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505 Van Ness Avenue
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VIA EMAIL

RE: Pacific Gas & Electric Company's Response to California Public Utilities Commission Review of Proponent's Environmental Assessment for PG&E's Moraga-Oakland X 115 kV Rebuild Project (A.24-11-005)

Dear Ms. Wright,

This letter is in reply to your December 12, 2025, letter in which you request certain additional information regarding Pacific Gas and Electric Company's (PG&E's) application (A.24-11-005) for a Permit to Construct (PTC) and Proponent's Environmental Assessment (PEA) for the Moraga-Oakland X 115 kilovolt (kV) Rebuild Project (project). The original text for each data request item from the California Public Utilities Commission (CPUC) is included, followed by PG&E's response.

There is one attachment to this letter to support PG&E's response: Attachment 1 CPUC_DR1_PD-4_Figure 3.5-1

CPUC Data Request Item ES-1
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.*

PG&E's Response

The PEA page 1-1 footnote should reference Figure 3.3-3c. Please refer to Figure 3.3-3c for the expected locations of static ground wire and optical ground wire on a proposed power line structure.

CPUC Data Request Item PD-1
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?

PG&E's Response

No, the upgraded rating is not the next available capacity increment of the conductors. The increase to 1,212 Amps per circuit is based on forecasted demand growth in the North Oakland area. When replacing existing transmission infrastructure, a key objective is to right-size facilities to efficiently and cost-effectively address transmission needs identified in the California Independent System Operator (CAISO) Transmission Planning Process (TPP). North Oakland area is experiencing rapid load increase due to industrial and commercial growth and the rise in the electrical vehicle charging and electrification loads. According to the 2024-2025 CAISO TPP load forecast, local demand is expected to grow from 376.7 megawatt (MW) in 2024 to 458.2 MW by 2039 in the North Oakland area.

In the 2024-2025 CAISO TPP reliability assessments, thermal violations on the Moraga-Oakland X 115 kV lines were identified for the 2026 summer peak case. The third-party owned Vistra Oakland Power Plant generation is currently required to serve local load and mitigate these overloads. The Moraga-Oakland X 115 kV Rebuild project, with all 4 lines being rebuilt, resolves these thermal violations upon completion. For detailed reliability assessment results, please refer to CAISO's Final Reliability Assessment Results. [1]

Further, removing two circuits would not comply with NERC reliability standards and would result in system overloads under contingency conditions. Upgrading only two circuits would not be sufficient to meet NERC TPL-001-5[2] reliability requirements. The standard mandates that system reliability be maintained under specific contingency scenarios, including:

- P6 contingencies: Sequential loss of two transmission lines.
- P7 contingencies: Loss of two adjacent circuits (either vertically or horizontally) on a common structure.

If only two circuits are upgraded, a P6 or P7 contingency involving the loss of both Moraga-Oakland X circuits would result in overloads on other lines in the North Oakland pocket, including the Moraga-Claremont 115 kV lines, Oakland D-K 115 kV lines, Oakland D- L 115 kV cable, and Oakland C- L 115 kV cable. Therefore, upgrading only two circuits does not meet NERC TPL-001-5 standard. Additionally, upgrading only two circuits would significantly reduce operational flexibility and limit the ability to perform necessary maintenance clearances.

CPUC Data Request Item PD-2
Project Description
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?

PG&E's Response

In the 2024-2025 TPP, CAISO conducted Local Capacity Requirement (LCR) studies for near-term (2025) and long-term (2029, 2034, 2039) planning horizons.

- In 2025 and 2029, the existing Moraga-Oakland X 115 kV lines are the limiting factor for Oakland's Sub-area LCR[3].
- In 2034 and 2039, with the Moraga-Oakland X 115 kV Rebuild Project in service, these lines will no longer be a constraint for the Oakland Sub-area LCR[4].

However, due to projected long-term load growth, the local capacity requirement in the North Oakland area will continue to rise, even with the completion of the Moraga-Oakland X 115 kV Rebuild Project.

[1] California ISO - 2024-2025 Transmission planning process GBA Final Reliability Assessment Results
[2] Transmission System Planning Performance Requirements
[3] Local capacity requirements process - 2025
[4] 2024-2025 Transmission planning process

The primary driver for the Moraga-Oakland X 115 kV Rebuild Project is compliance with CPUC General Order 95 (GO-95). However, the project will increase transmission capacity in the North Oakland area, where significant load growth is expected. Even with the increased capacity, the Moraga-Oakland X 115 kV Rebuild Project alone will not eliminate the need for local generation. In the 2024-2025 TPP cycle, PG&E submitted the North Oakland Reinforcement Project, which includes additional transmission upgrades in this area. If approved by CAISO, the North Oakland Reinforcement Project, combined with the Moraga-Oakland X 115 kV Rebuild Project, could open the possibility for third-party generation owners and CAISO to consider retiring existing generation resources. However, retirement of existing generation resources is unplanned and speculative at this time. Generation retirement decisions rest with generation owners and CAISO, as these assets are third-party owned. CAISO will determine whether local generation is still required for system reliability.

CPUC Data Request Item PD-3
Project Description
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 Morage instead of just 2 Circuit Breakers and 2 Air Switches identified? Please clarify.*

PG&E's Response

Two existing Circuit Breakers and Air Switches at Moraga Substation connecting with the project lines meet the proposed rating. The other two existing breakers and switches connected to the existing project lines aren't rated high enough for the proposed line rating and need to be replaced with higher rating.

CPUC Data Request Item PD-4
Project Description
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.*

PG&E's Response

Please see Attachment 1 with an updated PEA Figure 3.5-1. The GIS files provided with the PTC application include the numbered LZs and SAs shapefiles and no additional GIS files are provided.

CPUC Data Request Item Bio-1
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.

PG&E's Response

Of the approximately 14.7 acres of BAHCP AWS modeled habitat anticipated to have temporary impacts during project construction, approximately 5.0 acres also are within USFWS-designated critical habitat (DCH) for AWS. Permanent impacts of approximately 0.03 acre are calculated within both modeled habitat and DCH.

Under the BAHCP, PG&E mitigates temporary impacts to USFWS DCH within the AWS modeled habitat at 1:1, a higher ratio then the typical 0.5:1 mitigation ratio. If there are impacts to AWS DCH that falls outside of modeled habitat, these impacts are assessed on a case-by-case basis and mitigated for under the BAHCP as warranted based on the field assessment. The standard for disturbance is the same under either scenario. The vast majority of modeled habitat in the biological study area overlaps with DCH. All large project impacts (more than 0.1 acre) are field mapped and verified under the BAHCP implementing provisions. Final field measured impacts are submitted under the BAHCP and mitigated annually.

Acreages presented in this response are estimates only, and actual impacts will be field mapped and verified. Impacts, if any, to DCH outside modeled habitat will be field evaluated and included as appropriate in the BAHCP impact calculations and submitted to California Department of Fish and Wildlife and USFWS.

Refer to BAHCP ECOS (https://ecos.fws.gov/ecp/report/conservation-plan?plan_id=4567) for additional questions related to Alameda whipsnake mitigation under the BAHCP.

CPUC Data Request Item Bio-2
Biological Resources
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.

PG&E's Response

A single activity, E-9 Line Reconductoring, found in both the BAHCP and the CDFW ITP, applies to the proposed project. Tower replacement is part of the larger E-9 reconductoring activity. Per the HCP and ITP protocols, a project will fit under one activity type per project. Therefore, activities E-12 and E-13 which address construction of new lines and structures and do not apply to the proposed project.

CPUC Data Request Item Bio-3
Biological Resources
PEA Section 5.4.1.8, PG&E Bay Area Operations and Maintenance HCP, Pg. 5.4-32

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.

PG&E's Response

BAHCP Chapter 10, Glossary, defines modeled habitat, hot zones, and Map Book zones.

> **modeled habitat.** The characterization of the species-specific habitat based on known species' ranges, species' life history needs, and multiple datasets. A guiding tool for calculating effects less than 0.1 acre, and a general tool for screening of larger activities. Synonymous with habitat models.
>
> **hot zone.** Area containing a known localized population of covered species with a small and well defined range, and where the species would be most likely to be affected should covered activities occur there.
>
> **Map Book zone.** Area of occupied or potentially occupied plant habitat as determined by previous PG&E botanical surveys.

The modeled habitat shown in PEA Figures 5.4-6, 5.4-7, and 5.4-8 identifies the AWS modeled habitat that in BAHCP Figure 4-14. There are no designated hot zones in the project area (see HCP Section 5.4.2) and therefore no figure is provided. The only MBZ in the project BSA is a pallid manzanita MBZ which overlaps the pallid manzanita occurrences provided in confidential PEA Figure 5.4-5c. The PG&E BAHCP GIS database cannot be shared.

CPUC Data Request Item Bio-4
Biological Resources
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.

PG&E's Response

Estimated impact acreages are less than approximately 0.01 acre of permanent impact and approximately 0.6 acre of temporary impact within these conservation easements. The BAHCP provides for coordination with conservation easement owners through the Access and Site management Field Protocols (BAHCP Table 5-1):

> *".FP-05: Notify conservation land owner at least 2 business days prior to conducting covered activities on protected lands (state and federally owned wildlife areas, ecological reserves, or conservation areas); more notice will be provided if possible or if required by other permits... While this notification is intended only to inform conservation land owner, PG&E will attempt to work with the conservation land owner to address landowner concerns".*

As described in PEA Sections 2.2.2.1 and 2.2.2.8, the proposed project was discussed in detail with the conservation easement holders. PG&E will continue project communication with the conservation landowners and provide notice as stipulated in the BAHCP prior to conducting covered activities. No further measures or mitigation are required under the HCP.

CPUC Data Request Item Bio-5
Biological Resources
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.

PG&E's Response

Refer to PG&E's Response to Bio-2, E-9 Line Reconductoring is the covered activity type applicable to the proposed project. Use of activities E-12 and E-13 are not needed for the proposed project.

CPUC Data Request Item Bio-6
Biological Resources
PEA Section 5.4.2.4, Habitat Conservation Plan, Pg. 5.4-38

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.*

PG&E's Response

Refer to PG&E's Response to CPUC Data Request Item Bio-1 for acres of impact AWS critical habitat and BAHCP mitigation methodology.

CPUC Data Request Item Bio-7
Biological Resources
PEA Section 5.4.2.4, Habitat Conservation Plan, Pg. 5.4-38

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.*

PG&E's Response

Mitigation ratios (not fees) can differ for the type of BAHCP AWS modeled habitat. The mitigation ratios for AWS modeled habitat types were provided in Table 5.4-14. Mitigation for permanent impacts for core, perimeter core, and movement habitat is at a 3:1 ratio and mitigation for temporary impacts are at a ratio of 0.5:1 mitigation for movement habitat and 1:1 for core and perimeter core habitats.

CPUC Data Request Item Bio-8
Biological Resources
PEA Section 5.4.2.4, Habitat Conservation Plan, Pg. 5.4-38

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.

PG&E's Response

Both of these APMs (ITP FEIR APM BIO-1 and MOX APM BIO-1) are being utilized. ITP-FEIR APM BIO-1, *Prevent or minimize the spread of invasive weeds,* and MOX APM BIO-1, *Pre-construction surveys and biological monitoring,* will be used to reduce impacts to plants. PEA Section 5.4.4.2 includes applicable measures from the HCP, ITP, and ITP FEIR, and those proposed specifically for this project, called MOX APMs. The ITP FEIR APMs relevant to the project are identified in PEA Table 5.4-12 and the MOX APMs are provided in Section 5.4.4.2.1.

CPUC Data Request Item Bio-9
Biological Resources
PEA Section 5.4.2.4, Habitat Conservation Plan, Pg. 5.4-38

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.

PG&E's Response

Where a rare plant was found in a work area during project development, the work area was revised to avoid the rare plants. The population shown on the confidential PEA Figure 5.4-5c is the pallid manzanita. Similarly, the Oakland star-tulip population will be avoided and the star-tulips are therefore not in the work area but are adjacent to the work area. Refer to ITP FEIR APM BIO-4 and ITP FEIR APM BIO-5 for measures used to avoid special-status plants. Because these rare plant occurrences will be avoided, no further impact or mitigation discussion is necessary.

CPUC Data Request Item Bio-10
Biological Resources
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.*

PG&E's Response

The features described in PEA text and shown in PEA Figures 5.4-4 and PEA Appendix D2 that are along access roads and in work areas are expected to be considered jurisdictional by the United States Army Corps of Engineers (USACE) as waters of the U.S (including wetlands) and by Regional Water Quality Control Board (RWQCB) as waters of the U.S. and waters of the State. No roadway improvements are necessary for the project that would affect these potentially jurisdictional features. No impacts are anticipated to the potentially jurisdictional features along access roads and therefore no mitigation is necessary for these.

CPUC Data Request Item Bio-11
Biological Resources
Regarding response to Criterion (c) of Appendix G of the CEQA Guidelines, please address the following data requests:

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.*

PG&E's Response

All aquatic resources meet the current definition of Waters of the State. A Report of Waste Discharge (ROWD) pursuant to California Water Code Section 13260, would be submitted to the RWQCB if the feature would be impacted. Note that while the PEA provides an assessment of jurisdiction for each aquatic resource, only the jurisdictional agencies (USACE, United States Environmental Protection Agency, or RWQCB) can definitively determine what features meet their defined jurisdictions and provide a jurisdictional determination.

CPUC Data Request Item Bio-12
Biological Resources
Regarding response to Criterion (c) of Appendix G of the CEQA Guidelines, please address the following data requests:

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.*

PG&E's Response

During the aquatic resource delineation survey in December 2023 and January 2024, the access road to existing and replacement towers RN/S 9) was surveyed and no aquatic features were observed at the drainage locations where the hydric vegetation noted in December 2024. PG&E believes no waters of the U.S. or waters of the state are present in the road prism. The road was reviewed in summer and winter months and no ephemeral flow was observed. No impact is expected during project construction because work will be restricted to within the road prism.

CPUC Data Request Item Bio-13
Biological Resources
Regarding response to Criterion (c) of Appendix G of the CEQA Guidelines, please address the following data requests:

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*

PG&E's Response

The PG&E biologist found no change to the extent of these features from what is included in the PEA.

CPUC Data Request Item Bio-14
Biological Resources
Regarding response to Criterion (c) of Appendix G of the CEQA Guidelines, please address the following data requests:

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.*

PG&E's Response

PG&E's proposed project avoids all identified features except R-11 where avoidance may not be feasible and which could be affected temporarily during construction as explained in the response to Criterion (c) in the PEA. R-11 is potentially a water of the State but not a water of the U.S. As final design of an approved project progresses, this feature will be avoided if possible. At this time, no fill is planned at this location and no RWQCB Water Discharge Requirements (WDR) permit should be required. If, upon further development of the project it becomes clear that the features cannot be avoided the WDR associated with the RGP 40 may be used. Covered maintenance activities such as minor road repairs would be anticipated to be covered under the RGP 40/401 process. The RGP and its enclosures including 401 certification and Programmatic Biological Opinions. Refer to CESPN Regional General Permitting on the USACE's website (https://www.spn.usace.army.mil/Missions/Regulatory/Permitting/Regional).

CPUC Data Request Item N-1
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						

PG&E's Response

The significance of noise depends on duration of exposure at any single location, and the narrative beginning on page PEA 5.13-5 discusses duration of exposure. The information PG&E provided in the PEA, aligns with the noise approach in the Northern San Joaquin Transmission Project EIR, which PG&E anticipates is sufficient for this project's CEQA impact analysis.

We trust the information provided herein is fully responsive to your requests. However, should you have any further requests, please contact me at **415-990-6001** or **BXLG@pge.com**.

Sincerely,

Brandon Liddell
Principal Land Planner

Attachment:

Attachment 1 CPUC_DR1_PD-4_Figure 3.5-1

cc:

Michelle Wilson, CPUC CEQA Unit
Hedy Koczwara, Aspen Environmental Group
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