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**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 25, 2016

Jo Lynn Lambert  
Jillian Blanchard  
1325 High Street  
Alameda, CA 94501

***Subject:*** Pacific Gas and Electric (U 39E) South of Palermo Reinforcement Project Application of a Permit to Construct (***Application No. A.16-04-023*** )

Dear Ms. Armstrong,

The California Public Utilities Commission (CPUC), with technical assistance from Dudek, has reviewed Pacific Gas and Electric Permit to Construct (PTC) application, including the Proponent's Environmental Assessment (PEA), dated April, 2016, and subsequent responses to the Data Request 1.0. Further clarification on certain aspects of the Application, PEA and Data Requests responses are required. Attachment A identifies the areas of the application that were found to be deficient.

We would appreciate your response to the requested information in Attachment A in support of the analysis for the South of Palermo Reinforcement Project provided to Andrew Barnsdale (CPUC Energy Division) and Iain Fisher (Dudek) no later than September 8, 2016.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.3221 or Andrew.Barnsdale@cpuc.ca.gov.

Sincerely,

Andrew Barnsdale

Andrew Barnsdale  
CPUC Project Manager

cc:

*Attachment A:Data Request 2.0*

**ATTACHMENT A**  
**Permit to Construct**  
**PG&E South of Palermo Reinforcement Project**  
**Proponent's Environmental Assessment (PEA) Completeness Review**  
**Data Request 2.0**

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Data Request 2.0 reviews the PEA, Data Request 1.0 and accompanying appendices. This data request mirrors the layout of information in the PEA, and appendices. Consequently, requests may be duplicated or cross-referenced between sections, and resource specialist may be required to address data requests that originate from both the PEA and the associated appendices or the subsequent data requests.

**3.8 Hazards and Hazardous Materials**

- a. Please provide information related to local fire safe regulations, as noted in the response to data request 3.8(b).
- b. The original data request stated: “The PEA (page 3.8-19) states that “Fire prevention actions will be taken during construction to reduce the wildland fire risk, especially in the moderate and high fire-hazard severity zones.” Provide specific details of the fire prevention actions, how and when they will be implemented, relationship to proposed construction equipment, potential ignition sources (vehicles, equipment, line break), required plans and permits, and a discussion of responsible parties and those with enforcement responsibility. Additionally, clarify whether fire prevention actions are proposed in all project areas, or only in SRA.” The response identified only a portion of proposed fire prevention actions and did not address how/when they will be implemented, their relationship to proposed construction equipment, potential ignition sources, required plans and permits, identification of responsible parties and those with enforcement responsibility and whether fire prevention actions are proposed in all project areas, or only in SRA. More detailed information is needed to evaluate potential impacts.
- c. Information related to mitigating O&M fire risk relies on information identified for the project’s construction phase, which is incomplete (see previous response).
- d. Please provide the estimated quantities of fuels to be stored during construction in each construction yard and the approximate duration of use of each construction yard.
- e. Are the existing steel poles painted? If so, has lead-based paint testing been conducted?