



December 11, 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 Responses to Deficiency Letter 1 regarding the 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 Pacific Gas & Electric's (PG&E) responses to CPUC's letter, dated October 30, 2015. The letter identified several deficiencies in data that would prevent preparation of an adequate CEQA document in a timely manner. CPUC has determined that several deficiencies identified in the October 30, 2015, letter remain unresolved.

Attachment A identifies information required to deem PG&E's application and PEA complete. CPUC is requesting a response to this request by December 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](mailto: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. The deficiency number is the same as for the deficiency letter dated October 30, 2015.

<b>PG&amp;E Sanger Substation Expansion Project PEA Deficiencies</b>			
<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
<b>Project Description</b>			
3, 4, 8	N/A	PEA Checklist sections 3.4, 3.5.1, 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><b>Provide additional detail in the project GIS (or equivalent) data layers.</b></p> <p>In Deficiency Response 1, PG&amp;E provided GIS data for several components and confirmed the project would not involve several other components. PG&amp;E omitted from the GIS several components that would be included in the proposed project, and stated it was unknown if several other components would be required for the project. The GIS therefore does not contain but should contain potential locations of:</p> <ul style="list-style-type: none"> <li>• <i>New access roads for construction and overland routes for construction.</i> It would be acceptable to provide a “corridor” of where roads may be located, as well as the maximum disturbance (e.g., length of road and width of road) in lieu of providing precise locations of access roads and overland routes)</li> <li>• <i>Existing access roads to be used for construction.</i> Provide the location and extent of the existing twin-track road that would be used to access new pole locations east of South McCall Avenue referenced on page 2-16 of the PEA.</li> <li>• <i>Staging area within substation area.</i> Provide a delineation of the area that would be used for staging on the eastern portion of the substation pad, as described on page 2-16 of the PEA. Figure 2-4, which contains information about extent of the expanded substation, may provide constraints for where the staging area would be located within the substation pad.</li> <li>• <i>Temporary shoo-fly pole locations, guard structures, designation of TSPs and LDSPs.</i> Indicate when preliminary design information will be available so PG&amp;E can provide GIS data for these components.</li> <li>• <i>Telecommunications locations.</i> Provide GIS that shows the location of the proposed fiber optic line as described on page 2-10 of the PEA.</li> <li>• <i>Soil stockpile areas.</i> PG&amp;E indicated up to 30,000 cubic yards of soil may be imported and that,</li> </ul>

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			<p>in general, topsoil would be salvaged and stockpiled. There is a potential that a large area may be needed for soil stockpiling. PG&amp;E should identify where soil would be stockpiled.</p> <ul style="list-style-type: none"> <li>• <i>Guy poles.</i> PG&amp;E stated that it is not yet known whether guy poles will be required. State when PG&amp;E will know whether guy poles will be needed.</li> <li>• <i>Poles that would be shortened and left in place.</i> PG&amp;E stated that it is not yet known whether poles would be shortened and left in place for distribution lines. State when PG&amp;E will know whether poles will be shortened and left in place for distribution lines.</li> </ul>
6	PEA page 2-10	PEA Checklist section 3.5.3.1; section V(11) of the Information and Criteria List	<p><b>Describe construction methods and operation and maintenance required for the telecommunications component of the proposed project.</b></p> <p>In Deficiency Response 1, PG&amp;E’s clarified that telecommunications would be a part of the project. PG&amp;E omitted a description of construction methods and operation and maintenance activities for the telecommunications component.</p>
<b>Air Quality</b>			
15	PEA Appendix C	PEA Checklist section 5.3; section V(14) of the Information and Criteria List	<p><b>Update Air Quality calculations to use the most recent EMFAC and OFFROAD emission factors. Provide spreadsheets to facilitate CPUC review.</b></p> <p>In Deficiency Response 1, PG&amp;E provided updated construction emissions that supersede the information presented in Section 4.3 and Appendix C of the PEA. The information provided presents inconsistencies and/or missing data that needs clarification, as indicated below:</p> <ul style="list-style-type: none"> <li>• <i>Offroad Equipment Count.</i> The ‘Offroad Equipment Count’ presented in Attachment C of Deficiency Response 1 (PDF pages 15, 55 and 91) shows 6 pieces of equipment for ‘Phase 4b- Power line re-route: Install TSP’. This information is inconsistent with Attachment B and Page 12 of Attachment C (both show 7 pieces of equipment for Phase 4-b). Clarify this discrepancy.</li> <li>• <i>Onroad Vehicles Count.</i> Attachment C does not list the number of onroad vehicles used to calculate Trips and VMT. Provide the vehicle count for each Phase used in the calculations. Ensure this information is consistent with response to PEA Deficiency No. 22.</li> <li>• <i>Revised PEA Table 3.3-6.</i> Provide a revised PEA Table 3.3-6, indicating tons/year emissions.</li> </ul>
<b>Noise</b>			
19	PEA Section 3.12.3	PEA Checklist section 4; section V(12) of the	<b>Provide baseline noise measurements for the project area.</b>

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<i>No.</i>	<i>Reference</i>	<i>CPUC Requirement</i>	<i>Description of Deficiency</i>
		Information and Criteria List	<p>In Deficiency Response 1, PG&amp;E states that background noise levels in the project vicinity fluctuate on a daily and seasonal basis due to the use of agricultural heavy machinery that operates at various times of the year. Page 3.12-10 of the PEA cites the Fresno County Background Report (Fresno County Public Works and Planning Department 2000), which reports equivalent sound pressure levels (Leq) for the Central County area “from high 40s to low 50s”. Assuming the Fresno County Background Report provides representative baseline levels for the project, construction noise reported in Tables 3.12-7 and 3.12-8 of the PEA could temporarily exceed ambient noise levels at the closest sensitive receptor (located at 185 feet from the substation site). In order to assess the potential temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project:</p> <ul style="list-style-type: none"> <li>• Provide the expected noise reduction from implementation of APM NOI-2 and APM NOI-5.</li> <li>• Clarify if all the equipment listed in Table 3.12-7 of the PEA would be used if nighttime work is needed.</li> </ul>
<b>Utilities and Service Systems</b>			
20	PEA page 3.17-6	Section V(14) of the Information and Criteria List	<p><b>Provide more detail about the source of water to be used during construction and provide information about water use during operation.</b></p> <p>In Deficiency Response 1, PG&amp;E provided information about the amount of water that would be used during construction and potential source of water for construction. PG&amp;E omitted specific information for certain sources (i.e., “local farmers or other local water purveyors”). PG&amp;E should provide specific information about all purveyors it wishes to use for analysis in the EIR.</p> <p>PG&amp;E also omitted information about water use during operations. PG&amp;E should provide information about water use during operation, including quantity (per year) and source(s).</p>
<b>Traffic and Transportation</b>			
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><b>Provide more detail regarding trip generation during AM and PM peak hours.</b></p> <p>In Deficiency Response 1, PG&amp;E provided a revised text and transportation table (Attachment E) that replaces text in Section 3.16 and data in Table 3.16-3 of the PEA. The information provided needs clarification, as indicated below:</p> <ul style="list-style-type: none"> <li>• Clarify the total maximum number of daily trips for the project, and maximum number of daily trips for Worker Trips, Construction Equipment Trips, and Other Construction Support Trucks.</li> <li>• Assumptions listed at the end of the Revised Sanger Substation Transportation Table indicate Phases 4a, 4b, 4c, and 4d would be performed in parallel with Phase 3. Clarify if all worker trips</li> </ul>

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			<p>presented in the Revised Sanger Transportation Table for these phases are cumulative. The table provided in Attachment E currently looks as though there could be 120 daily workers if these phases happened concurrently, but the text indicates the project would have a maximum of 30 daily workers.</p> <ul style="list-style-type: none"> <li>• Assumptions listed at the end of the Revised Sanger Substation Transportation Table indicate that Total Equipment-related Delivery/Removal Trips = (No. of Trucks to Deliver Equipment x No. of Work Days); however these do not appear to add up (ex. Phase 1: 9 Trucks to deliver Equipment x 1 work day = 9 trips, not 18). Clarify if there would be 2 truck trips (for dropping off equipment and leaving site) for 9 days, or 18 truck trips for 1 day.</li> <li>• Assumptions indicate that all equipment dropped off during Phases 1-5, would be removed at the end of Phase 5, but it is not clear from the table how the daily trips and total trips during Phase 5 were determined.</li> </ul>