PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

July 5, 2018

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

RE: Review of Pacific Gas and Electric Co.'s Proponents Environmental Assessment for the Vierra Reinforcement Project. A.18-06-004

Dear Ms. Lambert:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of Pacific Gas and Electric Company's Application (A. 18-06-004) and related Proponent's Environmental Assessment (PEA) for a Permit To Construct the Vierra Reinforcement Project that was filed at the CPUC on June 6, 2018.

Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the approval of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses CPUC's Information and Criteria List and PEA Checklist as the guide for determining the adequacy of project applications.

After review of PG&E's application for the Vierra Reinforcement Project, the Energy Division finds that the information contained in the PEA is incomplete. While it is thorough in many sections, there are information gaps in critical areas that prevent preparation of an adequate environmental document in a timely manner. The attached report identifies the portions of the application found to be deficient. In addition to these staff identified items, there may be more technical deficiencies, but these cannot be determined at this time since a contract has not yet been approved for consultant specialists. A contract package for this project was submitted to CPUC Contract Office in May, 2018, but due to an ongoing lack of staffing, a contract package has not yet been completed to send to DGS for approval. Therefore, the When-Needed consultant for this project cannot yet bill hours on the PEA review.

Information provided by PG&E in response to the Energy Division's finding of deficiency should be filed as supplements to Application A.18-06-004. Please send two sets of responses to the Energy Division, in both hardcopy and electronic format. Please consider the Commission's recent discussion on confidentially declarations from Decisions 16-08-024 and 17-05-035. This

is the guidance that we will be following in considering whether the PEA can be appropriately deemed complete.

We request that PG&E respond to this report no later than August 28, 2018. Upon receipt of this information, we will review it within 30 days and determine if it is adequate to accept the PEA and amended application as complete. We will be available to meet with you at your convenience to discuss these items.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should PG&E's PTC be approved.

Please direct questions related to this application to me at (415) 703-2579 or Michael.Rosauer@cpuc.ca.gov.

Sincerely,

Michael Rosauer

Project Manager
Energy Division, CEQA Unit

Attachment – Deficiency Report # 1

cc: Lonn Maier, Supervisor
Mary Jo Borak, Supervisor
Molly Sterkel, Program Manager

DEFICIENCY REPORT #1 FOR THE PG&E VIERRA REINFORCEMENT PROJECT APPLICATION (A. 18-06-004)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in Pacific Gas and Electric Company's (PG&E) Application (A.18-06-004) and Proponent's Environmental Assessment (PEA) for a Permit to Construct the Vierra Reinforcement Project. Deficiencies were identified using the CPUC PEA Checklist (CPUC, October 2008) and the CPUC Information and Criteria List. Deficiencies are presented (via PEA Checklist numbering) as follows:

Chapter 1 PEA Summary

The PEA Summary needs to include, but not be limited to, a discussion of any areas of controversy and any major issues that must be resolved. The PEA concludes that no areas of controversy exist. Provide additional information on all public and/or agency comments that were received as part of the public and community outreach effort described in 1.3.3, including comment letters received.

2.1 Overview

Provide an explanation of why the breaker-and-a-half bus configuration is necessary and whether a low-profile, more compact substation configuration (e.g., ring bus) could provide necessary reliability needs.

Provide a list of technical reports and surveys including GIS files that will be submitted to the CPUC and expected delivery date of those files and reports.

To meet the intent of CEQA to provide full disclosure of the project and its feature locations, provide GIS data layers for all project facilities and disturbance areas including the existing and proposed rights-of-way (ROWs), and detailed information for the, substation and pole/tower locations. For elements related to construction include: all proposed and possible extra work areas (e.g., staging areas, lay-down areas, work areas at and around specific pole/tower sites, parking areas, pull and tension sites, and temporary, permanent, and existing access roads), areas where special construction methods may need to be employed, helicopter landing areas, airport landing areas, all permanent and temporary disturbance areas, underground installation areas, horizontal directional drilling areas, etc.

2.2 Project Purpose, Need, and Objectives

On page 2.0-4 the PEA indicates that due to the limitation of the four existing transmission paths between Tesla and Manteca substations there is a high potential for overload leading to overlapping outages (NERC P6 event) or a need for rolling blackouts. Identify any outages on

the four transmission paths that have occurred historically, and any corrective action taken to alleviate the outage.

Indicate what "preliminary calculations" were utilized to develop the 164 MW estimate of improved system reliability and increased capacity.

2.5.1 Power Line

On page 2.0-12 of the PEA the second paragraph describes the basic design of the tubular steel poles (TSPs) and indicates that the design will meet "raptor safety requirements". Describe how TSP design ensures safety of raptor bird species and identify which design features specifically provide measures to prevent harm to raptor species.

2.5.2 Substation Modifications

Page 2.0-14 indicates that substation modifications will include the installation of "battery buildings." Provide additional details on the capacity and purpose of these units – does this component provide battery storage resource? Does the anticipated increase in capacity to 164 MW take into consideration the on-site battery storage facility? If so, indicate how the storage resource will be utilized.

In addition, on page 2.0-14 of the PEA, it is stated that portable generators may be used to provide power during the construction phase. Provide an estimate of the type of generator to be utilized and the number of hours they will run, as a basis for calculating potential air quality emissions.

2.5.4.1 Telecommunications

The microwave tower located at Vierra will be approximately 100 feet tall. Provide an explanation why a shorter monopole tower is not sufficient.

2.6 Right of Way Requirements

This section describes new easements along Christopher Way and Nestle Way to be acquired of varying widths. Provide the specific easement widths and/ or other land requirements necessary for the project. If possible, provide a table and/or diagram illustrating all new easement requirements associated with the project.

2.7.1 Staging Areas

Describe any new potential staging areas, pull sites and helicopter landing zones identified.

2.7.6 Substation Construction

Approximately 10,000 yards of fill will be required to bring the new portion of the substation to grade. Describe the composition of the fill, where will it come from, and how many truck trips will be required to transport it.

2.7.9 Construction at other Substations

Describe the minor modifications proposed to existing equipment for each substation.

3.1.3.2 Project Viewshed and Representative Views

Provide photographic visual simulation for each of the representative views contained in the PEA. Additionally, provide a photograph of the existing substation and a visual simulation of the expanded substation to enable evaluation of the aesthetic impact of the expanded substation. Also, provide a visual simulation of the proposed microwave tower. **3.4 Biological Resources**

Describe how possible tree removal habitat loss could impact the white-tailed kite, Swainson's hawk other nesting raptors.

3.5 – Cultural Resources

Provide a copy of the cultural resources report which documents the results of literature search, pedestrian survey, and Native American consultation. Include a map with mileposts as applicable and the boundaries of all survey areas along with the GIS data files. Provide copies of all records found in literature search and documentation of Native American outreach and consultation activities.

3.7 – Greenhouse Gas

Provide the detailed construction emission calculations referenced in this section.

3.8 Hazards and Hazardous Materials

As noted on page 3.8-6 in Section 3.8.3.3-Existing Hazardous Materials/Sites, a limited soil investigation was conducted for metals. It was determined that arsenic exceeded screening levels, although within naturally occurring background concentrations. The PEA states that additional testing will be performed to determine if groundwater is present on the site. Indicate if this testing has been conducted, what results, if any, were determined and the plan for remediation if needed. Pursuant to CEQA, the Energy Division (as lead agency) requires an accurate and complete understanding of the baseline conditions of the site prior to evaluating the project impacts.

3.9 Hydrology and Water Quality

Describe the design, capacity and function of the storm water retention pond.

3.12.3.1 Noise

Describe the potential noise impacts to the Sensitive Receptors— primarily the five residences located along the south side of Vierra Road and impacts to Light of the World Christian Center.

3.16 Transportation and Traffic

Section 3.16.4.3 of the PEA determines that construction traffic associated with the proposed project would have a less-than-significant impact on existing roadway segment and intersection levels-of-service, however the number of vehicle and truck trips during peak periods is not provided. A detailed estimate of trip generation during construction and operation of the proposed project to confirm the PEA's conclusion is required. In addition, consult with local and state agencies to determine what traffic and roadway improvements may be scheduled in the near future that may be a cumulative consideration for the project.

3.17 – Utilities and Service Systems

The PEA describes the proposed project's impact on local water supply as "No Impact." Provide information detailing how much water will be used during construction and operation of the project and where water for those activities will come from. The PEA also states that that water will be used for dust control and worker needs during construction, that the existing water supplies will be sufficient to serve the project's needs and that PG&E does not expect to need new or expanded entitlements. Provide more information regarding the project's water needs including:

- Potential sources of water in addition to the City of Lathrop
- How water will be transported to the project site
- A commitment letter from the local water authority or well owner confirming their ability to meet the project's water needs.

3.18 Cumulative Impacts

Describe in greater detail the cumulative impacts analysis including updates to the Lathrop Gateway Business Park Specific Plan and the ACE Forward Final EIR.

Appendix B - Mailing List

Provide the GIS data of all parcels within 300 feet of the Proposed Project with the following data: APN numbers, mailing addresses, and parcel's physical address. The PEA includes a list and Excel spreadsheet containing the data. Given the height of poles and telecommunication facilities, additional coverage beyond 300-feet may be required for Land Use or Visual Resource analysis notification.