

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



SENT BY E-MAIL

June 29, 2017

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: Revised 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 CEQA section has reviewed the Revised PEA. Table 1 summarizes Application and PEA action items.

Table 1. Schedule of Application and PEA Action Items (CPUC Application No. A.17-01-023)

Action Item	Date
Application and PEA (Application Exhibit B) filed at CPUC	January 25, 2017
PEA Deficiency Letter No. 1 requesting that PEA be revised and resubmitted and that all items be provided in full that were marked confidential or otherwise marked to be provided upon request	February 16, 2017
Horizon (Energy Division consulting team) contract in place	February 24, 2017
Revised PEA filed; Revised PEA electronic filing includes five volumes (Volumes I-V) with Vol. III including all data marked confidential	May 18, 2017
Applicants' Motion for leave to file under seal and maintain confidentiality of entirety of Revised PEA Vol. III (GIS, cultural resources data)	May 18, 2017
Energy Division denies Applicants' 5/24/17 request that Horizon provide a signed NDA for access to confidential materials	May 24, 2017
Horizon received Revised PEA Vol. III DVD; FTP site provided by Applicants on 5/24/17 did not function due to filename lengths used, upload failures, or other issues	May 30, 2017
Energy Division staff received Revised PEA Vol. III DVD upon request made on 6/5/17	June 6, 2017
PEA Deficiency Letter No. 2 requesting, among other data, an updated Appendix G (Distribution Needs Analysis) based on 2016 data and other revisions.	June 29, 2017

Prepared by Energy Division, Infrastructure Permitting and CEQA Section

We are unable to deem the PEA complete at this time. A list of deficiency items is attached to this letter (Attachment 1). Additional information submitted in response to this letter should be filed as supplements to the Revised PEA. Responses to each item should be provided within 60 days. Please carefully consider the Commission's recent discussion on confidentially declarations from Decision 16-08-024. We will follow this guidance when considering whether to deem the Revised PEA complete. If the Applicants believe that any part of a deficiency response is confidential, provide a redacted version of the document that can be made public. If confidentially designations are misapplied, we may require resubmittal, which could delay our review of PEA adequacy.

If these instructions are closely followed, it will allow us to timely process your application. Upon receipt of complete responses to each deficiency item, we will complete our review of PEA adequacy and issue a determination. Questions should be directed to me at (916) 823-4748 or robert.peterson@cpuc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Peterson", with a horizontal line extending from the end of the signature.

Rob Peterson
Energy Division, Infrastructure Permitting and CEQA

cc:

Tracy Davis, Attorney, NEET West
Andy Flajole, Environmental Licensing Lead, NEET West
Tom Johnson, Principal Land Planner, PG&E
Megan Peterson, Director, SWCA
Martin Nakahara, Docket Office, CPUC
Simon Baker, Deputy Director, Energy Division, CPUC
Molly Sterkel, Program Manager, Infrastructure Planning and Permitting, CPUC
Lonn Maier, Supervisor, Infrastructure Permitting and CEQA, CPUC
Jack Mulligan, Attorney, CPUC
Tom Engels, Principal, Horizon Water and Environment

Attachment

**Attachment 1 (June 29, 2017) to PEA Deficiency Letter No. 2 for the
Estrella Substation and Paso Robles Area Reinforcement Project (A.17-01-023)**

Complete	Incomplete (no further request at this time)	Incomplete (additional request)	Response Under Review	No Applicant Response
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#	Resource Area / Topic	Source / PEA Page	Comment	Request			Notes
				Date	Reply Date	Status	
1-1	PEA Summary	1-3	Provide the year when adding distribution capacity and improving service reliability is expected to be required in the Paso Robles DPA. Insert the year within Project Objective No. 2. Provide quantifiable data to support the year provided, describe the overload anticipated in this year, and identify the specific distribution facility(ies) that are expected to overload. These additions may be added to PEA Appendix G.	6/29/17			
1-2	PEA Summary	1-7	Please provide summaries of all public meetings held on the proposed project. In particular, please indicate the date, time, and location of any public meetings and a summary of concerns expressed during the meeting(s).	6/29/17			
1-3	PEA Summary	1-7	A PowerPoint presentation of an apparent public meeting for the proposed project is posted on PG&E's web site. According to the last slide, the applicants potentially would make modifications to the proposed project based on input received during the public meeting(s). Please indicate whether such modifications were made, and if so, describe the modifications	6/29/17			
1-4	PEA Summary	N/A	What is the initial proposed capacity of Estrella Substation in MW? What would the capacity be in MW upon full build out?	6/29/17			
1-5	PEA Summary	1-28; 1-29; Def. Letter No. 1, Item 9.0	Provide full copies of the Hazardous Substance Control and Emergency Response Plan (<i>draft copy may be acceptable</i>), Health and Safety Plan (<i>draft copy may be acceptable</i>), and Worker Environmental Awareness Program (<i>draft copy may be acceptable</i>)	6/29/17			
2-1	Project Description	2-1	"Minor modifications" within existing area substations that would be required to accommodate the project are not described. Please provide a site-by-site description of these modifications.	6/29/17			
2-2	Project Description	2-4	a. Description of future anticipated 70/21 kV distribution facilities at the substation is confusing. The PEA indicates that some future facilities are foreseeable and are evaluated in the document to the extent that details are known. It states, "These new distribution facilities are considered a reasonably foreseeable consequence of the proposed project for California Environmental Quality Act (CEQA) review purposes, and are therefore included—to the extent details are known at this time—in the PEA's impact analysis." Please explain. b. There would be space at the substation for installation of additional future facilities (70/21 kV and 230 kV) that are not foreseeable at this time and are not evaluated because they are unlikely to be constructed for at least 20 years. Is that correct? If so, should the latter set of future facilities still be included in cumulative analysis if not evaluated in detail? Please explain.	6/29/17			
2-3	Project Description	2-16	Please provide the approximate size/dimensions of the proposed concrete secondary containment basin for the transformer oil.	6/29/17			
2-4	Project	2-28	Please explain why the new easement for the power line needs to be up to	6/29/17			

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				Date	Reply Date	Status	
	Description		115 feet wide. Description states that easement will typically be 70 feet wide, and the reconductoring segment would be mostly within an existing 30- to 40-foot-wide easement.				
2-5	Project Description	2-29	The PEA indicates that temporary work areas will be determined as part of final design and may be subject to change. Can any parameters be identified to narrow the scope of where they may be located?	6/29/17			
2-6	Project Description	2-32	Would temporary construction easements be obtained for the project? It appears that the work areas described for the towers/poles may extend outside of the area of the easements, described in Section 2.7.2.	6/29/17			
2-7	Project Description	2-33	The PEA states that, in addition to the identified helicopter landing zones, "other sites within the project area could also serve as landing zones, if needed." Where are these other sites? Do these other sites consist of cleared areas or do they require additional preparation, such as gravel base, grading, etc.?	6/29/17			
2-8	Project Description	2-34	What are the dimensions and locations of the temporary new roads that may be developed during project construction? Is it the case that rock bedding added to existing roads will be removed following project construction?	6/29/17			
2-9	Project Description	2-34	Please provide examples of minor adjustments to access that may be necessary at the time of construction due to land use changes, unanticipated impacts, and other factors.	6/29/17			
2-10	Project Description	2-34	Please clarify if Table 2-4 only includes private roads (existing and proposed) or if any public roads are included in the summary.	6/29/17			
2-11	Project Description	2-36	In what cases, and why, would residents need to relocate from their homes during helicopter activities? For how long and how many times would residents need to relocate? Which residences are potentially affected by relocations, and where would these residents relocate? Provide a mailing list (in Excel) for all residences with occupants that may need to relocate. We plan to notify these residences of the potential for relocation during our CEQA scoping process. Identify/estimate the number of occupants that may need to relocate using a mailing-list provider service.	6/29/17			
2-12	Project Description	2-37	The PEA indicates that three oak trees would be removed; please indicate on a GIS-based map where these oak trees are located. Later, the PEA states that additional oak trees may be removed. Please clarify the number and location of additional oak trees that may be removed.	6/29/17			
2-13	Project Description	2-39	From where would the 6 inches of surface gravel to be imported to the substation site be obtained?	6/29/17			
2-14	Project Description	2-42	Would topsoil be salvaged during open trench methods for installation of telecommunication lines?	6/29/17			
2-15	Project Description	2-44	Please list the roadways at which crossing structures would be constructed, or provide a set of maps at a sufficient scale, so that it clearly identifies all affected roadways by name.	6/29/17			

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				Date	Date		
2-16	Project Description	2-50	Is it correct that no concrete trucks would be used during foundation construction for the 230 kV substation, as appears to be indicated in Table 2-7?	6/29/17			
2-17	Project Description	2-54	Light and medium-duty helicopters listed under Table 2-7 to be used for conductor installation are not included in the construction air quality, greenhouse gas, and noise models. What would the horsepower and dBA be for these aircraft?	6/29/17			
2-18	Project Description	Figure 2-4; Def. Letter No. 1, Item 20.0/21.0	Provide an updated version of Figure 4 that identifies ownership (i.e., PG&E or NEET West). Update the figure to show full build-out (e.g., second 230/70-kV transformer pad).	6/29/17			
2-19	Project Description	Figure 2-5; Def. Letter No. 1, Item 20.0/21.0	a. Provide an updated version that shows the full substation build out. Estimate where facilities would likely be located. Use a color or other means to indicate future/estimated build out. Label the added full-build-out facilities (i.e., future 230/70-kV transformer and associated breakers and switches, three future 70/21 kV transformers and associated 70-kV breakers, 21-kV breakers, and switches). Identify the future 230-kV transmission tie-line alignments. b. Identify facility ownership (i.e., PG&E or NEET West) by color.	6/29/17			
2-20	Project Description	Figures 2-6 and 2-7; Def. Letter No. 1, Item 20.0/21.0	Update Figures 2-6 and 2-7 with all future transmission facilities. Use a color or other means to indicate future/estimated build out.	6/29/17			
2-21	Project Description	Figure 2-8; Def. Letter No. 1, Item 20.0/21.0	Provide an updated version that shows the full substation build out. Estimate where facilities would likely be located. Use a color or other means to indicate future/estimated build out. Label the added full-build-out facilities (i.e., future 230/70-kV transformer, three future 70/21 kV transformers and associated 70-kV breakers, 21-kV breakers, and switches). Identify the future 230-kV transmission tie-line alignments.	6/29/17			
2-22	Project Description	Figures 2-9 and 2-10; Def. Letter No. 1, Item 20.0/21.0	Update Figures 2-9 and 2-10 with all future 70-kV and distribution facilities. Use a color or other means to indicate future/estimated build out.	6/29/17			
3.1-1	Aesthetics	Aesthetics	Please provide a visual simulation of the proposed Estrella substation at full-buildout (i.e., depicting all future components)	6/29/17			
3.1-2	Aesthetics	3.1-17	Please describe how the viewshed delineation was conducted (i.e., describe assumptions of elevations at which the project elements are expected to be visible). Also, it is unclear why the viewshed delineation (Figures 3.1-3 through 3.1-5) shows 2- to 5-mile buffers from project elements when the	6/29/17			

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			visual analysis focuses on the foreground viewshed.				
3.1-3	Air Quality	N/A	The extent and type of emissions from helicopters are unclear. It does not appear that helicopter emissions were included in the CalEEMod analysis of construction. Please the data required to complete the air quality analysis and update the analysis	6/29/17			
3.1-4	Air Quality	N/A	The equipment used in the CalEEMod model (e.g., generators, concrete/cement equipment) are inconsistent with the equipment in the text of the Project Description and Air Quality chapter.	6/29/17			
3.4-1	Biological Resources	3.4-11	Why weren't focused surveys done for vernal pool fairy shrimp, golden eagle nests, burrowing owls, and least bell's vireo? If not warranted, please explain why the surveys weren't conducted.	6/29/17			
3.4-2	Biological Resources	3.4-11	A kit fox survey was conducted for the proposed Estrella substation site, but not for the other components of the proposed project. Please explain why a kit fox survey wasn't conducted for the entire proposed project alignment (including the reconductoring portion) and disturbance area.	6/29/17			
3.4-3	Biological Resources	3.4-14	Please indicate where and why nonnative grasslands are subject to frequent mowing or grading.	6/29/17			
3.4-4	Biological Resources	3.4-15; Def. Letter No. 1, Item 5.0	Please explain the rationale for not doing a wetland delineation in areas likely to contain jurisdictional wetlands in the proposed project area. Depending on observations during upcoming site visits, a preliminary JD may be required for the CEQA document.	6/29/17			
3.4-5	Biological Resources	3.4-33	Please indicate on a GIS-based figure where upland vernal pool fairy shrimp habitat is located in relation to the mapped seasonal wetlands described on p. 3.4-33	6/29/17			
3.4-6	Biological Resources	3.4-48	Please indicate whether the "Nesting Birds: Specific Buffers for PG&E Activities" has been approved by CDFW and USFWS.	6/29/17			
3.4-7	Biological Resources	3.4-56	Please indicate on a GIS-based map the potential location of overland travel and/or staging outside of the substation footprint.	6/29/17			
3.5-1	Cultural Resources	N/A	Please modify Appendix F, <i>Archaeological Survey Coverage Maps</i> , in the power line technical report so that those access roads that are intended to be "access restricted" are easily discernable. At present, it is not possible to tell whether they are part of the archaeological survey area or are all meant to be "access restricted." Please clarify if the access roads are part of the archaeological survey area.	6/29/17			
3.10-1	Land Use	3.10-5	16 wineries are listed that exist within 2 miles of the proposed Estrella substation site. Please indicate whether the owners of these wineries have been informed of the project. If they have been contacted or informed, please list any concerns they have regarding the proposed project.	6/29/17			
3.12-1	Noise	N/A	Helicopter is not mentioned during construction noise modeling, but it is mention in text below Table 3.12-11 and in Project Description. In addition, there is no mention of helicopter use in table 3.12-8 or 3.12-10. Please provide clarification with this inconsistency. Update the noise modeling results	6/29/17			

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				Date	Date		
			to include helicopters.				
3.12-2	Noise	N/A	Concrete trucks are not listed in Table 3.12-8 or 3.112-10.	6/29/17			
3.12-3	Noise	N/A	General comment: please provide an accurate list and description of equipment to be used during each state of construction and operation. The CalEEMod files and tables/descriptions in the PEA do not agree.	6/29/17			
3.16-1	Transportation and Traffic	3.16-8	Table 3.16-4 does not present capacity utilization (it shows level of service). Please revise the table to include percentage capacity utilization.	6/29/17			
3.16-2	Transportation and Traffic	13-16.12	In 2013, the City of Paso Robles adopted Traffic Impact Analysis Guidelines. The PEA should use these guidelines to consider whether a traffic impact study is needed for the project. If a traffic study is needed according to the guidelines, provide the traffic study.	6/29/17			
3.16-3	Transportation and Traffic	13-16.13	On Table 3.16-6, please add the estimated work dates from Table 2-9; that information is necessary to understand when the trips would occur. Also, all of the tasks in Table 2-9 should be in Table 3.16-6, and vice versa; currently, the tasks in the two tables do not match.	6/29/17			
3.16-4	Transportation and Traffic	3.16-15	Please provide the schedule of activities and generated trips. Also, please explain whether the generation of trips for the transformer installation will coincide with the generation of trips for the Estrella substation. If so, please add the trips generated by the simultaneous tasks together.	6/29/17			
3.16-5	Transportation and Traffic	3.16-15	Table 3.16-7. LOS is applicable to the roadways in unincorporated County. If the table uses LOS, it should clarify that the roadway segments included in the table are located in unincorporated county. Since the Estrella substation is located in unincorporated County, please include traffic data for applicable road segments for the unincorporated County. Also, all 3 road segments in the table are located in the City of Paso Robles; therefore, LOS is not the correct threshold of significance. The analysis of traffic impacts for City roads should show the capacity utilization of the roadways (existing and during construction), which is presented as a percentage.	6/29/17			
3.16-6	Transportation and Traffic	3.16-16	Power Line Route. The PEA states that construction workers and vehicles will "primarily" access both the new power line route and the reconductoring segment by a number of local and regional roadways including US 101, SR-46, Niblick Road, River Road, Buena Vista Drive, Golden Hill Road, and Union Road. The use of the work "primarily" suggests that there are other roads that would be used. Please name any additional roads that would be used for access.	6/29/17			
3.16-7	Transportation and Traffic	3.16-16	The PEA states, "Where the power line route crosses roadways, complete road closures may occur during construction. If lane closures are required, traffic will be diverted to adjacent lanes, temporarily, with the use of cones and flaggers. If the entire roadway must be closed, the road will be closed for up to 5 to 10 minutes at a time during the installation of crossing structures prior to pulling conductor." Please list the names of roads that would (or potentially would) be affected, or show the names of the roads clearly on a	6/29/17			

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			map.				
3.16-8	Transportation and Traffic	3.16-18	Table 3.16-9. Since all of the road segments in this table are in the City of Paso Robles, the analysis should present capacity utilization, which is presented as a percentage. As described in the General Plan Circulation Element, LOS is not used for evaluating traffic impacts on City roads. Also, no road segments are shown for unincorporated County. Please include applicable road segments located in the unincorporated County.	6/29/17			
3.17-1	Utilities and Service Systems	3.17-14	The PEA indicates that stormwater facilities or infrastructure may be disturbed during construction, but that these facilities would be restored upon the conclusion of construction activities. What types of facilities may be impacted by the project and where are they located?	6/29/17			
4-1	Alternatives	4-3	The PEA states that, at the end of "outreach efforts," three out of 19 potential substation sites were moved forward for further analysis. Please describe the outreach process referred to. Also, please explain what the other 16 sites were, where they are located, and why they were excluded from further analysis.	6/29/17			
4-2	Alternatives	4-11	The PEA states that PG&E conducted numerous briefings, public meetings, and presentations to solicit input about preliminary route options. During this process, PG&E "narrowed the previous 42 corridors and 125 route segments, down to the proposed three alternative routes..." Please provide a summary of the input received during the public outreach process.	6/29/17			
4-3	Alternatives, Project Description	2-21 to 2-22, Chapter 4, and PEA Appendix G	<p>Cost Estimates</p> <p>A. 1. <i>Proposed Project</i>: Provide an itemized (unbundled) cost estimate for all project components identified in the PEA (i.e., both transmission and immediate and future distribution identified).</p> <p>2. Estimate and itemize the costs of constructing the proposed transmission facilities.</p> <p>3. Estimate and itemize the costs for all distribution facilities (below 50 kV) required to meet the 10-year distribution demand forecast presented in PEA Appendix G.</p> <p>Define the length (aggregate, in miles) of distribution lines that would be required. Define the number and type of all associated distribution facilities (e.g., 70/21-kV and 70/12-kV transformers; breakers and switches; 12-kV and 21-kV pole-top transformers).</p> <p>4. Estimate and itemize the cost of each parcel acquisition or partial parcel acquisition that would be required and estimate the amount of land to be acquired (aggregate, in square feet). Identify the number of unique parcels that would be impacted by the land acquisitions.</p> <p>B. 1. <i>Potential Templeton Expansion Alternative</i>: Provide an itemized</p>	6/29/17			

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			<p>(unbundled) cost estimate with a level of detail comparable to the estimate provided for the proposed project in response to Item "A." Assume this alternative to constructing the proposed project is potentially feasible.</p> <p>2. Estimate and itemize the costs of constructing, replacing, or reconductoring the above 50-kV facilities necessary to meet the minimum, mandatory NERC/WECC/FERC standards planning requirements and CAISO requirements.</p> <p>Describe, in detail and with maps, any new 70-kV lines or 70-kV reconductoring work that would be required.</p> <p>Provide GIS data for all the 70-kV transmission line work described.</p> <p>3. See Item A.3.</p> <p>4. See item A.4.</p> <p>5. Document the level of design and engineering used as a basis for the cost estimate as compared to the estimate provided for the proposed project.</p> <p>6. Explain to what extent this alternative would meet each of the three basic objectives of the proposed project listed in the PEA.</p> <p>7. If there are potential feasibility constraints, please describe, and compare these potential constraints to those of the proposed project.</p> <p>C. 1. <i>Potential Paso Robles Substation Expansion Alternative</i>: Provide an itemized (unbundled) cost estimate with a level of detail comparable to the estimate provided for the proposed project in response to Item "A." Assume this alternative to constructing the proposed project is potentially feasible.</p> <p>2. Estimate and itemize the costs of constructing, replacing, or reconductoring any above 50-kV facilities necessary to meet the minimum, mandatory NERC/WECC/FERC standards planning requirements and CAISO requirements.</p> <p>Describe, in detail and with maps, any new 70-kV lines or 70-kV reconductoring work that would be required.</p> <p>Provide GIS data for all the 70-kV transmission line work described.</p> <p>3. See Item A.3.</p> <p>4. See item A.4.</p>				

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			<p>5. See item B.5.</p> <p>6. See item B.6.</p> <p>7. See Item B.7.</p> <p>8. Provide aerial imagery, substation schematic diagrams, and a parcel map with an explanation for why Paso Robles cannot be expanded as described in the response to item "C."</p>				
Appendix G (1)	Distribution Need Analysis	Appendix G	<p>a. Recompile and resubmit Appendix G. Include a table that lists deficiency items 1–13 and identifies where updates to Appendix G were made in response to the deficiency items.</p> <p>b. File the fully updated PEA Appendix G with the CPUC’s Docket Office.</p>	6/29/17			
Appendix G (2)	Distribution Need Analysis	G-9 to G-10	<p>a. Update Table 2 and all pertinent sections of Appendix G based on 2016 data. Appendix G indicates that 2015 (or older) data were used.</p> <p>b. Update Table 2 with rows for 0%, 10%, 20%, 30%, 40%, 50%, 60%, 70%, 80%, 90%, and 100% DER.</p>	6/29/17			
Appendix G (3)	Distribution Need Analysis	G-10	Provide all data required for the CPUC to independently verify the distribution load forecast modeling results presented in Appendix G, as updated and revised with 2016 data (see Def. Item Appendix G (2), above). Include load data for each distribution point and include all system electrical parameters. If powerflow data files are available, please provide in either EPC (GE) or PWD (PowerWorld) format.	6/29/17			
Appendix G (4)	Distribution Need Analysis	G-10, G-13	<p>a. Explain why a new 230/21-kV substation (we assume an initial capacity of about 90 MW, see Def. Item 1-4, above) is required to meet only 22.4 MW (23 MW) of load). Discuss other solutions, such as, installation of a new transformer at any existing substation in the Distribution Planning Area (DPA), e.g., San Miguel or Atascadero. The demand forecast indicates loads could reduce over time with Distributed Energy Resources (DER). Appendix G only discusses Paso Robles and Templeton substation options.</p> <p>b. Identify a specific planning standard that would be violated if distribution capacity was expanded at Templeton Substation and the other potential substation expansions evaluated. Provide detailed documentation that describes the planning standard, provides related/similar distribution planning standards to give context, identifies when the standards were adopted, identifies the process of adoption, and identifies who adopted them.</p>	6/29/17			
Appendix G (5)	Distribution Need Analysis	G-10 to G-11, Table 2	<p>In the best case DER scenarios (both 100% and 75% DER), the proposed substation would be unneeded through 2026; please explain.</p> <p>Update the discussion with reference to the 75% DER (or 70%; see Def. Item Appendix G (2), above). If the 2016 data update results indicate that overload would be avoided with a lower percentage DER through 2026 (e.g., 0% to 60% DER), include this percentage in the updated discussion.</p>	6/29/17			

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#	Resource Area / Topic	Source / PEA Page	Comment	Notes		
				Request Date	Reply Date	Status
Appendix G (6)	Distribution Need Analysis	G-3, G-12, G-13 to G-14, and throughout the Appendix	<p>a. Explain how “tripling the length” of a single feeder increases “exposure” to outages any more than building a series of shorter feeders that would accumulate to approximately same length. Wouldn’t the same number of customers be served even if the feeders are more segmented? Explain what is meant by exposure. What is/are the cause(s) of outages described in this context?</p> <p>b. Identify the length of feeders. Appendix G repeatedly indicates that “long” or “lengthy” feeders from Templeton and other substations have resulted in poor service reliability and that future “long” feeders would further degrade reliability (if installed). Define the terms “long” feeder and “lengthy” feeder in each instance that the terms are used. Use feet if less than a mile or miles if one mile or longer.</p> <p>c. Define the length that a feeder becomes “problematic” with respect to service reliability.</p>	6/29/17		
Appendix G (7)	Distribution Need Analysis	G-5	<p>There is very little data provided to substantiate many of the statements and conclusions in Appendix G.</p> <p>Quantify the growth in MW expected from the Airport and Gold Hill business/industrial developments sites (separately) between 2016 and 2026 and justify the growth estimate provided. Describe the business developments expected and support the forecast with specific citations to adopted Paso Robles area incorporated and unincorporated land-use planning materials.</p>	6/29/17		
Appendix G (8)	Distribution Need Analysis	G-6	<p>Quantify (in miles or feet) the phrase, “far closer” to anticipated growth areas. Define the specific points from which measurements were taken.</p>	6/29/17		
Appendix G (9)	Distribution Need Analysis	G-8, Figures 1, 2, and 4	<p>Figures 1, 2, and 4 and accompanying text indicate that the existing and proposed 12 kV and 21 kV systems interconnect. Describe how the two voltages interconnect (i.e., are there pole-top transformers at each interconnection site). Describe the type and extent of distribution system modifications required to reconfigure the 12 kV and 21 kV system interconnection points as proposed.</p> <p>Describe to what extent the distribution systems described in these figures and text are looped or radial.</p>	6/29/17		
Appendix G (10)	Distribution Need Analysis	G-8, Figures 2 and 4	<p>The gold lines in Figures 2 and 4 are a mix of feeder lines from Templeton and Paso Robles (black and green, respectively). Update the figures to identify Paso Robles lines (green) and Templeton lines (black) by color. In addition, identify on the updated figures the circuit numbers as done for the other Distribution Circuits (e.g., Cholame 1101).</p>	6/29/17		
Appendix G (11)	Distribution Need Analysis	G-8, Figure 4	<p>a. Provide the GIS data for the New Overhead Distribution Lines identified on Figure 4.</p>	6/29/17		

**Attachment 1 (June 29, 2017) to PEA Deficiency Letter No. 2 for the
Estrella Substation and Paso Robles Area Reinforcement Project (A.17-01-023)**

#	Resource Area / Topic	Source / PEA Page	Comment	Request Date	Reply Date	Status	Notes
			<p>b. Explain why these two segments, specifically, were identified.</p> <p>c. Provide the length of each segment and estimate number of poles to be installed.</p>				
Appendix G (12)	Distribution Need Analysis	G-10, Figure 5	<p>a. For Figure 5, describe in detail the assumptions that cause a steep increase in load growth after year 2024?</p> <p>b. Identify and describe the methodology used to extrapolate out to 2030 and later for the 100% and 75% DER scenarios (see Figure 5)?</p>	6/29/17			
Appendix G (13)	Distribution Need Analysis	G-1	Discuss the timing of future plans to connect Cholame Substation to the proposed Estrella Substation with a transmission line to better serve the Cholame DPA. Discuss reliability of the Cholame DPA, which appears to be a radial system.	6/29/17			
Appendix J (1)	Estrella Air Quality Calcs	Table J-1	The footnote for #2 in Table J-1 is missing. Please provide.	6/29/17			
GIS-1	GIS Data	n/a	Please provide GIS data files showing the existing and proposed easements for the proposed project. The easements should be depicted as polygons, not as line data.	6/29/17			
GIS-2	GIS Data	n/a	Please confirm whether overland routes and pull/splice boxes are included in the GIS data provided in response to Deficiency Letter #1 for the roads and work areas. There are no GIS files named "overland routes" or "pull/splice boxes", so we cannot tell if they have been included.	6/29/17			