



PUBLIC UTILITIES COMMISSION
STATE OF CALIFORNIA
505 VAN NESS AVENUE | SAN FRANCISCO, CALIFORNIA 94102

December 12, 2024

VIA EMAIL

Brandon Liddell, Principal Land Planner
Environmental Management- Transmission
Pacific Gas and Electric Company
300 Lakeside Drive, Oakland CA 94612

Subject: CPUC Review of Proponent's Environmental Assessment for PG&E's Moraga to Oakland X
115 Kilovolt Rebuild Project (A.24-11-005)

Dear Mr. Liddell,

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has conducted a review of Pacific Gas and Electric Company's (PG&E's) application for a Permit to Construct (PTC) (A.24-11-005) and Proponent's Environmental Assessment (PEA) for the proposed Moraga to Oakland X 115 Kilovolt (kV) Rebuild Project (Project) relative to the CPUC's *Guidelines for Energy Project Applications Requiring CEQA compliance: Pre-filing and Proponents Environmental Assessments* (Version 1.0, November 2019) and the Commission's Information and Criteria List. The Energy Division finds that the PEA contains sufficient information to satisfy the requirements of the Commission's Information and Criteria List and deems the application complete.

The Energy Division is requesting additional information (see Data Request 1 attached to this letter) to supplement and inform the environmental review. Please provide the requested information, or explain why it cannot be provided, by January 10, 2025. Please note that as the environmental review progresses, the Energy Division may submit clarifying questions or request additional data, as necessary, to prepare a complete and adequate analysis of the potential environmental effects of the proposed Project in accordance with the requirements of CEQA.

Please do not hesitate to call me at (916) 594-4699 if you have any questions.

Sincerely,

Tharon Wright

Tharon Wright
Public Utilities Regulatory Analyst III
California Public Utilities Commission

cc: Michelle Wilson, CPUC CEQA Unit

Hedy Koczwar, Aspen Environmental Group

Erica Schlemer, PG&E

Colleen Taylor, Jacobs

Andrea Gardner, Jacobs

PG&E Moraga-Oakland X 115 kV Rebuild Project (A.2024-11-005)

Data Request No. 1

Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (MOX or Project) Data Request (DR) No. 1 includes requests related to the following issue areas:

- Executive Summary
- Proposed Project Description
- Biological Resources
- Noise

Executive Summary

PEA Section 1.1, Proposed Project Summary, Pg. 1-1

ES-1 Figure 3.3-2c is referenced in a footnote that describes the stringing of the static ground wire and optical ground wire. We are unable to locate the figure. Please provide.

Project Description

PEA Section 3.2.1, Existing and Proposed System, Pgs. 3-2 to 3-4

PD-1 *Background:* Currently, the combined rating of the existing 4 circuits is 1,624 Amps (406 Amps x 4) with there being no identified reliability or load serving need to increase the capacity of these circuits. However, there is a need to upgrade these circuits due to obsolescence and ageing infrastructure.

The proposed Project results in the rating of each circuit increasing by almost 3X (406 Amps to 1,212 Amps). The combined rating of the 4 circuits (on 2 double-circuit lines) after completion of the upgrade project is 4,848 Amps (1,212 Amps x 4). The combined capacity provided by 2 circuits after the upgrade (on 1 double-circuit line) is 2,424 Amps (1,212 Amps x 2). The combined rating of just 2 circuits (2,424 Amps) represents 149% of the combined capacity provided by the 4 existing circuits (Calculated as $[2,424/1,624] = 1.49$ or 149%).

Questions: Is the higher per circuit rating of 1,212 Amps a reflection of the minimum capacity increment available with the latest technology?

If so, can the load be served by upgrading just 2 circuits (on 1 double-circuit line) instead of all 4 circuits (on 2 double-circuit lines) as proposed?

Can the other 2 circuits (on the 2nd double-circuit line) be removed and the easements be preserved for future use?

PEA Section 3.2.3, System Reliability, Pg. 3-4

PD-2 If all 4 circuits are upgraded as planned and the rerating process completed for the higher rating, how much does the local capacity requirements reduce by?

Does this open the possibility for retirement of existing old generation resources in the local area?

PEA Table 3.3-2, Types of Existing Facilities to be Removed or Modified, Approximate Metrics, Pg. 3-7

PD-3 If all 4 circuits are upgraded as planned, would there be a need to upgrade 4 Circuit Breakers and 4 Air Switches at Moraga instead of just 2 Circuit Breakers and 2 Air Switches identified? Please clarify.

PEA Section 3.5.2.1, Table 3.5-1, Potential Staging Areas and Landing Zones, Pg. 3-26

PD-4 PEA Table 3.5-2 (Potential Staging Areas and Landing Zones) identifies 6 landing zones and 21 staging areas. Figure 3.5-1, Proposed Project, does not distinguish between LZs and SAs in the legends and does not number these areas so they can be matched with Table 3.5-2. Please update the figure to show which locations are LZs and/or SAs and number them consistent with Table 3.5-2 numbering.

Biological Resources

PEA Section 5.4.1.6, Critical Habitat, Pg. 5.4-38

BIO-1 A total of 1,231 acres of the biological study area (BSA) is located within U.S. Fish and Wildlife Service (USFWS)-designated Alameda whipsnake (AWS) Critical Habitat Unit 6. The section states that impacts are shown on Figures 5.4-7 and 5.4-8 and addressed in Section 5.4.4. Impacts to PG&E Bay Area Operations and Maintenance Habitat Conservation Plan (BAHCP) modeled habitat for AWS is discussed in Section 5.4.4.3 under “Alameda Whipsnake,” but impacts to critical habitat is not discussed.

Please provide the acres of impact to critical habitat and the methodology for mitigating those impacts under the BAHCP.

PEA Section 5.4.1.8, PG&E Bay Area Operations and Maintenance HCP, Pg. 5.4-32

BIO-2 This section lists the O&M activities covered under the BAHCP, including E9, Line Reconductoring; E12, New Distribution and Transmission Line Construction or Relocation; and E13, Tower Line Construction. E12 and E13 are not included in the CDFW ITP. This section states, “[a]s an O&M activity, the project also is covered under the ITP, which authorizes take of AWS.”

Please explain how E12 and E13 activities are covered and why they are not included in the CDFW ITP.

BIO-3 This section also mentions “hot zones” and “Map Book Zones” (MBZ), however, these zones are not included in the BAHCP and cannot be verified. It is also unclear if “hot zones” are the same as BAHCP Modeled Habitats shown in Figures 5.4-6, 5.4-7, and 5.4-8.

Please describe the differences between modeled habitat and “hot zone” and provide applicable “hot zone” and MBZ’s figures and GIS data.

PEA Section 5.4.1.8.2, Other Biological Resource Management Areas, Pg. 5.4-33

BIO-4 Moraga Creek Open Space Area and Indian Valley Preserve Area Conservation Easement are shown on Figure 5.11-2. Though BAHCP modeled habitat is provided in Section 5.4.4, impacts to the Open Space and Conservation Easement areas are not discussed.

Please provide the impact acreage to Moraga Creek Open Space Area and Indian Valley Preserve Area Conservation Easement and the avenue for mitigating those impacts under the BAHCP.

PEA Section 5.4.2.4, Habitat Conservation Plan, Pg. 5.4-38

BIO-5 This section mentions covered activities E9, reconductoring, and E12, Tower Line Construction, but does not list E13, which was mentioned in Section 5.4.1.8.1.

Please confirm that E13 is a covered activity.

PEA Section 5.4.4.3, Potential Impacts, Pgs. 5.4-52 to 5.4-61

Regarding response to *Criterion (a)* of Appendix G of the CEQA Guidelines, please address the following data requests:

BIO-6 The USFWS Biological Opinion and BAHCP requires mitigation for impacts to designated critical habitat. Impacts to AWS critical habitat and mitigation is not discussed. Please discuss impacts to Alameda Whipsnake critical habitat. As mentioned previously (DR BIO-1), please provide the acres of impact to critical habitat and the methodology for mitigating those impacts under the BAHCP.

BIO-7 During the biological field visit on 12/4/24, there was a discussion of different levels of mitigation fees based on the type of AWS modeled habitat impacted. Please provide the formula for mitigation for impacts to different types of Modeled Habitat for AWS.

BIO-8 Special-Status Plant Species: The discussion includes Incidental Take Permit (ITP) Final Environmental Impact Report (FEIR) Applicant-Proposed Measures (APMs) and MOX APMs. The paragraph refers to “ITP FEIR APM BIO-1” which is different from the “MOX APM BIO-1” that is mentioned in the response to comment.

Please clarify which APMs are being utilized for impacts to special-status species and distinguish between ITP FEIR APMs and MOX APMs.

BIO-9 Special-Status Plant Species: The discussion states “no special-status plant species were identified in the project footprint (impact area).” However, Confidential Figure 5.4-5c, Rare Plant locations, show rare plant locations within “Work Areas” with a note that “rare plants to be fenced and avoided.”

Please clarify and provide a discussion of plant species that are located within mapped “Work Areas,” impacts, and mitigation measures.

Regarding response to *Criterion (c)* of Appendix G of the CEQA Guidelines, please address the following data requests:

BIO-10 The first paragraph (pg. 5.4-60) states that aquatic resources mostly occur along access routes but does not further describe if features along access routes are jurisdictional, if impacts would occur during vehicle ingress/egress, and if mitigation measures are required. Please clarify.

BIO-11 The second paragraph states that Feature R-11 may be temporarily affected and that it does not meet the current definition of Waters of the U.S. Please include a discussion of whether this feature meets the current definition of Waters of the State, and if a Waste Discharge Requirement permit is required for impacts.

BIO-12 During the site visit on 12/4/24, there were areas along the access road to proposed tower (RN/S) 9 where drainages crossed the road and hydric vegetation was present. Please clarify if these aquatic features meet the definition of waters of the U.S., if they meet the definition of waters of the state, and if they may be impacted during project construction.

BIO-13 During the biological field visit, Wetland W-01a-c was located with a submeter accurate GPS unit by the PG&E biologist. Please verify there are no changes to the extent of these features.

BIO-14 Please discuss whether impacts to jurisdictional aquatic features are covered under PG&E's RGP 40 and associated Water Board 401 permit, and if PG&E intends on using this RGP/401 for project impacts. Please also provide a copy, as appropriate.

Noise

PEA Section 5.13.4.3, Potential Impacts, Pg. 5.13-29 to 5.13-33

N-1 The CPUC's Pre-Filing Comments (8/22/24) stated that the impact analysis for *Criterion (a)* would be better explained if construction noise was quantified based on phase, schedule, and equipment used at the specific location along the Project route. "Item b" in the Pre-Filing Comments requested that PG&E provide a table that identifies each phase of construction, the equipment used in each construction phase, and the length of each phase at any single location. Some information on construction phasing has been provided in the PEA, however, Item b was not completely addressed.

Please provide a table that identifies phase (or work stream), equipment to be used, length of each phase at any single location, and the cumulative noise for each phase. See the example below, which is Table 7 in Section 5.13.4.2(b) of CPUC's Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and PEAs.

Equipment Required	Equipment Noise Levels (Leq; 50 feet)	Phase Noise Level (Leq; 50 feet)	Phase Duration at Each Location	Receptor Nearest to Construction Phase	Noise Level at Nearest Receptor (Leq)	Exceeds Noise Standard at Nearest Receptor?	Distance to Not Exceed Standard
Site Preparation/Grading							
Dozer	78 dBA	82 dBA	5 days	Residence on Main Street; 100 feet from Substation Site	76 dBA	Yes	112 feet
Gradall	79 dBA						
Dump Truck	73 dBA						
Construct Tower Foundation							
Auger Rig	77 dBA	82 dBA	11 days	School on Education Avenue; 130 feet from Tower A12	73 dBA	No	N/A
Dump Truck	73 dBA						
Excavator	77 dBA						
Concrete Truck	75 dBA						