



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

April 10, 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 #8 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 #8 attached to this letter). Please provide the requested information or explain why it cannot be provided by April 17, 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 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. 8

Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (MOX or Project) Data Request (DR) No. 8 includes requests related to the following issue area(s):

- PTC Application
- PTC Application Exhibit D (Preliminary EMF Field Management Plan)
- PEA Project Description

Permit to Construct Application and PTC Application Exhibit D (Preliminary EMF Field Management Plan)

- PTC-1** The Preliminary EMF Field Management Plan (FMP; page 1) states that the project cost will be \$440 million. The PTC Application (page 2) says it will be \$276.8 million. Please explain which figure is correct. Please also explain whether the correct cost has any effect on the approach to EMF Mitigation defined in PTC Exhibit D.
- PTC-2** There appears to be an error in the conclusion paragraph below Table 4 (page 6) in PTC Exhibit D. Please confirm that the total estimated cost for raising height of structures ten feet should be \$360,000 (\$320,000+\$40,000) and not \$3,492,000.
- PTC-3** In the Preliminary EMF FMP Section B.1, Table 3 (low-cost mitigation of increased structure height), PG&E proposes to increase structure height by 10 feet per structure (for 36 structures). This reduces EMF by 38.5%. These taller structures may create more severe visual impacts. Is it possible to define a tower height increase that would result in a 15% reduction in EMF (the guideline target reduction)? If so, this may be considered as an option in the EIR's impact analysis.

PEA Chapter 3, Project Description

- PD-15** In the Preliminary EMF FMP Section B.2, Undergrounding (Table 6), PG&E proposes that the EMF Low-cost mitigation would require that the trench be 5 feet deeper along the entire underground segment where there are school or residences. Given the locations of these receptors, Table 6 shows that the trenching for all but 0.2 miles of the 1.27-mile underground segment would be 5 feet deeper than proposed.

The PEA (Section 3.5.6.2) states that the trenched underground segments would be 5 feet deep “on average.” All of the PEA graphics illustrate the 5-foot trench depth. It appears that the PEA does not take into account the EMF mitigation with a 10-foot trench depth. Our questions are as follows:

1. Will either or both trenches along Park Boulevard and Park Boulevard Way be 10 feet deep for 1.07 miles (as shown in EMF FMP Table 6)?

2. If so, please identify the changes to the PEA that result from the deeper trench (from 5 to 10 feet). In particular, please address the volume of fill removed, whether the construction vehicle emissions would require changes, whether the construction schedule needs to be modified, and any other changes that would arise.