

Comment Set PG – Supplemental Comment, 9/12/03

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File No. 023907-0037

September 12, 2003

Billie C. Blanchard, PURA V
Project Manager for Jefferson-Martin
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Jefferson-Martin 230 kV Transmission Project; Confidential Information
Related To Comments on Draft Environmental Impact Report

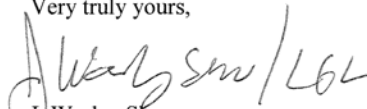
Dear Ms. Blanchard:

On behalf of Pacific Gas and Electric Company ("PG&E"), we provide this supplement to PG&E's comments, submitted on Friday September 5, 2003, concerning the Draft Environmental Impact Report ("DEIR") prepared by the California Public Utilities Commission for the Jefferson-Martin 230 kV Transmission Project.

As Attachment E to its DEIR Comments, PG&E's submitted a letter from David A. Gutierrez, Acting Chief, Division of Dam Safety, California Department of Water Resources to the San Francisco Public Utilities Commission ("SFPUC"), dated August 27, 2003. This letter stated that the Division of Dam Safety found PG&E's proposal to place the 230 kV cable in the top of Crystal Springs Dam satisfactory. In a letter postmarked September 4, 2003 and received by PG&E on Monday, September 8, 2003, the Division of Dam Safety similarly informed the SFPUC that it found the face of the dam crossing option, addressed in the DEIR, satisfactory. PG&E requests that this letter be added to the administrative record for the DEIR.

PG&E appreciates the opportunity to submit these comments on the DEIR. Please do not hesitate to contact me with any questions.

Very truly yours,


J. Wesley Skow
of LATHAM & WATKINS LLP

Enclosure

cc: Susan Lee, Aspen Environmental Group

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PG-319

Comment Set PG, Supplemental Comment, 9/12/03, cont.

STATE OF CALIFORNIA -- THE RESOURCES AGENCY

GRAY DAVIS, Governor

DEPARTMENT OF WATER RESOURCES

1416 NINTH STREET, P.O. BOX 942836
SACRAMENTO, CA 94236-0001
(916) 653-5791



Ms. Cheryl Davis, Manager
Water Supply and Treatment Division
Public Utilities Commission
City and County of San Francisco
Post Office Box 730
Millbrae, California 94030

Lower Crystal Springs Dam, No. 10-6
San Mateo County

Dear Ms. Davis:

This is in response to Mr. Lowell Rogers' letter of September 2, 2003 regarding the proposed Jefferson-Martin 230 kV Transmission Project. Mr. Rogers' letter outlined a tentative proposal for Pacific Gas and Electric Company to install a 230 kV transmission line across the upstream face of Lower Crystal Springs Dam. The new proposal has been discussed with Mr. Leo Bauer of your staff.

We have reviewed Mr. Rogers' letter and find the tentative proposal for a transmission line across the upstream face of the dam is satisfactory. An alteration application, together with detailed plans and specifications, must be approved by this office prior to the start of any work.

If you have any questions, contact Area Engineer Jon Wright at (916) 227-4627 or Regional Engineer Frederick Sage at (916) 227-4604.

Sincerely,

Original signed by
David A. Gutierrez

David A. Gutierrez, Acting Chief
Division of Safety of Dams

cc: Mr. Lowell Rogers, Project Engineer
Black & Veatch Corporation
8950 Cal Center Drive, Suite 238
Sacramento, California 95826

Mr. Robert Masuoka, Principal Planner
Building and Lands Services
Mail Code N10A
Pacific Gas and Electric Company
Post Office Box 770000
San Francisco, California 94177-0001



PG-319

Responses to Comment Set PG – PG&E Supplemental Comment, 9/12/03

PG-319 The letter from the Division of Dam Safety postmarked September 4, 2003 has been incorporated into the feasibility analysis regarding alternatives evaluation and use of the face of the dam.

Comment Set PG, Supplemental Comment, 9/19/03

LATHAM & WATKINS LLP

September 19, 2003

VIA EMAIL & HAND DELIVERY

Billie Blanchard, AICP
California Public Utilities Commission
c/o Aspen Environmental Group
235 Montgomery Street, Suite 800
San Francisco, CA 94104-2906

Re: A-02-09-043: Supplemental Comments of Pacific Gas and Electric Company on Draft Environmental Impact Report for the Jefferson-Martin 230 kV Transmission Line Project

Dear Ms. Blanchard

On behalf of Pacific Gas and Electric Company ("PG&E"), we submit these supplemental comments on the Draft Environmental Impact Report ("DEIR") for the Jefferson-Martin 230 kV Transmission Line Project to correct certain discrepancies in the DEIR. The DEIR should use maximum net output of electricity from San Francisco generation facilities rather than maximum gross output to determine generation capacity to meet demand for electricity.

On page A-3, the DEIR states the following:

Hunters Point has a total active generating capacity of 222 MW from one combustion turbine (52 MW) and one steam unit (Unit 4 at 170 MW). Potrero has a total generating capacity of 363 MW from three combustion turbines (52 MW each) and one steam unit (Unit 3 at 207).

The DEIR inconsistently uses maximum net and maximum gross electricity output to calculate the total generation capacity of the steam turbines, Hunter's Point Power Plant Unit 4 ("HPPP Unit 4") and Potrero Power Plant Unit 3 ("Potrero Unit 3"). The DEIR uses the maximum gross generation output of HPPP Unit 4 (170 MW) to determine its total generation capacity, while using the maximum net generation output of Potrero Unit 3 (207 MW) to determine its total generation capacity.

The distinction between net and gross electricity output is significant. "The net output of the facility is its send out after subtraction of power used to operate auxiliary equipment in the

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PG-320

Comment Set PG, Supplemental Comment, 9/19/03, cont.

Billie Blanchard, AICP
September 19, 2003
Page 2

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facility necessary for power generation (such as pumps, blowers, fuel preparation machinery, and exciters) and for other essential electricity uses in the facility from the gross generator output.”¹ This power, which a plant uses to generate power to the grid, is also called “plant load.” Therefore, gross output includes plant load, while net output does not.

Net output should be used to determine total electricity generation available to meet demand for electricity. Plant load is not available to meet “electric demand in San Francisco and northern San Mateo County” and, accordingly, should not be included in the DEIR’s calculation of the generating capacity of HPPP or Potrero Power Plant.²

Moreover, the DEIR states that the total generation capacity of the combustion turbines at HPPP and Potrero Power Plant are 52 MW each. As stated in the final version of the California Independent System Operator’s San Francisco Load Serving Capability Report (Sept. 15, 2003) (“LSC Report”), the net capability of these combustion turbines at maximum generation output is 50 MW each.³

HPPP Unit 4 has a plant load of 7 MW at maximum generation output. Therefore, HPPP Unit 4 has a maximum net electricity output of 163 MW.⁴ HPPP Unit 1 has a net output of 50 MW at maximum generation output. Therefore, HPPP has a total generation capacity of 213 MW. Each of the three combustion turbines at Potrero have a net output of 50 MW at maximum generation output. Therefore, the total generation capacity at Potrero is 357 MW.

¹ Order Instituting Investigation on the Commission’s Own Motion to Implement the Biennial Resource Plan Update Following the California Energy Commission’s Seventh Electricity Report, Decision No. 01-05-085 2001, Cal. PUC LEXIS 404 (May 24, 2001) (citation omitted).

² DEIR at p. A-3.

³ California Independent System Operator’s San Francisco Load Serving Capability Report at p. 13 (Sept. 15, 2003).

⁴ Additionally, this is the same net capability total for HPPP Unit 4 provided in the final version of LSC Report. See CAISO LSC Report at p. 13.

PG-320

Comment Set PG, Supplemental Comment, 9/19/03, cont.

Billie Blanchard, AICP
September 19, 2003
Page 3

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Thank you for your attention to this issue.

Sincerely,



Sarah Esmaili
of LATHAM & WATKINS LLP

cc: Susan Lee, Aspen Environmental Group
David Kraska, Pacific Gas & Electric Company
Alain Billot, Pacific Gas & Electric Company
Stanley K. Nishioka, Pacific Gas & Electric Company
Robert Masuoka, Pacific Gas & Electric Company
Richard W. Raushenbush, Latham & Watkins
J. Wesley Skow, Latham & Watkins

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Responses to Comment Set PG – PG&E Supplemental Comment, 9/19/03

PG-320 Section A has been revised in this Final EIR to incorporate the requested change.