



October 30, 2015

Jo Lynn Lambert
Attorney at Law
Pacific Gas and Electric Co.
707 Brookside Avenue
Redlands, California 92373

RE: Review of Pacific Gas and Electric Co.'s Proponent's Environmental Assessment for the Sanger Substation Expansion Project. A. 15-09-012

Dear Ms. Lambert,

The California Public Utilities Commission's (CPUC) Energy Division, Infrastructure Permitting & CEQA Unit, has reviewed the Sanger Substation Expansion Project's Proponent's Environmental Assessment (PEA) for completeness. Pacific Gas and Electric Co. (PG&E) filed its application for a Permit to Construct (A.15-09-012) and the PEA on September 30, 2015. CEQA Guidelines section 15101 allows 30 days for the lead agency to determine if an application is complete.

The Energy Division has determined that PG&E's PEA is incomplete and has identified several deficiencies. Deficiencies in data are those that would prevent preparation of an adequate CEQA document in a timely manner. The Energy Division used the PEA Checklist for Transmission Line and Substation Projects and the CPUC Information and Criteria List to identify deficiencies.

Attachment A identifies information required to deem PG&E's application and PEA complete. CPUC is requesting a response to this request by November 30, 2015. Please send one set of responses to the Energy Division and one set to Ecology and Environment, Inc., in hardcopy and electronic formats.

Data requests will also be submitted to PG&E to obtain information needed during the CEQA review. The CPUC reserves the right to ask for additional information in the form of data requests at any point in the process. Please direct questions on the completeness review to me at (415) 703-2068 or via email to Billie.Blanchard@cpuc.ca.gov.

Sincerely,

Billie Blanchard

Billie Blanchard
Project Manager
Energy Division
California Public Utilities Commission

CC: Mary Jo Borak, CPUC Energy Division, Supervisor
Molly Sterkel, CPUC Energy Division, Program Manager
Silvia Yáñez, Ecology & Environment, Project Manager

Attachment A: Deficiencies in the Proponent's Environmental Assessment

Attachment A: PEA Completeness Review

Deficiencies in Pacific Gas and Electric Company’s (PG&E’s) Proponents Environmental Assessment (PEA) are described in detail in the table below. The California Public Utilities Commission’s PEA Checklist (November 2008) and CPUC Information and Criteria List (July 2008) were used to identify the deficiencies in PG&E’s PEA.

PG&E Sanger Substation Expansion Project PEA Deficiencies			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
Objectives			
1	PEA Section 2.4	PEA Checklist section 2.2; section V(10) of the Information and Criteria List	<p>State what current utility standards the proposed project is intended to meet and describe how the proposed project would meet the standards.</p> <p>PG&E lists “update equipment to meet current utility standards” as a project objective. More detail is needed as to what the utility standards are, how the current Sanger Substation does not meet those standards, and how the proposed project would meet the utility standards. Page 3.8-11 of the PEA states the proposed project would be implemented in part to maintain conformance with the Institute of Electrical and Electronic Engineers’ safety standards. State whether these are the “current utility standards” and whether there are other “current utility standards” the proposed project is designed to meet.</p>
2	PEA Section 2.4	PEA Checklist section 2.2; section V(10) of the Information and Criteria List	<p>Provide additional detail on what reliability standard(s) the proposed project is intended to meet.</p> <p>PG&E lists “build a more reliable substation” as a project objective. Reliability is in general dictated by NERC, WECC, and CAISO. State whether there are particular reliability standards or planning guidelines the project is meant to address. Describe how the proposed project would meet the reliability standard(s).</p>
Project Description			
3	N/A	PEA Checklist sections 3.4, 3.7.1.1, 3.7.1.2, 3.7.1.3, 3.7.1.5, 3.7.2.1, 3.7.2.2; section V(11) of the Information and Criteria List	<p>Provide additional detail in the project GIS (or equivalent) data layers.</p> <p>The provided data layers are limited in scope. Additional layers are needed. Provide layers, as applicable, for:</p> <ul style="list-style-type: none"> • New access roads for construction • Overland routes for construction • New access roads for operation and maintenance • New driveways for construction • Driveways for operation and maintenance • Existing access roads to be used for construction • Poles that would be shortened and left in place

PG&E Sanger Substation Expansion Project PEA Deficiencies			
No.	Reference	CPUC Requirement	Description of Deficiency
			<ul style="list-style-type: none"> • Temporary shoo-fly pole locations • Temporary work areas outside of “substation expansion footprint” shown in Figure 2-2 • Staging area within substation area • Permanent disturbance areas around poles and outside of “substation expansion footprint” • Soil stockpile area(s) • Guard structures, if applicable • Guy poles, if applicable • Telecom locations, if applicable • Designation of which poles are TSP and which are LDSP • Pull and tension sites
4	PEA page 2-11	PEA Checklist section 3.5.1; section V(11) of the Information and Criteria List	<p>Identify where distribution lines would remain in place and where they would be moved onto new infrastructure.</p> <p>The PEA states that some structures would be shortened to allow existing distribution to remain in place. The PEA and the GIS data do not identify where distribution would remain in place and where it would be moved to structures installed as part of the proposed project. Provide additional detail on distribution line realignment.</p>
5	PEA page 2-11	PEA Checklist section 3.5.2; section V(11) of the Information and Criteria List	<p>Confirm that the PEA describes all poles and types of poles that would be installed as part of the proposed project.</p> <p>The PEA describes TSPs and LDSPs as the proposed pole structures. Confirm that no other pole types or additional poles are needed, including wood, guy pole, or tangent pole.</p>
6	N/A	PEA Checklist section 3.5.3.1; section V(11) of the Information and Criteria List	<p>State whether there would be a telecommunications component of the proposed project.</p> <p>The PEA does not mention telecommunications work, though telecommunications are often included in transmission and substation projects. Clarify whether telecommunications work would be completed as part of the proposed project. If telecommunications work would be completed, describe the scope of the work, the construction methods, and the operation and maintenance required.</p>
7	APM GHG-2, PEA page 3.7-8	PEA Checklist section 3.5.4; section V(11) of the Information and Criteria List	<p>Specify which equipment would utilize SF₆.</p> <p>APM GHG-2 requires minimization of SF₆ leakage and states a standard for maximum SF₆ leakage from gas insulated switchgear. The project description does not describe the circuit breakers as containing SF₆, though the greenhouse gas section analysis states that there would be 23 new SF₆ circuit breakers. Specify whether any other equipment used for the proposed project would contain SF₆.</p>
8	PEA Section 2.4.4	PEA Checklist section 3.7.1.1; section V(11) of	<p>Verify the staging area described in the PEA is sufficient in size and configuration for the proposed project.</p>

PG&E Sanger Substation Expansion Project PEA Deficiencies			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
		the Information and Criteria List	The PEA states that all staging, parking, and lay down will be located on the eastern portion of the graded pad. Provide a diagram that shows the portion of the graded pad that will be used for staging. Confirm the space will be adequate to serve staging area needs for the entirety of the project construction period and that no additional staging areas will be needed, including staging while the graded pad is being constructed. If additional space for staging, parking, and lay down may be needed, identify where additional space will be located and provide GIS data that describes this additional space.
9	N/A	PEA Checklist section 3.7.1.4; section V(11) of the Information and Criteria List	Confirm helicopters would not be used during construction. The PEA does not mention helicopter use during construction. Confirm that helicopter would not be used for any activities, including line stringing and pole installation, during construction. If helicopters would be used, describe the scope of activities helicopters would be used for.
10	PEA Section 2.5.9.2, page 2-19, and section 2.5.8	PEA Checklist section 3.7.2.2 and 3.7.4; section V(11) of the Information and Criteria List	Identify the source of imported backfill and the maximum quantity of imported material. The PEA states that PG&E would use soils from on site to backfill and grade, but that some supplementation of soils may be needed. Identify the source of imported soil or other backfill material as well as a maximum volume of material to be imported.
11	PEA Section 2.5.9.3	PEA Checklist section 3.7.2.5; section V(11) of the Information and Criteria List	State what methods would be used for stringing conductor and removing conductor over roadways. PEA Figure 2-2 shows eight locations where conductor stringing would take place over South McCall Avenue and East Jensen Avenue as well as several locations where conductor would be removed from over roadways. State how PG&E would ensure motorist safety during stringing operations, such as through use of guard structures or netting. Clarify whether any methods would be used when conductor that crosses roadways is temporarily transferred onto shoo-fly structures.
12	PEA Section 2.5.1	PEA Checklist section 3.7.4; section V(11) of the Information and Criteria List	State whether North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection (CIP) requirements in CIP-014-2 affect the proposed project State whether Sanger Substation is subject to CIP-014-2 (Physical Security). If so, verify that the height and design of the fence as proposed is consistent with potential NERC CIP 14 requirements.
13	PEA Sections 2.5.6 and 2.5.13, Table 3.16-3	PEA Checklist section 3.7.5; section V(11) of the Information and Criteria List	Provide a schedule by phase for the proposed project. Provide durations of each phase of construction described in section 2.5.13 and in Table 3.16-3. Provide descriptions of each phase, including designating which activities in 2.5.6 would occur in each phase in section 2.5.13.
14	PEA Table 2-1, section 2.5.13	PEA Checklist sections 3.7.1.3, 3.7.1.5, 3.7.2.1, 3.7.2.2, 3.7.5; section	Provide more detail about equipment used during construction. PEA Table 2-1 provides a list of equipment that would be used during construction. Specify which

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		V(11) of the Information and Criteria List	equipment and the quantity of equipment that would be used for each phase of construction described in PEA section 2.5.13.
Air Quality			
15	PEA Appendix C	PEA Checklist section 5.3; section V(14) of the Information and Criteria List	<p>Update air quality emissions calculations to use the most recent EMFAC and OFFROAD emissions factors. Provide spreadsheets to facilitate CPUC review.</p> <p>Air quality emissions provided in the PEA use OFFROAD 2013 and EMFAC 2007 emissions factors. Updated emissions factors are available and generally required by air districts. Provide air quality emissions calculations with updated emissions factors. The air quality emissions calculations should be provided in Excel spreadsheet format.</p>
Biological Resources			
16	PEA Pages 3.4-19 and 3.4-24	PEA Checklist section 6.1; section V(14) of the Information and Criteria List	<p>State which PG&E San Joaquin Valley Operation & Maintenance Habitat Conservation Plan (HCP) measures PG&E would implement during operations and maintenance.</p> <p>The PEA specifies that the HCP does not cover the construction of the proposed project but states it would implement HCP measures during operation of the proposed project. Identify measures of the HCP that PG&E would adhere to during operation of the proposed project to comply with HCP.</p>
Cultural Resources			
17	PEA Pages 3.5-5 through 3.5-6	PEA Checklist section 5.5; section V(12) of the Information and Criteria List	<p>Provide information about any follow ups with or responses from Tribes contacted via letter on September 17, 2015.</p> <p>PG&E contacted 15 individuals and organizations on the Native American Heritage Commission contact list via letter on September 17, 2015. The PEA does not contain any responses or information about attempted follow ups and states that no responses were received as of September 21, 2015. It is unlikely that PG&E would have received responses or conducted follow ups by September 21, 2015, four days after letters were sent. The CPUC requests PG&E's records of attempted follow ups and responses to complete PG&E's documentation of Native American consultation.</p>
18	PEA page 3.5-4	PEA Checklist section 4; section V(12) of the Information and Criteria List	<p>Provide GIS data that shows areas surveyed for cultural resources.</p> <p>The PEA describes the areas surveyed for cultural resources. Provide a GIS (or equivalent) layer that shows the areas that have been surveyed for cultural resources.</p>
Noise			
19	PEA Section 3.12.3	PEA Checklist section 4; section V(12) of the Information and Criteria	<p>Provide baseline noise measurements for the project area.</p> <p>The PEA does not provide current baseline noise measurements for the project area. Provide noise</p>

PG&E Sanger Substation Expansion Project PEA Deficiencies			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
		List	measurements that are representative of noise conditions at Sensitive Receptors 1, 2, and 6 (shown on PEA Figure 3.12-1). Noise levels should be provided in L _{dn} and L _{eq} (1 hour).
Utilities and Service Systems			
20	PEA page 3.17-6	Section V(14) of the Information and Criteria List	<p>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.</p> <p>The PEA states that that water will be used for dust control and worker needs during construction, and that the existing water supplies will be sufficient to serve the project’s needs. PG&E does not expect to need new or expanded entitlements. Provide more information regarding the project’s water needs including:</p> <ul style="list-style-type: none"> • Potential sources of water in addition to the City of Sanger • 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.
21	Page 3.17-6	CPUC PEA Checklist 5.16	<p>Describe how treated wood poles would be disposed of after removal.</p> <p>PG&E details that 24 wood poles would be removed as part of the project. The CPUC requests information regarding the location and capacity of disposal facilities that may accommodate treated wood poles.</p>
Traffic and Transportation			
22	PEA Table 3.16-3, section 3.1.4.3, page 2-22	PEA Checklist section 3.7.5, 5.15; section V(14) of the Information and Criteria List	<p>Provide more detail regarding trip generation during AM and PM peak hours.</p> <p>Provide a trip generation table that includes truck trips broken down by types of trucks (e.g., heavy duty), and number of worker and truck trips expected to take place during AM and PM peak hours. Section 3.16.4.3 indicates a maximum of 30 workers would each take 2 trips per day between the substation and surrounding communities. This would equate to 60 daily worker trips; however, Table 3.16-3 shows a maximum of 46 worker trips per day. Please state whether 46 trips per day is correct and provide any assumptions used for trip generation (e.g., carpooling, passenger car equivalent factor for heavy vehicles).</p>
23	PEA Section 3.16.33	PEA Checklist section 4; section v(12) of the Information and Criteria List	<p>Provide baseline traffic volumes for McCall Avenue and East Jensen Avenue.</p> <p>Existing traffic volumes are not provided in the PEA for McCall Avenue and East Jensen Avenue. Provide recent (2012 or later) AM and PM peak period traffic volumes for Mc Call Avenue and East Jensen Avenue.</p>