STATE OF CALIFORNIA
PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

Edmund G. Brown Jr., *Governor*

February 4, 2016

Jo Lynn Lambert
Attorney at Law
Pacific Gas and Electric Co.
707 Brookside Avenue
Redlands, California 92373

Re: Data Request No. 1 for the Sanger Substation Expansion Project. A. 15-09-012

Dear Ms. Lambert,

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its review of Pacific Gas and Electric's (PG&E) application (A. 15-09-012) and associated Proponent's Environmental Assessment (PEA) for a Permit to Construct the Sanger Substation Expansion Project.

The CPUC identified several data needs that do not rise to the level of deficiencies during its review of the Application, PEA, and responses to Deficiency Reports #1 (November 30, 2015) and #2 (January 7, 2016). Attachment 1 details the data needs.

One set of responses should be submitted to the Energy Division and another to Silvia Yánez at Ecology and Environment in San Francisco in hard copy and electronic format. We request that PG&E respond to this data request by March 4, 2016. Inform us as soon as possible if you cannot provide responses by this date. Delays in responding to this data request may cause delays to preparation of the Initial Study/Mitigated Negative Declaration.

The Energy Division reserves the right to request information at any point in the environmental review process and during construction of the project, if PG&E's PTC is granted. Please direct questions related to this application to me at (415) 703-2068 or Billie.Blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division
California Public Utilities Commission

CC: Mary Jo Borak, CPUC Energy Division, Supervisor
Molly Sterkel, CPUC Energy Division, Program Manager
Silvia Yánez, Ecology & Environment, Project Manager
Kristi Black, Ecology & Environment, Deputy Project Manager

Attachment 1: Data Request #1

Attachment A: Sanger Substation Expansion Project Data Request # 1

Data request for Pacific Gas and Electric Company's (PG&E's) Sanger Substation Expansion Project are described in detail in the table below.

No.	*Reference*	*Description of data being requested*
Project Description		
1	PEA Section 2.2	**State whether new right of way (ROW) would be required for power line reconfiguration.** The PEA states that the substation land would be acquired by PG&E. The PEA does not provide detail as to any whether ROW would need to be acquired for the power line reconfiguration. State whether any ROW would need to be acquired as well as the dimensions of the new ROW.
2	N/A	**State whether the expanded substation would allow for interconnection of more power lines than the current substation.** The PEA does not discuss any reasonably foreseeable future phases of the proposed project. State whether PG&E may in the future interconnect additional power lines into the substation as a result of the expansion.
3	PEA pages 2-11, 3.1-7, and 3.1-21	**Clarify the range in height of tubular steel poles (TSPs) and light-duty steel poles (LDSPs).** The PEA states that new poles would be 60 to 110 feet tall on page 2-11 and 3.1-21. The PEA states on page 3.1-7 that new poles would be 66 to 101 feet in height. Provide a height range for LDSPs and a height range for TSPs.
4	PEA page 2-21	**Provide additional detail about conductor to be installed.** The PEA provides some detail on conductor characteristics. State if the conductor is ACSR.
5	PEA section 2.5.10	**State whether trees would be removed during construction.** The PEA suggests some agricultural trees may be removed. State how many trees and what type of trees would be removed.
6	PEA page 2-21	**Describe how vegetation would be removed from the site.** The PEA states vegetation would be removed. Describe how the vegetation would be removed, such as by hand, with heavy equipment, or with herbicides.
7	PEA page 2-21	**Describe how conductor would be removed from the site.** The PEA states conductor would be removed after new conductor is connected. Describe how old conductor would be removed from the site.

No.	*Reference*	*Description of data being requested*
8	PEA section 2.5.2	**Describe how poles would be shortened (topped).** The PEA states that some poles may be shortened and left in place with distribution lines. Describe how poles would be topped. Discuss access to poles for topping.
9	PEA section 2.5.9.1	**Describe installation process for LDSPs.** The PEA states that TSPs and LDSPs would be used. The PEA does not describe the installation process for LDSPs. Describe the installation process for LDSPs, including foundations and assembly.
10	PEA Section 2.5.9.1	**Describe how TSPs and LDSPs would be delivered to the project site.** The PEA does not specify how TSPs and LDSPs would be transported to the project site. Describe how the poles would be delivered, specifying whether helicopters and heavy duty trucks would be used.
11	PEA section 2.5.2	**Describe diameters of TSPs and LDSPs.** The PEA does not contain the diameter of new TSPs and LDSPs. State the minimum and maximum diameters of these poles.
12	PEA section 2.5.8	**Provide detail about grading depth.** The PEA states that some grading would be necessary at the substation site. State the maximum anticipated depth of excavation for grading. State the maximum anticipated depth of excavation for equipment installation.
13	PEA Section 2.5.2	**State whether the existing and new structures follow APLIC standards.** The PEA does not state whether the new structures would be designed according to the standards recommended by the Avian Power Line Interaction Committee (APLIC) to reduce conflicts between birds and power lines. In addition, state whether the towers that are being removed were built following APLIC standards.
Aesthetics		
14	PEA Section 3.1 Figure 3.1-6b	**Provide Visual Simulation VP7 with darker poles and labels.** The proposed TSP poles in Visual Simulation of Proposed Project 7. It is difficult to differentiate which poles are on the site of the expanded substation and which are offsite poles. Provide an updated visual simulation showing darker poles provide an additional figure for the visual simulation identifying (i.e., labeling) the pole numbers visible in both the foreground and the background of the view.
Agriculture and Forest Resources		
15	PEA Section 3.2.4.3	**Include Figure 2-8 or clarify the reference used on page 3.2-7.**

No.	*Reference*	*Description of data being requested*
		Figure 2-8 is referenced to indicated access road and pull site conditions once construction is complete; however, Figure 2-8 was not provided. Provide Figure 2-8 or revise the reference used in this section.
Biological Resources		
16	Biological Resources Technical Report Figure 4 and Sections 1.1 and 2.2, PEA Section 3.4.2.2	**Provide GIS data Figure 4 in the Biological Resources Technical Report.** Provide GIS data for the biological resource survey area, nest locations, and habitat types presented in Figure 4 of the Biological Resources Technical Report.
17	Biological Resources Technical Report Appendix C2	**Substantiate inclusion of white-tailed kite on Appendix C2.** The white-tailed kite is determined to be special status species with the potential to occur within the survey area (Appendix C2 and Table 3.4-2 in PEA section 3.4.3.2), yet it does not appear on the USFWS or CNDDB database searches in Appendix B. Provide rationale for why white-tailed kite is designated as having a potential to occur within the survey area.
18	PEA Section 3.4.2.2	**Provide details of field survey methods.** Clarify whether the additional surveyed areas identified in PEA Section 3.4.2.2 as areas with potential to support special-status species or aquatic resources are within the general biological resources survey area.
19	PEA Pages 3.4-19 and 3.4-24, Response to Deficiency Letter No. 1	**State specific measures from the PG&E San Joaquin Valley Operations & Maintenance Habitat Conservation Plan (HCP) that would be implemented during operations and maintenance.** PG&E's response to the first deficiency letter did not state which specific measures would be implemented by operations and maintenance, as requested by deficiency #16 in the CPUC's deficiency letter. List the specific measures.
Cultural Resources		
20	PEA page 3.5-11	**Explain why historic structures and canal would not be impacted by the project.** Substantiate that historic structures and a canal would not be impacted by project activities. The PEA states that there are several resources that would not be affected by the project but does not explain why. Describe why the project would not affect the resources (e.g., distance to the resource, no visual component to the resource).
21	PEA page 3.5-11 and Cultural Resources Studies (Appendix C)	**Provide responses sent to Native American letters requesting information or action.** In communication sent on April 13, 2012, the Santa Rosa Tachi Rancheria representiative (Lalo Franco) recommended PG&E to conduct monitoring by an archaeologist and that all parties be made aware of the prescribed actions to be taken in the event of an unanticipated discovery of cultural resources. Clarify whether

No.	*Reference*	*Description of data being requested*
		PG&E responded to this letter.
22	PEA page 3.5.5 and Deficiency Letter Response No. 1	**Provide information about any follow ups with or responses from Tribes contacted via telephone and/or email on November 04, 2015.** In Response to Deficiency Letter No.1 Attachment D, there were twelve contact records that required follow up of voicemails and/or email communication. Provide records of attempted additional follow-ups after calls and emails reported on November 4, 2015 to complete PG&E's documentation of Native American consultation.
Hazards and Hazardous Materials		
23	PEA page 3.8-6 Section 3.8.2 and 3.8.5	**Provide referenced document.** Provide "Environmental Data Resources, Inc. 2012. The EDR Radius Map Report with Geocheck. North McCall Avenue/Jensen Avenue, Sanger, CA. Environmental Data Resources, Inc. Milford, Connecticut. Report No. 3290411.2s."
24	PEA page 3.8-7 Section 3.8.1 and 3.8.5	**Provide referenced document.** Provide "Pacific Gas and Electric Company. 2015. California Environmental Reporting System Submittal Summary for PG&E Sanger Substation (CERSID: 10128688)."
25	PEA page 3.8-8 Section 3.8.2 and 3.8.5	**Provide referenced document.** Provide "Pacific Gas and Electric Company. 2013. Spill Prevention Control and Countermeasure (SPCC) Plan, Sanger Substation, McCall Avenue North of Jensen Avenue, Sanger, California."
Hydrology and Water Quality		
26	PEA page 3.9-10 Section 3.9.4	**Confirm that an oil-water separator would be part of the proposed stormwater retention basin system.** Section 3.9.4 of the PEA indicates that as part of the proposed project, "the proposed stormwater retention basin will include an oil-water separator to reduce the potential for discharge of polluted stormwater in the event of a leak or spill." This activity is not speficied in Section 2.0. Clarify if an oil-water separator would be part of of the proposed project's stormwater retention basin design.
Public Services		
27	PEA Section 3.14.4.3	**Clarify which roadways (if any) would require full closure or partial lane closure during project construction.** Section 3.14.4.3 states that "PG&E will coordinate any road closures with emergency service providers so that response times will not be affected." Provide details on any public roadways that would be fully or partially closed during construction.

No.	*Reference*	*Description of data being requested*
Transportation and Traffic		
28	Deficiency Letter Response No. 2, Attachment C	**Confirm all footnote formulas for Revised Table 3.16-3 are correct.** In Response to Deficiency Letter No. 2 Attachment C, Table 3.16-3 footnote 9 states "Total Equipment-related Delivery/Removal Trips = (No. of Trucks to Deliver Equipment x No. of Work Days)." Total Equipment-related Delivery/Removal Trips values provided in the table do not equal what is calculated using this formula. Confirm if this footnote should be Total Equipment-related Delivery/Removal Trips = Daily Trips x No. of Work Days.
29	Deficiency Letter Response No. 2, Attachment C	**Confirm all values for Construction Equipment Trips are correct.** According to Table 3.16-3 provided in Attachment C of Response to Deficiency Letter No. 2, Total Equipment-related Delivery/Removal Trips for Phase 5 = 224; however it is not clear how this total was calculated. For example, No. of Trucks to Deliver Equipment (14) x No. of Work Days (1) = 14; or per comment above, Daily Trips (16) x No. of Work Days (1) =16. Confirm if the numbrs provided in Table 3.16-3 are correct or if additional footnotes are needed.
Utilities and Service Systems		
30	PEA Section 3.17.3.4	**Provide details regarding PG&E's recycling rate.** Explain the following statement included in the PEA, "PG&E maintains an active recycle rate of materials used in its construction and O&M activities." Provide PG&E's active recycle rate and where these materials would go.
31	PEA Section 3.17.4.3	**Provide details from utility surveys done as part of the feasibility study and routing analysis.** The PEA states that PG&E has conducted surveys to identify existing utilities, but the results of those surveys are not included. Include maps and other results of the exisiting utilities the proposed project would encounter and/or avoid.
32	PEA Section 3.17.4.3	**Quantify stormwater and drainage changes.** Quantify the increase in impervious area at the substation site.Provide GIS data supporting the impervious area quantification.
33	PEA page 3.17-6 and Deficiency Letter Response No. 2	**Identify the specific source(s) of water required during project construction and the source(s)/quantity of water required during operation.** In Deficiency Response Letter 2, PG&E identified Fowler Packing as potential water purveyor during project construction. Specify the source of the water that would be provided by Fowler Packing if it is considered to be a potential option for the proposed project. In addition, PG&E omitted information about water use during operation and maintenance activities. It is likely that the proposed project would have similar operational water

No.	*Reference*	*Description of data being requested*
		needs even if it does not exceed baseline conditions. Provide quantities and sources of water that would be used during operation and maintenance of the proposed project, including substation landscaping irrigation, cleaning of insulators, and any other activity that would involve water use.
34	PEA Section 3.17.4.3	**Provide quantity and supplier of irrigation water for crops currently in the substation expansion area.** The agricultural lands in the proposed project area are planted with row crops that require irrigation. Identify the quantity of water that is currently supplied to irrigate crops located in the substation expansion area. Also, clarify if water currently supplied from an onsite groundwater well.
35	PEA Section 3.17.4.3	**Identify current water use at the substation.** Provide information regarding substation landscaping and any associated water needs for current operations of the existing Sanger Substation. Confirm whether the existing substation has landscaping that requires irrigation. If so, provide the quantity of water required for irrigation purposes.
36	PEA Section 3.17.4.3	**Provide more detail about materials waste recycling.** Confirm if materials generated by removal of the existing electrical lines and poles would be sent to a local commercial metal-recycling facility where recyclable or salvageable items, such as conductors, steel, and hardware, would be received, sorted, baled, and sold on the open market.
37	PEA Section 3.17.4.3	**Identify solid waste disposal facility and estimate amount of solid waste generated.** The PEA states that PG&E would recycle material whenever practicable, and dispose of unrecyclable material in the appropriate manner; however, no estimates of quantity of waste is given. Provide estimates regarding the amount of waste to be disposed of including categories for recyclable material, non-recyclable material, vegetation, soil, and other construction materials. Also, identify which landfill would be used for solid waste disposal.
Cumulative Impacts		
38	PEA sections 3.18.3 and 3.18.4, Table 3.18-2	**Distinguish which projects listed in the PEA are part of the cumulative impact assessment.** Table 3.18-2 contains “Planned and Current Projects in the Vicinity of the Project” and section 3.18-4 contains “Key Projects in the Project Vicinity. Table 3.18-2 and Section 3.18.4 appear to have different projects. State whether all five projects are part of the cumulative impact assessment, and if they are not, state which projects are part of the cumulative impact assessment.
39	PEA section 3.18.3	**State whether PG&E has any proposed projects in the area.**

No.	*Reference*	*Description of data being requested*
		The PEA does not specify if PG&E has proposed other projects in the area. Provide a list of any projects, including those that do not require a PTC or CPCN, within 5 miles of the proposed project.