NextEra Energy Transmission West and Pacific Gas and Electric Company

Estrella Substation and Paso Robles Reinforcement Project
Proponent's Environmental Assessment (A.17-01-023)

Response to Deficiency List No. 1

The California Public Utilities Commission (CPUC) identified deficiencies in NextEra Energy Transmission West, LLC's (NEET West) and the Pacific Gas and Electric Company (PG&E's) Proponent's Environmental Assessment (PEA) for the Estrella Substation and Paso Robles Reinforcement Project. Below are responses to Deficiency List No. 1 issued by the CPUC on February 16, 2017. Each deficiency is numbered according to the list, followed by NEET West's and PG&E's response. The Revised PEA will be submitted as part of this deficiency response in the following volumes:

Volume I.	Revised PEA
Volume II.	Revised PEA Appendices
Volume III.	Confidential Information, including confidential GIS with cover sheet and redacted confidential cultural appendices
Volume IV.	Public GIS and Figures, including GIS cover sheet
Volume V.	Deficiency Response Files

This document includes the following attachments, which are described in more detail in the text below under the applicable response.

Attachment 1.	Summary of Revised PEA Changes
Attachment 2.	Appendix A – Affected Properties, excel format
Attachment 3.	Appendix H – List of Properties Likely to Require Acquisition, excel format
Attachment 4a.	Appendix J – Estrella Air Quality Calculations, CalEEMod Input (January 2017)
Attachment 4b.	Appendix J – Estrella Air Quality Calculations, CalEEMod Input (April 2017)

Deficiency 1:

Provide all of the GIS data identified in the PEA (e.g., pp. 1-8, 1-9, 1-10, 1-12, 1-13, 1-14, 1-2515, 1-27, and all other pages). In addition, explain with specificity why each of the layers submitted must remain confidential. GIS is a format; a way of presenting information. If GIS layers are to be kept confidential, it must be because something specific about the underlying information warrants confidentiality, not because the information is presented in a GIS format.

Response:

GIS data will be submitted to the CPUC as part of this deficiency response. This GIS data may be used by the CPUC to produce pdf maps for public review, but the applicants request that the confidential data layers or shape files themselves not be posted or otherwise made available to the public. PG&E and NEET West seek confidential treatment of most of the GIS data, and have

filed a motion to seal with the CPUC contemporaneously with this deficiency response. Confidential treatment of GIS data is based on several reasons. Some data provides critical energy infrastructure information, either directly or allowing derivation of the information. Some biological resources data is confidential under a license agreement for the California Department of Fish and Wildlife. GIS data for parcels is confidential and may not be shared per license agreement with ParcelQuest. Certain cultural information is confidential under Federal and California legal requirements. The cover sheet provided with the GIS data specifies which layers are confidential, and the reasons for each. GIS data will be submitted on two discs, one for confidential data and one for non-confidential data.

Deficiency 2:

Provide all of the background information identified on PEA page 1-5.

Response:

Background information has been incorporated as additional appendices to the Revised PEA, which is being submitted as part of this deficiency response. Refer to Attachment 1, Summary of Revised PEA Changes, for the list of new appendices.

Deficiency 3:

Provide the list of properties requiring acquisition (PEA p. 1-11). Provide the list of properties that will require new easements for the proposed powerline (PEA p. 2-25).

Response:

The list of properties likely to require new easements and require acquisition is provided as Appendix H in the Revised PEA, and in excel format in Attachment 3. Easement requirements are discussed in the Revised PEA's project description in Chapter 2, Section 2.7.

Deficiency 4:

Provide the Air Quality calculations in a fully unlocked Excel format and provide the CalEEMod report, if separate, in a fully unlocked Excel format (PEA pp. 1-24, 3.3-1, 3.3-6, 3.3-14, and others). PDF versions of these calculations must be included as an appendix to the updated PEA.

Response:

Air Quality calculations are provided as Appendix J in the Revised PEA. CalEEMod input for the calculations is provided in excel format in Attachment 4.

Deficiency 5:

Provide a full copy of the wetland delineation and associated documentation (PEA p. 1-25). It cannot be marked confidential.

Response:

Wetlands and other waters were preliminarily mapped during the initial biological reconnaissance surveys between April 20-22 and April 27-30, 2016. These features are provided in Appendix P (Substation Biological Resources Technical Report) and Appendix Q (Power Line Biological Resources Technical Report) and the shapefiles will be provided on the GIS disk and is not marked confidential.

Deficiency 6:

Provide a full copy of the special status species surveys (PEA p. 1-25). They cannot be marked confidential.

Response:

Results of the special status species surveys are included in the biological resources technical reports provided in Appendix P (Substation Biological Resources Technical Report) and Appendix Q (Power Line Biological Resources Technical Report) and are not marked confidential.

Deficiency 7:

Provide full copies of each technical biological report referenced in PEA Section 3.4.

Response:

Biological resources technical reports are provided as Appendix P (Substation Biological Resources Technical Report) and Appendix Q (Power Line Biological Resources Technical Report).

Deficiency 8:

Provide full copies of the cultural resources reports and records search and paleontological reports (PEA p. 1-26 and Section 3.5). These documents cannot be marked confidential pursuant to Section 583. They may be marked confidential, but they are confidential under other laws and will be treated as such by the CPUC and its consultants.

Response:

Cultural resources technical reports are provided in Appendix R (Substation) and Appendix S (Power Line). Per Federal and California legal requirements, certain archaeological and paleontological information will be submitted confidentially.

Deficiency 9:

Provide full copies of the Environmental Data Resources Report, Hazardous Substance Control and Emergency Response Plan (draft copy may be acceptable), Health and Safety Plan (draft copy may be acceptable), Worker Environmental Awareness Program (draft copy may be acceptable) (PEA p. 1-26).

Response:

The Estrella Substation Phase 1 Environmental Site Assessment is included as Appendix N in the Revised PEA, and the Power Line Environmental Data Resources Report is included as Appendix O. Prior to the start of construction, NEET West and PG&E will develop a Hazardous Materials Management Plan (HMMP) and implement Applicant Proposed Measure General-1 (Prepare and Implement a Worker Environmental Awareness Program). The HMMP includes the elements of a Hazardous Substance Control and Emergency Response Plan and Health and Safety Plan. The project-specific Worker Environmental Awareness Program requires all on-site construction personnel to attend training before they begin work on the project.

Deficiency 10:

Provide full copies of all the noise reports and surveys cited in Section 3.12.

Response:

The Estrella Substation Baseline Noise Survey is included in Appendix K.

Deficiency 11:

Provide Appendix A in a fully unlocked Excel file format.

Response:

Affected Properties are provided in Appendix A of the Revised PEA, and in excel format in Attachment 2.

Deficiency 12:

Provide full copies of all other reports identified in the PEA as to be submitted at a later date.

Response:

All reports identified in the PEA as to be submitted at a later date are included in the Revised PEA.

Deficiency 13:

Provide the original figure files for all figures included in the PEA.

Response:

As indicated in the response to Deficiency No. 1, original figure files and GIS data are provided as part of this deficiency response.

Deficiency 14:

Update all PEA sections that mention the purpose, need, and project objectives as requested by CPUC staff and management at the meeting held with NEET West staff on 1/12/17. Ms. Patrice

Agostino Martin notified CPUC staff and management by email on 1/30/17 that an Estrella Distribution Need Analysis would be provided on 2/24/17. This analysis must be included as an appendix to the PEA. The results of the analysis must be reflected in the project objectives and in the purposes and need described in the PEA. The update must clearly explain why the proposed substation must be sited within the 2.2-mile radius provided to NEET West in a data response from the CAISO. The 2.2-mile radius diagram must be included as a figure in the updated PEA. Please describe, with specificity, the PG&E distribution needs in that area that are being addressed by the project. Also, please state whether addressing PG&E distribution needs is a project objective, and if not, explain why within the updated PEA.

Response:

The Distribution Need Analysis is provided as Appendix G in the Revised PEA. The Revised PEA includes updates to the Purpose, Need, and Project Objectives in Chapter 1, Section 1.3, and the Project Objectives in Chapter 2, Section 1.2. The relevance of the 2.2-mile radius provided by CAISO is discussed in Appendix G and Chapter 4, Alternatives. Figure 3 in Appendix G is a map showing the 2.2-mile radius diagram.

Deficiency 15:

Identify within the updated PEA a timeframe for installation of the distribution components within the proposed substation, e.g., the 70/12-kV, 70/21-kV, and/or other distribution transformers (PEA p. 2-4). Provide the estimated year of installation in the PEA.

Response:

Section 2.4, Proposed System, has been updated to discuss reasonably foreseeable construction of distribution facilities. Additional distribution capacity is expected to be needed, possibly on short notice, within 5 to 15 years. For this reason, the Estrella Substation includes a location for the new 70/21 kV distribution facilities, including a new distribution transformer and three 21 kV feeders.

Deficiency 16:

Identify within the updated PEA a timeframe within which Estrella Substation could be fully built out (PEA p. 2-4). Provide the estimated year of full buildout in the PEA.

Response:

Section 2.4, Proposed System, has been updated to address the full build-out of Estrella Substation. While Estrella Substation, at full build-out, has space for future 230 kV transmission lines, a second 230/70 kV transformer, and associated transmission facilities on the NEET West portion of the site, and future 70 kV lines, two additional 70/21 kV distribution transformers, and associated distribution facilities on the PG&E portion of the site, these future transmission and substation facilities are not yet planned and are unlikely to be built for at least 20 years, if at all. The timing of any potential future expansion beyond the distribution facilities described in Response 15 above (one transformer and three feeders) is therefore uncertain, and the timing of full substation build-out is unknown.

Deficiency 17:

Identify on a map of suitable scale in the updated PEA all locations where distribution lines would be relocated and underbuilt on the proposed new or reconductored 70-kV lines (PEA pp. 2-6, 2-23). In addition, provide GIS data for the distribution lines to be relocated.

Response:

Figure 2-3, Project Overview Map, has been revised to show where distribution lines would be relocated and underbuilt on the new or reconductored power lines. GIS data showing where distribution lines would be relocated and underbuilt on the new or reconductored power lines will be submitted to the CPUC as part of this deficiency response.

Deficiency 18:

Indicate within the updated PEA how many miles of new or reconductored distribution lines are expected to be constructed that would be connected to the ultimate, full buildout of Estrella Substation (PEA pp. 1-2, 2-4).

Response:

Section 2.6.1.4, Future Distribution Facilities, has been added to the project components section in the project description. It describes the future distribution project that includes one 70/21 kV transformer and three feeders. As indicated in Response 16 above, Estrella Substation has space at full buildout for future transmission, substation and distribution facilities, including two additional 70/21 kV distribution transformers, and associated distribution facilities on the PG&E portion of the site. These future distribution facilities are not yet planned, will depend upon future demand growth, and are unlikely to be built for at least 20 years, if at all. Whether, when and how these facilities would be designed and constructed is not currently known.

Deficiency 19:

For the distribution lines described in Deficiency Item 18, provide the expected line alignments and voltages in the update PEA. Provide GIS data for this distribution line work and include a map of suitable scale in the PEA that shows the work.

Response:

Section 2.6.1.4, Project Components - Future Distribution Facilities has been added, and Section 2.7.3, Easement Requirements - Future Distribution Facilities has been updated to describe the locations and voltage of foreseeable distribution lines. A possible general route for the new feeders has been provided in Appendix G, Distribution Need Analysis (see Figure 4, Future Estrella Substation Distribution System). Because the project has not yet been designed, GIS for the route is not available. A simulated view of Estrella Substation with future distribution from Key Observation Point 1 has been added to Section 3.1, Aesthetics.

Deficiency 20:

Update figures 2-4, 2-5, 2-6, 2-7, 2-8, and 2-9 to show the ultimate, full substation buildout (PEA p. 2-4), and update associated PEA text as appropriate. "Specifically, Estrella Substation will include room for future 230 kV transmission lines, a second 230/70 kV transformer, three future 70/21 kV distribution transformers and associated breakers and switches, and associated transmission facilities" (PEA p. 2-4).

Response:

Figures 2.5 (Estrella Substation Layout), 2-8 (70 kV Substation General Arrangement), and 2-9 (70 kV Substation Profile View) in Chapter 2, Project Description, have been updated to show Estrella Substation with the planned future distribution facilities, including one transformer and three feeders. The design of the "ultimate, full substation buildout" is not yet known, but space has been reserved at the substation to preserve the option of future expansion. Because full substation buildout is not planned, designed or reasonably foreseeable, its impacts are not analyzed in the PEA. A summary of PEA revisions is provided in Attachment 1.

Deficiency 21:

Update figures 2-4, 2-5, 2-6, 2-7, 2-8, and 2-9 with utility ownership details. PG&E would own and operate the components shown in Figure 2-8, for example. Update associated PEA text as appropriate.

Response:

Utility ownership has been described in Section 2.6, Project Components. Language to clarify ownership was added to Sections 2.6.1.1 (230 kV Substation), 2.6.1.2 (230 kV Interconnection), 2.6.1.3 (70 kV Substation), and 2.6.2 (Power Line). The 230 kV substation will be owned and operated by NEET West. The 230 kV transmission line interconnection, 70 kV substation, and future distribution facilities will be owned and operated by PG&E.

Deficiency 22:

Provide the alignment of any fiber optic lines or telecommunications lines that would be required for operation of the fully built-out substation in addition to those that would be collocated on the proposed 70-kV lines or reconductored 70-kV segments or in underground or other locations already described in the PEA (pp. 2-12, 2-13, 2-24, and 2-39). Update associated PEA text as appropriate.

Response:

Any fiber optic lines or telecommunications lines that would be required for operation of the fully built-out substation facilities are not yet planned and are unlikely to be built for at least 20 years, if at all. This potential future expansion is therefore not reasonably foreseeable and its impacts are not analyzed in the Revised PEA.

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