

NextEra Energy Transmission West and Pacific Gas and Electric Company

Estrella Substation and Paso Robles Reinforcement Project

Proponent's Environmental Assessment (A.17-01-023)

Response to Deficiency List No. 5

The California Public Utilities Commission (CPUC) identified deficiencies in NextEra Energy Transmission West, LLC (NEET West) and Pacific Gas and Electric Company's (PG&E) Proponent's Environmental Assessment (PEA) for the Estrella Substation and Paso Robles Reinforcement Project. Below are responses to Deficiency List No. 5 issued by the CPUC on June 4, 2018. Each deficiency is numbered according to the list, followed by NEET West's and PG&E's response.

Deficiency 1:

Explain the discrepancy. PEA Appendix G (version May 7, 2018), Table 3, "Breakdown of Updated LoadSEER Forecast," indicates that in 2024, forecast demand for the Paso Robles Distribution Planning Area (DPA) could reach 213.37 MW at peak. This would exceed Available Capacity (212.55 MW) for the DPA by 0.82 MW. By comparison, the February 23, 2018 letter from CAISO to the CPUC states, "PG&E has indicated that based on the latest forecast, the Paso Robles distribution planning area is forecast to be overloaded by 7.3 MW or 3.4 % during peak in 2024." See CAISO letter in attachments to Applicants' responses to Deficiency Letter No. 4.

- a. *Explain why PEA Appendix G does not include the following information and supporting data: "The distribution feeders that are forecast to be loaded at or above 100% of normal ratings in 2024 are: Atascadero 1103, Paso Robles 1107, Paso Robles 1108, San Miguel 1104, and Templeton 2113. Templeton Bank #2 is forecast to be overloaded in 2024 by 2.4%." This is a direct quote from the CAISO letter.*
- b. *Please update and refile a new version of PEA Appendix G with CPUC Dockets Office that includes the detailed explanations requested in Item 1 and 1a, above.*

Response:

As demonstrated in Figure 6 of Appendix G, electrical system forecasts vary with the facts and assumptions that go into them. PG&E's load forecasts are updated annually with the latest peak load data, using the most current load growth indicators available at the time of the forecast. However, forecasts are estimates, not precise predictors of what will happen but rather tools to determine when new facilities are expected to be required.

The information contained in Table 3 of Appendix G indicates that, in 2024, demand for the DPA could reach 213.37 MW at peak, exceeding available capacity for the DPA by 0.82 MW. As explained in Part III.B, that forecast is based on the 2016 IEPR Update, incorporating the mid-case 2015 DER forecast, the planned new load identified in Table 6A, and the worst-case contingency for the largest distributed generator on line at the time of the DPA peak. This forecast is based on

the 2016 recorded peak load, using the non-simultaneous peak load data for each substation bank in the DPA.

In February of 2018, CAISO requested and PG&E provided load data that included more-recent load information based upon the 2017 recorded peak load for the DPA. The new information, which CAISO passed on to the CPUC, resulted in an updated forecast that indicated the 2024 electric demand for the DPA could reach 219.81 MW, with an approximately 7.3 MW (3.4%) overload. This forecast was different from the forecast shown in Table 3 because it included the more-recent 2017 peak load data and adjustments. Although both forecasts confirm that electric demand could exceed available capacity by 2024, the most-recent data indicates a larger overload.

a. At CAISO's request, PG&E also provided the latest list of feeders and banks projected to be loaded over their normal thermal ratings in 2024 based on the 2017 forecasting cycle. Because the focus of Appendix G is on a distribution needs assessment for the entire DPA and the need for additional substation capacity, it does not include individual distribution bank or feeder overloads in the discussion. Instead, it assesses capacity constraints by substation. (See Table 4, Section III.B of Appendix G.)

b. An updated PEA Appendix G containing the information requested above will be filed with the CPUC Docket Office. A track-changes version of the updated Appendix G is being submitted with this response, showing changes from the May 2018 version of Appendix G. If you wish to have something different, please let us know.

Deficiency 2:

Explain why PEA Appendix G (version May 7, 2018), Table 4, "Breakdown of Substation Capacities and Forecasted Loads, Paso Robles DPA," identifies the system capacity as 212.22 instead of 212.55. This appears to be a typographical error, but please clarify. The correction should be made in the refiled Appendix G per Item 1, above.

Response:

This was a typographical error. The correction was made in Appendix G refiled in response to Deficiency 1 above.

Deficiency 3:

Clarify that under the Templeton Expansion Alternative (double-circuit 70-kV option), the existing 70-kV circuit north of Paso Robles Substation to San Miguel Substation would not be reconducted.

Response:

Under the Templeton Expansion Alternative, the existing 70 kV circuit north of Paso Robles Substation would need to be reconducted at a minimum from the high side switch on the dead-end structure (Paso Robles to San Miguel 70 kV line) to where the new circuit from Templeton can tie into the existing 70 kV line as explained in the Deficiency #4 Response on Page 8: