

PUBLIC UTILITIES COMMISSION

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SENT BY E-MAIL

June 4, 2018

Mr. David Kraska
Law Department
Pacific Gas and Electric Company
dtk5@pge.com

Mr. Scott Castro
Senior Attorney
NextEra Energy Transmission West, LLC
scott.castro@nexteraenergy.com

SUBJECT: Fifth Proponent's Environmental Assessment (Revised PEA) completeness review for the NextEra Energy Transmission West, LLC and Pacific Gas and Electric Company (the Applicants) Estrella Substation and Paso Robles Area Reinforcement Project (A.17-01-023; Proposed Project)

Dear Mr. Kraska and Mr. Castro:

The California Public Utilities Commission's (CPUC's) Infrastructure Permitting and California Environmental Quality Act (CEQA) section has reviewed the updated, Revised PEA. The information provided is not complete. As stated previously, we require all of the data requested to move forward with the CEQA analysis (e.g., see Attachment 1, including email dated May 2, 2018). The system data requested in Attachment 1 may be provided by granting direct access to PG&E's Application Programming Interface and allowing the CEQA section to download all of the data (preferred) or by providing CEQA section the requested data via a USB device, SFTP, PG&E server access, or other methods. PG&E's failure to provide the requested data is delaying environmental review of the Proposed Project.

The system data are required to sufficiently document and evaluate both the Proposed Project and alternatives pursuant to CEQA. Full compliance with this request must occur within two weeks (**June 18, 2018**). In requesting the data, we note the Commission's authority to do so pursuant to Public Utilities Code sections 314, 581, 582, 584, 701, and 702. Failure to comply with the request for data may subject PG&E to penalties pursuant to Public Utilities Code Section 2107.

In addition to the previously requested data, please respond to and resolve the following items by the June 18, 2018 deadline:

- 1) Explain this discrepancy. **PEA Appendix G** (version May 7, 2018), Table 3, "Breakdown of Updated LoadSEER Forecast," indicates that in 2024, forecast demand for the Paso Robles Distribution Planning Area (DPA) could reach 213.37 MW at peak. This would exceed Available Capacity (212.55 MW) for the DPA by **0.82 MW**. By comparison, the February 23, 2018 letter from CAISO to the CPUC states, "PG&E has

indicated that based on the latest forecast, the Paso Robles distribution planning area is forecast to be overloaded by **7.3 MW** or 3.4 % during peak in 2024.” See CAISO letter in attachments to Applicants’ responses to Deficiency Letter No. 4.

- a. In addition, explain why PEA Appendix G does not include the following information and supporting data: “The distribution feeders that are forecast to be loaded at or above 100% of normal ratings in 2024 are: Atascadero 1103, Paso Robles 1107, Paso Robles 1108, San Miguel 1104, and Templeton 2113. Templeton Bank #2 is forecast to be overloaded in 2024 by 2.4%.” This is a direct quote from the CAISO letter.
 - b. Please **update and refile** a new version of PEA Appendix G with CPUC Dockets Office that includes the detailed explanations requested in Item 1 and 1a, above.
- 2) Explain why **PEA Appendix G** (version May 7, 2018), Table 4, “Breakdown of Substation Capacities and Forecasted Loads, Paso Robles DPA,” identifies the system capacity as 212.22 instead of 212.55. This appears to be a typographical error, but please clarify. The correction should be made in the refiled Appendix G per Item 1, above.
 - 3) Clarify that under the **Templeton Expansion Alternative** (double-circuit 70-kV option), the existing 70-kV circuit north of Paso Robles Substation to San Miguel Substation would not be reconductored.
 - 4) Provide **load shape (8760)** in MW and MVAR for all substations in the Paso Robles and San Luis Obispo distribution planning areas at the transmission level. This item adds to and clarifies the request for system data provided on May 2, 2018 (Attachment 1).

Upon receipt of all the system data requested (Attachment 1), complete responses to items 1 to 4 in this letter, and verification that all the data provided are fully accessible and adequate, the PEA will be deemed complete. Please keep us posted on your progress. After receipt of all the requested information and updates, we will complete another review of PEA adequacy and issue a completeness determination. If you have any questions, please coordinate with Rob Peterson at robert.peterson@cpuc.ca.gov.

Sincerely,



Rob Peterson
Energy Division, Infrastructure Permitting and CEQA

cc:

Tracy Davis, Attorney, NEET West
Matthew Swain, Attorney, PG&E
Andy Flajole, Environmental Licensing Lead, NEET West
Tom Johnson, Principal Land Planner, PG&E
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Gabe Petlin, Supervisor, Grid Planning and Reliability
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA, CPUC
Jack Mulligan, Attorney, CPUC
Tom Engels, Principal, Horizon Water and Environment

Attachment 1

From: Peterson, Robert

Sent: Wednesday, May 02, 2018 9:27 AM

To: 'Swain, Mathew' <MTSN@pge.com>; 'Ellis, Lee' <LEE2@pge.com>; 'Johnson, Tom' <TJJ1@pge.com>; 'Lambert, Jo Lynn' <JLLm@pge.com>

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Subject: ESTR: follow-up about System Data (Deficiency Letter No. 4, Item G (3.1))

Hi Mathew,

We reviewed PG&E's proposal and provide the following responses and clarifications.

Our responses are listed in red in the attached [...see next page of this Attachment 1]. In general, we need to see the sample data before we can confirm it would be adequate if provided for an entire DPA. Please submit the sample data with Atascadero 1101 as soon as possible for review (**DUE: 5/16/18**). Please pay careful attention to the clarifications in the attached when preparing the response to help ensure the initial and subsequent responses are adequate.

Rob Peterson | Senior Analyst/Project Manager | Infrastructure Permitting and CEQA, Energy Division | California Public Utilities Commission | 300 Capitol Mall, Suite 418, Workstation #85, Sacramento, California 95814 | 916/823-4748

Estrella Project

Paso Robles Distribution Planning Area (DPA) and San Luis Obispo DPA Study Requirements: Deficiency Letter No. 4, Item G (3.1), CPUC Clarification by Email on 3/26/18

Based on the 4/6/2018 meeting in which distribution load forecasting was discussed, below is the list of suggested information data set to be provided for the Paso Robles planning area. Our responses are listed below, in red. In general, we will need to see the sample data before we can confirm it would be adequate if provided for an entire DPA. Please submit the sample data with Atascadero 1101 as soon as possible for review (DUE: 5/16/18). Please pay careful attention to the clarifications here (a, b) and below (in red) when preparing the response to help ensure the initial and subsequent responses are adequate:

- a. We request the same scope and types of data for the entire San Luis Obispo DPA that we requested for the entire Paso Robles DPA (see pp. 3-4).
- b. We also request each of the PG&E power flow cases that CAISO relied on to support their approval of the proposed project. These should be provided at the same time as the initial Atascadero 1101 response package.

Please note that a secure ftp site will be required for file transfer purposes. OK

It is proposed that, initially, the data for a single feeder will be provided in order to verify that data formats are acceptable. PG&E suggests the Atascadero 1101 be used as the test case for data, but any other feeder is equally acceptable. OK

It is our understanding that connectivity data from GIS, the equipment files, and the feeder load-flow simulation files is not needed by you at this time, but may be requested at a future date. This is accurate, for now, but we will ask for this in our larger, follow-up request after reviewing the proposed data sampling.

- 1) Hierarchy showing relationships between banks and feeders OK
- 2) Available SCADA data for each substation transformer bank and feeder in the planning area. Data provided shall be in the units of MW for transformer bank loading and in amps for feeder loading. Up to five years of historic data will be provided, depending on historic SCADA data availability for each asset. OK
- 3) We think SCADA data is the best source for feeder and bank shapes for purposes of this study. In order to use AMI data, you would need to clean multiple years of AMI meter data, create non-AMI meter approximations, and determine generator load data. Using SCADA data would avoid these burdens and provides the real-time distribution load data from substation assets within the DPA. We suggest that you review the SCADA data and then let us know if you need additional data such as AMI meter data.

*Unfortunately, this proposal would not be adequate. We request the source data that PG&E provided to Integral Analytics for use in the LoadSEER tool.

- 4) Annual electric load growth forecast for each feeder from the adopted 2016 IEPR. **OK**
- 5) Annual non-residential PV growth forecast for each feeder from the adopted 2016 IEPR. **OK**
- 6) Annual residential PV growth forecast for each feeder from the adopted 2016 IEPR. **OK**
- 7) Annual EV growth forecast for each feeder from the adopted 2016 IEPR. **OK**
- 8) Annual AAEE growth forecast for each customer-class on each feeder from the adopted 2016 IEPR. **OK**
- 9) Annual LMDR (Load Modifying Demand Response) growth forecast for each feeder from the adopted 2016 IEPR. **OK**
- 10) 576 hour shapes for Non-Residential PV, Residential PV, EV, AAEE, and LMDR
*We request 8760 data. Our tools are capable of handling it.
- 11) 576 hour shapes for 4 customer classes in the Paso Robles area: Industrial, Commercial, Residential, and Agricultural.
*We request 8760 data. Our tools are capable of handling it.
- 12) Hourly weather data for the Paso Robles weather station (PPRB) from 4/1/1983 to 9/30/2017
OK
- 13) Future known new loads, by feeder, indicating relevant customer-class **OK**
- 14) Feeder and bank capabilities. Data provided shall be in the units of MW for transformer bank capabilities and in amps for feeder capabilities **OK**

Updated Deficiency Letter No. 4, Item G (3.1), CPUC 3/26/18 Clarification Email

Clarification about Required System Data

We request that PG&E meet with our team by phone to discuss the most efficient means to provide the following system data. The data are due on April 27, 2018. The data are in addition to those specified in Deficiency Letter No. 4, Attachment 1.

Note that *Infrastructure data* includes two categories: *GIS* and *non-GIS*. Non-GIS infrastructure data can be provided within a GIS file's associated table and does not need to be provided separately if it is contained in the GIS files. The goal of providing non-GIS infrastructure details separately is to simplify the compliance process so that geospatial joins do not have to be performed if they are not necessary. Some data we consider infrastructure data may fall outside of a narrow interpretation of infrastructure (e.g. customer class/meter associations) but is generally bundled with it for purposes of data type continuity.

Load data is generally time-series data, representing consumption of electricity over time. Time-series data is generally incompatible with geospatial data because the volume of data associated with time-series is much larger than geospatial data systems are capable of processing.

GIS Infrastructure Data:

GIS data [either ESRI shape files (preferred) or Google KMLs] of the following:

- 1) Existing and proposed transmission lines for PG&E's Paso Robles Distribution Planning Area (DPA) and existing transmission lines in the San Luis Obispo DPA;
- 2) Existing and proposed substations in both the Paso Robles DPA and San Luis Obispo DPA;
- 3) Current distribution infrastructure lines (primaries and secondaries) in both DPAs;
- 4) Service address/location IDs or meter IDs (to be able to be paired with meter data described below) in both DPAs;
- 5) Known distributed generation (DG; in front of and behind the meter) with system sizing information, including in front or behind the meter position; system sizing information must identify if it is nameplate, AC, or CEC de-rated in both DPAs; and

- 6) Bulk Power generation resources within the DPA (if any) with system sizing information; system sizing information must identify if it is nameplate, AC, or CEC de-rated in **both DPAs**.

Non-GIS Infrastructure Data [CSV (preferred) or Excel formats are acceptable] of the following:

- 1) Service address/location or meter ID and circuit association table for all load in **both DPAs**;
- 2) Identification of any advanced metering infra-structure (AMI) opt-out locations in **both DPAs**;
- 3) DG type, size, online date, and circuit association for all Distributed Energy Resources in **both DPAs**;
- 4) Circuit and transformer association for all circuits in **both DPAs**;
- 5) Transformer and substation association for all transformers in **both DPAs**; and
- 6) Customer class and service location/meter association for all service locations/meters in **both DPAs**.

Load Data:

Can be provided via Application Programming Interface (API; preferred) or in CSV format. There must be an association with a circuit, substation, or service location/meter ID as is appropriate for all records.

- 1) SCADA data for all circuits in **both DPAs**, where available, for a period of 5 full years;
- 2) SCADA data for all substations in **both DPAs**, where available, for a period of 5 full years;
- 3) AMI meter data (interval) for all meters in **both DPAs**, where available, for a period of 1 full year (12 full months of data), ending with the most recent month for which a full month of data is available; and
- 4) Monthly KWh for all AMI opt-out customers in **both DPAs**.