

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



Robert Donovan
Pacific Gas and Electric
77 Beale Street
San Francisco, California 94105
(Email: RJDt@pge.com)

May 17, 2018

Subject: Pacific Gas and Electric Company Martin Substation Extension/Egbert Switching Station Project (Application No. 17-12-021) - Data Request No. 3

Dear Mr. Donovan:

The California Public Utilities Commission (CPUC), with technical assistance from Dudek, has reviewed Pacific Gas and Electric's responses to the Data Request 2.0, dated April 26, 2018. Based on review of the responses provided, further clarification on certain aspects of the proposed project are required before the application and supporting documentation is determined to be complete. Attachment A identifies the areas that require additional clarification.

We would appreciate your response to the requested information in Attachment A in support of the analysis for the Egbert Switching Station Project (Martine Substation Extension) be provided to Eric Chiang (CPUC Energy Division) and Wendy Worthey (Dudek) no later than June 1, 2018. Within 14 days of receipt of the information requested in Attachment A, the CPUC will review and determine if it is adequate to accept the CPCN application and supporting documentation as complete. At any point in this process, the CPUC reserves the right to ask for additional information.

If you have any questions regarding this letter or need additional information, please contact me at 415-703-1956 or eric.chiang@cpuc.ca.gov.

Sincerely,

Eric Chiang, CPUC Project Manager

cc: *Brandon Liddell (PG&E: via email)*
Wendy Worthey and Rica Nitka (Dudek: via email)

Attachment A: Proponent's Environmental Assessment Data Request No. 3

ATTACHMENT A

*Certificate of Public Convenience and Necessity –
A.17-12-021 Egbert Switching Station Project (Martin
Substation Extension) Data Request No. 3*

ATTACHMENT A
Certificate of Public Convenience and Necessity – A.17-12-021
Egbert Switching Station Project (Martin Substation Extension)
Data Request No. 3

1. Transportation and Traffic

- a) The PCE factor of 1.5 provided in Data Request Response No. 2 is used for trucks when analyzing freeway use. For planning-level analysis of signalized intersections, as is the project area conditions, a conversion factor of 2.0 is recommended for heavy vehicles in mixed traffic stream in the Highway Capacity Manual 6th Edition (TRB). Based on the location of the project components, Dudek recommends using a factor of 1.5 for trucks and 2.0 for heavy haul trucks. Please provide project trip generation for the project based on these factors.

2. Air Quality / Health Risks

- a) If there are any revisions to construction traffic volume assumptions based on the response to item 1a) above, please update the air quality and greenhouse gas emissions calculations accordingly.
- b) Please provide a construction Health Risk Assessment for the Egbert Switching Station site. In regards to the construction health risk assessment, we understand that there is not a regulatory requirement that triggers this. However, we reiterate our request for a construction health risk assessment based on the public concerns regarding this topic. There are several important factors that warrant this assessment:
- i. The PEA cites the 2017 BAAQMD CEQA Guidelines as support for not conducting the construction health risk assessment. However, although the BAAQMD CEQA Guidelines were adopted in 2017, they are re-adopted based on the 2010 BAAQMD CEQA Guidelines, which do not account for the 2015 revisions to the Office of Environmental Health Hazard Assessment's (OEHHA) *Guidance Manual for Preparation of Health Risk Assessments*. OEHHA's updated *Guidance* accounts for the higher sensitivity of infants and children by applying age-specific daily breathing rates (DBRs) and age-sensitivity factors (ASFs). This updated OEHHA *Guidance* recommends that exposure be assumed to start in the 3rd trimester and

“We do not recommend assessing cancer risk for projects lasting less than two months at the MEIR [Maximum Exposed Individual Resident]. We recommend that exposure from projects longer than 2 months but less than 6 months be assumed to last 6 months (e.g., a 2-month project would be evaluated as if it lasted 6 months). Exposure from projects lasting more than 6

ATTACHMENT A (Continued)

months should be evaluated for the duration of the project.” (OEHHA 2015, page 8-18)

Therefore, health risk evaluation for even short-term (over 2 months) exposure of toxic air contaminants (such as from construction activity at the Martin Substation site) is recommended based on the potential early-life impact.

- ii. We have evaluated short-term construction health risk impacts following the updated 2015 OEHHA *Guidelines* for other projects in similar proximity to sensitive residential receptors as the Martin Substation site and have identified potentially significant health risk impacts. These projects have required greater mitigation than the APMs provided in the PEA in order to reduce health risk impacts to less than significant levels.
- iii. The PEA notes that construction emissions are short-term and do not exceed the BAAQMD significance threshold for any criteria pollutant and thus will not have a significant impact on the nearby sensitive receptors during construction. However, criteria air pollutants are not the same as toxic air contaminants. Even if criteria pollutant emissions are found to be less than significant, toxic air contaminant exposure and health risk can still exceed thresholds.

3. Noise

- a) If there are any revisions to construction traffic volume assumptions based on the response to item 1a) above, please provide analysis of the worst-case construction traffic noise level increase within Brisbane and San Francisco, based upon comparison of existing roadway volume to existing plus construction traffic roadway volumes, at the closest noise-sensitive receptor along potential construction truck and equipment haul routes.

4. Electric and Magnetic Fields

- a) Clarification is needed whether the Egbert Avenue site satisfies CPUC EMF policy goals (and meets CAISO reliability goals) as well as, or better than, other sites. Note that this request does not depend on final design engineering. Please disclose the following additional information concerning the Egbert Switching Station:
 - i. Area required for the 230 kV switching station in respect of the proposed 1.7 acre Egbert site;
 - ii. Locations, if any, of sites for a 230 kV switching station in the target zone near the Martin Substation and evaluation of such sites for no-cost/low-cost EMF reductions.

ATTACHMENT A (Continued)

- iii. Factors relevant to EMF levels in inhabited environments that influenced selection of the Egbert Avenue site and disclose other sites superior to the Egbert Avenue site with regard for CPUC EMF policy.
- b) Provide information to clarify the magnitude of environmental EMF increases associated with the project and locations where such EMF increases would indicate the usefulness of no-cost/low-cost EMF reductions. Note that Table 1 of the preliminary EMF Management Plan shows reductions within the ROW due to greater conductor depth, but does not inform on reductions of environmental EMF levels, such as at the locations given in Table 2 (loc. cit.) that include sensitive receptors. EMF levels at various distances from the proposed underground 230 kV transmission cables are not presented and should be given in a tabular or graphical form, as commonly is done for overhead transmission lines. Presentation of such data would be informative, consistent with intentions of CPUC policy, and would not require comparisons of environmental levels to any existing or proposed exposure standard.
- c) Provide tables and maps of sufficient resolution and detail (greater than in Figure 2.5-1 of the PEA) to show distances from residential and sensitive receptor sites to the proposed rights-of-way of the new Jefferson-Egbert, Egbert-Embarcadero and Martin-Egbert underground 230 kV underground transmission lines. Depending on the locations of residences and sensitive receptors (e.g., schools, hospitals, daycare centers), additional design factors may be useful to clarify compliance with CPUC EMF policy. Such other factors include location of cables entering and exiting the Egbert switching station, ductwork design, cable phasing and, conceivably, slant distances from utility infrastructure to residences in multi-story buildings.

5. Santos Street - New Alignment

- a) Based on the proposed road alignment for Santos Street due to the Sunnydale Housing complex, please provide updated GIS data layers that reflect this change to the alignment for the Egbert Switching Station Project.