



October 14, 2025

Tharon Wright
Public Utilities Regulatory Analyst III
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
VIA EMAIL

RE: CPUC Data Request #12 for PG&E's Moraga to Oakland X 115 Kilovolt Rebuild Project (A.24-11-005)

Dear Ms. Wright,

This letter is in reply to your October 1, 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.

PEA Chapter 3, Project Description

PD-21 Please confirm or clarify the following statements and/or project description assumptions submitted by Patricia and Andrew Jeffries (Comment Sets D14 and F02):

- A. Please provide a general update on PG&E's discussions with the Jeffries and clarify whether the two structures adjacent to the Jeffries' residence (Structures EN15 and ES17) are planned to be replaced by PG&E in September 2026, prior to the construction of the MOX Project.
- B. Please review the following statements by Mr. Jeffries and modify his assumptions, as needed, based on PG&E's proposed replacement of structures by their residence:
 - 1) PG&E engineering will review the site and contact us. We would likely approve the eastern position. Engineering would generate drawings and specification. And have the project approved/permitted.
 - 2) The footing foundation contractor will come and drill deep piers, fill with concrete, and top with steel mounting plate. When might this happen and how long would it take? Would equipment be moved out each day?
 - 3) At a later date, the circuits would be deenergized, a tall crane will come in and place tubular sections to the full height necessary including the top pieces to hold the wires.
 - 4) At approximately the same time as above, the crane will disassemble and remove the old towers including the concrete footings. And the old wires will be moved to the new towers. What can we say about the schedule here and the time to complete these tasks and access to the houses?
 - 5) At some time later, probably in 2028, new larger gage wire will be pulled to replace the old wire as a part of the MOX project."

PG&E's Response

PG&E is continuing its ongoing inspections of the existing power lines during the CPUC's review of the proposed MOX project. PG&E found issues with Structures EN15 and ES17 that are best remedied by replacing the existing structures. As noted in PEA Section 3.8.3 Inspection Programs, the second paragraph reads:

Ongoing inspections of these lines will continue while the proposed project is being considered by the CPUC. If ongoing inspections find issues that are best remedied by replacing or eliminating existing structures, PG&E will follow the appropriate process to address those issues to enable continued safe line operation.

Please see responses to confirm or clarify the following statements and/or project description assumptions submitted by Patricia and Andrew Jeffries (Comment Sets D14 and F02):

- A. Please provide a general update on PG&E's discussions with the Jeffries and clarify whether the two structures adjacent to the Jeffries' residence (Structures EN15 and ES17) are planned to be replaced by PG&E in September 2026, prior to the construction of the MOX Project.**

PG&E has discussed Structures EN15 and ES17 with the Jeffries, and will continue to communicate with the Jeffries and the CPUC concern the replacement of these towers. PG&E anticipates replacing the structures before the overall MOX Project is approved by the CPUC and anticipates seeking independent approval for replacement of EN15 and ES17 from CPUC. Replacement is expected to occur within an ideal seasonal line clearance window, typically in the October/November through March/April timeframe.

- B. Please review the following statements by Mr. Jeffries and modify his assumptions, as needed, based on PG&E's proposed replacement of structures by their residence:**

- 1) PG&E engineering will review the site and contact us. We would likely approve the eastern position. Engineering would generate drawings and specification. And have the project approved/permitted.**

PG&E is in the preliminary engineering phase for these tower replacements. PG&E will continue to coordinate with the Jeffries and the CPUC as engineering and planning progresses, and as part of the CPUC's review and approval of the work.

- 2) The footing foundation contractor will come and drill deep piers, fill with concrete, and top with steel mounting plate. When might this happen and how long would it take? Would equipment be moved out each day?**

Structure foundation construction activities and will typically occur over several days. Outside of work hours, equipment would be positioned to allow access to residences.

- 3) At a later date, the circuits would be deenergized, a tall crane will come in and place tubular sections to the full height necessary including the top pieces to hold the wires.**

Yes, structure installation occurs during a line clearance, when the circuits are deenergized.

- 4) At approximately the same time as above, the crane will disassemble and remove the old towers including the concrete footings. And the old wires will be moved to the new towers. What can we say about the schedule here and the time to complete these tasks and access to the houses?**

Existing structure removal typically occurs over several days during a line clearance. Outside of work hours, equipment would be positioned to allow access to residences.

- 5) At some time later, probably in 2028, new larger gage wire will be pulled to replace the old wire as a part of the MOX project."**

The reconductoring is planned to occur as part of the MOX Project, therefore the reconductoring timeline depends on if and when the MOX Project is approved.

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

cc:

Michelle Wilson, CPUC CEQA Unit
Erica Schlemer, PG&E Law Department
Colleen Taylor, Jacobs
Hedy Koczwarra, Aspen Environmental Group