

January 30, 2025

Tharon Wright
Public Utilities Regulatory Analyst III
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
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 January 9, 2025, letter requesting additional information regarding Pacific Gas and Electric Company's (PG&E's) application (A.24-11-005) for a Permit to Construct and Proponent's Environmental Assessment (PEA) for the Moraga-Oakland X 115 kilovolt (kV) Rebuild 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 PEA Figure 5.1-1a and Figures 5.1-2a through 5.1-17b

CPUC Data Request Item ES-1

Aesthetics

PEA Section 5.1.4.3, Analysis of Visual Change

AES-1 PEA Figure 5.1-1a identifies the following KOPs, which should be updated to reflect the terminology in Table 5.1-3, as follows:

- a. KOPs 3 and 3b, should be changed to 3a and 3b to reflect the text in Table 5.1-3.
- b. KOPs 6 and 6b, should be changed to 6a and 6b to reflect the text in Table 5.1-3.
- c. KOPs 8 and 8b, should be changed to 8a and 8b to reflect the text in Table 5.1-3.

PG&E's Response

Figure 5.1-1a, Photograph Viewpoint Locations, is updated to reflect the terminology referenced in Table 5.1-3 of the PEA Section 5.1.4.3. Refer to Attachment 1.

CPUC Data Request Item ES-2

Aesthetics

PEA Section 5.1.4.3, Analysis of Visual Change

AES-2 In the Analysis of Visual Change (see CPUC Pre-Filing Comment Letter, page ref 5.1-20), the narrative repeatedly refers to the change in structure heights but never specifically identifies the different heights (as requested). Instead, PG&E's tracked revisions to the comment refer to Tables 3.3-4 and 3.3-5. The changes to the referenced tables are unclear, and it would be time-consuming to identify which towers are in question in the KOP views (presumably by cross-checking a KMZ) and then cross-check them with the height table(s). As initially requested, please identify the referenced structure heights in the text.

PG&E's Response

Existing and proposed structure heights are added to captions in PEA Section 5.1 figures with KOP views and visual simulations.

Existing structure heights are added to figure captions on the following Figures:

- 5.1-2a,
- 5.1-2b,
- 5.1-2c,
- 5.1-2d,
- 5.1-2e,
- 5.1-2f,
- 5.1-2g,
- 5.1-2h,
- 5.1-2i,
- 5.1-2j,
- 5.1-2k,
- 5.1-2l,
- 5.1-3a,
- 5.1-4a,
- 5.1-5a,
- 5.1-6a,
- 5.1-7a,
- 5.1-8a,
- 5.1-9a,
- 5.1-10a,
- 5.1-11a,
- 5.1-12a,
- 5.1-13a,
- 5.1-14a,
- 5.1-15a,
- 5.1-16a, and
- 5.1-17a.

Proposed structure heights are added to captions on the following visual simulation Figures:

- 5.1-4b,
- 5.1-5b,
- 5.1-6b,
- 5.1-7b,
- 5.1-8b,
- 5.1-9b,
- 5.1-10b,
- 5.1-11b,
- 5.1-12b,
- 5.1-13b,
- 5.1-14b, and
- 5.1-15b.

Structures are not proposed for replacement, as shown in the visual simulation, and thus no structure heights were added in the following Figures:

- 5.1-6b,
- 5.1-12b,
- 5.1-16b, and
- 5.1-17b.

Refer to Attachment 1.

CPUC Data Request Item ES-3

Aesthetics

PEA Section 5.1.4.3, Analysis of Visual Change

AES-3 The CPUC's pre-filing comments requested that Tree Trimming and Removal be addressed in the analysis of visual change. In the PEA, tree trimming/removal is referred to only once in the discussion of KOP 16 on Estates Drive near Sandringham Road. PG&E's tracked revisions (page 5.1-31) state that PG&E reviewed Table 3.5-5 (which identifies tree trimming/removal locations) and revised the simulations and discussion concerning vegetation management. The Project work area generalizes the locations of tree removal, and it is difficult to ascertain if KOP 16 is the only impacted view. Please confirm whether KOP 16 is the only KOP affected by tree removal/trimming and provide information on any other affected KOPs.?

PG&E's Response

KOP 16 is confirmed as the only KOP affected by tree removal/trimming as referenced in Table 3.5-5 and Section 5.1.4.3.

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 (DR2-AES-2_Moraga-OaklandX115kVRebuild_PEA_Figures5.1) contains 43 figures:

Figure 5.1-1a. Photograph Viewpoint Locations
Figures 5.1-2a to 5.1-2l. Representative Photos
Figure 5.1-3a. Existing View - Sibley Volcanic Regional Preserve
Figure 5.1-3b. Visual Simulation - Sibley Volcanic Regional Preserve
Figure 5.1-4a. Existing View - East Bay Skyline Trail
Figure 5.1-4b. Visual Simulation - East Bay Skyline Trail
Figure 5.1-5a. Existing View - East Bay Skyline Trail SW
Figure 5.1-5b. Visual Simulation - East Bay Skyline Trail SW
Figure 5.1-6a. Existing View - Manzanita Drive
Figure 5.1-6b. Visual Simulation - Manzanita Drive
Figure 5.1-7a. Existing View - Skyline Boulevard
Figure 5.1-7b. Visual Simulation - Skyline Boulevard
Figure 5.1-8a. Existing View - Balboa Drive
Figure 5.1-8b. Visual Simulation - Balboa Drive
Figure 5.1-9a. Existing View - Thackeray Drive
Figure 5.1-9b. Visual Simulation - Thackeray Drive
Figure 5.1-10a. Existing View - Montclair Railroad Trail
Figure 5.1-10b. Visual Simulation - Montclair Railroad Trail
Figure 5.1-11a. Existing View - Drake Drive
Figure 5.1-11b. Visual Simulation - Drake Drive
Figure 5.1-12a. Existing View - Drake Drive NE
Figure 5.1-12b. Visual Simulation - Drake Drive NE
Figure 5.1-13a. Existing View - State Route 13
Figure 5.1-13b. Visual Simulation - State Route 13
Figure 5.1-14a. Existing View - Park Boulevard
Figure 5.1-14b. Visual Simulation - Park Boulevard

Figure 5.1-15a. Existing View - Estates Drive
Figure 5.1-15b. Visual Simulation - Estates Drive
Figure 5.1-16a. Existing View - Hollywood Avenue
Figure 5.1-16b. Visual Simulation - Hollywood Avenue
Figure 5.1-17a. Existing View - Holman Road
Figure 5.1-16b. Visual Simulation - Hollywood Avenue
Figure 5.1-17a. Existing View - Holman Road
Figure 5.1-17b. Visual Simulation - Holman Road

cc:

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