

September 25, 2026

Tharon Wright
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Moraga-Oakland X 115 kV Rebuild Project
Notice to Proceed Request Package No. 2 (NTP #2), Revision 0

Dear Ms. Wright,

The California Public Utilities Commission (CPUC) issued a decision granting Pacific Gas and Electric Company (PG&E) a Permit to Construct to authorize construction of the Moraga-Oakland X 115 kV Rebuild Project (project) (Application A.24-11-005) pursuant to General Order 131-E. The CPUC Decision adopted the Final Environmental Impact Report (EIR), released in January 2026, in its entirety. The Final EIR includes a Mitigation Monitoring, Compliance and Reporting Plan (MMCRP), and the CPUC adopted the MMCRP as part of its approval of the project. In order for PG&E to commence construction, PG&E needs to provide the CPUC with several preconstruction requirements per the MMCRP.

This Notice to Proceed (NTP) #2 request package focuses on installing three power line structures (RN14, RS14, and RS16) on existing foundations (installed during NTP #1); modifying existing adjacent inline structures (EN14, EN16, ES15, ES16, ES18, and ES20) by replacing insulators, hardware and steel pieces; moving existing conductors (from EN15, ES17, and ES19) to the new structures (RN14, RS14, and RS16) and re-tensioning the conductors; and removing the three replaced towers (EN15, ES17, and ES19). This revision 0 updates the project setting to include the RS16 access road improvement allowed under NTP#1 issued September 25, 2026.

Construction will start on October 26, 2026 and will continue for approximately three to four weeks. Construction work hours are 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. Work is requested to occur at 12 structures and adjacent spans in Oakland. When the existing lines are moved between existing and replaced structures, work will occur at adjacent structures to re-tension the lines. The type of structure activity, construction method other than hand tools, and access from a paved road included in this request (east to west) are:

- Modify Structure ES15, walk to and climb from the end of East Circle
- Modify Structures EN14 and ES16, walk to and climb from Sayre Drive
- Install Structures RN14 and RS14, use crane methods at the end of Saroni Court
- Remove Structures EN15 and ES17, use crane methods at the end of Saroni Court
- Modify Structures EN16 and ES18, walk to and climb from Balboa Drive
- Install Structure RS16, use gin pole methods with vehicle access from the end of West Circle
- Remove Structure ES19, use gin pole methods with vehicle access from the end of West Circle
- Modify Structure ES20, walk to and climb from the end of Cortez Court

The work sites with offroad vehicle travel or ground disturbance are in an urban residential area on ornamental landscaping (EN15/RN14 and ES17/RS14 at Saroni Court) and non-native grassland (ES19/RS16 accessed from West Circle). Equipment will be offloaded to paved areas and used on or immediately adjacent to paved areas at Saroni Court. While the access road from West Circle to RS16 will be improved (allowed under NTP #1), no heavy equipment will be used on the non-native grassland at ES19 and RS16 accessed from West Circle. Gin pole construction methods will be used to install the rebuild structure on its existing foundation and remove the existing tower. Gin pole construction generally is not ground disturbing other than the potential use of temporary anchors for safety. The ground disturbance to remove each lattice steel tower footing assumes the concrete footing (up to 3-foot diameter) will be removed to approximately 2 feet below grade (approximately 14.14 cubic feet, mainly concrete, per footing). Clean backfill will be used if needed to reestablish the grade.

Structure and Road Name	Work Description	Construction Methods
ES15 (East Circle)	Replace steel pieces and bolts.	Walk to and climb structure and use hand tools.
EN14 (Sayre Road)	Re-insulate, replace hardware, and re-tension conductor.	Walk to and climb structure and use hand tools.
ES16 (Sayre Road)	Re-insulate, replace hardware, steel pieces, bolts, and re-tension conductor.	Walk to and climb structure and use hand tools.
RN14 (Saroni Court)	Install rebuild structure, move conductor from EN15 and re-tension.	Crane will lift structure segments into place.
EN15 (Saroni Court)	Move conductor to RN14. Remove existing structure.	Crane will remove structure segments.
RS14 (Saroni Court)	Install rebuild structure, move conductor from ES17 and re-tension.	Crane will lift structure segments into place.
ES17 (Saroni Court)	Move conductor to RS14. Remove existing structure.	Crane will remove structure segments.
ES18 (Balboa Drive)	Re-insulate, replace hardware, and re-tension conductor.	Walk to and climb structure and use hand tools.
EN16 (Balboa Drive)	Re-insulate, replace hardware, and re-tension conductor.	Walk to and climb structure and use hand tools.
RS16 (West Circle)	Install rebuild structure, move conductor from ES19 and re-tension.	Gin pole will lift structure segments into place.
ES19 (West Circle)	Move conductor to RS16. Remove existing structure.	Gin pole will remove structure segments.
ES20 (Cortez Court)	Replace steel pieces and bolts.	Walk to and climb structure and use hand tools.

Construction Activities

Construction crews, equipment, and vehicles will drive to work locations using Shepherd Canyon Road. From Shepherd Canyon, East Circle is accessed via Arrowhead Drive, and Saroni Drive or Paso Robles Drive/Saroni Drive connects Saroni Court and to Sayre Drive, and Balboa Drive connects to West Circle and to Cortez Court. The Saroni Court work area is on or accessed from a paved residential driveway. From West Circle, vehicles and equipment will use an unpaved access road to access the work area. Construction activities for the insulator and conductor work as well as the hardware and steel pieces

replacements will be performed with hand tools. Crews will climb the towers to perform the work and will access the towers on foot from vehicles parked on the side of the road.

Site preparation may include flagging the limits of work area or access to avoid an environmentally sensitive area if needed or other demarcation to support work area safety. No vegetation management work is planned for this work. Site preparation is typically a two person crew using a line truck or pickup truck with trailer, as needed. Certified weed-free mulch, straw, hay bales, or equivalent materials will be used where necessary.

During structure replacement, equipment will be transported to the work areas or off-road equipment will drive itself. Equipment for structure replacement at Saroni Court will include three lowboy truck/trailer, two framer trucks, two 4x4 foreman trucks, two $\frac{3}{4}$ ton 4x4 pickup trucks, one crane truck, and one cranes. Structure replacement and removal at West Circle will use gin pole methodology (a pole supported by guy wires that uses a pulley to lift or lower the structure pieces).

Waste from the removal of existing steel tower components and concrete footings will be generated during replacement. Steel tower components may have lead paint. Steel tower components found with lead paint will be removed in safe manner (such as applying duct tape before cutting) and disposed of at a licensed waste facility per applicable regulations. Concrete footings may contain asbestos; per APM AIR-2, BAAQMD will be notified of any structure removal activities at least 10 days before, and structures and equipment will undergo asbestos testing led by the PG&E Environmental Field Specialist. If asbestos is encountered, contaminated equipment will be removed and disposed of at a licensed waste facility per applicable regulations. 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.

Basic hand tools will be used for replacing steel pieces, bolts, and hardware on existing structures. Work will be completed by a six-person crew, with an expected duration of approximately 1 structure per day. Vehicles will include one foreman truck and two crew trucks.

For line moving and re-tensioning, crews will communicate with flaggers to hold traffic for up to 5 minutes at a time, and a bucket truck will be positioned as a guard structure in one location. Flaggers will be positioned at locations along Gunn Drive, Saroni Drive, Sayre Drive, Paso Robles Drive, Woodrow Drive, and Balboa Drive as shown on the traffic control plans (TCP) submitted to the City of Oakland that includes signage. As shown in the TCPs, no alternative routes or detours, temporary relocation or closure of bus stops, or obstruction of traffic is required. No driveway access will be blocked. Line work will be halted to allow emergency vehicles to travel unimpeded on roads identified in the traffic control plan. If an emergency evacuation situation occurs, line work would be halted or stopped depending on the situation and the need for the crews to evacuate as well.

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.

Following their use, equipment, surplus materials, matting, and supplies will be removed and work sites will be returned to conditions that allow for pre-project land uses. Per biological AMM 5.11, crews will remove mud and accumulated soil for equipment and vehicles to the maximum extent possible. Crews will clean or wash vehicles and equipment before entering a new work site and keep a log documenting each cleaning or washing of equipment before entering each new work site. Vehicles will be staged and stored on paved or cleared areas to the extent practicable. At Saroni Court, a fence is expected to be reinstalled in coordination with the landowner at the end of construction. All site improvements will be subject to conditions stipulated in easements obtained from landowners.

Preconstruction Requirements and Resource Monitoring

Preconstruction Asbestos-contaminated materials (ACM) and PCB testing is scheduled to occur prior to construction at structures EN15, ES17 and ES19. Desktop evaluation identified lead-based paint on the structures EN14, EN15, EN16, ES15, ES16, ES17, ES18, ES19, and ES20 where structure maintenance or removal will occur. Crews will adhere to proper removal and disposal of waste containing ACM or lead paint procedures.

Where ground disturbance will occur or vehicles or equipment will travel off paved areas (work areas for EN15/RN14 and ES17/RS14 at Saroni Court or off West Circle for ES19/RS16) preconstruction surveys for Western Pond Turtle, Alameda Whipsnake, rare plants, and milkweed (Monarch) were completed on September 1 and September 2, 2026 respectively. No rare plants, milkweed or Monarch butterflies were observed at either location. No potential habitat for Western Pond Turtle was observed other potentially a residence's ornamental water feature that is outside of the work area. A small debris pile, potential habitat for Alameda Whipsnake, inside the RS16 and ES19 fenced area will be checked by a biological monitor before construction, which may include checking the debris pile before it is removed as part of site preparation under NTP1.

A Crotch's Bumble Bee habitat assessment was completed on September 1, 2026 for Saroni Court (EN15/RN14 and ES17/RS14) and off West Circle (ES19/RS16). A Crotch's Bumble Bee Survey, Impact Avoidance, and Mitigation Plan was submitted to the CDFW and CPUC per MM BIO-1b. The CPUC replied with an approval of the plan on September 11, 2026. Site preparation during NTP1 at West Circle is expected to establish access and the work area that will allow NTP2 work to avoid areas identified as potential bumblebee habitat. These potential habitat areas will be flagged as environmentally sensitive areas to avoid during NTP2.

Bat habitat assessments were completed on September 1 and 2 at the work area off West Circle and at Saroni Court, respectively. No habitat was identified within the survey area at Saroni Court. Suitable day roosting habitat is present at West Circle within the oak woodland, particularly the dead snags located southeast and east of the project area. Following the emergence surveys on September 1 and 2, 2026, it was concluded by the qualified biologist that no bats are currently day roosting within the project area or within the dead snags within the 250 foot survey area. No maternity colonies were detected within the project area. All surveys were conducted by CPUC-approved biologists and the results provided were approved by CPUC on September 8.

Locations EN14, EN16, ES15, ES16, ES18, and ES20 do not have ground disturbing work and will be accessed on foot. A qualified biologist will perform site checks for potential species activity prior to work commencing at these locations. The qualified biologist will flag any known biological or environmentally sensitive area to avoid during work at these locations.

A tribal monitor will be invited to monitor all ground-disturbing activities at West Circle (removal of the ES19 concrete footings to approximately 2 feet below grade), which is within 500 feet of a current or historic creek. No other cultural or paleontological surveys are required for this work.

Other Activities

Additional construction or operational activities are not planned at the project site.

Attached items included in this submittal for CPUC to review are:

MM/APM	Document Name
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

Please do not hesitate to contact me directly at (415) 990-6001 if you have any questions.

Sincerely,



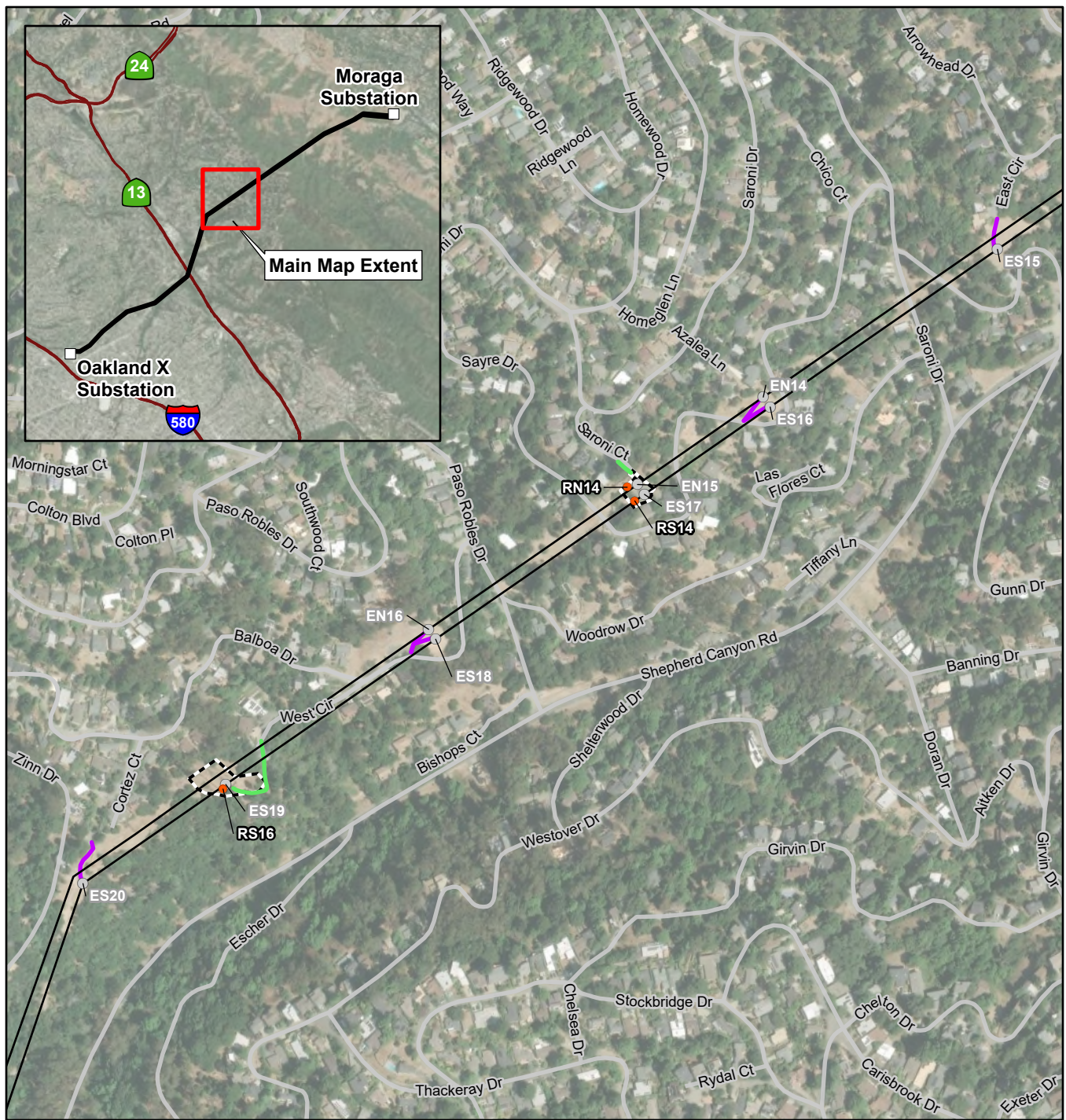
Brandon Liddell
Principal Land Planner

Enclosure:

WEAP Training PowerPoint
Construction Notification Letter Template
Construction Fire Prevention Plan
Soil Management Plan
Traffic Control Plan

cc:

Vida Strong, Aspen Environmental
Colleen Taylor, Jacobs



Version: 9/25/2026

Legend

- Existing Structure
- Proposed Structure
- Existing Overhead Line
- Existing Access Road
- Walk to Structure
- Temporary Work Area

0 500 1,000
Feet



Request for Notice to Proceed 2
Moraga-Oakland X 115 kV Rebuild Project
Pacific Gas & Electric Company

