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

March 17, 2025 VIA EMAIL

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

Subject: CPUC Data Request #6 for PG&E's Moraga to Oakland X 115 Kilovolt Rebuild Project (A.24-11-0005)

Dear Mr. Liddell,

The California Public Utilities Commission (CPUC) Energy Division, California Environmental Quality Act (CEQA) Unit, is continuing its 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. On December 11, 2024, the Energy Division deemed PG&E's application complete and is in the process of its environmental review of the Project under CEQA.

The Energy Division has identified additional data requests related to PG&E's activities associated with the Project to supplement and inform the environmental review (see Data Request #6 attached to this letter). Please provide the requested information or explain why it cannot be provided by March 31, 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 IV
California Public Utilities Commission

cc: Michelle Wilson, CPUC CEQA Unit
Greg Heiden, CPUC Attorney
Hedy Koczwara, 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. 6

Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (MOX or Project) Data Request (DR) No. 5 includes requests related to the following issue area(s):

Project Description Alternatives

PEA Chapter 3, Project Description

PD-9 Timeline and Process for Underground Construction Activities: PEA Table 3.3-1 states that underground construction is scheduled to occur from 2028 Q3 through 2030 Q1. Table 3.6-3 is more specific, stating "July 2028 thru Feb 2030."

PEA Section 3.5.3.2 states: Trenching work generally is expected to progress at an average of 40 to 100 linear feet per day per crew depending on soil conditions, existing utilities, and other considerations. Daily progress is expected to be 300 to 400 feet per workday. In general, closure of one travel lane and one parking lane is expected during the underground line construction, with one lane remaining open to allow through traffic. Approximately 100 to 300 feet of trench will be open at any one time.

Table 3.3-2 states that for each pair of circuits, 5 to 10 splice vaults will be required, and each vault also requires an adjacent telecommunication vault.

PEA Section 3.5.3.2 (Work Area Disturbance) states that each vault will take 2 weeks to install. When the vaults are installed, the workspace for open trenching operations to install the duct bank between the vaults typically may extend up to approximately 1,500 feet long by 24 feet wide.

In order to understand potential impacts of underground construction on residents, businesses, schools, and churches along Park Boulevard, please expand on the information summarized above.

a) Provide an approximate timeline showing each construction activity required for both of the 2-circuit duct banks, showing sequential construction of the first 2 circuits and then the second 2 circuits. We understand that these activities will move along Park Boulevard as the trench is dug and filled, but it would be helpful to see the most detailed timeline possible. For each set of 2-circuit duct banks, describe the most likely activities ongoing during each of the 20 months defined in Table 3.6-3, including an overall timeline for the following activities: trenching, soil hauling, shoring, duct bank installation, vault installation, fill, cable splicing, installation of cables, repaving, and lane striping.
b) Provide a hypothetical timeline for all construction activities occurring in front of a single address on Park Boulevard, assuming installation of a vault within 100 feet, including each of the following tasks: trenching, shoring, duct bank installation, vault installation, fill, repaving, and lane striping.
c) Vaults: The PEA states that as many as 10 vaults will be required for each pair of circuits and that each vault requires a nearby communications vault. Please confirm that this means that there could be as many as 20 total vaults installed on each side of Park Boulevard (10 splice vaults and 10 communications

vaults). Please also confirm that the requirements for communications vault installation would be the same as that described in Section 3.5.3.2 for splice vaults.

d) Vault Cranes: While PEA Section 3.5.3.2 states that one lane of traffic will be left open during construction, please verify whether this can be done during vault installation. Section 3.5.6.1 states that vaults require cranes for installation. Where would the cranes be located in order to allow vault installation, while still allowing traffic flow?

PD-10 Accommodations for Residents, Businesses, School Personnel and Children. Given the timelines and locations of the underground construction defined in PD-9 above, please explain how PG&E would accommodate the needs of residents, businesses, school staff, and school children during construction. Specifically:

a) How will PG&E ensure that access to businesses will be maintained during construction?

b) Would alternative parking be provided for people typically parking on Park Boulevard during the day or overnight?

c) Would all open trenches be plated overnight and on weekends to allow access to all driveways and street parking areas? At what hour would plates be in place and at what hour would they be removed?

d) If residents or businesses require access to their homes or businesses during construction and an open trench blocks their driveways, would temporary plating be available upon request?

e) Would alternative drop-off and pick up arrangements be required for the large schools along the route (Corpus Christi and Edna Brewer schools) affected by construction? Please describe specific plans or options.

f) Will construction activities block delivery services (USPS or parcels), or trash pick-up from access to businesses or residences? If so, what accommodations will be made?

PD-10 Construction in Park Boulevard Way: Section 3.1, Project Overview, states that "Each underground double-circuit line will turn onto Park Boulevard Way to reach the Oakland X Substation property." Please explain the construction process in detail, specific to this short road segment. This road has entrances to several multi-family buildings, and is only 35 to 45 feet wide. Specifically, please describe:

a) For how many weeks will construction be active on this street?

b) Will all 4 circuits be installed in a single duct bank, or will there be 2 separate duct banks installed in this street?

c) Please describe whether all 4 circuits will be installed at the same time, or if the circuit pairs will be installed at different times (as they will be in Park Boulevard). If the circuit pairs will be installed at different times, will the road be open during installation of each pair of circuits? Or will it be fully closed during installation of each pair of circuits?

d) Will the road be closed during construction, or will there be room for vehicles to pass when trenches are open?

e) If the road will be closed at any point, please define in detail how PG&E will ensure that the residents with driveways and entrances facing this street will access their homes.

f) How will parking needs for residents who normally park on the street be accommodated during construction on Park Boulevard Way?

PD-11 **PEA 3.5.4.4 and Table 3.5-5, Tree Removal in Park Boulevard.** This section states that approximately 71 trees are expected to be removed from Park Boulevard's central median and along Park Boulevard Way where the underground portion is in adjacent lanes. It further states that "Conservatively, all trees in the central median are identified for potential removal given the early design phase."

Please explain whether APM-AES-1, which commits to revegetating of disturbed areas, would apply to the trees removed from Park Boulevard. Describe the specific plan for replanting of these trees.

PD-12 **PEA Section 3.5.4.3, Vegetation Clearing and Tree Trimming.** We have heard public concerns about wildfire risk along the proposed overhead Moraga-Oakland X line segments. Table 3.5-5 describes vegetation management and tree trimming or removal.

a) Please explain how the need for tree trimming is defined by PG&E for the existing and proposed overhead segments. Is there a minimum distance from conductors within which there may be no vegetation that could contact the conductors?
b) Table 3.5-5 identifies nearly 100 trees that would be removed, including 7 acacias, 15 California bay laurels, 43 Coast Live Oaks, and 2 Coast redwoods. Would these trees be replaced, or are they required to be removed due to clearance and/or wildfire risk?

PD-13 **Land Ownership, Rights-of-Way, and Easements.** PEA Section 3.4 states that PG&E's existing rights are not sufficient to accommodate the rebuilt power lines and that "perfected, modified, or new rights-of-way" will be required. Section 3.4.3 and Table 3.4-1 define that approximately 2 new permanent easements and approximately 43 modified easements are expected to be required. In order for the EIR team to understand the extent of the proposed changes to the existing ROW and the process used to make these changes, please provide the information requested.

a) Please explain the timing for the process of easement "perfection" (PEA Section 3.4.3). At what point will property owners be contacted regarding easement changes needed, or informed that their properties are listed in Table 3.4-1 as requiring modified rights?
b) Please confirm that information provided in the PEA about project impacts (e.g., corona noise and vegetation removal) is based on the future line configuration and adjustments of property rights.
c) Are the proposed easement changes required due to the reduced proximity between PG&E facilities and individual residences? If so, please provide details of these changes. Table 3.4-1 describes changes that are required, but not how the defined changes may change the proximity of facilities to private property improvements or residences.
d) Please confirm whether the vegetation clearing defined in Section 3.5.4.3 is driven by these additional easement requirements or by other factors.

PEA Chapter 4, Description of Alternatives

ALT-1 Some of the alternatives defined in PEA Chapter 4 would require that segments be installed underground in narrow and winding roadways, including some with "hairpin" turns. In addition, the feasibility of these

underground alternatives would depend on the presence and location of other buried utilities (water, sewer, distribution-level electricity, fiber, gas). The following additional information is required.

a) Please define the maximum bending angle for underground conduit or duct banks that could be constructed where all 4 circuits and are installed underground in one road, as well as for 2 circuits.
b) Please define the maximum bending angle for underground conduit or duct banks that could be constructed where only 2 circuits are installed underground in one road.
c) Please define the minimum road width in which the 4 circuits could be installed underground. Would the minimum width be defined by the size and width of vaults, or by the space required for duct bank installation?
d) Please define the process for determining the types, sizes, and locations of existing utilities buried in city or county roadways.