



California Public Utilities Commission



July 17, 2024

VIA EMAIL

Tony Aguilar
Pacific Gas and Electric Company
300 East State Street, Suite 520
Redlands, CA 92373

Re: CPUC Review of Proponent's Environmental Assessment for Pacific Gas and Electric's (PG&E's) Plainfield Substation Upgrade Project (Application 24-06-008)

Dear Mr. Aguilar:

The California Public Utilities Commission (CPUC) Energy Division California Environmental Quality Act (CEQA) and Energy Permitting Section has conducted a review of PG&E's Application 24-06-008 and Proponent's Environmental Assessment (PEA) for the Plainfield Substation Upgrade Project (Project) filed with the CPUC on June 18, 2024. The Energy Division reviewed the PEA relative to the Commission's *Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (Version 1.0, November 2019) and Information and Criteria List. The Energy Division finds that the PEA contains sufficient information to satisfy these requirements, and therefore deems the application complete.

The Energy Division will now begin preparing an Initial Study for the proposed Project. However, we have identified additional information that is needed to adequately conduct the CEQA review. Accordingly, we are requesting further details and evaluations of the proposed Project in the attached Data Request 1. Please provide the requested information, or explain why it cannot be provided, by August 2, 2024. Submit your response in electronic format to the CPUC and to our consultant, Environmental Science Associates (ESA).

Please note that the Energy Division may request additional data, including the information described in the attached data request, to prepare a complete and adequate analysis of the potential environmental effects of the Project in accordance with the requirements of CEQA.

Please do not hesitate to call me at (213) 266-4748 if you have any questions.

Sincerely,

Tommy Alexander
Project Manager for the Plainfield Substation Project
CPUC Energy Division

cc: Michelle Wilson, CPUC Energy Division
Jo Lynn Lambert, PG&E

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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



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Darrin Gambelin, PG&E
Janet Liver, ERM
Gordon Li, ERM
Selena Whitney, ESA
Michael Manka, ESA

Attachment A:

- 1) Data Request 1

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Data Request 1 Plainfield Substation Upgrade Project CEQA Evaluation

Chapter 2, Introduction

- Section 2.2.1: Provide detailed information on all pre-filing consultation and public outreach, including presentation slides, outcome notes, mailed notices, and other materials from PG&E's pre-filing outreach.
- Section 2.2.2: Provide contact information, notification materials, meeting dates and materials, meeting notes, and records of communication organized by entity.

Chapter 3, Project Description:

- Section 3.1: Provide an updated version of the project overview first sentence to clarify this is not an "upgrade" of the two 5 MVAR cap banks, but rather the addition of two 5 MVAR cap banks.
- Section 3.2.1: How many circuits are there (per transformer)? What is the total current peak load supported by the 12 kV distribution circuits?
- Section 3.2.1: What is the age of the existing transformers? Are there any plans for replacement during the upgrade period?
- Section 3.2.2: What is the basis or forecast for identifying the three 115 kV, 45 MVA banks in Alternative 1? Is it anticipated that such a future expansion will require a 60 kV bus upgrade and/or new 115 kV bussing?
- Section 3.3.1: Provide preliminary design drawings for project features.
 - Figures 3-2 and 3-4 through 3-6 provide good information but are hard to read at the resolutions provided. Please provide higher resolution versions of these figures, or the 60% preliminary design and engineering drawings.
 - Figure 3-5 (Substation Plan): Is the 60 kV bus and breaker configuration a Breaker & ½ scheme or Ring bus arrangement?
 - Figure 3-7 (Project Components): For clarity, identify the location(s) of the new cap banks in the proposed expanded plan drawing. Will any of the infrastructure be built to 115 kV standards and operated at 60 kV?
- Section 3.3.3.1: Clarify the 115x60 kV/30 MVA transformer bank is a dual winding or optional voltage connection.
- Section 3.3.3.2: Verify current power line conductors are 715.5 kcmil. The 2016 Operating Diagrams indicate 1/0, 2/0, or 3/0 (depending on the segment). Was there a recent reconductor?
- Section 3.12.4: Please provide the pole heights and conductor sizes in a GIS attribute table.
- Provide any updated project description information that has become available since filing.

Section 5.3, Air Quality

- Section 5.3.4.2: Provide an applicant-proposed measure (APM) that requires all equipment over 50 horsepower to be Tier 4 Final to support the emissions model provided in the PEA.



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Section 5.4, Biological Resources

- Section 5.4.4.1: Impact criterion “g” states that “avian collisions are not a substantial issue at Plainfield Substation as it is not a flyway.” The Central Valley is within the Pacific Flyway. Please provide any evidence, if available, empirically demonstrating that the existing Plainfield Substation has not contributed to avian or bat collision injuries or mortalities (e.g., data from an avian reporting system). If data is not available, please state this in your response.

Section 5.6, Energy

- Section 5.6.4.3: Identify the amount of energy (kWh) that would serve the project during construction if temporary power would be obtained from existing distribution transformers at the substation.

Section 5.10, Hydrology and Water Quality

- Section 5.10.1.3: Please provide a copy of the 2022 geotechnical investigation referenced in the PEA.

Section 5.17, Transportation

- Section 5.17.4.2: Please provide an Excel spreadsheet with VMT assumptions and model calculations.

Section 5.19, Utilities and Service Systems

- Section 5.19.1.5: Provide the landfill capacity for the Esparto Convenience Center.

GIS Data Review:

- Please provide GIS shapefiles for conductor size, pole and tower heights.
- Please provide GIS shapefiles for existing, modified, and new rights-of-way or easements.

Alternatives:

- **Chapter 4, Description of Alternatives, and Chapter 6, Comparison of Alternatives:** This application completeness determination is contingent upon the assumption that the appropriate CEQA documentation will be a Mitigated Negative Declaration. If an EIR becomes necessary to support adequate environmental review, additional information regarding the proposed alternatives will be required prior to publishing the Notice to Proceed.
- **Section 4.2.2, Rejected Alternatives: Other Alternatives Considered and Rejected:** Regarding the project phasing options, PG&E’s transmission planning engineers believe that the substation equipment will need to be further upgraded at some point in the future to support new capacity. However, they also state that ... “there are no current plans for expansion or future phases in the next 10 years.” Please reconcile the forecast supporting capacity increases to accommodate three 115 kV/12 kV 45 MVA transformers and possible timelines.