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April 24, 2019

Rob Peterson, CPUC Project Manager
c/o Tom Engels
Horizon Water and Environment, LLC
400 Capitol Mall, Suite 2500
Sacramento, CA 95814

Re: Estrella Substation and Paso Robles Area Reinforcement Project ("Project")
*Response of San Antonio Winery, Inc. and Riboli Paso Robles, LLC to Circulation of
Draft Alternatives Screening Report*

Dear Mr. Peterson:

This law firm represents both San Antonio Winery, Inc. and Riboli Paso Robles, LLC (collectively, "San Antonio") with regard to the above-referenced Project being pursued by applicants Pacific Gas & Electric Company ("PG&E") and NextEra Energy Transmission West, LLC ("NEET"). In response to the California Public Utilities Commission's ("CPUC") circulation of the draft *Alternatives Screening Report* ("ASR") for review and comment, San Antonio submits the following comments for consideration in the preparation of the final ASR.

In its prior public comment letter, which was submitted in follow-up to receiving the CPUC's *Notice of Preparation of Draft Environmental Impact Report*, San Antonio raised numerous environmental concerns regarding the Project and the applicant's proposed placement of towers and transmission lines on Golden Hills Road in Paso Robles. These concerns included significant impacts on aesthetics and visual resources, interferences with Highway 46E transportation projects and the Paso Robles Regional Airport, safety concerns regarding the placement of overhead lines in such close proximity to San Antonio's facilities and the critical flight paths for firefighting helicopters, the significant disruption of local habitats and ecosystems, and the detrimental construction-related impacts the Project will have on the Golden Hills commercial district. The draft ASR circulated for comment offers multiple alternatives that have the potential to completely resolve San Antonio's concerns and, at worst, mitigate many of them. On that basis, San Antonio offers its support for many of the alternatives set forth in the ASR.

The first alternative set forth in the ASR that garners San Antonio's support is *Alternative SS-1*, which would completely relocate the proposed substation to McDonald Ranch. This alternative is favored by San Antonio because it is a more rural location and it would resolve numerous of the environmental impacts identified in San Antonio's prior letter. The new substation location would also resolve San Antonio's transmission line concerns through multiple of the proposed alternative routes emanating from this new substation location.

In particular, *Alternatives PLR-1C and PLR-1D* would both place the transmission lines in rural locations East of Paso Robles. Both of these routes would almost entirely resolve aesthetic concerns and, as identified in the ASR, would also reduce environmental impacts to biological and agricultural resources. ~~The negative impacts identified for Alternatives PLR-1C and PLR-1D principally concern longer transmission line length, but as stated in the draft ASR, such negative effects “would likely not be significant.”~~

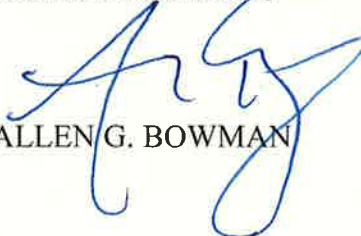
San Antonio also supports *Alternatives BS-1, BS-2 or BS-3*, which all involve battery storage technologies. Such alternatives would seem to accomplish the overall objectives of the Project without relying upon antiquated technologies that place a greater burden on the environment and affected communities. Additionally, the battery storage alternatives would also serve the purpose of meeting the State’s mandate on the CPUC to identify and procure viable and cost-effective energy storage systems as part of the State’s *Energy Storage Procurement Framework* within the required implementation deadline of 2024.

Another alternative identified in the Draft ASR, *Alternative PLR-3*, which receives contingent support from San Antonio involves “Strategic Undergrounding” in and around the Golden Hills Road commercial corridor. Although not preferred, this alternative would be more desirable to San Antonio than the current Project design of overhead transmission lines in this same area *assuming that the towers and transmission lines are still not within the viewshed of the owners and residents of this area*. The current rendering of the proposed undergrounding site does not clearly identify the aesthetic impacts of this alternative and therefore San Antonio’s support is contingent on receiving confirmation that the towers and transmission lines would not be visible from its property.

San Antonio would appreciate your consideration of the above comments and concerns and looks forward to working with you in the review process. If you have any questions or would like to discuss further, please contact me at (805) 238-2300 or abowman@ammcglaw.com

Sincerely,

ADAMSKI MOROSKI MADDEN
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ALLEN G. BOWMAN