

March 20, 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 #5 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 March 3, 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.

CPUC Data Request Item PD-5

Project Description

PEA Chapter 3.5.1.4, Watercourse Crossings

- PD-6 The PEA project description states that the rebuilt PG&E line will span across five creeks, but the new structures will be located well outside of the creek banks. Please clarify how close to the creeks ground-disturbing work will be taking place.
- PD-7 GIS data of the project shows staging areas in or very close to creeks, specifically, Shepherd Creek, Sausal Creek, and Palo Seco Creek. Please clarify what ground-disturbing activity is proposed, including depth, and how close this activity gets to the creeks themselves.
- PD-8 PG&E's responses to CPUC Data Request #3 discuss a potential timeframe of up to 45 minutes for crane truck removal in the event of an emergency (provided in response DR PD-5[f]). During this timeframe, emergency/evacuation access may be impacted if a crane truck is blocking a travel lane. Please provide any construction specifications or measures to be included in PG&E's traffic control plans (APM TRA-1) that would address this worst-case scenario of a 45-minute obstruction.

PG&E's Response

- PD-6 The PEA project description states that the rebuilt PG&E line will span across five creeks, but the new structures will be located well outside of the creek banks. Please clarify how close to the creeks ground-disturbing work will be taking place.**

Rebuilt powerline structures are proposed within approximately 40 to 400 feet of the five creeks as listed in the following table.

Creek	Approximate Distance (feet) from Structure Work Area	Project Identifier in GIS (rebuild structure number)
San Leandro Creek	400	SWA08 (RN9, RS9)
Shepherd Creek	205	SWA21 (RN20, RS20)
Cobbledick Creek	40	SWA22 (RN21, RS21)
Palo Seco Creek	275	SWA23 (RN22, RS22)
Sausal Creek	115	SWA30 (RN26, RS26)

Temporary guard structures are expected under the existing power lines along the paved access road to the Montclair Golf Course parking lot off of Monterey Boulevard. This paved road is adjacent to daylighted lengths of Palo Seco Creek. Guard structure options are described in PEA Section 3.5.5.4 and may include options such as traffic control or flaggers that do not result in ground disturbance. Should guard structures using direct-bury poles be used at this location, they will be placed outside of bed, bank, and channel. No other guard structures are expected near creeks.

PD-7 GIS data of the project shows staging areas in or very close to creeks, specifically, Shepherd Creek, Sausal Creek, and Palo Seco Creek. Please clarify what ground-disturbing activity is proposed, including depth, and how close this activity gets to the creeks themselves.

Shepherd Creek, Sausal Creek, and Palo Seco Creek are culverted underground in the areas where they intersect with project staging areas. No ground-disturbance (grading or excavation) is anticipated at staging areas, as such, there is no anticipated impact to the waterways.

PD-8 PG&E's responses to CPUC Data Request #3 discuss a potential timeframe of up to 45 minutes for crane truck removal in the event of an emergency (provided in response DR PD-5[f]). During this timeframe, emergency/evacuation access may be impacted if a crane truck is blocking a travel lane. Please provide any construction specifications or measures to be included in PG&E's traffic control plans (APM TRA-1) that would address this worst-case scenario of a 45-minute obstruction.

PG&E has included several APMs in the PEA to support the project's consistency with emergency response plans. For example:

- APM TRA-1 includes both notification to residents and emergency service providers of upcoming road closures including emergency vehicle access and evacuation routes in the project area at least one week in advance of construction, and implementation of residential safe transport where work areas will occupy the end of a street with no secondary access and residential access may be restricted.
- APM WFR-1 includes coordination of procedures with federal, state, and local fire officials and emergency responders, including notifications of temporary lane or road closures, as part of the Construction Fire Prevention Plan.
- APM WFR-2 includes all planned work is suspended during an R5-Plus fire rating. PG&E defines R5-Plus fire rating as: *The greatest level of fire danger where rapidly moving catastrophic wildfires are possible. When fire danger is R5-Plus, there are high-risk weather triggers (for example, strong winds).*

Construction specifications or measures to be included in PG&E's traffic control plan will be dictated by transportation and encroachment permits issued by local jurisdictions. When PG&E is applying for these local permits, PG&E's application will include identification of alternate emergency access where a temporary road closure is proposed. This alternative access will be reviewed and adjusted by the issuing local jurisdiction as appropriate to align with the issuing local jurisdiction's emergency evacuation plan. Permits issued by local jurisdictions will comply with policies and regulations of the local jurisdictions and as such will not conflict with any adopted emergency response or evacuation plan. Any detailed requirements for construction areas using cranes would be determined in coordination with local jurisdictions.

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 Koczwara, Aspen Environmental Group