, trimming, or mowing of ornamental landscaping and grasses or other organic matter to allow construction equipment or vehicles to operate safely within a work area or for access. At Saroni Court, an existing fence will be removed to access the foundation installation work area. Tree trimming or removal will be conducted by a certified arborist. Flagging, vegetation management, and site preparation is typically a two-person crew using a line truck or pickup truck with trailer, as needed.

## PUBLIC UTILITIES COMMISSION

*The access road improvements from West Circle will include moving woodchips off the upper section of the road and surface contouring and curve improvement on the lower section to ensure construction vehicles and equipment stability and safe turn radius. Woodchips will be spread off the access road and away from marked special-status species habitat. Soil is expected to be reused onsite unless potentially contaminated and then the additional steps in the Soil Management Plan will be taken. Appropriate stormwater best management practices (BMPs) will be implemented to avoid degrading water quality through erosion, sediment runoff, or other pollutants. If needed, access road winterizing such as, construction matting or aggregate base, may be laid down over geotextile fabric and removed after construction unless otherwise specified in landowner agreements. The road improvement will use typical road construction equipment, including a skid steer and a compact excavator. Typically, a three-person crew performs the work. A copy of an obstruction permit from the City of Oakland will be provided to the CPUC before the offloading/ loading activities occur that will temporarily block parking along the side of West Circle.*

*During foundation installation, equipment will be transported to the work areas or off-road equipment will drive itself. Equipment for foundation installation at each location will include a dump truck, drill rig truck, two concrete mixer trucks, two 4x4 pickup trucks, a trailer, a skid steer, a boom truck, and a backhoe/ loader truck. Typically, a three-person crew performs the work.*

*Micropile drill rigs drill and grout pile foundations are reinforced with a casing or a center reinforcing bar. The surface and subsurface layers from drilling will be stockpiled separately and returned to their approximate locations in the soil profile or will be disposed of offsite at an approved disposal location. Contaminated soils are not expected; however, if they are encountered, they will be handled and disposed as described in the Soil Management Plan. Any construction debris including fencing and green waste will be picked up regularly from construction areas, stored as needed in approved containers onsite, and then hauled away for recycling or disposal at an appropriate facility.*

*Water will be used for dust suppression as needed using a water truck with water sourced from local municipal sources close to the work sites (which are provided by East Bay Municipal Utility District [EBMUD]) or, if available, recycled water from EBMUD's main wastewater treatment plant in West Oakland. Wastewater service will be provided by portable toilets, and waste will be disposed of at appropriately licensed offsite facilities.*

*After the civil work is complete, construction equipment will be removed from the work areas and debris removed. No soil stockpiles are expected to remain. Restoration (for example, fence replacement) will occur as discussed with the property owner and may not occur until after line work (to be included in request for NTP #2) completes in December 2026.*

### Preconstruction Requirements and Resource Monitoring

*Preconstruction surveys for Northwestern Pond Turtle, Alameda Whipsnake, rare plants, and Monarch Butterfly were completed, on September 1 and 2, respectively, and no species or habitat were identified in the work areas. A bat habitat assessment and focused bat survey was completed on September 1 and 2. All surveys were conducted by CPUC-approved biologists and the results provided were approved by CPUC on September 8. The work area off Saroni Court does not have habitat or species and no flagging is needed. Based on the results of the Crotch's*

## PUBLIC UTILITIES COMMISSION

*Bumble Bee Habitat Assessment and survey completed September 2, a Crotch's Bumble Bee Survey, Impact Avoidance, and Mitigation Plan (Plan) was submitted to CDFW and CPUC on September 9. CPUC approved the Plan on September 11. Flagging is installed to identify the potential Crotch's Bumble Bee overwintering or foraging habitat and to mark the existing unpaved access road improvement from West Circle to the RS16 work area.*

*Biological resource checks occur daily at active construction sites. A preconstruction survey for Alameda Whipsnake will be performed again if ground-disturbing work begins at West Circle after September 30, 2026. A Crotch's Bumble Bee survey, following the steps in the Crotch's Bumble Bee Plan, will be performed concurrently with site preparation activities to move a downed log across the access road, moving debris piles from the road or work area, and move downed fence panels out of the work area/access to the RS16 drill location. If a Crotch's Bumble Bee is observed, the site preparation work activity will stop when safe to do so, and notifications will follow the Plan.*

*A tribal monitor will be invited to monitor all ground-disturbing activities at West Circle, which is within 500 feet of a current or historic creek. No other cultural or paleontological surveys are required for this work.*

*Table 2 includes documents that were included in NTPR #1 that were reviewed and approved by the CPUC.*

**Table 2. NTPR #1 Documents submitted for CPUC Review**

| <b>MM/APM</b>                  | <b>Document Name</b>                                    |
|--------------------------------|---------------------------------------------------------|
| APM CUL-1; HAZ-4; HYD-2; PAL-2 | Attachment 1: WEAP Training PowerPoint                  |
| MM N-1b                        | Attachment 2: Construction Notification Letter Template |
| APM WFR-1                      | Attachment 3: Construction Fire Prevention Plan         |
| MM HH-1a                       | Attachment 4: Soil Management Plan                      |

## CPUC Evaluation of Preconstruction Mitigation Implementation

All applicable project mitigation measures (MMs), Applicant Proposed Measures (APMs), Field Protocols (FPs), Avoidance and Minimization Measures (AMMs) from the Bay Area Habitat Conservation Plan (BAHCP) permit conditions of approval (COAs), compliance plans, and other permit conditions shall be implemented. Some measures have ongoing/time-sensitive requirements and must be implemented before and during construction, where applicable. The following provides the status of applicable MM and APM-required submittals and requirements. Any outstanding requirements are also included:

**Aesthetics:** As required by APM AES-1, all Project sites will be maintained in a clean and orderly state, orderly condition. Upon completion of Project construction, temporary work areas will be returned to pre-Project conditions, including regrading of the site and revegetating or repaving of disturbed areas to match pre-existing contours and conditions. No nighttime lighting or staging yards outside of existing PG&E facilities are proposed for activities under NTP #1.

PUBLIC UTILITIES COMMISSION

**Agriculture and Forestry Resources:** Construction activities in NTP #1 are not located in an area with agriculture or forestry resources.

**Air Quality:** As required by APM AIR-1, PG&E will implement measures to control fugitive dust consistent with the Bay Area Air Quality Management District's (BAAQMD's) Basic Best Management Practices (BMPs) during construction activities under NTP #1. This includes: 1) exposed surfaces within the active construction area which shall be watered two times per day as necessary to contain dust, 2) haul trucks transporting soil, sand, or other loose material offsite will be covered, 3) visible mud or dirt track out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, and 4) vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). Where project activities are within 1,000 feet of residential areas, PG&E will also implement the following additional BMPs, consistent with BAAQMD's Enhanced BMPs (BAAQMD, 2023): 1) limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities, 2) minimize the amount of excavated material or waste materials stored at the site, and 3) stabilize soil where project grading occurred and the area is inactive for at least 14 calendar days.

As required by AMP AIR-3, PG&E will minimize construction equipment exhaust by using low-emission or electric construction equipment where feasible, ensure that cranes, off-highway trucks, and tractors/loaders/backhoes used during project construction will comply with Tier 4 emissions standards, and minimizing ensuring that cranes, off-highway trucks, and tractors/loaders/backhoes used during project construction comply with Tier 4 emissions standards, and minimizing unnecessary construction vehicle idling time.

**Biological Resources:** PG&E prepared a Worker Environmental Awareness Program (WEAP) to educate on-site workers about the proposed Project's sensitive environmental issues in accordance with ITP 5.4 for construction activities described NTP#1. Throughout construction, PG&E shall ensure that all on-site project personnel receive this training before beginning work. PG&E shall maintain a list of all personnel who have completed the WEAP training and provide copies to the CPUC in the Weekly Compliance Reports. The CPUC approved the WEAP on August 12, 2026.

As required by FP-1 through FP-18, AMM Wetland-2, and AMM Plant-01 through AMM Plant-08, PG&E will implement measures within PG&E's Multiple Region Operations and Maintenance Habitat Conservation Plan (MRHCP) Area and in accordance with CDFW Measures from the Bay Area O&M ITP (ITP 5.3 through 7.24 and ITP FEIR APM BIO-1 through BIO-7) during construction activities.

As required by APM BIO-1, clearance surveys and preconstruction surveys will be conducted at work locations as directed by the PG&E biologist during construction activities. Preconstruction survey results will be provided to the CPUC for review and verification before construction begins. Preconstruction survey protocols and minimization measures for Crotch's bumble bee (MM BIO-

## PUBLIC UTILITIES COMMISSION

1b), Monarch butterfly (MM BIO-1c), northwestern pond turtle (MM BIO-1d), and bats (ITP FEIR BIO-7) will be implemented according to the mitigation measure language, as required.

Preconstruction surveys for Northwestern pond turtle, Alameda whipsnake, rare plants, and monarch butterfly were completed, on September 1 and 2, respectively, and survey results were provided to the CPUC. No species or habitat were identified in the work areas. Per Bay Area O&M ITP measure 7.17, if construction activities at RS16 do not begin within 30 days of the Alameda whipsnake preconstruction survey, the survey will need to be completed again and survey results provided to the CPUC.

Per the approved Crotch's Bumble Bee Survey, Impact Avoidance, and Mitigation Plan (Plan), flagging is installed to identify the potential Crotch's bumble bee overwintering or foraging habitat and to mark the existing unpaved access road improvement from West Circle to the RS16 work area. A Crotch's bumble bee survey will be performed concurrently with site preparation activities to move a downed log across the access road, moving debris piles from the road or work area, and move downed fence panels out of the work area/access to the RS16 drill location and survey results will be provided to the CPUC. If a Crotch's bumble bee is observed, construction activities will stop when safe to do so, and agency notifications will be completed.

As required by ITP 5.5 and 6.4, if biological monitoring is required, the Monitoring Biologist(s) shall maintain monitoring documentation onsite in hard copy or digital format throughout the duration of work, including a copy of the ITP with attachments. The Designated Representative or Monitoring Biologist shall prepare daily written observation and inspection records for construction activities. The Designated Representative or Monitoring Biologist shall provide a summary of biological monitoring activities to the CPUC in the Weekly Compliance Reports.

As required by MM BIO-5a, any required tree trimming or removal of trees shall be conducted in accordance with the International Society of Arboriculture (ISA) American National Standards Institute (ANSI) A300 Tree Care Standards and ISA's Pruning Best Management Practices and overseen by an ISA Certified Arborist.

**Cultural Resources:** As required by APM CUL-1, PG&E developed a Worker Environmental Awareness Program (WEAP) to educate on-site workers about the proposed Project's sensitive environmental issues. Throughout construction, PG&E shall ensure that all on-site project personnel involved in earth-moving activities receive this training before beginning work. PG&E shall maintain a list of all personnel who have completed the WEAP training. The CPUC approved the WEAP on August 12, 2026.

**Geology and Soils:** Implementation of mitigation measures for Geology and Soils is not anticipated for construction activities described in NTP #1.

**Greenhouse Gas (GHG) Emissions:** As required by APM GHG-1, PG&E will implement measures during construction to minimize GHG emissions by reducing vehicle and equipment

PUBLIC UTILITIES COMMISSION

idling and maintaining construction equipment in proper working condition. The project will apply a “common sense” approach to vehicle use to reduce idling as much as possible, below the 5-minute maximum allowed by California law.

**Hazards, Hazardous Materials, and Public Safety:** As required by APM HAZ-1, HAZ-2, HAZ-3, and HAZ-4, PG&E will implement construction controls, training, and communication to minimize the potential exposure of the public and site workers to potential hazardous materials during all phases of project construction. Materials will be available on the project site during construction to contain, collect, and dispose of any minor spill. Oil-absorbent material, tarps, and storage drums will be available on the project site during construction and will be used to contain and control minor oil releases. PG&E or the construction contractor's safety managers will implement safety training, including WEAP, before construction. The contractor will keep a record of when the safety training occurred, who delivered it, and who attended, and make it available for review by PG&E and the CPUC upon request. CPUC approved the WEAP on August 12, 2026.

In compliance with APM-HAZ-5 and MM HH-1, if excavation activities encounter soil suspected of being contaminated due to odor or unusual coloration, it will be segregated and tested. PG&E prepared a Soil Management Plan and submitted it to the CPUC for review. The CPUC approved the plan on August 10, 2026.

**Hydrology and Water Quality:** As required by APM HYD-2, PG&E developed a WEAP that included spill prevention and response measures and proper BMP implementation, including installation of erosion and sediment control measures before construction activities began. In compliance with APM HYD-3, as part of the final construction activities, PG&E will restore all removed curbs and gutters, repave, and restore landscaping or vegetation, as necessary.

**Noise:** As required by MM N-1a, APM NOI-2, NOI-3, NOI-4, and NOI-7, PG&E will implement standard noise-reducing construction practices to reduce noise during construction activities and use quiet equipment whenever possible. PG&E will shield compressors and other small stationary equipment with portable barriers if located within 200 feet of a residence and, where feasible, direct equipment exhaust stacks and vents away from noise-sensitive uses. All equipment shall be in good working order, adequately muffled, and maintained in accordance with the manufacturers’ recommendations.

As required by MM N-1b, PG&E shall provide written notice to all affected jurisdictions, including local agencies and jurisdictions, emergency service providers, and public transit agencies, at least 1 month before planned construction activities. PG&E shall notify utility service providers about utilities that may require relocation at least 18 months before construction begins. PG&E shall provide a hotline telephone number in all posted notices and written notices to allow impacted residents, schools, or park users to call to inquire regarding schedule and noise. Throughout construction, the PG&E public liaison shall document, investigate, evaluate, and attempt to resolve

PUBLIC UTILITIES COMMISSION

all project-related noise complaints. PG&E shall provide CPUC with monthly documentation of all complaints and the actions taken to resolve them.

**Paleontological Resources:** As required by APM PAL-1, PAL-2, and PAL-5, PG&E retained a Paleontological Principal Investigator to ensure that all APMs related to paleontological resources are properly implemented during construction. The WEAP provided for NTP#1 included training on paleontological resources protection.

**Recreation:** Construction activities described in NTP #1 are not within or near parks, open spaces, or recreational facilities.

**Transportation:** As required by APM TRA-1, PG&E will obtain any necessary transportation and encroachment permits from Caltrans and the local jurisdictions, as required, including those related to state route crossings and the transport of oversized loads and certain materials, and will comply with permit requirements designed to prevent excessive congestion or traffic hazards during construction. PG&E will provide the CPUC with copies of permits obtained prior to construction activities described in the permit in each jurisdiction or location. In compliance with APM TRA-2, PG&E will restore any roads and all removed or damaged curbs, gutters, and sidewalks, in compliance with the locally issued ministerial permits. PG&E provided the CPUC with documentation of coordination with the City of Oakland stating that they would only need an obstruction permit for activities described in NTP#1.

**Tribal Cultural Resources:** As required by APM TRC-1 and TRC-2b, PG&E will invite a tribal monitor to monitor all ground-disturbing activities at West Circle, which is within 500 feet of a current or historic creek. If cultural resources of Native American origin are identified during grading or excavation of the proposed Project, all ground-disturbing activities within 100 feet shall cease until an archeologist has evaluated the nature and significance of the find as a cultural resource and a representative from the Confederated Villages of Lisjan Nation is consulted by the government agency.

In compliance with MM TCR-2c, if human remains are encountered during construction and/or other ground-disturbing activities, PG&E will redirect work within 100 feet of the remains, and the County Coroner will be notified immediately.

**Utilities and Service Systems:** Construction activities described in NTP #1 do not include any underground portions of the Project.

**Wildfire:** As required by APM WFR-1 and WFR-2, PG&E prepared and submitted a project-specific Construction Fire Prevention Plan with fire prevention practices to be implemented at active construction sites and during maintenance activities. The approved WEAP included those fire prevention measures. The CPUC approved the Fire Prevention Plan on August 3, 2026.

PUBLIC UTILITIES COMMISSION

## Conditions of NTP Approval

The conditions noted below shall be met by PG&E and its contractor(s) prior to the start of construction:

- All applicable project MMs, APMs, FPs, AMMs, COA's, compliance plans, and permit conditions shall be implemented. Some measures have ongoing/time-sensitive requirements and shall be implemented before and during construction, where applicable.
- Copies of all relevant permits, compliance plans, and this NTP shall be available on site for the duration of construction activities. Make all permits and plans available to the CPUC Environmental Monitors (EMs) upon request.
- An updated Project Contact List shall be provided to the CPUC prior to construction that includes updated Project Personnel.
- **APM CUL-1; HAZ-4; HYD-2; PAL-2:** Prior to workers arriving onsite, all new MOX Project personnel will receive MOX Project-approved WEAP training. Copies of the training logs will be provided to the CPUC in the Weekly Compliance Reports.
- **MM N-1b:** PG&E shall provide CPUC copies of dated notices sent to all affected jurisdictions, including local agencies and jurisdictions, emergency service providers, and public transit agencies for work activities included in NTP#1.
- **APM TRA-1:** PG&E will provide the CPUC with copies of the obstruction permit(s) required and obtained from the City of Oakland for work activities described in each permit prior to initiation of subject activities.
- **MMCRP:** Once preconstruction survey reports are submitted, the CPUC EMs shall conduct site reviews to verify that the required site boundary and resource staking have been installed in work areas (MMCRP Section 4.2). Typically, each work site shall be delineated by markers (usually wooden stakes) which define the approved work area boundaries. Delineate any Environmentally Sensitive Area (ESA) identified during preconstruction surveys for avoidance. Construction may begin only after the preconstruction survey reports and staking verification reviews are complete.
- **MMCRP:** PG&E will prepare and distribute a weekly environmental compliance status report for distribution to the CPUC consistent with project permits, mitigation measures, and the MMCRP (MMCRP Section 4.4.1).
- **MMCRP:** No movement or staging of construction vehicles or equipment shall be allowed outside of the approved areas. If additional temporary workspace areas or access routes, or changes in technique and mitigation implementation to a lesser level, are required, submit a Temporary Extra Work Space (TEWS) or Minor Project Refinement (MPR) request for CPUC review (MMCRP Section 4.6). In addition, all water sources and disposal sites not previously identified shall require a TEWS or an MPR.

PUBLIC UTILITIES COMMISSION

- Any variances from local jurisdictions on allowable workdays/hours shall be provided to the CPUC prior to their implementation.

Sincerely,



Michelle Wilson for Tharon Wright  
Environmental Project Manager  
California Public Utilities Commission

cc. V. Strong, Aspen