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BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the Egbert Switching Station Project.	Application No. 17-12-___

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING THE CONSTRUCTION OF THE EGBERT SWITCHING STATION PROJECT

PUBLIC VERSION

Exhibit E is Confidential in its Entirety and Excluded from the Public Version

Exhibit B (Proponent's Environmental Assessment), Exhibit H (Detailed Cost Estimate for Project), Exhibit Q (CAISO 2013-2014 Transmission Plan) and Exhibit R (CAISO 2014-2015 Transmission Plan) are Electronically Filed and Excluded from the Served Version Due to File Size

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Dated: December 28, 2017

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Pursuant to the California Public Utilities Code, the California Public Utilities Commission's ("Commission" or "CPUC") General Order 131-D ("GO 131-D"), and the Commission's Rules of Practice and Procedure ("Rules"), Pacific Gas and Electric Company ("PG&E") respectfully requests that the Commission issue a Certificate of Public Convenience and Necessity ("CPCN") authorizing the construction of the Egbert Switching Station Project (the "Project") (formerly known as the Martin 230 kV Bus Extension Project).

I. INTRODUCTION

A. Contents of Application

PG&E's Application for the Project consists of this cover pleading, the Proponent's Environmental Assessment ("PEA") submitted herewith, and the other specific materials required by GO 131-D and the CPUC Rules of Practice and Procedure, which are attached as Exhibits A-R, and incorporated herein by reference.

The PEA complies with and provides the information required by CPUC Rule 2.4, GO 131-D, and the Commission's Information and Criteria List. The PEA includes all information necessary for the Commission to evaluate the environmental consequences of the Project in accordance with the California Environmental Quality Act ("CEQA").

B. Project Overview

The Project includes construction, operation, and maintenance of a new 230 kilovolt ("kV") switching station in the City and County of San Francisco ("San Francisco") that will be connected to the local 230 kV system by reconfiguring two existing underground, single-circuit 230 kV lines located in San Francisco, the City of Daly City ("Daly City"), and the City of Brisbane ("Brisbane"). The Project will provide an alternative 230 kV transmission path to serve customers in San Francisco in the event that Martin Substation becomes inoperable due to an extreme event.

The San Francisco Peninsula has no in-area utility scale power generation, which makes it entirely dependent on electric power imports. There are approximately 417,000 electric customers on the San Francisco Peninsula that are served from the south by PG&E's 230 kV and 115 kV transmission systems and from the east by Trans Bay Cable LLC's Trans Bay Cable ("TBC").[1/] Within the City of San Francisco, approximately 290,000 customers receive electric power almost entirely from Martin Substation and the TBC. There are no major electrical generation sources in San Francisco, leaving aside minor contributions from rooftop solar and other small-scale distributed generation.

If the electric transmission system at Martin Substation is unavailable, the TBC, if it functions properly, can only supply approximately 46% of the typical weekday electrical needs of the approximately 290,000 customers in San Francisco referenced above and approximately 81% of those customers' typical nighttime electrical load. This means that a service failure at

1/ Trans Bay Cable LLC is owned by SteelRiver Infrastructure Fund North America.

Martin Substation will result in widespread blackouts and rotating outages for approximately 290,000 customers in San Francisco until the infrastructure at Martin Substation can be repaired. The California Independent System Operator ("CAISO") Board of Governors concluded in its 2014-15 Transmission Plan that this low probability, yet high impact event constituted a significant reliability concern that requires mitigation under its Planning Standards.

The Project will address San Francisco reliability concerns by reconfiguring the existing 230 kV transmission lines terminating at Martin Substation to provide a new 230 kV path bypassing Martin Substation. This will provide an alternative source for San Francisco that, together with the TBC, could support 100% of San Francisco's power demands even if Martin Substation is not operational.

The Project will include construction of a new 230 kV switching station in San Francisco (the "Egbert Switching Station," or "switching station"). In addition, the Project will reroute two existing underground 230 kV transmission lines currently connected to the existing Martin Substation (the existing Martin-Embarcadero line and the existing Jefferson-Martin line) and connect them to the proposed Egbert Switching Station. Specifically, the existing Martin-Embarcadero line will be looped into the proposed Egbert Switching Station, creating a Martin-Egbert line and an Egbert-Embarcadero line, and the existing Jefferson-Martin line will be rerouted and extended to the proposed Egbert Switching Station, creating a Jefferson-Egbert line. Rerouting the existing underground 230 kV lines will require constructing approximately 3.9 miles of new underground transmission line installed mainly in paved areas, with approximately 420 feet to be installed by trenchless technology under U.S. Highway 101.

The Project was recommended by the CAISO in its 2014-2015 Transmission Plan and approved by the CAISO Board of Governors at their March 26-27, 2015 meeting. If PG&E's proposed schedule, set forth at Exhibit C, is achieved, the Project would be operational by February 2022 and construction would be completed by March 2022.

II. PROJECT DESCRIPTION

The Project includes construction of a new 230 kV switching station in San Francisco that will be connected to the local 230 kV system by reconfiguring two existing underground, single-circuit 230 kV lines located in San Francisco, Daly City and Brisbane. The Project would be located primarily in San Francisco, with small portions of the Project in Daly City and Brisbane. Once completed, electrical power will be able to travel from Jefferson Substation to Embarcadero Substation without going through Martin Substation. The Project will increase the reliability of the existing system by providing an alternative transmission path to serve approximately 290,000 customers in San Francisco in the event that Martin Substation becomes inoperable due to an extreme event. This Project will not provide a capacity increase.

The Project involves both transmission and substation/switchyard construction activities consisting of three major elements:

1. Construction of the Egbert Switching Station that will connect with an existing 230 kV transmission line that will be routed around the existing Martin Substation.

- The new switching station will use gas-insulated switchgear ("GIS") equipment configured as a breaker-and-a-half bus arrangement to accommodate three 230 kV transmission lines (from the existing Martin, Jefferson and Embarcadero substations).[2/]
- An approximately 11,000 square foot building will be constructed to house GIS equipment; control, metering and protection equipment; and alternating current ("AC") and direct current battery systems for power backup.
- Outdoor equipment includes, among other things: one 230 kV single-phase, three-step series reactor with circuit switches; two 230 kV shunt reactors; a pad-mounted station voltage service transformer; and an oil pump system for the proposed Egbert-Embarcadero and Martin-Egbert 230 kV lines.

2/ A spare terminal will also be constructed as part of the Project, although PG&E has no plans currently to utilize the spare terminal.

2. Modifying the existing underground Jefferson-Martin 230 kV line by rerouting the line from the existing Martin Substation to the new Egbert Switching Station, thereby creating a new underground 230 kV connection (the "Jefferson-Egbert" line).

3. Modifying the existing Martin-Embarcadero No. 1 underground 230 kV line by constructing line extensions that loop the existing 230 kV line through the proposed Egbert Switching Station, thereby creating two separate new underground 230 kV lines (the "Egbert-Embarcadero" line and the "Egbert-Martin" line).

In addition, construction will require equipment staging sites, laydown yards, equipment and material storage areas, and areas to temporarily store excavated materials.

Project construction will take place over an approximately 22-month period with initiation of service targeted for February 2022, and will involve a workforce of 26 to 88 people at any one time. As more fully detailed in Exhibit H, PG&E estimates that the total construction cost for the Project will be approximately $206 million before contingencies. PG&E has budgeted $55 million in contingences. Thus, the total estimated construction cost of the Project with contingencies is approximately $261 million.

III. CPCN REQUIREMENTS UNDER GO 131-D, SECTION IX.A

A. A Detailed Description Of The Proposed Transmission Facilities, Including The Proposed Transmission Line Route And Alternative Routes, If Any; Proposed Transmission Equipment, Such As Tower Design And Appearance, Heights, Conductor Sizes, Voltages, Capacities, Substations, Switchyards, Etc.; And A Proposed Schedule For Certification, Construction, And Commencement Of Operation Of The Facilities.

Pursuant to GO 131-D, Section IX(A)(1)(a) and CPUC Rule 3.1(a) (as incorporated by GO 131-D), PG&E has provided in Section 2 of the PEA (Exhibit B), a detailed description of the proposed transmission facilities and equipment, as well as a schedule for certification, construction and commencement of operations of the facilities included in the Project. In Chapter 4 of the PEA (Exhibit B), PG&E provides a discussion of alternatives considered. A

preliminary schedule, including proposed dates for certification, right-of-way acquisition, construction, and commencement of operation, is attached as Exhibit C.

B. A Map Of Suitable Scale Of The Proposed Routing Location Showing Details Of The Right-Of-Way In The Vicinity Of Settled Areas, Parks, Recreational Areas, Scenic Areas, And Existing Electrical Transmission Lines Within One Mile Of The Proposed Route.

Pursuant to GO 131-D, Section IX(A)(1)(b), and CPUC Rule 3.1(c) (as incorporated by GO 131-D), PG&E provides a map of the Project at Exhibit A. Maps showing route showing parks, recreation areas, and scenic areas may be found at Figures 3-10.3 and 3-10.4 of the PEA (Exhibit B). A map showing the location of existing electrical transmission lines within one mile of the Project is included as Exhibit D. Maps showing settled areas, including residential development, in the Project vicinity may be found at Figures 3-10.1 and 3-10.2 of the PEA (Exhibit B). A map showing the Project location in relation to the broader region may be found at Figure 2.3-1 of the PEA (Exhibit B).

C. A Statement Of Facts And Reasons Why The Public Convenience And Necessity Require The Construction And Operation Of The Proposed Transmission Facilities.

Pursuant to GO 131-D, Section IX(A)(1)(c) and CPUC Rule 3.1(e) (as incorporated by GO 131-D), PG&E provides the following statement of why the public convenience and necessity require construction and operation of the Project. PG&E's objectives for the Project, which reflect its purpose and need, are to:

1. Improve the reliability of PG&E's transmission system serving San Francisco by constructing a new 230 kV switching station in the vicinity of Martin Substation that provides a high likelihood of continued electric service to San Francisco should an extreme event render Martin Substation inoperable.

2. Construct a safe, economically and technically feasible project that minimizes environmental impacts and will receive 230 kV power from the south and transmit it to San Francisco.

3. Provide a 230 kV connection between a new switching station and Martin Substation to enable the transmission system serving San Francisco to operate in the event that a 230 kV transmission line serving either Martin Substation or the proposed switching station experiences an unplanned outage.

The Egbert Switching Station Project is intended to enhance electric reliability on the San Francisco Peninsula and mitigate an extreme event that could cause a lengthy loss of electric service. The Project responds to San Francisco's need for a redundant and geographically-distinct source of 230 kV power that bypasses Martin Substation to protect against an extreme event that renders Martin Substation inoperable. A detailed discussion of the need for the Project is provided below. In addition, because this Project is unique in that the underlying CAISO studies supporting approval of the Project are confidential, a discussion of the analysis and results of CAISO's confidential analysis that demonstrate why the public convenience and necessity justify the construction of the Project is presented in confidential Exhibit E.[3/] The Project's need is not dependent on the load forecasts in San Francisco, but it should be noted that any increase in demand will be subject to the same extreme event reliability risk without construction of the Project.

Currently, almost all of the electricity consumed by approximately 290,000 customers in San Francisco is provided by two sources: (1) Martin Substation's 230 kV and 115 kV systems, which send power to six substations in San Francisco; and (2) the TBC. There are no major electrical generation sources in San Francisco. If the 230 kV and 115 kV transmission systems at Martin Substation are rendered inoperable, the TBC, if it functions properly, can only supply approximately 46% of San Francisco's typical weekday electrical needs and about 81% of San Francisco's nighttime load. This means that a loss of the 230 kV and 115 kV systems at Martin Substation will result in blackouts and rotating outages in San Francisco until the infrastructure at Martin Substation can be repaired.

3/ Confidential Exhibit E to this Application has been provided to the Commission pursuant to a Motion to File Under Seal filed concurrently with this Application.

The consequences of a service failure at Martin Substation would be severe and would be magnified by the length of time it takes to repair the equipment at Martin Substation that was rendered inoperable by an extreme event. As discussed below, even a one day outage has the potential to cause significant economic harm and social disruption. An outage lasting multiple days or weeks would have potentially catastrophic impacts.

The economic costs of an outage to approximately 290,000 customers in San Francisco resulting from the loss of Martin Substation can be estimated by reference to a 2013 outage cost study commissioned by PG&E based on a loss of service at Embarcadero Substation ("Embarcadero Cost Study" or "Study"), which is attached hereto as Exhibit F.[4/] PG&E had the Embarcadero Cost Study prepared in connection with its application for a CPCN authorizing construction of the Embarcadero-Potrero 230 kV Transmission Project, which the Commission granted. The Embarcadero Cost Study was focused on the direct and indirect economic costs that would result from an outage at Embarcadero Substation. The Study assumed that the outage would result in a loss of power to approximately 24,000 residential accounts, 3,000 business accounts and 2,500 business tenants of master-metered buildings. The Study calculated the direct and indirect cost estimates of an outage at Embarcadero Substation over 24 hours, 4 days, 3 weeks and 7 weeks, with the results as follows:

Outage Duration	Direct Cost ($ Millions)	Indirect Cost ($ Millions)	Total Outage Cost ($ Millions)
24 hours	$125.7	$62.9 to $251.4	$188.6 to $377.1
4 days	$407.4	$203.7 to $814.8	$611.1 to $1,222.2
3 weeks	$1,417.0	$708.5 to $2,833.9	$2,125.5 to $4,250.9
7 weeks	$2,922.6	$1,461.3 to $5,845.2	$4,383.9 to $8,767.8

If an extreme event occurs that renders the 230 kV and 115 kV systems at Martin Substation inoperable, the direct and indirect economic costs of the resulting outage would be many times worse than shown in the Embarcadero Cost Study. With the loss of Martin

4/ Freeman Sullivan & Co., Downtown San Francisco Long Duration Outage Cost Study (2013).

Substation, the TBC would be the sole source of power imports until repairs are made to the transmission system. Based on recent studies, the San Francisco system load for a typical weekday is 650 MW during the day and 380 MW at night. Assuming that the TBC can supply up to 300 MW of power to San Francisco,[5/] approximately 54% of the 290,000 customers would be without power during the day and 19% of the 290,000 customers at night. If 290,000 customers in San Francisco were to endure rotating outages for durations between 24 hours and seven weeks, the direct and indirect economic costs can reasonably be assumed to be equal to or greater than what is shown in the table above, in other words well into the *billions of dollars*.[6/] Moreover, the outage caused by a loss of Martin Substation would be expected to result in a wide variety of adverse societal impacts in the form of government response and assistance costs, damage from looting and rioting, interruption of transportation flows, costs incurred by displaced residents, as well as impacts to health care facilities and emergency services, water delivery and treatment utilities, and communications infrastructure. The actual duration of the outage and subsequent rolling blackouts would depend on the time it would take to repair equipment at Martin Substation that was damaged during an extreme event.[7/] The upshot is that although the likelihood of an extreme event that renders the 230 kV and 115 kV systems at Martin Substation inoperable is low, it would be an extremely "high impact" event if it occurred.

The CAISO evaluated the reliability risk to the San Francisco Peninsula posed by an extreme event and required PG&E to undertake this Project. According to CAISO:

5/ As originally installed, the TBC could not provide any power without PG&E's alternating current ("AC") on the Potrero Substation bus, as AC power is needed to provide plant startup power as well as reference bus voltage and frequency at Potrero Substation to allow TBC to convert power from direct current ("DC") to AC. In 2016, Trans Bay Cable LLC completed a project that installed AC generators at its Potrero converter station as well as upgrades to its control and protection system specifically to allow the TBC to be brought back on line after a loss of AC power at Potrero (which a loss of Martin would cause)—which is referred to as a "black start." Trans Bay Cable LLC has informed PG&E and CAISO that after a loss of AC power at Potrero Substation, it could now bring the TBC back on line in an "island configuration" to initiate power restoration to San Francisco of 300 MW.

6/ Confidential Exhibit E discusses the analysis of economic impacts by a loss of Martin Substation that CAISO presented in confidential Appendix D to its 2013-2014 Transmission Plan.

7/ Martin Substation equipment restoration time is discussed in confidential Exhibit E.

> The reliability assessment focuses on whether the specific risks and circumstances regarding the San Francisco Peninsula warrant mitigation measures beyond the minimum prescribed by mandatory reliability standards and the effectiveness of various proposed solutions in mitigating the identified risks…. [¶] The ISO assessment has determined that there are unique circumstances affecting the San Francisco area that form a credible basis for considering mitigations of risk of outages and of restoration times that are beyond the minimum reliability standards. The Peninsula area does have unique characteristics in the western interconnection due to the urban load center, geographic and system configuration, and potential risks with challenging restoration times for these types of events.[8/]

As a result of CAISO's evaluation of the unique risks that the San Francisco Peninsula faces, CAISO enhanced its Planning Standards in September 2014 "to recognize that the unique characteristics of the San Francisco Peninsula form a credible basis for considering for approval corrective action plans to mitigate the risk of outages for extreme events that are beyond the level that is applied to the rest of the ISO controlled grid."[9/]

Given the significant adverse economic, safety, and convenience impacts of prolonged power outages in the San Francisco Peninsula, CAISO recommended construction of an alternative 230 kV path to bypass Martin Substation.[10/] The Project will consist of a new 230 kV switching station located approximately 1.6 miles from Martin Substation, and re-routing two 230 kV transmission lines from Martin Substation to the new switching station. This will create another route for electrical power from the south to serve San Francisco that does not go through Martin Substation. The Project will provide geographically diverse redundancy to the system while mitigating the risk of an extreme event.

PG&E shares CAISO's conclusion that the value of making the reliability investment reflected in the Project is warranted based upon the risk of an unplanned loss of Martin Substation; the impact that such an outage would have upon its approximately 290,000 customers in San Francisco; the reduction of risk resulting from the Project; and the estimated

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8/ CAISO 2013-2014 Transmission Plan at 72 (attached as Exhibit Q).

9/ CAISO Planning Standards, § 7.1 at 7-8 (Sept. 4, 2014); *see also* CAISO 2014-2015 Transmission Plan at 69-70.

10/ CAISO 2014-2015 Transmission Plan at 72-73 (attached as Exhibit R).

cost of mitigating the risk through the Project. In addition, PG&E has prepared a more detailed statement of facts and reasons why the public convenience and necessity requires the construction and operation of the Project in confidential Exhibit E, which PG&E has submitted to the Commission pursuant to a Motion to File Under Seal filed contemporaneously with this Application.

The minutes from CAISO's March 26-27, 2015 Board of Governors meeting adopting the 2014-2015 Transmission Plan, including CAISO's determination that the Project is needed and should be constructed, are included at Exhibit G.

D. A Detailed Statement Of The Estimated Cost Of The Proposed Facilities.

Pursuant to GO 131-D, Section IX(A)(1)(d) and CPUC Rule 3.1(f) (as incorporated by GO 131-D), PG&E estimates that the total construction cost for the Project will be approximately $206 million before contingencies. PG&E has budgeted $55 million in contingences. Thus, the total estimated construction cost of the Project with contingencies is approximately $261 million. A summary and detailed decision-level cost estimate is provided in Exhibit H. Project construction costs are broken down in the following preliminary estimates:

Construction Costs	**Cost ($2017)**
Egbert 230 kV Switching Station	107,935,738
Jefferson-Egbert 230 kV Transmission Line	59,527,842
Egbert-Embarcadero and Martin-Egbert Transmission 230 kV Lines	30,392,768
Transmission Line Construction Cost to Increase Trench Depth to Implement Low-Cost and No-Cost Measures to Reduce Electromagnetic Field Exposure	8,000,000
TOTAL CONSTRUCTION COSTS WITHOUT CONTINGENCIES	**205,856,348**
Contingencies	55,000,000
TOTAL CONSTRUCTION COSTS WITH CONTINGENCIES	**260,856,348**

PG&E estimates that average annual operation and maintenance costs for the Project over a 40-year project life will be as follows:

Operation and Maintenance Costs	**Average Annual Cost ($2017)**
Egbert 230 kV Switching Station	29,120
Transmission Lines (Jefferson-Egbert, Egbert-Embarcadero and Martin-Egbert 230 kV Lines)	50,960
TOTAL ANNUAL OPERATION AND MAINTENANCE COSTS	**80,800**

PG&E notes that the last cost estimate it submitted in January 2015 to the CAISO as part of the Transmission Planning Process was developed prior to the completion of the engineering cost and feasibility studies that resulted in the current, more refined decision-quality cost estimates reflected above and in Exhibit H.

E. Reasons For Adoption Of The Route Selected, Including Comparison With Alternative Routes, Including The Advantages And Disadvantages Of Each.

Pursuant to GO 131-D, Section IX(A)(1)(e), PG&E has included a discussion of the alternatives it considered in Chapter 4 of the PEA (Exhibit B). That discussion evaluates the advantages and disadvantages of the considered alternatives and provides the reasons for adoption of the route selected.

F. A Schedule Showing The Program Of Right-Of-Way Acquisition And Construction.

Pursuant to GO 131-D, Section IX(A)(1)(f), PG&E provides a preliminary, illustrative schedule for construction and right-of-way acquisition activities in Exhibit C. The final Project construction schedule can only be determined once the Commission's staff issue a full Notice to Proceed, all applicant-proposed measures and any other environmental mitigation measures have been taken into account, materials needed for construction have been delivered and are ready for installation, and PG&E's contractors have mobilized and are ready to initiate construction.

The estimated construction duration for the Project is approximately 22 months, and PG&E's intent is to place the new switching station and lines in service by February 2022 and complete construction by March 2022. The construction activities included in the attached preliminary schedule include the construction of the Egbert Switching Station and the Jefferson-Egbert, Egbert-Embarcadero and Egbert-Martin underground 230 kV lines.

Construction will typically occur between 7 a.m. and 8 p.m., or during times that will be set through coordination with San Francisco, Brisbane and Daly City. If trenching work will cause traffic congestion, the Project may require nighttime work to avoid traffic disruption. All

applicable regulations, ordinances, and restrictions will be identified and complied with prior to and during construction.

G. A Listing Of The Governmental Agencies With Which Proposed Route Reviews Have Been Undertaken, Including A Written Agency Response To The Applicant's Written Request For A Brief Position Statement By That Agency. (Such Listing Shall Include The Native American Heritage Commission, Which Shall Constitute Notice On California Indian Reservation Tribal Governments.) In The Absence Of A Written Agency Position Statement, The Utility May Submit A Statement Of Its Understanding Of The Position Of Such Agencies.

Pursuant to GO 131-D, Section IX(A)(1)(g), PG&E provides the following information regarding the government agencies with which PG&E has reviewed the proposed Project. While PG&E has provided summaries of its meetings with both local governments and resource agencies, it has appended to this Application written correspondence with San Francisco, Brisbane and Daly City as Exhibits J-P, as these are the local governments in the Project area, and are consequently the only agencies from which PG&E specifically sought input regarding siting and routing alternatives.

City and County of San Francisco, California

PG&E has met with San Francisco planning and public works officials and other key staff on multiple occasions in 2015, 2016, and 2017 to provide an overview of the Project and subsequent updates.

On November 24, 2015, PG&E met with the Assistant Engineer Gene Chan of the San Francisco Public Works Department to provide an overview of the Project.

On December 22, 2015, PG&E met with the key staff from the San Francisco Planning Department including Senior Advisor for Special Projects Dan Sider, Team Leader Eastern Neighborhoods Mat Snyder, CEQA Environmental Review Planner Paul Maltzer, Urban Design Lead Architect David Winslow, and Southeast Quadrant Historic Preservation Technical Specialist/Planner III Rich Sucré to provide an overview of the Project. San Francisco staff provided information on zoning, existing land use, existing public works facilities, and

development plans in the Project study area. PG&E was encouraged to use the San Francisco Property Information Map (http://propertymap.sfplanning.org) to review zoning during its planning process. San Francisco staff suggested that PG&E focus switching station siting efforts within PDR zoning (defined as Production, Distribution, and Repair) and M zoning (defined as Industrial).

On August 22, 2016, PG&E met with City Administrator Naomi Kelly, Director of Real Estate John Updike, Emergency Planner Nick Majeski, and San Francisco staff Bill Barnes and Jennifer Johnston to provide an overview of the Project.

On October 24, 2016, PG&E met with Office of San Francisco Supervisor Malia Cohen and District 10 staff Yoyo Chan to provide an overview of the Project.

On September 27, 2016, PG&E met with Street Use and Mapping Manager Jerry Sanguinetti from San Francisco Public Works to provide an overview of the Project. Mr. Sanguinetti provided information on existing underground utilities and other considerations for potential routing in San Francisco.

On February 13, 2017, PG&E met with San Francisco Planning Department staff Mr. Sucré and Mr. Winslow to discuss a potential switching station site in San Francisco and potential project routing within city streets. San Francisco staff identified the site as located within PDR-2 zoning. PG&E discussed the potential routes being evaluated for the project and the preliminary design for the new switching station site in San Francisco.

On September 1, 2017, PG&E sent the letter attached as Exhibit J to the San Francisco Planning Department confirming that the switching station site and associated transmission line routes are the proposed Project and requesting a written position statement. The San Francisco Planning Department expressed its support for the Project in a letter dated October 4, 2017, which is attached as Exhibit K. In addition, the San Francisco City Manager expressed his support for the Project in a letter dated October 4, 2017, which is attached as Exhibit L.

City of Brisbane, California

PG&E met with Brisbane planning and public works officials on multiple occasions in 2016 and 2017 to provide an overview of the Project and subsequent updates.

On January 11, 2016, PG&E representatives met with Brisbane officials, including City Manager Clay Holstine, Community Development Director John Swiecki, and Public Works Director Randy Breault to provide an overview of the Project. Brisbane staff provided information on zoning, existing land use, existing public works facilities, and development plans in the Project study area. Mr. Holstine confirmed that the Brisbane Baylands Project ("Baylands") area is a planned land use under current review. Constraints within Baylands roadways were discussed, including Tunnel Road being under private ownership. PG&E understands this road is likely to be realigned and improved as part of the Baylands and locations of the final road designs are unknown at this time. PG&E and Brisbane discussed utilities congestion in the Bayshore Boulevard franchise area, including a city sewer line, a major fiber optic line, and a PG&E gas transmission line among other utilities.

On August 23, 2016, PG&E representatives met with Brisbane officials Mr. Holstine, Mr. Swiecki, and Mr. Breault to provide a Project update on a potential switching station site in Brisbane and potential project routing within city streets. Brisbane staff identified the location as part of the Baylands planned development that is identified for community use. PG&E commented that even with a project site not located within Brisbane, construction activities, such as work within Martin Substation and connecting to the existing Jefferson-Martin line, may occur within the Brisbane city limits.

On September 22, 2016, PG&E representatives met with Brisbane officials Mr. Swiecki and Mr. Breault, Senior Civil Engineer Gerald Flanagan, and Chief of Police Elizabeth Macias to provide an overview of the Project focused on engineering of underground routes. Brisbane staff provided information on existing underground utilities and other considerations for potential routing in Brisbane.

On February 27, 2017, PG&E representatives met with Brisbane officials Mr. Holstine, Mr. Swiecki, and Mr. Breault to provide a Project update. PG&E confirmed that three sites discussed the previous year, namely the site in Brisbane, a site in Daly City and a site in San Francisco, continued to be analyzed. Potential new transmission line routes connecting the existing transmission lines to the San Francisco site were discussed along with work within Martin Substation that would occur as part of the Project to remove the existing Jefferson-Martin line terminal.

On September 7, 2017, PG&E sent the letter attached as Exhibit M to the City of Brisbane confirming that the San Francisco switching station site and associated transmission line routes are the proposed Project and requesting a position statement. The City of Brisbane expressed its support for the Project in a letter dated September 13, 2017, which is attached as Exhibit N.

City of Daly City, California

PG&E met with Daly City planning and public works officials on multiple occasions in 2016 and 2017 to provide an overview of the Project and subsequent updates.

On February 8, 2016, PG&E representatives met with Daly City officials, including City Manager Pat Martel, Assistant City Manager Julie Thuy Underwood, Economic and Community Development Director Tatum Mothershead, and Public Works Director John Fuller to provide an overview of the Project. Daly City staff provided information on zoning, existing land use, existing public works facilities, and development plans in the Project study area. Reviewing the Project study area, Daly City officials did not see a switching station as compatible with the City's General Plan Planning Areas 11 (Crocker) and 12 (Southern Hills), which were described as densely populated residential areas. Daly City officials stated Planning Area 13 (Bayshore) is primarily residential with some existing commercial and industrial (e.g., Martin Substation). Daly City officials did not see a switching station as compatible with planned land use in the Bayshore planning area (Cow Palace Master Plan and Bayshore Redevelopment Project Area Implementation Plan). PG&E commented that even with a project site not located within Daly

City, construction activities, such as work within Martin Substation and connecting to the existing Jefferson-Martin line, may occur within the Daly City city limits.

On September 14, 2016, PG&E representatives met with Daly City official Ms. Martel to provide an update on a potential Project switching station site in Daly City and potential project routing within city streets. Ms. Martel identified the site as within the Cow Palace Master Plan area. Potential transmission line routes within city streets were discussed.

On September 22, 2016, PG&E representatives met with Brisbane officials Mr. Fuller and City Engineer Richard Chiu to provide an overview of the project focused on engineering of underground routes. Daly City staff provided information on existing underground utilities and other considerations for potential routing in Daly City.

On February 27, 2017, PG&E representatives met with Daly City officials Ms. Martel, Ms. Mothershead, Mr. Fuller, and Mr. Chiu to provide a project update. PG&E confirmed that three sites discussed the previous year, namely the site in Daly City, a site in San Francisco, and a site in Brisbane, continued to be analyzed. Potential new transmission line routes connecting the existing transmission lines to the San Francisco site were discussed along with work within Martin Substation that would occur as part of the project to remove the existing Jefferson-Martin line terminal.

On September 1, 2017, PG&E sent the letter attached as Exhibit O to Daly City confirming that the switching station site in San Francisco and associated transmission line routes are the proposed project and requesting a written position statement. Daly City expressed its support for the Project in a letter dated September 18, 2017, which is attached as Exhibit P.

Caltrain

On December 30, 2015, PG&E representatives met with Caltrain Real Estate and Property Development Manager Brian Fitzpatrick, Grants and Real Estate Analyst Cindy Lee, Senior Engineer for Public Third-Party Projects Anthony Quicho, and Project Manager for Electrification Zhenlin Guan to provide an overview of the Project. Caltrain representatives provided information on compatibility of underground infrastructure crossings with Caltrain

facilities in the project study area. Caltrain would complete a project-specific compatibility review and any needed real estate transactions (e.g., easement) with project-specific information if requested by PG&E.

California High-speed Rail Authority

On August 5, 2016, PG&E representatives met with the California High-speed Rail Authority ("High-speed Rail") to provide an overview of the Project. High-speed Rail Lead Engineer Johnny Kuo provided information on light maintenance facility alternative sites under review in Brisbane in the Baylands planned development area.

Caltrans District 4

On September 22, 2016, PG&E representatives met with Caltrans District 4 Encroachment Permit Inspector Amjad Naseer to provide an overview of the Project. Mr. Naseer provided information the compatibility of underground transmission lines potentially crossing U.S. Highway 101.

The Native American Heritage Commission ("NAHC")

PG&E requested a search of the Sacred Lands Files from the Native American Heritage Commission ("NAHC") on May 18, 2017. The NAHC responded on May 24, 2017, indicating that the file search was negative but providing a list of Native American groups and individuals with ancestral ties to the area. The NAHC provided a list of six Native American tribes (Amah Mutsun Tribal Band, Amah Mutsun Tribal Band of Mission San Juan Bautista, North Valley Yokuts Tribe, Muwekma Ohlone Indian Tribe of the SF Bay Area, The Ohlone Indian Tribe, and Indian Canyon Mutsun Band of Costanoan) who may have an interest in the proposed Project. PG&E sent letters to these groups and individuals on May 25, 2017, and made follow-up phone calls on June 8, 2017. All NAHC correspondence is included in the PEA (Exhibit B) as Appendix C.

IV. CPCN REQUIREMENTS UNDER GO 131-D, SECTION X

GO 131-D, Section X(A) requires PG&E to provide information regarding the measures taken or proposed by PG&E to reduce the potential for exposure to electric and magnetic fields ("EMF") generated by the Project. PG&E will employ "no cost" and specified "low cost" measures to reduce public exposure to EMF in accordance with Commission Decision ("D.") 06-01-042 and PG&E's "EMF Design Guidelines for Electrical Facilities." Although the precise measures that will be employed will not be determined until final engineering is completed, the following are examples of measures that may be adopted as required by D. 06-01-042 and the Design Guidelines:

- Triangular Configuration. The typical configuration for this Project will be a triangular placement of the three cables in a duct bank.
- Strategic Line Placement. The trench will be placed within the right of way to reduce magnetic field exposure to buildings along the entire route, except where the location of existing underground utilities prevent strategic line placement.
- Lowering the trench an additional five-feet. PG&E will lower the trench by five feet for the underground transmission line near high priority group land uses where doing so achieves at least a 15% magnetic field reduction and meets the 4% Project cost benchmark for low cost mitigation.

Once the Project is approved by the Commission, a Final EMF Management Plan containing the precise EMF measures to be employed will be prepared for the Project and submitted to the CPUC. Interested parties may contact PG&E's Project Information Line at 415-973-5530 to receive a copy of the Final EMF Management Plan once it has been prepared. PG&E's Preliminary EMF Management Plan and Checklist for the proposed Project are attached as Exhibit I.

V. CEQA COMPLIANCE AND MINOR MODIFICATIONS IN FINAL PROJECT DESIGN

GO 131-D, Section XVI, and CPUC Rule 2.4 require that the Project comply with CEQA. PG&E submits herewith as Exhibit B its PEA for the Project. The Commission's Energy Division will review the Project in accordance with CEQA and prepare the appropriate CEQA document (a Negative Declaration ("ND"), Mitigated Negative Declaration ("MND"), or Environmental Impact Report ("EIR")). The Commission will determine whether the CEQA document was completed in compliance with CEQA and, if so, certify it for the Project.

To avoid incurring significant costs before the Commission approves the Project, PG&E will perform final engineering after the Commission has completed its CEQA review and approved the Project or an alternative thereto. Final engineering sometimes results in minor modifications to the Project design. Under Section 15162(a)(1) of the CEQA Guidelines, which commence at Section 15000 of Title 14 of the California Code of Regulations, a subsequent ND, MND or EIR is required if the lead agency determines that "[s]ubstantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects."

PG&E requests that in issuing any CPCN approving the Project, the Commission explicitly order that the Energy Division shall be authorized to determine whether a minor Project modification would trigger any of the criteria that require preparation of a subsequent ND, MND or EIR under CEQA Guideline § 15162(a), including the standard set forth above. If a proposed change to the approved Project requires a subsequent ND, MND or EIR under this standard, then Energy Division would determine that a Petition for Modification of the Commission Decision granting the CPCN must be filed and a subsequent ND, MND or EIR must be prepared if the proposed change is pursued. If a proposed change to the approved Project does not trigger the subsequent ND, MND or EIR standard under CEQA, then the Energy

Division should be authorized by the Commission's CPCN Decision to grant any requested minor Project modification required during final engineering and construction.

VI. STATUTORY AND PROCEDURAL REQUIREMENTS

A. The Applicant

PG&E is, and since October 10, 1905, has been, an operating public utility corporation organized under California law. It is engaged principally in the business of furnishing electric and gas services in California. PG&E's principal place of business is 77 Beale Street, San Francisco, California, 94105.

A certified copy of PG&E's Restated Articles of Incorporation, effective April 12, 2004, is on record before the Commission in connection with PG&E's A.04-05-005, filed with the Commission on May 3, 2004. These articles are incorporated herein by reference pursuant to Rule 2.2 of the Commission's Rules.

PG&E's most recent Proxy Statement dated April 18, 2017 was filed with the Commission on June 1, 2017 in A.17-06-005, and is incorporated herein by reference. PG&E's balance sheet and an income statement for the three months ending September 30, 2017 was filed with the Commission on November 17, 2017 in A.17-11-009, and is incorporated herein by reference.

Communications with regard to this Application should be addressed to:

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MATHEW J. SWAIN
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77 Beale Street, B30A
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B. Competing Utilities

CPUC Rule 3.1(b) (as incorporated by GO 131-D) requires an applicant to address utilities, corporations, persons, or other entities with which the proposed construction is likely to

compete. This Project is located in within the City and County of San Francisco, the City of Brisbane and Daly City. The proposed construction lies entirely within the boundaries of PG&E's existing service territory, and as such, will not compete with any other utility, corporation or person.

C. Required Permits

CPUC Rule 3.1(d) (as incorporated by GO 131-D) requires an applicant to identify the franchises and such health and safety permits as the appropriate public authorities have required or may require for the Project. Significant portions of the route of the proposed Project lie within the existing franchise rights PG&E has acquired to build facilities within the public rights of way in San Francisco, Brisbane and Daly City. Additionally, Section 2.11 of the PEA (Exhibit B) lists the potential permits that may be required by other public authorities.

D. Alternatives To Transmission Facilities

Pursuant to Public Utilities Code Section 1002.3, PG&E has included in its discussion of alternatives in Section 4 of the PEA (Exhibit B) consideration of whether there are cost-effective alternatives to the Project that "meet the need for an efficient, reliable, and affordable supply of electricity, including but not limited to, demand-side alternatives…."

E. Design And Construction Management Cost Control Plan

Pursuant to Public Utilities Code Section 1003(e), PG&E describes below its plan for design and construction management and cost control for the Project. The Project is being managed by PG&E's Electric Transmission Department using industry accepted project management tools. Activities are planned and tracked use the Primavera P6 scheduling tool. Costs are estimated, forecast and controlled using the P6 schedule and PG&E's SAP business system. The project management team will plan, monitor and control Project activities and cost in relationship to the schedule. Monthly reports will be provided to PG&E management showing progress, status, planned work, cost information and issues and risks.

PG&E management will provide gated approvals for the Project. This allows management to set spending limits, provides opportunities to check the Project for compliance with project governance rules, provide input on major decisions and resolve issues that arise. Management will also control contingency funds approved for use with this Project.

The contracts for the engineering team are already in place and are managed by the project management team. The contracts for procurement and construction services and construction monitoring have not been put in place. The contract type will follow PG&E's procurement standards and be managed by the project management team.

F. Public Notice

Pursuant to GO 131-D, Section XI.A, notice of this Application will be given within 10 days of filing the Application by mail,[11/] by advertisement,[12/] and by posting:[13/] (1) to certain public agencies and legislative bodies; (2) to owners of property located on or within 300 feet of the Project area; (3) by advertisement in a newspaper or newspapers of general circulation; and (4) by posting a notice on-site and off-site at the Project location. PG&E has given, or will give, proper notice within the time limits prescribed in GO 131-D.

11/ Pursuant to GO 131-D (Section XI.A.1), notice of the filing of an application for a CPCN must be sent by direct mail to "(a) The planning commission and the legislative body for each county or city in which the proposed facility would be located, the CEC, the State Department of Transportation and its Division of Aeronautics, the Secretary of Resources Agency, the Department of Fish and Game, the Department of Health Services, the State Water Resources Control Board, the Air Resources Board, and other interested parties having requested information. The utility shall also give notice to the following agencies and subdivisions in whose jurisdiction the proposed facility would be located: the Air Pollution Control District, the California Regional Water Quality Control Board, the State Department of Transportation's District Office, and any other State or Federal agency which would have jurisdiction over the proposed construction; and (b) All owners of land on which the proposed facility would be located and owners of the property within 300 feet of the right-of-way as determined by the most recent local assessor's parcel roll available to the utility at the time notice is sent[.]"

12/ Pursuant to GO 131-D (Section XI.A.2), publication of the notice of the filing of an application for a CPCN must be "[b]y advertisement, not less than once a week, two weeks successively, in a newspaper or newspapers of general circulation in the county or counties in which the proposed facilities will be located, the first publication to be not later than ten days after filing of the application[.]"

13/ Pursuant to GO 131-D (Section XI.A.3), notice of the filing of an application for a CPCN must be posted "[b]y posting a notice on-site and off-site where the project would be located."

G. Compliance with Rule 2.5

CPUC Rule 2.5 provides that an applicant include a deposit, to be applied to the costs the Commission incurs to prepare a negative declaration or an environmental impact report, when the Commission is acting as the lead agency pursuant to CEQA. Pursuant to Rule 2.5, PG&E has calculated the total deposit to be $212,428.17. Rule 2.5 additionally provides: "Proponent shall pay the applicable deposit in progressive payments due as follows: One-third of the deposit at the time the application or pleading is filed, an additional one-third no later than 120 days after the time the application or pleading is filed, and the remaining one-third no later than 180 days after the time the application or pleading is filed." Therefore, PG&E has provided with this application a check payable to the Commission in the amount of $70,809.39.

H. PG&E's Financial Ability

CPUC Rule 3.1(h) (as incorporated by GO 131-D) asks for: **"**Statements or exhibits showing the financial ability of the applicant to render the proposed service together with information regarding the manner in which applicant proposes to finance the cost of the proposed construction or extension." PG&E will own the assets that comprise the Project, and such assets will be added to PG&E's utility rate base. PG&E intends to finance the Project's estimated cost of approximately $206 million with the same proportion of debt and equity with which all other rate base assets are financed: 47% long-term debt; 1% preferred stock; and 52% common stock.

PG&E anticipates that the funds to finance the Project will be primarily derived from cash generated by PG&E's operations and, to the extent necessary, from external sources of funds. External sources of funds would come from the issuance of some combination of debt and equity securities. PG&E's ability to fund this Project is demonstrated through PG&E's financial statements contained in PG&E Corporation's Quarterly Report on Form 10-Q filed with the United States Securities and Exchange Commission on November 2, 2017 for the period ending September 30, 2017. PG&E believes that its utility operations will continue to generate substantial cash with which to fund its construction activities, including the Project.

I. Proposed Rates for the Project

CPUC Rule 3.1(h) (as incorporated by GO 131-D) asks for a "statement of the proposed rates to be charged for service to be rendered by means of such construction or extension." The Project's costs are for transmission-related services, and PG&E therefore will seek to recover such costs through transmission rates under the jurisdiction of the Federal Energy Regulatory Commission. Accordingly, ratemaking issues are beyond the scope of this Application.

VII. APPLICATION EXHIBITS

The following Exhibits are attached to this Application:

A. Project Overview Map

B. Proponent's Environmental Assessment (Electronically Filed and Excluded from Served Version Due to File Size)

C. Preliminary Project Schedule

D. Map Showing the Location of Existing Electrical Transmission Lines Within One Mile of the Project

E. Confidential Exhibit (Submitted Under a Motion to File Under Seal) and Excluded from the Public Version

F. Freeman Sullivan & Co., Downtown San Francisco Long Duration Outage Cost Study (2013)

G. Minutes of the March 26-27 2015 California Independent System Operator Board of Governors Meeting

H. Detailed Cost Estimate for Project (Electronically Filed and Excluded from Served Version Due to File Size)

I. Preliminary Transmission EMF Management Plan and Substation Checklist

J. Letter from PG&E to the City and County of San Francisco Seeking Position Statement, dated September 1, 2017

K. Letter from the City and County of San Francisco Planning Department to PG&E Providing a Position Statement, dated October 4, 2017

L. Letter from the City and County of San Francisco City Administrator to PG&E Providing a Position Statement, dated October 4, 2017

M. Letter from PG&E to the City of Brisbane Seeking Position Statement, dated September 7, 2017

N. Letter from the City of Brisbane to PG&E Providing a Position Statement, dated September 13, 2017

O. Letter from PG&E to the City of Daly City Seeking Position Statement, dated September 1, 2017

P. Letter from the City of Daly city to PG&E Providing a Position Statement, dated September 18, 2017

Q. CAISO 2013-2014 Transmission Plan (Electronically Filed and Excluded from Served Version Due to File Size)

R. CAISO 2014-2015 Transmission Plan (Electronically Filed and Excluded from Served Version Due to File Size)

VIII. CATEGORIZATION OF PROCEEDINGS AND NEED FOR HEARINGS

Pursuant to CPUC Rule 2.1(c), the Application must contain: "The proposed category for the proceeding, the need for hearing, the issues to be considered including relevant safety considerations, and a proposed schedule. (See Article 7.) The proposed schedule shall be consistent with the proposed category, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding)." CPUC Rule 7.1(e)(2) provides: "When a proceeding does not clearly fit into any of the categories as defined in Rules 1.3(a), (d), and (e), the proceeding will be conducted under the rules applicable to the ratesetting category unless and until the Commission determines that the rules applicable to one of the other categories, or some hybrid of the rules, are best suited to the proceeding."

The Commission has consistently found that applications for CPCNs under GO 131-D do not fit within any of the enumerated categories and should therefore be considered as "ratesetting proceedings." Thus, even though transmission rates are set by FERC and are therefore beyond the scope of this proceeding, the ratesetting rules apply to this Application.

The issue in this proceeding, as set forth in GO 131-D, is whether the Project is necessary to promote the safety, health, comfort, and convenience of the public, and thus is required by the public convenience and necessity.

Safety considerations will be addressed in the following manner. The new switching station and rerouted underground cables will be constructed, operated and maintained in compliance with current safety requirements, including CPUC General Orders 95, 128, 165, 166 and 174, state and local building codes, and OSHA. PG&E workers will utilize construction Best Management Practices, standard health and safety procedures, and guard structures to ensure the safety of workers and nearby residents throughout construction. PG&E will also implement transportation safety practices and procedures and coordinate with local government agencies and transportation service providers to ensure safe access of emergency service providers during lane closures associated with construction. In addition, PG&E will prepare a Worker Environmental Awareness Program and will implement hazardous substance control/emergency response and fire risk procedures, and will comply with all measures and applicable laws, to address potential hazardous materials safety issues. Removed equipment and other waste generated during construction will be characterized and disposed of appropriately in accordance with applicable law.

Whether hearings are needed should be determined after protests, if any, are filed. PG&E's proposed certification schedule is set forth in Exhibit C.

IX. CONCLUSION

PG&E respectfully requests that the Commission:

1. Issue a Decision and Order granting PG&E a Certificate of Public Convenience and Necessity, certifying an applicable environmental document for the Project, and granting any other permission and authority necessary to construct, operate and maintain the Project.
2. Determine that the public convenience and necessity does now, and will in the future, require the proposed Project.

3. Authorize Energy Division to approve requests by PG&E for minor project modifications that may be necessary during final engineering and construction of the Project so long as Energy Division finds that such minor project modifications do not require a subsequent environmental document under Section 15162 of the CEQA Guidelines.

4. Grant such other and further relief as the CPUC finds just and reasonable.

Respectfully Submitted,

DAVID T. KRASKA
MATHEW J. SWAIN

By: */s/ Mathew J. Swain*
MATHEW J. SWAIN

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Attorneys for Applicant
PACIFIC GAS AND ELECTRIC COMPANY

Dated: December 28, 2017

SCOPING MEMO INFORMATION

Category:

Ratesetting. Pursuant to Rule 2.1(c) of the Commission's Rules of Practice and Procedure, the application must propose a category for the proceeding as defined in Rule 1.3. If none of the enumerated categories are applicable, proceedings will be categorized under the catch-all "ratesetting" category. (CPUC Rule 7.1 (e)(2).) The Commission has consistently found that applications for CPCNs and PTCs under GO 131-D do not fit within any of the enumerated categories and should therefore be considered as "ratesetting proceedings."

Need for hearing:

No areas of environmental or other public concern are known. If environmental concerns are raised, those can be addressed in the environmental review process and do not require separate hearings. If other concerns about the Project are raised, PG&E recommends that a public participation hearing be held.

Issues:

Whether the Project is necessary to promote the safety, health, comfort, and convenience of the public, and thus is required by the public convenience and necessity.

Safety considerations:

This Project consists of constructing a new 230 kV switching station and rerouting two underground 230 kV lines that terminate at Martin Substation to reconfigure the existing 230 kV transmission system to provide one 230 kV path that bypasses Martin Substation. The new switching station and rerouted underground cables will be constructed, operated and maintained in compliance with current safety requirements, including CPUC General Orders 95, 128, 165, 166 and 174, state and local building codes, and OSHA. PG&E workers will utilize construction BMPs, standard health and safety procedures, and guard structures to ensure the safety of workers and nearby residents throughout construction. PG&E will also implement transportation safety practices and procedures and coordinate with local government agencies and transportation service providers to ensure safe access of emergency service providers during lane closures associated with construction. In addition, PG&E will prepare a Worker Environmental Awareness Program and will implement hazardous substance control/emergency response and fire risk procedures, and will comply with all measures and applicable laws, to address potential hazardous materials safety issues. Removed equipment and other waste generated during construction will be characterized and disposed of appropriately in accordance with applicable law.

Proposed Schedule:

See Exhibit C, attached.

VERIFICATION

I, the undersigned, declare:

I am an officer of PACIFIC GAS AND ELECTRIC COMPANY, a corporation, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 4, 2017, at San Francisco, California.

/s/ Andrew Williams
Andrew Williams
Vice President, Safety, Health and Environment