PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE SAN FRANCISCO, CA 94102-3298



April 11, 2018

Mathew Swain Pacific Gas and Electric 77 Beale Street San Francisco, California 94105 (Email: mathew.swain@pge.com)

Subject: Pacific Gas and Electric Company Martin Substation Extension/Egbert Switching Station Project (Application No. 17-12-021) - Data Request No. 2

Dear Mr. Swain:

The California Public Utilities Commission (CPUC), with technical assistance from Dudek, has reviewed Pacific Gas and Electric Certificate of Public Convenience and Necessity (CPCN) application filed on December 28, 2017, including the Proponent's Environmental Assessment (PEA), and subsequent responses to the Data Request 1.0, dated March 14, 2018. Further clarification on certain aspects of the Application, PEA and Data Request No. 1 responses are required. 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 April 27, 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: Wendy Worthey and Rica Nitka (Dudek: via email) Attachment A: Proponent's Environmental Assessment Data Request No. 2

ATTACHMENT A

Certificate of Public Convenience and Necessity – A.17-12-021 Egbert Switching Station Project (Martin Substation Extension) Data Request No. 2

ATTACHMENT A Certificate of Public Convenience and Necessity – A.17-12-021 Egbert Switching Station Project (Martin Substation Extension) Data Request No. 2

CHAPTER 3 ENVIRONMENTAL SETTING AND IMPACT ASSESSMENT SUMMARY

1. General

a) Please provide copies of the written comments received at the public meeting held in San Francisco on April 3, 2018. Following review of the public comments additional requests may be submitted regarding data needs.

2. Air Quality / Health Risks

a) Based on public concerns expressed at the public meeting regarding potential health risks due to construction, please provide a construction Health Risk Assessment for the Egbert Switching Station site.

3. Biological Resources

- a) A formal delineation will determine the extent of (boundaries of) the potentially jurisdictional features so that sufficient avoidance and protection measures, including SWPPP measures can be implemented. The PEA identifies two drainage features (both identified as riverine intermittent streambeds), and a wetland feature (identified as palustrine emergent persistent wetland) within the biological resources survey area. These features were identified during the project's biological reconnaissance surveys. Although the large majority of the project will occur in developed and urbanized areas, a wetland delineation should be performed to identify and more clearly define the jurisdictional extent of features in the project area. The delineation should include those features noted above and any other aquatic features that may not have been previously identified via review of NWI maps (which are typically not reliable for project level analyses) and the general biological field reconnaissance. The delineation should also be completed to satisfy CPUC PEA requirements (per CPUC Checklist and as described in Table 1-2 of the PEA).
- b) See "a)" above. The SWPPP is sufficient to protect wetland features, provided the extent of these features are mapped by means of a formal wetland delineation.
- c) Bat sensitivity to noise is very different than it is for humans. Recent studies have documented that noise from nearby handheld survey equipment caused bats to abandon a roost, while noise from heavy equipment in the same area did not. If such equipment causes bats to abandon a maternity roost in a bridge or other structure, that would be

considered a direct impact under CEQA. Similarly, although foraging habitat is not limited in the vicinity of the project, bats are known to forage in specific areas adjacent to their roosts. Even short term changes in foraging success of lactating females due to changes in lighting or other roost disturbance could affect the viability of their pups during the breeding season. It is not sufficient to say disturbance would be minor and wouldn't affect foraging success without knowing if roosts exist in the vicinity of project work. A mitigation measure is recommended that specifies a preconstruction survey for bat roosts be performed by a qualified biologist within 7 days prior to the onset of construction, and that project activities occur during daylight hours in the vicinity of any active roosts. Noise disturbance near active roosts should be limited based on the location of the roost and planned activity in the vicinity of the roost, as determined by a qualified biologist.

4. Noise

a) For the Egbert Switching Station, please provide a description of the material composition for the proposed shunt reactor "shielding walls". Material intended to be used for perimeter screening of the site is described as "expanded metal mesh," will these shielding walls employ solid materials/surfaces?

5. Transportation and Traffic

a) Please provide information to support the use of a lower Passenger Car Equivalent (PCE) factor as applied to trucks and heavy haul trucks in the Vehicular Trip Generation Summary table. Typically, PCE factor of 1.5 is utilized for smaller trucks and PCE factor of 2.0-3.0 is utilized for medium to heavy trucks while estimating trip generation of truck traffic.