

February 26, 2014

Mr. Brandon Liddell
 Sr. Land Planner
 Pacific Gas and Electric Company
 77 Beale Street
 Post Office Box 7442, B30A
 San Francisco, CA 94120-7442

RE: Data Request #8 for the Pacific Gas and Electric Company’s Application for a Permit to Construct the Santa Cruz 115 Kilovolt Reinforcement Project (A. 12-01-012)

Dear Brandon:

The California Public Utilities Commission (CPUC) requests additional data related to the Santa Cruz 115 kV Reinforcement Project (A.12-01-012), as identified in this letter.

Based on information that PG&E provided in PEA Chapter 5 (Alternatives) and the Draft IS/MND prepared by Panorama, the following table has been developed to identify alternatives that would be either dismissed or analyzed in the draft EIR. Additional information or data needed to complete our alternatives analysis for the Draft EIR is identified in the last column of the table.

Following receipt of your response to this data request, Jeff Thomas in our office can set up a meeting to go over the alternatives screening process with you and to discuss any details of your response, should you have any additional questions.

Table 1 – Alternatives Screening for CEQA Analysis

Alternative	Description	Engineering Feasible/CEQA Feasible (carry forward)?	Justification	Additional Information/Data Needed
Alternative Designs Considered Against Project Objectives				
Alternative 1	“Open” the existing Green Valley-Camp Evers Power Line near Cox Road, extending both line sections to Rob Roy Substation in a double-circuit configuration, thus creating the Green Valley-Rob Roy Power Line and Rob Roy-Camp Evers Power Line.	No/No	Doesn’t meet project objectives. Alternative would not solve the loading and voltage issues.	Please provide data or documentation illustrating/ supporting the claim that the alternative would not meet loading and voltage needs (i.e., what is the current load, how much load/voltage would this alternative provide and how was that determined).

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Alternative 2	Create a tap connection between the existing Green Valley-Camp Evers Power Line near Cox Road, bringing a single-circuit tap to Rob Roy Substation.	No/No	Doesn't meet project objectives. Alternative would not solve the loading and voltage issues.	Please provide data or documentation illustrating/ supporting the claim that the alternative would not meet loading and voltage needs (i.e., what is the current load, how much load/voltage would this alternative provide and how was that determined).
Alternative 3	Convert the existing 60 kV system from Monta Vista Substation in Cupertino down to Davenport into a 115 kV system and constructing a new 115 kV line to Camp Evers Substation.	No/No	Requires the rebuilding of more than 30 miles of existing 60 kV power lines to support 115 kV conductors; the rebuilding of three existing substations to include new 115 kV equipment; and constructing a new approximately 9-mile-long 115 kV power line between Point Moretti Substation and Camp Evers Substation. This alternative would be costly, isn't reasonable in light of other feasible alternatives, and potentially result in substantial environmental impacts.	Please define the components of "rebuilding" (e.g., pole replacement? Substation work involved? Can be generally described) and associated cost implications (again, in general terms). Please provide a map indicating conceptually where new facilities would be located (or existing facilities expanded) so that we can assess the "substantial environmental impacts" conclusion.
Alternative 4	Construct a new 115 kV power line between Green Valley Substation and Rob Roy Substation.	Yes/Yes	Meets the project objectives while being cost-effective and environmentally sensitive.	See below.
Sub-Alternatives - Routing Alignments for Alternative 4				
Alternative 4A	Southern Alignment Alternative	Yes/Yes	This alternative has potentially greater significant biological resource, cultural resource, and visual impacts	Please provide the following requested information: 1. Does this alignment convert all existing wood poles to steel? Please indicate the types of steel poles and height ranges.

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			<p>than the proposed project, but may reduce visual impacts, air quality impacts, traffic impacts, etc.</p>	<ol style="list-style-type: none"> 2. Provide GIS files of the alignment. 3. It is our understanding that the ROW in several locations must be moved approximately 20-30 feet due to proximity to a gas pipeline, in order to minimize the likelihood of explosion. Please identify these locations where the alignment must be moved due to the gas pipeline on maps/GIS files. Please provide the supporting documentation used to determine the distance that poles/right-of-way would need to be moved, such as soil conductivity data, etc. 4. Please identify if any homes or other structures would need to be moved or are otherwise impacted from new right-of-way requirements. 5. Please provide an estimate of how many trees could be impacted by this alignment – only an estimate is needed and doesn't need to be precise. 6. Please provide any data that was collected for this alternative pertaining to cultural resources and biological resources (including surveys for Santa Cruz long-toed salamander, cultural surveys and records searches). New data does not need to be collected, but any data previously collected would be helpful.
Alternative 4B	Valencia Alternative	Yes/Yes	<p>Similar to proposed project resource effects with somewhat different biological resources effects.</p>	<ol style="list-style-type: none"> 1. Please indicate the type of poles that would be used for the single-circuit section of the alignment, including number and heights. Would these poles, like those used for the Cox-Freedom segment of the proposed project, follow an existing distribution alignment? 2. Please provide GIS files of the

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				<p>alignment.</p> <ol style="list-style-type: none"> 3. Would additional ROWs be needed that could impact homes or other structures? 4. Please provide any biological and cultural resource data collected for this alignment. New data does not need to be provided but any previous studies would be helpful – such as habitat assessments or cultural records searches.
Alternative 4C	West Cox Road Alternative	Yes/Yes	Similar to proposed project; somewhat different potential cultural effects (not clear if there is a historic viewshed or district if the resource is the structure itself); fewer effects to special-status species.	<ol style="list-style-type: none"> 1. Please indicate the type of poles that would be used for the single-circuit section of the alignment, including number and heights. Would these poles, like those used for the Cox-Freedom segment of the proposed project, follow an existing distribution alignment? 2. Please provide GIS files of the alignment. 3. Would additional ROWs be needed that could impact homes or other structures? 4. Please provide any biological and cultural resource data collected for this alignment. Is there a historical resources report for the identified eligible resources? New data does not need to be provided but any previous studies would be helpful – such as habitat assessments or records searches.
Alternative 4D	East Cox Road Alternative (Proposed)	TBD/TBD		Assuming this alternative is technically feasible, please provide

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	Project) with Undergrounding of Portions of the Cox-Freedom Segment			<p>the following items so that we can include an equal level of analysis¹ as for the proposed project in EIR for CPUC consideration:</p> <ol style="list-style-type: none"> 1. A revised project description for the underground segment describing the work to be completed including: a) the procedure and process for trench installation of the power line; b) temporary work areas (work and access corridors, staging areas); c) any additional vegetation, tree removals, or grading; d) materials and quantities for trenching and fill including cubic yards reused onsite versus disposed of offsite; e) equipment tables; f) construction crew composition and size; and g) maintenance associated with underground power lines (activity type and frequency). 2. Maps indicating revisions of project construction limits including access/work corridors and any added staging areas. Would additional right-of-way be required and if so, how much? Would it impact private yards or other existing structures? 3. Revisions to construction schedule. 4. Air Quality - Construction equipment summary (type of equipment, quantity and duration of use by activity) for undergrounding activities and modeling of air impacts with input and output data.

¹ In accordance with CEQA, to allow the CPUC to potentially choose this alternative and proceed under the EIR, it must be analyzed at the equivalent level of detail as the proposed project.

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				5. Aesthetics – visual simulations of transition structures and any tree trimming. 6. Biological Resources – assessment of Santa Cruz long-toed salamander impacts and vegetation mapping impacts covering additional work areas. 7. Cultural Resources – Report addendum documenting any potential effects associated with the revised limits of work where expanded beyond currently defined disturbance limits. 8. Hydrology & Water Quality – water usage required for undergrounding (compaction, dust control, etc.) 9. Transportation & Traffic – Provide traffic routing and road closure requirements for undergrounding; identify emergency access routes to be designated and limitations on emergency access. 10. Utilities – Potential impacts from construction to existing infrastructure, in particular the Central Water District’s aging water pipeline system.
Alternative 4E	White Road Alternative	Yes/No	Has potentially greater biological resource, cultural resource, and visual impacts than the proposed project.	1. Please indicate the type of poles that would be used for the single-circuit section of the alignment, including number and heights. Would these poles, like those used for the Cox-Freedom segment of the proposed project, follow an existing distribution alignment? 2. Please provide GIS files of the alignment. 3. Would additional ROWs be needed that could impact homes or other structures? 4. Please provide any biological

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				and cultural resource data collected for this alignment. New data does not need to be provided but any previous studies would be helpful – such as habitat assessments or cultural resources records searches.
Alternative 4F	Power Corridor West of Hwy 1	Maybe/No?	Potentially significant scenic highway impacts; level of greenfield construction?	<ol style="list-style-type: none"> 1. Please provide data or documentation supporting this for admin record. 2. Please provide a map indicating conceptually where new facilities would be located (or existing facilities expanded) so that we can assess the “potentially significant scenic highway impacts” conclusion as well as qualitatively assess other potential resource impacts. 3. Please provide confirmation that alternative is technically constructible, including the additional ROW that would be required.

Please contact Jeff Thomas at (650) 290-7216 or jeff.thomas@panorameenv.com if you have any questions regarding this data request.

Sincerely,



Tania Treis, Principal
 Panorama Environmental, Inc.

cc: Matthew Fogelson, PG&E
 Lisa Orsaba, CPUC