

# 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. 2

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The California Public Utilities Commission (CPUC) identified deficiencies in NextEra Energy Transmission West, LLC's (NEET West) and Pacific Gas and Electric Company's (PG&E) Proponent's Environmental Assessment (PEA) for the Estrella Substation and Paso Robles Reinforcement Project. Below are responses to Deficiency List No. 2 issued by the CPUC on June 29, 2017. Each Deficiency is numbered according to the list, followed by NEET West's and PG&E's response. This document includes the following attachment, which is described in more detail in the text below under the applicable response.

- Attachment A. Attachment 1 to PEA Deficiency Letter No. 2
- Attachment 1-5a. NEET West Example Worker Environmental Awareness Program
- Attachment 1-5b. PG&E Example Worker Environmental Awareness Program
- Attachment 1-5c. Example of Preliminary Draft Hazardous Materials Management Plan
- Attachment 2-15. Power Line Crossing Structures Mapbook
- Attachment 3.5-1. Appendix F to the Cultural Resources Technical Report for the 70kV Power Line, Archaeological Survey Coverage Maps
- Attachment 4-3a. NEET West Confidential and Highly Commercially Sensitive Cost Information (Redacted)
- Attachment 4-3b. PG&E Confidential and Highly Commercially Sensitive Cost Information (Redacted)
- Attachment G(4). Utility Procedure TD-3350P-09, Revision 3, Property Review

### Chapter 1. PEA Summary

#### ***Deficiency 1-1:***

*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.*

**Response:**

Based on recent CPUC forecasting directives and currently known large-load business applications, the new distribution will be needed in 2024. According to the updated LoadSEER forecast, the overload anticipated in 2024 will be 0.82 MW. Please see the updated Appendix G for additional information.

As was indicated in the updated Appendix G, Section III.C, overloads are most likely to occur at Paso Robles and San Miguel substations. These substations are closest to the anticipated load growth area.

**Deficiency 1-2:**

*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).*

**Response:**

PG&E and NEET West hosted eight joint open houses in December 2015, January 2016, and June 2016. Postcards were mailed to property owners and customers in the area, and notices were placed in several local news publications to notify the community. The meeting dates, times, and locations are as follows:

1. December 7, 2015; 4-7 p.m. at the Paso Robles Elks Lodge
2. December 8, 2015; 7-10 a.m. at the California Mid-State Fairgrounds, Frontier Pavilion
3. December 8, 2015; 4-7 p.m. at the Paso Robles Event Center
4. January 11, 2016; 4-6:30 p.m. at the Paso Robles Park Ballroom
5. January 12, 2016; 4-7 p.m. at the California Mid-State Fairgrounds, Frontier Pavilion
6. June 22, 2016; 4:30-6:30 p.m. at the Paso Robles Elks Lodge
7. June 23, 2016; 10 a.m.-12 p.m. at the Park Ballroom.
8. June 23, 2016; 4:30-7:30 p.m. at the Park Ballroom.

A summary of concerns from the open houses is included in the responses to Deficiencies 4-1 and 4-2 below.

**Deficiency 1-3:**

*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.*

**Response:**

At the tie-in location where the new 70 kV power line route connects to the existing Paso Robles-San Miguel 70 kV power line, one property owner expressed concerns regarding the tie-in location. Since the existing power line already ran through their property, the property owners were concerned about additional power lines traversing their property. PG&E agreed that additional power lines would overburden the property and an alternative tie-in location was selected.

**Deficiency 1-4:**

*What is the initial proposed capacity of Estrella Substation in MW? What would the capacity be in MW upon full build-out?*

**Response:**

NEET West's 230/70 kV substation has an initial capacity of 200 MW and the capacity upon speculative ultimate build-out, assuming current technology, is approximately 400 MW.

PG&E's 70 kV substation has an initial capacity of 0 MW, and a capacity of approximately 29 MW within 10 years. The capacity upon speculative ultimate build-out for the 70/21 kV substation, assuming current technology, is 89.1 MW.

**Deficiency 1-5:**

*Provide full copies of the Hazardous Substance Control and Emergency Response Plan (draft copy may be acceptable), Health and Safety Plan (draft copy may be acceptable), and Worker Environmental Awareness Program (draft copy may be acceptable)*

**Response:**

As described in the response to Deficiency 9 for the PEA Deficiency List No. 1, project proponents typically prepare these types of plans prior to construction. NEET West and PG&E will each prepare and implement a Hazardous Materials Management Plan (HMMP) that includes the elements of a Hazardous Substance Control and Emergency Response Plan and Health and Safety Plan. The proponents will also implement hazardous substance control and emergency response procedures (as described in APM HAZ-1, Hazardous Substance Control and Emergency Response), along with APM HYDRO-1 (Avoidance of Sensitive Aquatic Features), to ensure that hazardous materials are handled appropriately. NEET West and PG&E will implement APM General-1 (Prepare and Implement a Worker Environmental Awareness Program), requiring all on-site construction personnel to attend training before they begin work on the project.

The 230 kV substation will involve the use of transformer oil during construction and operation in quantities equal or greater than 500 pounds, 55 gallons, 200 cubic feet of gas, or at thresholds required by the local Certified Unified Program Agency (San Luis Obispo County Environmental Health Services Hazardous Materials Program). As a result, NEET West will incorporate a Hazardous Materials Business Plan (HMBP) and spill prevention, control, and countermeasures (SPCC) into the HMMP to address transformer oil at the 230 kV substation.

The 70 kV substation will not have a transformer or require the use of transformer oil and therefore PG&E’s HMMP will not need to include SPCC and HMBP components.

Draft example Worker Environmental Awareness Programs are provided in Attachment 1-5a and 1-5b. A preliminary draft HMMP is provided in Attachment 1-5c. PG&E and NEET West reserve the right to revise the structure and language of the WEAPs and HMMPs as needed based on specific project requirements.

## Chapter 2. Project Description

### Deficiency 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.*

### Response:

As stated in the PEA, Chapter 2, Project Description, and Chapter 3, Environmental Setting and Impacts Summary, minor modifications will be required at five existing substations. The minor substation modifications include installation and reconfiguration of system protection equipment and/or adjusting relays, and reprogramming SCADA and telemetry equipment. In addition, the fiber optic telecommunications cable extending from Estrella Substation to Paso Robles Substation along the new 70 kV line will require new network and telecommunications equipment at Paso Robles Substation. The minor substation modifications will be made within existing substation fence lines at California Flats Switching Station and Morro Bay, San Miguel, and Templeton substations, while minor excavation outside the fence line of Paso Robles Substation may be required for the telecommunication connection. A preliminary summary of the modifications required at each substation is provided in Exhibit 2-1 below.

**Exhibit 2-1. Minor Substation Modifications Summary**

Substation	Improvements
California Flats 230 kV Switching Station	Minimal outdoor work within the existing switching station fence line. <ul style="list-style-type: none"> <li>▪ Remove outdoor wave trap equipment and existing Morro Bay-California Flats 230 kV protection, and install new protection relays and related equipment within the existing control building.</li> <li>▪ Remove existing relays and install dual-line differential protection relays on the existing California Flats-Morro Bay line to match new Estrella Substation terminal for permissive overreaching transfer trip (POTT) high-speed protection.</li> <li>▪ Install regenerative catalytic oxidizer (RCO) switches, Local/Remote, and circuit breaker (CB) control through replaced CB relay.</li> <li>▪ Provide Breaker Failure Relay protection.</li> </ul>
Morro Bay 230 kV Substation	Minimal outdoor work within the existing substation fence line. <ul style="list-style-type: none"> <li>▪ Remove wave trap equipment.</li> <li>▪ Remove existing relays and install dual-line differential protection relays at CB 482 to match new Estrella Substation terminal for POTT high-speed protection.</li> <li>▪ Install RCO switches, Local/Remote, and CB control through replaced CB relay.</li> <li>▪ Provide Breaker Failure Relay protection.</li> </ul>

**Exhibit 2-1. Minor Substation Modifications Summary**

Substation	Improvements
Templeton 230/70 kV Substation	No outdoor work, only inside the control building within the existing substation fence line. <ul style="list-style-type: none"> <li>▪ Install reverse power relay on the existing Templeton 230/70 kV #1 transformer banks to prevent the 70 kV system from feeding the 230 kV system.</li> </ul>
San Miguel 70 kV Substation	No outdoor work, only inside the control building within the existing substation fence line. <ul style="list-style-type: none"> <li>▪ Remove existing directional overcurrent electro-mechanical relays at CB 22 breaker relay panel.</li> <li>▪ Install two line protection relays in CB 22 relay panel to match new Estrella Substation terminal for step-distance protection.</li> <li>▪ Provide Breaker Failure Relay and Reclosing Relay protection</li> </ul>
Paso Robles 70 kV Substation	Minimal outdoor work. Minor excavation may be required outside the existing substation fence line for telecommunication interconnection. <ul style="list-style-type: none"> <li>▪ Upgrade the new Estrella-Paso Robles 70 kV power line to meet line ampacity demands of 975A emergency.</li> <li>▪ Upgrade terminal equipment such as insulators, jumpers, and any rigid bus at the breaker to meet 975A ampacity ratings.</li> <li>▪ Remove existing SEL 321 and SEL 267 relays at CB 72 breaker relay panel, along with associated auxiliary switch devices.</li> <li>▪ Install two line protection relays in CB 72 relay panel to match new Estrella Substation terminal for step-distance protection.</li> <li>▪ Provide Breaker Failure Relay and Reclosing Relay protection.</li> <li>▪ Connect new fiber optic line into existing substation components, including minor trenching outside the fence line. Connection of the fiber optic line requires a shallow trench, measuring 10—15 feet in length and a minimum of 24 inches of cover, to be excavated so the fiber optic line can be connected from the last reconductoring pole to inside of the substation.</li> </ul>

Note: This table is preliminary and subject to change based on CPUC requirements, final engineering, and other factors.

**Deficiency 2-2:**

*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.*

**Response:**

- a. Section 15378 of the State CEQA Guidelines indicates that the “project” for purposes of CEQA review “means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.” The California Supreme Court has indicated that future

phases of construction must be identified, to the extent they are known, and their impacts evaluated, to the extent they are known. PG&E has included what is known about the future distribution facilities at the substation because PG&E transmission planners are certain the facilities will be needed. The updated forecast indicates the distribution will be needed in 2024.

- b. That is correct. CEQA does not require an analysis of future actions that is based on speculation or conjecture, whether it is in the guise of cumulative analysis or otherwise. “[W]here future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences” (*Kings County Farm Bureau v. City of Hanford* [1990] 221 Cal.App.3d 692, 712). “Cases have balanced the protection provided by conducting environmental review at the ‘earliest possible stage’ against the equally compelling practical demand that the decision-making process underlying a given ‘project’ be sufficiently developed to provide meaningful information for technical review” (*Kaufman & Broad-South Bay, Inc. v. Morgan Hill Unified School District* [1992] 9 Cal.App.4th 464, 475). “Deferral of environmental assessment does not violate CEQA where an EIR cannot currently provide meaningful information about speculative future projects” (*National Parks & Conservation Ass’n v. County of Riverside* [1996] 42 Cal.App.4th 1505, 1520). Even if ultimate build-out were a certainty, it is unclear what impacts would be cumulative given the intervening years and hardscape preparation being done as part of the proposed project. It is possible that aesthetic impacts might be cumulative if the later equipment was highly visible; a visual simulation showing a speculative layout indicates that there would be little visual change (see visual simulation for Deficiency 3.1-1).

***Deficiency 2-3:***

*Please provide the approximate size/dimensions of the proposed concrete secondary containment basin for the transformer oil.*

***Response:***

The secondary containment pit dimensions are 45 × 34 × 2.5 feet.

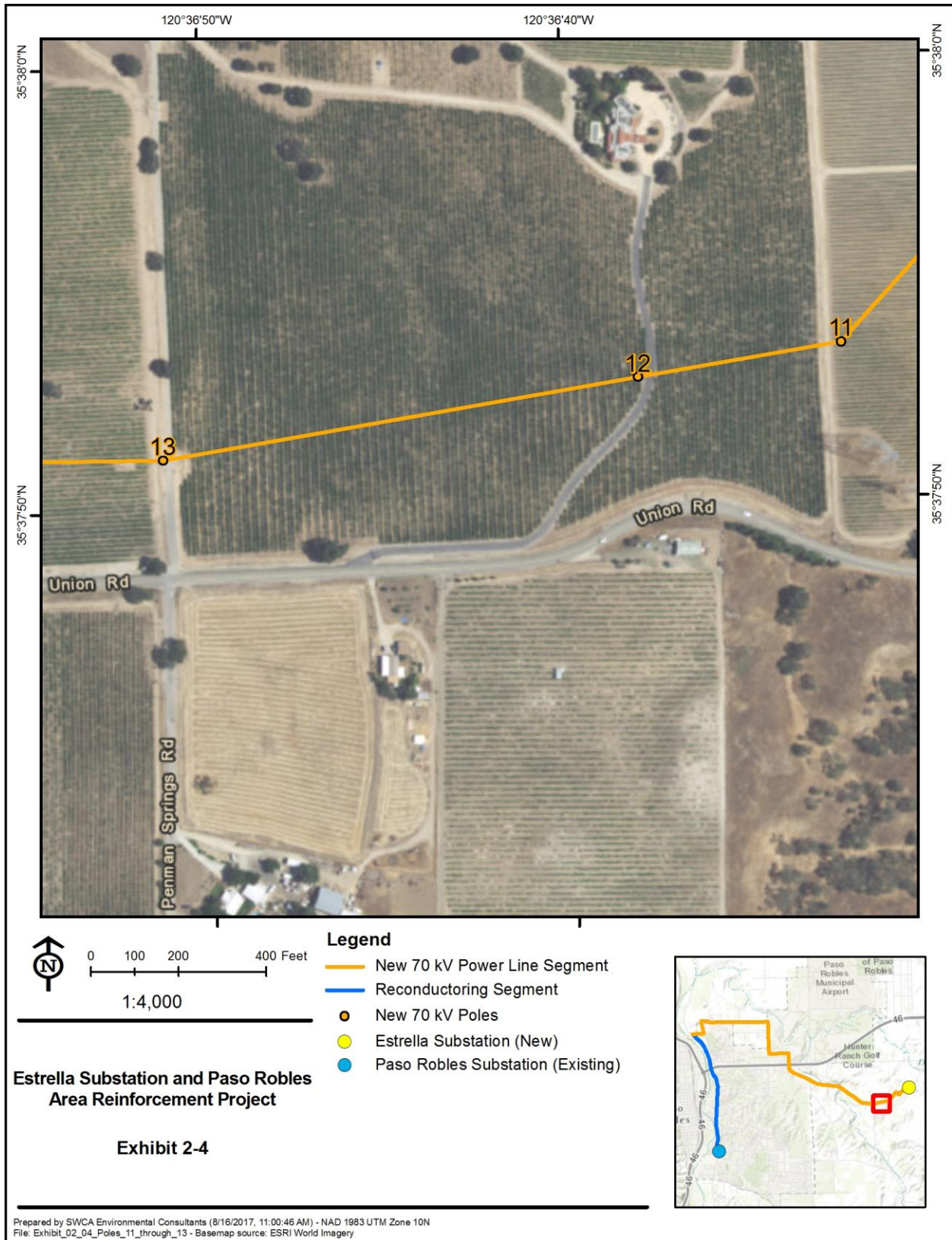
***Deficiency 2-4:***

*Please explain why the new easement for the power line needs to be up to 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.*

***Response:***

The easement width is determined by the type of structure being used, the length of the span and the type of conductor. Although most of the route will have easements up to approximately 70 feet wide, there is one location where the easement width could be over the 70 feet and that is between proposed pole locations 12 and 13 (shown below). In this location, engineering is proposing a design that will accommodate the existing farming operation.

**Exhibit 2-4. Poles 11 through 13**



Due to the topography of the land, PG&E is able to install a long span (over 1,100 feet in length) to allow for less interference with the farming operation. With a span length of this size, a wider easement is required to allow for the sway of the conductor and to maintain the legal clearance requirements set out in General Order 95. It has been determined that this span will need to have an easement up to 115 feet in width to cover these requirements. The final width of the easement will be determined after engineering and property owner negotiations are completed.

***Deficiency 2-5:***

*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?*

***Response:***

Work areas are discussed in the PEA's Project Description in Section 2.8.1 and include staging areas, structure work areas, crossing structure locations, pull and tension sites, and helicopter landing zones that will be used during construction. Work areas have been accounted for in the temporary ground disturbance calculations. To allow for greater flexibility during construction, the final locations for these temporary work areas will be determined as part of the final design and may move, as necessary, at the time of construction due to land use changes, to avoid unanticipated impacts, and other factors. The temporary work areas established as the substation staging areas will serve as the primary base of operations during construction of the 230 kV and 70 kV substations and the 230 kV interconnection. In addition, temporary work areas will be located along the power line route to facilitate construction of the new power line and reconductoring activities. Helicopter landing zones, equipment/material staging areas, and concrete staging areas may be located off the power line corridor. The considerations used in selecting helicopter landing zones are presented in response to Deficiency 2-7, above. Specific considerations that PG&E will evaluate when selecting the location and configuration of temporary work areas along the power line route include, but are not limited to, the following:

- Sufficient space to allow for safe construction activities, such as laydown of poles and hardware to be installed in specific locations along the power line route or locations where wire pulling/tensioning will occur;
- Accessibility for construction (as close as practical to paved roadways or existing unpaved roads);
- Ability for PG&E to negotiate and obtain landowner agreements; and
- Avoidance and minimization of potential environmental impacts.

***Deficiency 2-6:***

*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.*



**Response:**

If use of private property is needed and PG&E is not getting a permanent easement, a Temporary Construction Easement (TCE) would be obtained for that purpose, but with the current design, no TCEs have been identified. PG&E will be getting permanent easements for the new 70 kV power line where existing easement(s) do not exist. PG&E will not be acquiring TCEs on these properties since PG&E's easements will allow for the use of adjacent lands for construction purposes.

**Deficiency 2-7:**

*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.?*

**Response:**

PG&E has identified the possibility that other sites may be used as helicopter landing zones because land uses in the area may change during the permitting process, leaving the identified landing zones no longer available. Conditions on the ground will dictate where the landing zones are ultimately located. As stated in 2.8.1.5, Landing Zones, a site would need to measure about 100 by 100 feet, with a 30- by 30-foot touchdown pad. PG&E would look for a level site that would require little to no preparation (mowing grass, adding gravel) or utilize a site that is already disturbed, such as a pull and tension site or staging area. The amount of site preparation will depend on the chosen site. Some site preparation, such as vegetation mowing or placement of a gravel base or mats, may be necessary for dust control or to prevent fire hazard. Similar to the response provided for Deficiency 2-5, specific considerations in selecting helicopter landing zones include the following:

- Sufficient available space for helicopter takeoff/landing, and loading and unloading of crews, materials, and equipment (100 × 100 feet);
- Flat terrain with minimal site preparation and on-site vegetation;
- Absence of livestock (cattle and horses);
- Environmental constraints (e.g., oak trees, rare plant populations, drainages, vernal pool complexes);
- Ability to avoid conflicts with FAA-designated airspace and flight paths;
- Ability for PG&E to negotiate and obtain landowner agreements; and
- Proximity to final pole locations.

**Deficiency 2-8:**

*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?*

**Response:**

As stated in Chapter 2, Project Description, Table 2-4, temporary access roads will generally be approximately 12 feet wide, but may be expanded to approximately 15 feet wide around corners to allow safe access for construction equipment. For impact calculations and PEA analysis, temporary access roads were assumed to be 15 feet wide for the entire width as a conservative estimate. Temporary access roads for the power line route were provided as part of the GIS data submitted as part of the Revised PEA filed on May 18, 2017, and are named “New Unpaved” in the “Project Components – CONFIDENTIAL” GIS files.

Rock bedding may be used for roads that require improvements for access and equipment delivery and generally will be removed upon completion of construction and agreement with the property owners. However, the rock bedding may be left in place, at the discretion of the property owner, since it generally improves the quality of the road.

**Deficiency 2-9:**

*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.*

**Response:**

Project access roads have been designed to minimize environmental impacts and land use constraints to the extent they were known at the time of the PEA filing; however, minor adjustments such as widening at corners, adding turnouts, or minor realigning the centerline of the roadway may be required during construction due to unanticipated changes that could occur during the project’s permitting/approval process. Examples of circumstances that may require access routes to be adjusted in the field include, but are not limited to:

- Encroachment of certain vegetation communities into the roadway (e.g., oak woodland areas) that would require removal and/or trimming and/or additional habitat impacts;
- Presence of tree roots, stumps, or drip lines that could cause damage to trees;
- Drainage features such as culverts and roadside ditches that could be damaged by heavy vehicles and equipment;
- Presence of rock outcrops or other topographical features that could be avoided;
- Changes in land ownership since the PEA filing, resulting in new or modified fence lines or buildings that may restrict or prohibit access;
- To accommodate the turning capabilities of certain types of vehicles and equipment, or turnouts to allow passing of vehicles and equipment;
- New construction of homes, outbuildings, swimming pools, or other facilities that could alter access to construction work area; and
- A closer access route, an access route that will result in less ground or environmental disturbance, or a route that better addresses the needs of the associated construction activities is identified.

**Deficiency 2-10:**

*Please clarify if Table 2-4 only includes private roads (existing and proposed) or if any public roads are included in the summary.*

**Response:**

Primary arterials, freeways, and expressways that would be used to access the project were not included in the access road acreage calculations presented in Table 2-4, Project Access Summary. Only portions of public roadways identified for project access are included in the summary calculations for Table 2-4. These existing roads are publicly maintained secondary roadways and include Paso Robles Boulevard, Golden Hill Road, Clubhouse Drive, Palo Alto Court, Playa Circle, and one unnamed paved road. The remainder of the access roads identified in Table 2-4 are private roads.

**Deficiency 2-11:**

*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.*

**Response:**

Some residents may need to be temporarily relocated from their homes when it is necessary to move and set poles in close proximity to a residence using either a crane or a helicopter. Relocation is for the safety of the resident and generally lasts approximately 2 hours. Relocation would be a one-time event for any particular residence. Once the work on a particular pole is completed, there is no further need to conduct helicopter work in the area that could require relocation of residents.

Construction notes identifying these locations were provided in the Revised PEA GIS submittal. Approximately six poles may be either helicopter or crane set in areas of restricted access. Another approximately seven will be helicopter set. Some of these poles have residences nearby. The FAA may require individual homes to be vacated during helicopter setting of the poles, which will be identified in a helicopter use plan prior to construction. Individual houses would be identified during final engineering and PG&E will work with the residents of each home to find a time when the home is not occupied or provide a safe alternative for the duration of the relocation (e.g., by providing free movie tickets for a household or buying the family a meal at a restaurant).

**Deficiency 2-12:**

*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.*

**Response:**

The PEA states on page 3.4-59 that up to three oak trees may need to be removed to construct the project. In particular, one valley oak tree and two blue oaks trees may be removed to construct the new 70 kV power line segment. The locations of the three oak trees currently identified for potential removal are shown on Exhibit 2-12, Potential Oak Tree Removal Locations Map. It is difficult at present to estimate the number and location of additional oak trees that may be removed or trimmed, if any, at the time of construction because the project design is preliminary and subject to change due to agency requirements and other factors, and conditions on the ground at the time of construction may be different than when the PEA was submitted (e.g., oak trees grow over time and property owners may trim or remove them).

**Deficiency 2-13:**

*From where would the 6 inches of surface gravel to be imported to the substation site be obtained?*

**Response:**

Gravel and/or base rock used to prepare the substation site would be obtained from a local rock quarry prior to construction. The actual source of the surface gravel/base rock is unknown at this time. Sources in close proximity to the project site will be preferred to minimize impacts associated with on-road truck travel.

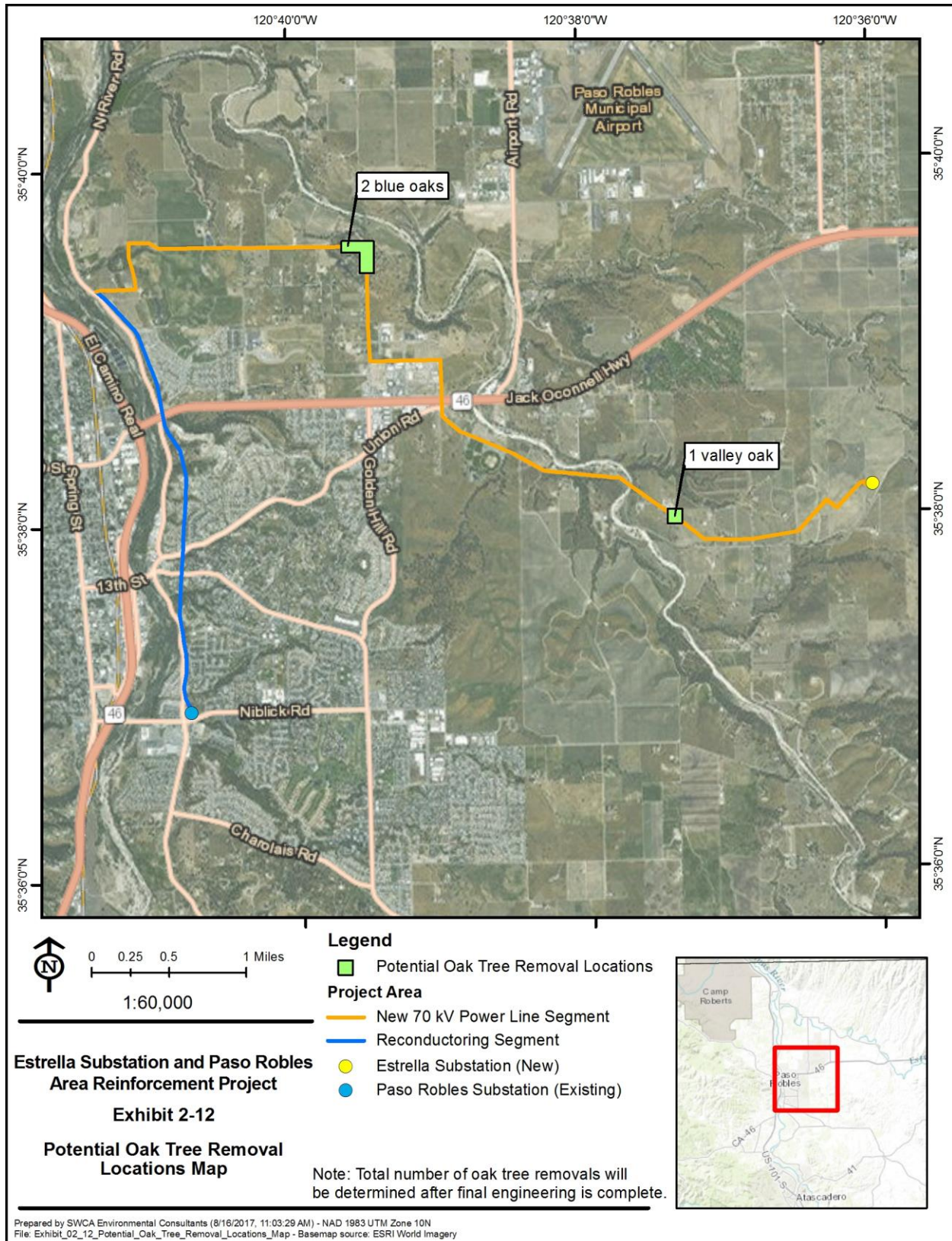
**Deficiency 2-14:**

*Would topsoil be salvaged during open trench methods for installation of telecommunication lines?*

**Response:**

Yes, topsoil will be salvaged during open trench methods for installation of underground telecommunication lines.

**Exhibit 2-12. Potential Oak Tree Removal Locations Map**



**Deficiency 2-15:**

*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.*

**Response:**

GIS data was provided for all information known at this time. Crossing structure locations are identified by local or state authorities for encroachment permits, which are obtained closer to the construction start date. PG&E does not expect all locations to acquire a crossing structure; the crossing structure locations identified in the GIS data are based on conservative/worst-case estimates of the number of locations where a crossing structure might be required and are shown on Attachment 2-15, Crossing Structures Mapbook. The following roadways may be affected:

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<b>Mapbook Page</b>	<b>Roadways*</b>
1	Unnamed driveway at 4380 Union Road
2	Union Road
3	Union Road; Highway CA-46
4	Germaine Way
5	Buena Vista Drive
6	River Oaks Drive; Highway CA-46
7	Via Fuschia; Via Camelia; Via Manzanita Court
8	El Dorado Court (at Riverglen Drive); Via Promesa (at Riverglen Drive); Union Road
9	Creston Road
10	Navajo Avenue (at South River Road); Cary Street

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\* Preliminary and Subject to Change with Agency Requirements, Conditions on the Ground at the Time of Construction, and Other Factors. In some cases, boom trucks or other equipment may be used to protect roadways instead of installing crossing structures.

**Deficiency 2-16:**

*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?*

**Response:**

Concrete trucks will be used during foundation construction for both the 230 kV substation and 70 kV substation. In the CalEEMod air model, all concrete trucks were included under the 70 kV power line component as the schedule for the power line foundation work and substation foundation work overlaps. The air model accounts for 216 concrete trucks over a 12-week period (three concrete trucks per day for 6 days per week over a 12-week period). While the concrete trucks were included under the 70 kV power line segment in the model, only approximately 78 trucks will be required for the power line and reconductoring segments. This leaves a remaining 138 concrete trucks during the same period for the 230 kV and 70 kV substation foundations. See Exhibit 2-16 below, Concrete Truck Use by Construction Phase. The 230 kV substation requires a maximum of 72 concrete trucks and the 70 kV substation requires 66 concrete trucks, for a total of 138 concrete trucks at Estrella Substation during the same time period. As a result, the air model adequately accounts for the concrete trucks required for foundation construction at the substation.

**Exhibit 2-16. Concrete Truck Use by Construction Phase**

**230-kV Substation Construction Equipment Usage (On-Road)**

Phase Name	Equipment Type	Equipment modeled as:	Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	27	28	29	30
Foundation Construction 72 concrete trucks over a 4-week period Numbers are per day, 6 days per week	Concrete Truck	On-Road Vehicle	0	0	0	0	0	0	0	2	2	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**70-kV Substation Construction Equipment Usage (On-Road)**

Phase Name	Equipment Type	Equipment modeled as:	Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	27	28	29	30
Foundation Construction 66 concrete trucks over a 4-week period Numbers are per day, 6 days per week	Concrete Truck	On-Road Vehicle	0	0	0	0	0	3	4	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**230-kV Transmission Interconnection Construction Equipment Usage (On-Road)**

Phase Name	Equipment Type	Equipment modeled as:	Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	27	28	29	30
Foundation/Tower Installation/Remove One tower	Concrete Truck	On-Road Vehicle	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**Power Line Construction Equipment Usage (On-Road)**

Phase Name	Equipment Type	Equipment modeled as:	Month 1				Month 2				Month 3				Month 4				Month 5				Month 6				Month 7			
			1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	27	28	29	30
Pole/Tower Installation	Concrete Truck	On-Road Vehicle	0	0	0	0	3	0	0	0	0	0	0	2	2	2	2	2	0	0	0	0	0	0	0	0	0	0	0	0



**Deficiency 2-17:**

*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?*

**Response:**

Representative helicopters would have horsepower that ranges from 1,650 shaft horsepower (shp) to 2,930 shp. Refer to Deficiency 3.12-1 for a discussion of helicopter noise.

**Deficiency 2-18:**

*Provide an updated version of Figure 2-4 that identifies ownership (i.e., PG&E or NEET West).*

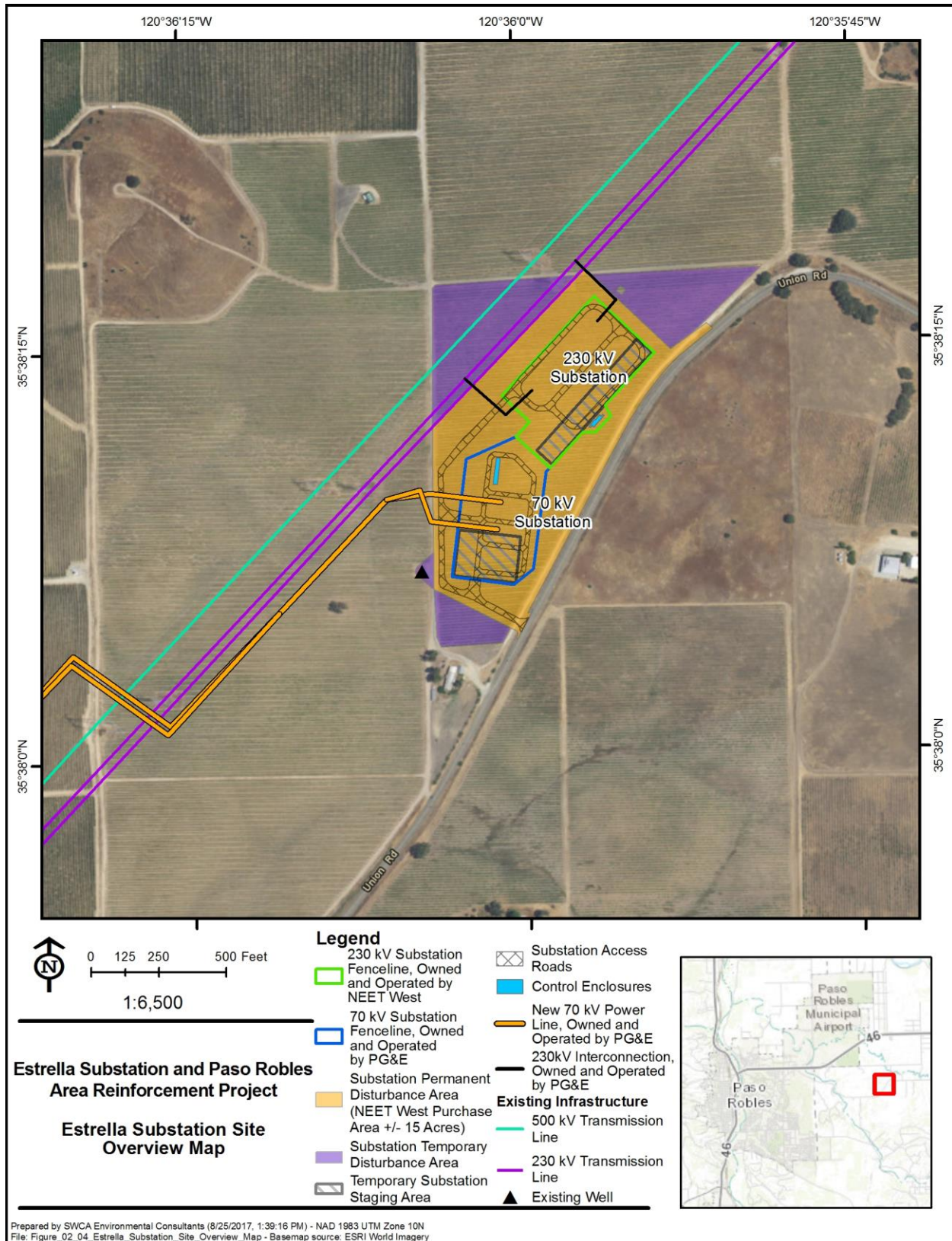
*Update the figure to show full build-out (e.g., second 230/70-kV transformer pad).*

**Response:**

As described in the response to Deficiencies 20 and 21 on the PEA Deficiency List No. 1, the design of the “full substation build-out,” referred to by applicants as “ultimate” build-out, is not yet known, but space has been reserved in the substation to preserve the option of future expansion. Because ultimate substation build-out is not planned, designed, or reasonably foreseeable, its impacts are speculative and not analyzed in the PEA. The 230 kV substation will be owned and operated by NEET West. The 230 kV transmission line interconnection, 70 kV substation, new and reconducted 70 kV power line, and future distribution facilities will be owned and operated by PG&E.

PEA Figure 2-4 (Estrella Substation Layout) in Chapter 2, Project Description, has been updated below to show ownership of the substation facilities. For the proposed project, NEET West is proposing to purchase the portion of the parcel illustrated in gold in Figure 2-4. The exact ownership of the property for the remainder of the parcel to be purchased and the property lines between the NEET West and PG&E facilities have yet to be determined. The property lines will be determined once the project is approved. Per the PEA Checklist, the purpose of this figure is to show the geographic location of the project. Please refer to PEA Figures 2-5 through 2-10 for the speculative ultimate substation build-out.

PEA Figure 2-4. Estrella Substation Site Overview Map



**Deficiency 2-19:**

a. Provide an updated version of Figure 2-5 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.

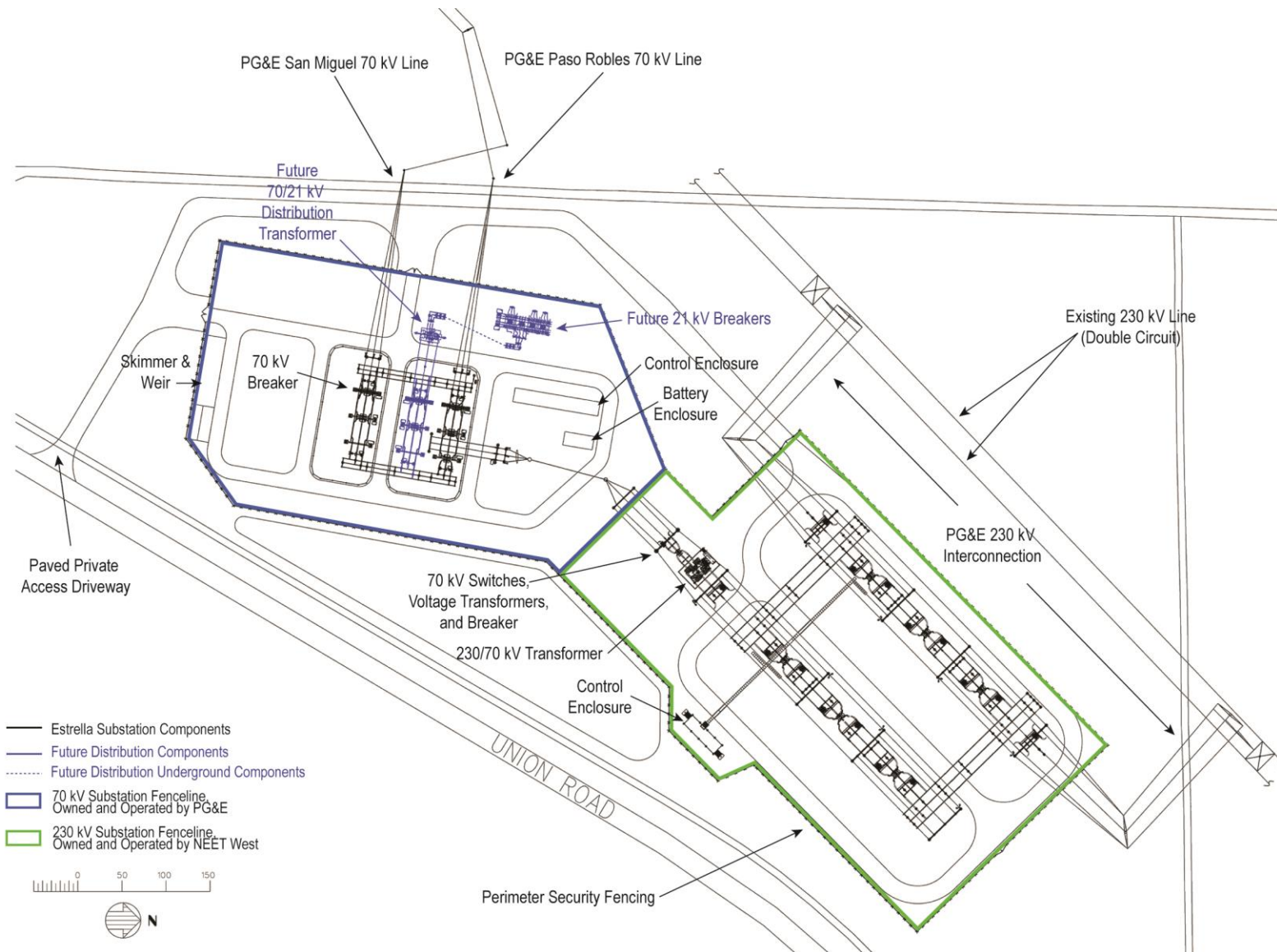
b. Identify facility ownership (i.e., PG&E or NEET West) by color.

**Response:**

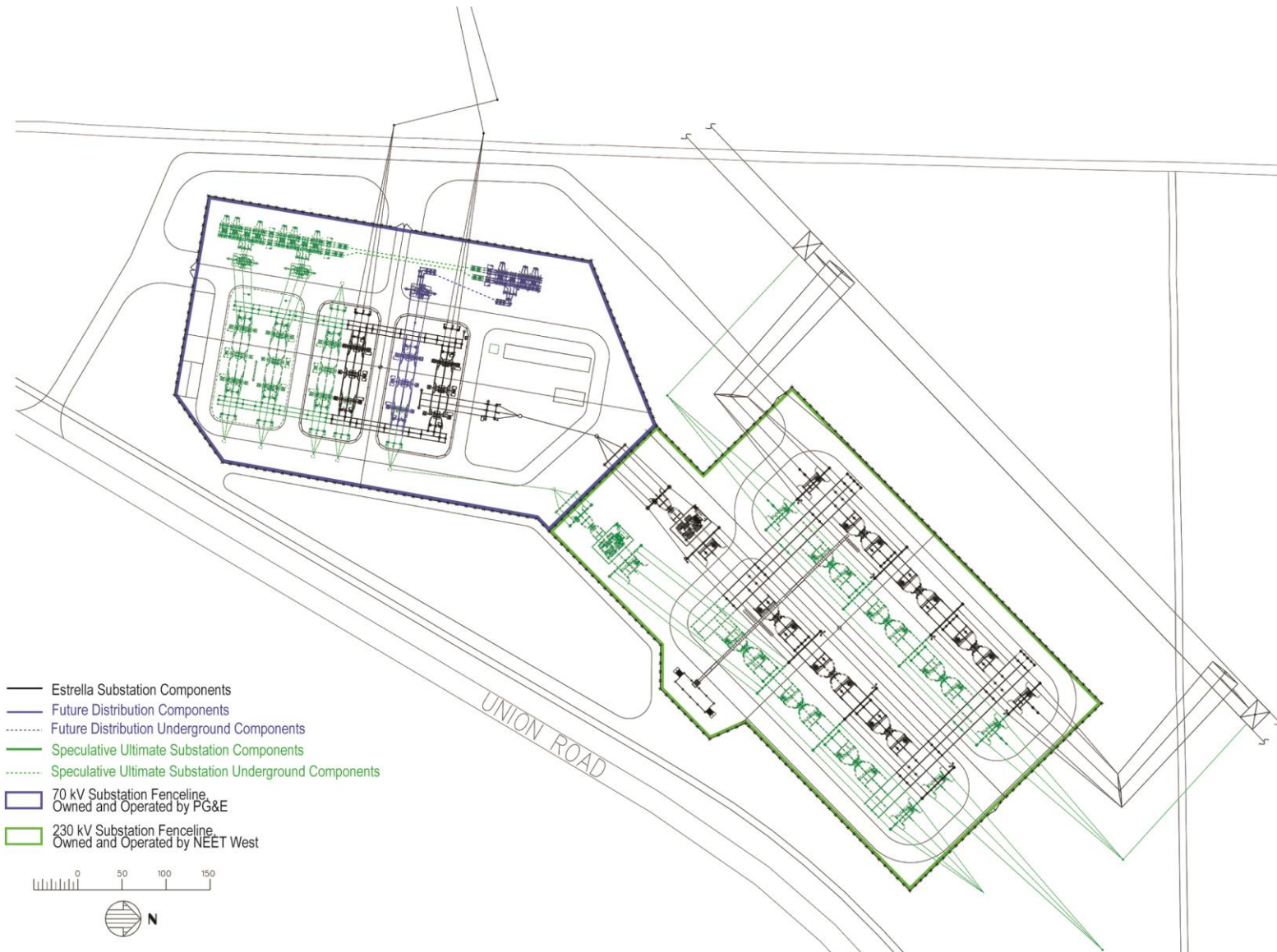
As described in the response to Deficiency 2-18 above, since the design of the ultimate substation build-out is not yet known and is not planned, designed, or reasonably foreseeable, its impacts are speculative and not analyzed in the PEA. The 230 kV substation will be owned and operated by NEET West. The 230 kV transmission line interconnection, 70 kV substation, new and reconducted 70 kV power line, and future distribution facilities will be owned and operated by PG&E.

PEA Figure 2-5 was updated in the Revised PEA to show Estrella Substation with the planned future distribution facilities, including one transformer and three feeders. In response to Deficiency 2-19, the applicants have further updated PEA Figure 2-5 to identify facility ownership (see Figure 2-5a below), and to provide a speculative overview of a potential ultimate build-out that includes a future 230 kV transmission interconnection, a future 230/70 kV transformer with associated breakers and switches, and three future 70/21 kV transformers with associated 70 kV breakers, 21 kV breakers, and switches (see Figure 2-5b below). Current technology is assumed for purposes of the illustration.

**PEA Figure 2-5a. Estrella Substation Layout Showing Foreseeable Distribution Facilities**



PEA Figure 2-5b. Estrella Speculative Ultimate Substation Layout



**Deficiency 2-20:**

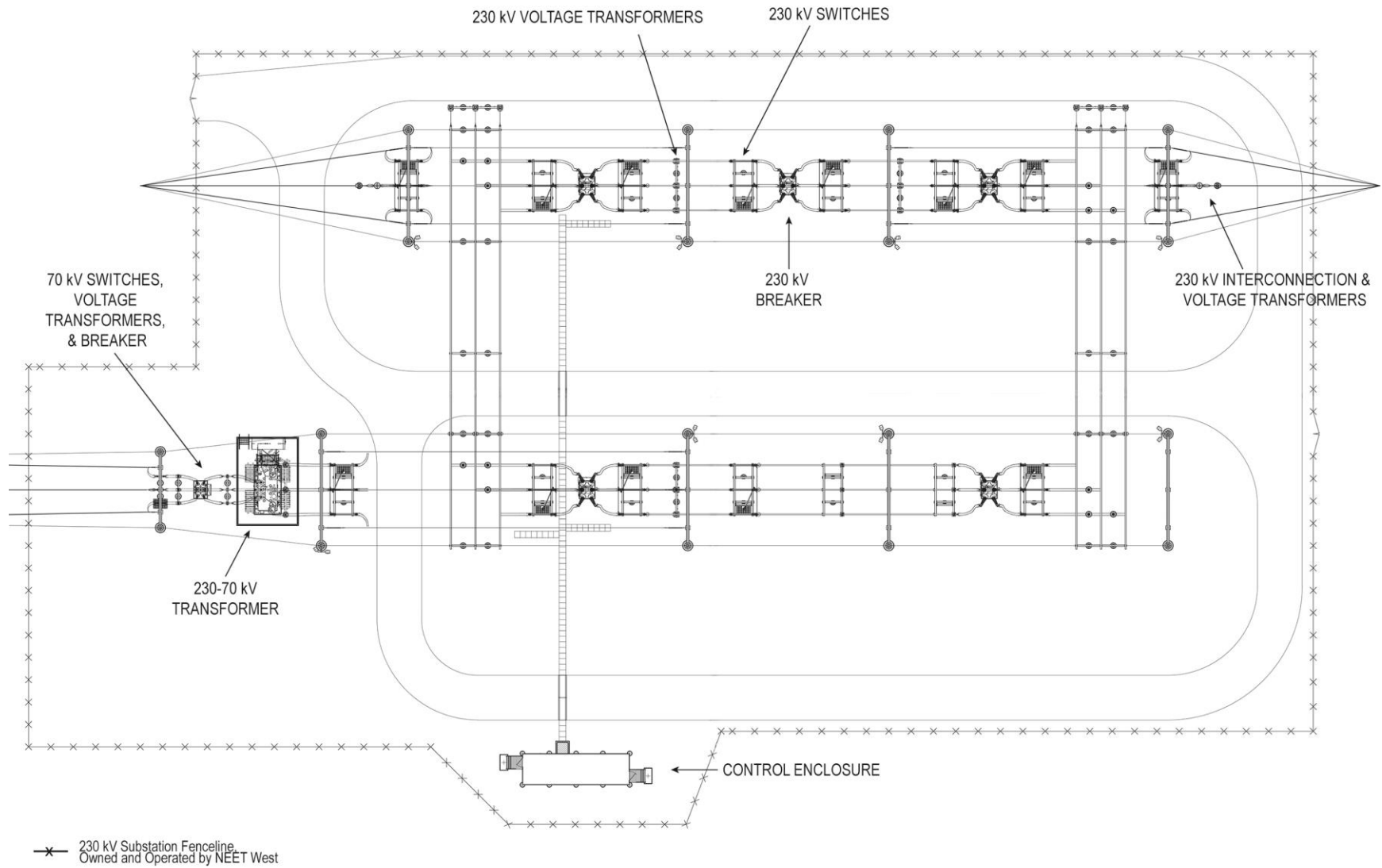
*Update Figures 2-6 and 2-7 with all future transmission facilities. Use a color or other means to indicate future/estimated build out.*

**Response:**

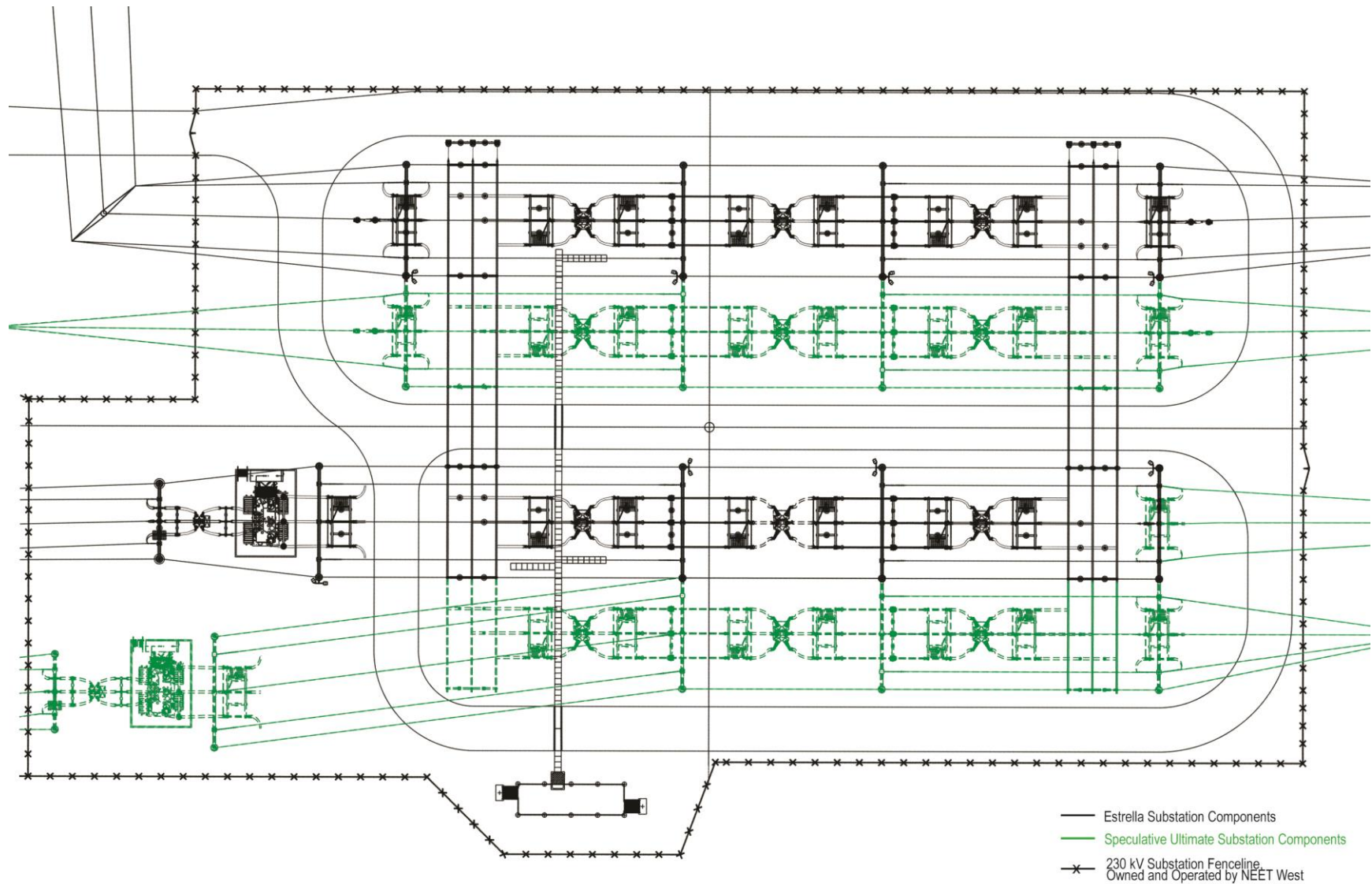
As described in the response to Deficiencies 20 and 21 on the PEA Deficiency List No. 1, the design of the ultimate substation build-out is not yet known, but space has been reserved at the substation to preserve the option of future expansion. Because ultimate substation build-out is not planned, designed, or reasonably foreseeable, its impacts are not analyzed in the PEA.

PEA Figures 2-6 and 2-7 have been updated to include a speculative view of an ultimate 230 kV Substation build-out including a future 230/70 kV transformer and associated breakers and switches, and a future 230 kV transmission interconnection (see Figures 2-6b and 2-7a and b). Current technology is assumed for purposes of the illustration.

PEA Figure 2-6a. 230 kV Substation General Arrangement

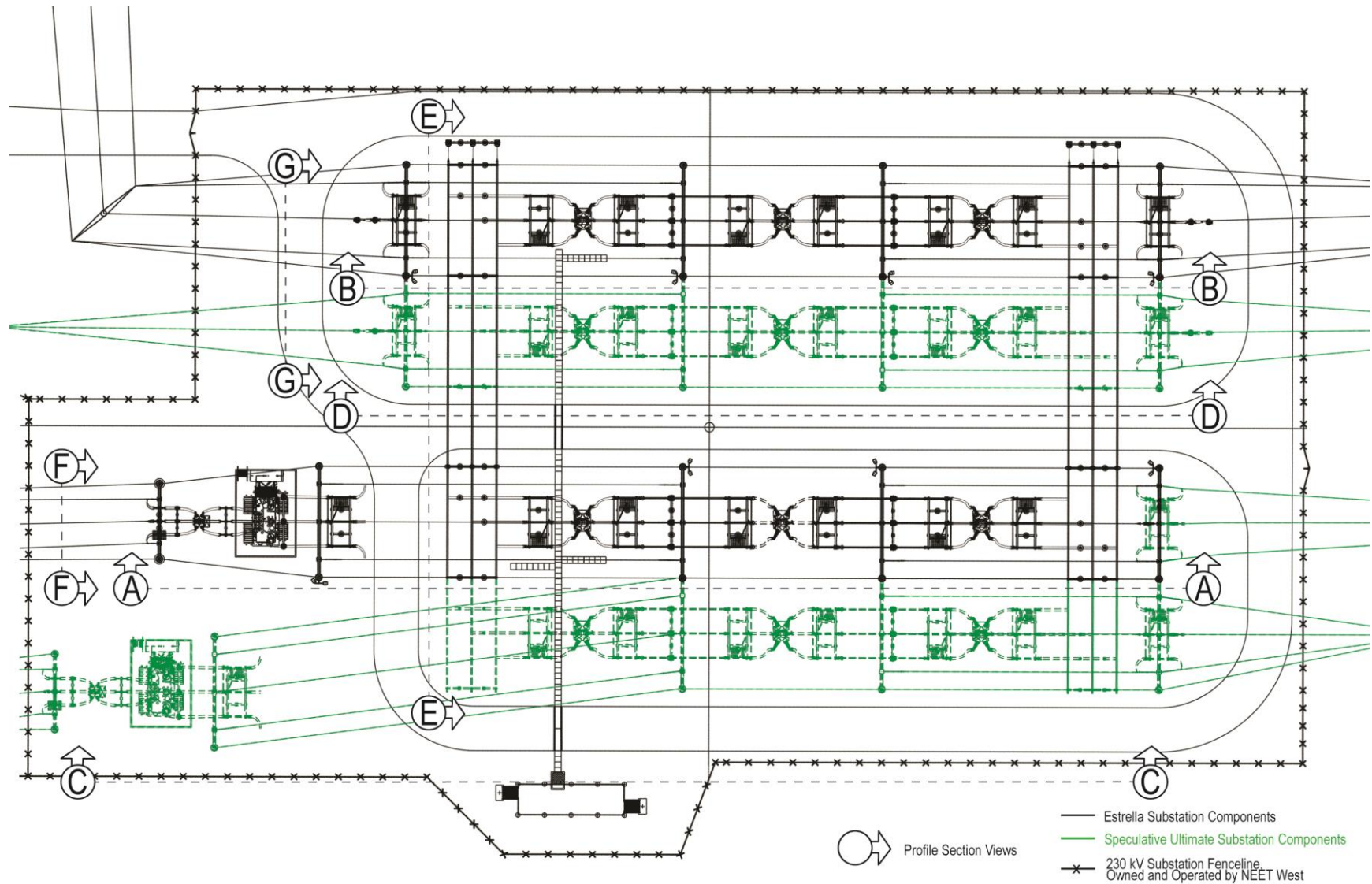


PEA Figure 2-6b. 230 kV Speculative Ultimate Substation General Arrangement

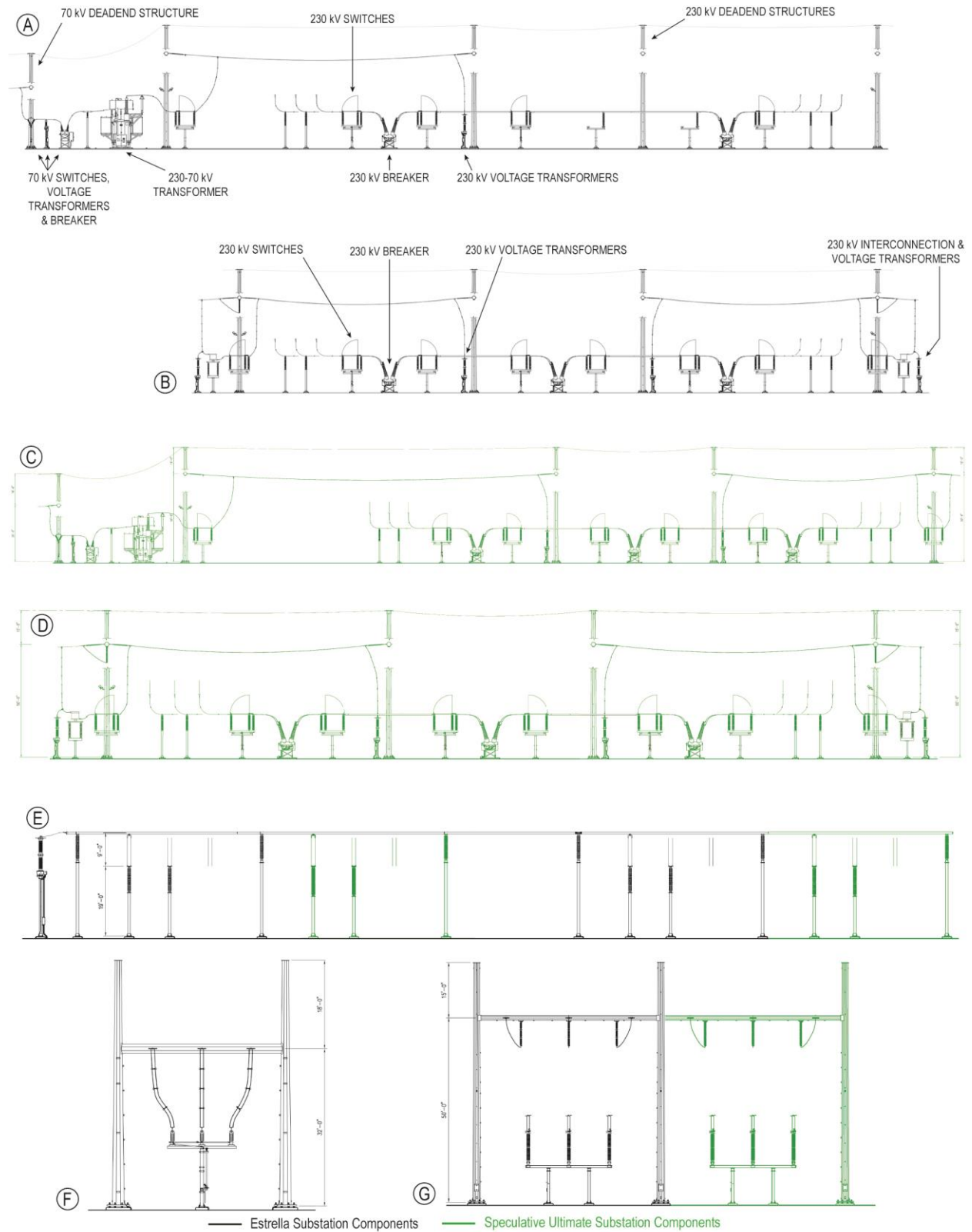




PEA Figure 2-7a. 230 kV Substation Profile Viewpoints



**PEA Figure 2-7b. 230 kV Substation Profile View**



**Deficiency 2-21:**

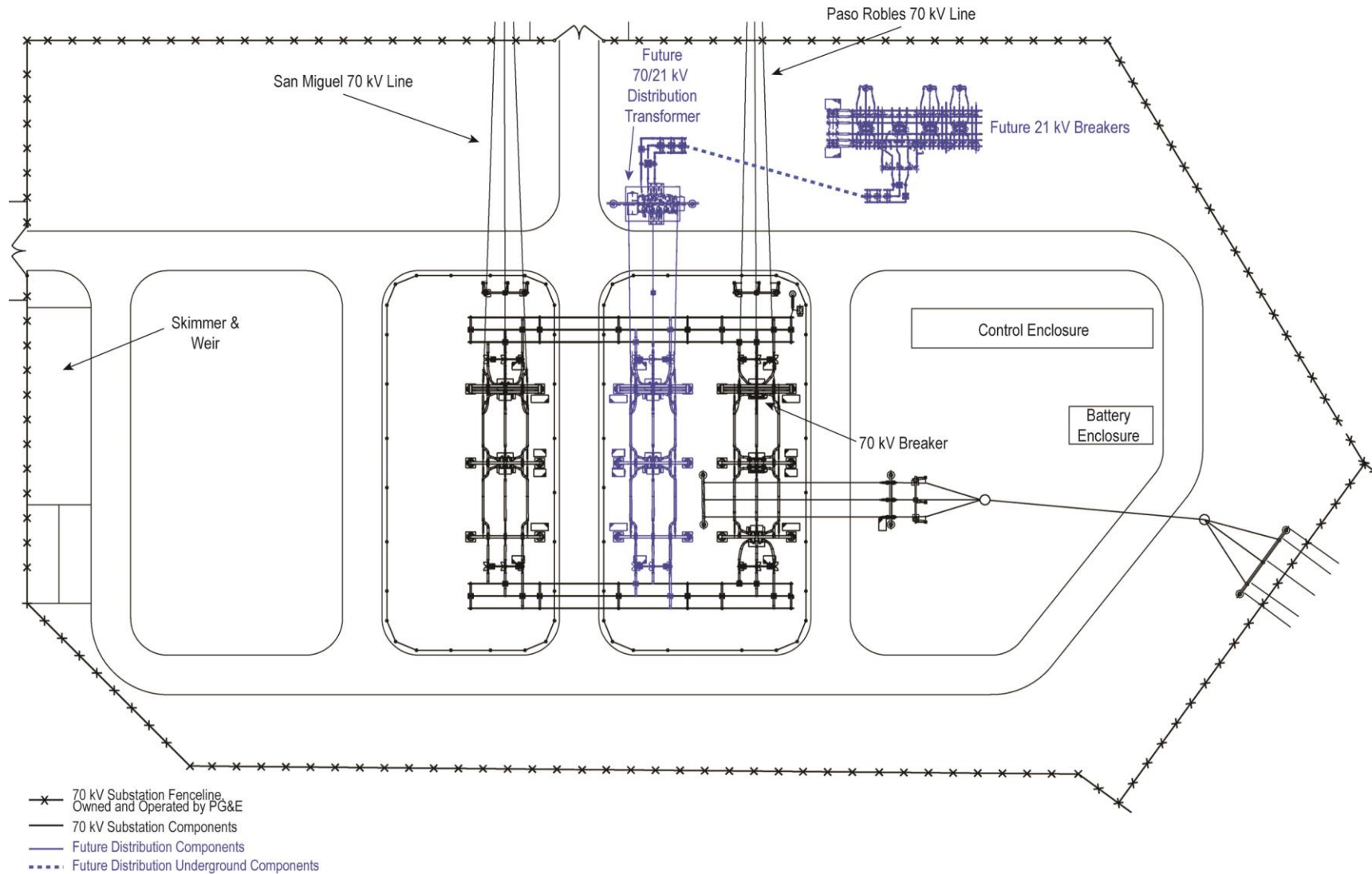
*Provide an updated version of Figure 2-8 that shows the full substation build-out. Estimate where facilities would likely be located. Use a color or other means to indicate future/estimated build-out. Label the added full-build-out facilities (i.e., future 230/70-kV transformer, three future 70/21 kV transformers and associated 70-kV breakers, 21-kV breakers, and switches). Identify the future 230-kV transmission tie-line alignments.*

**Response:**

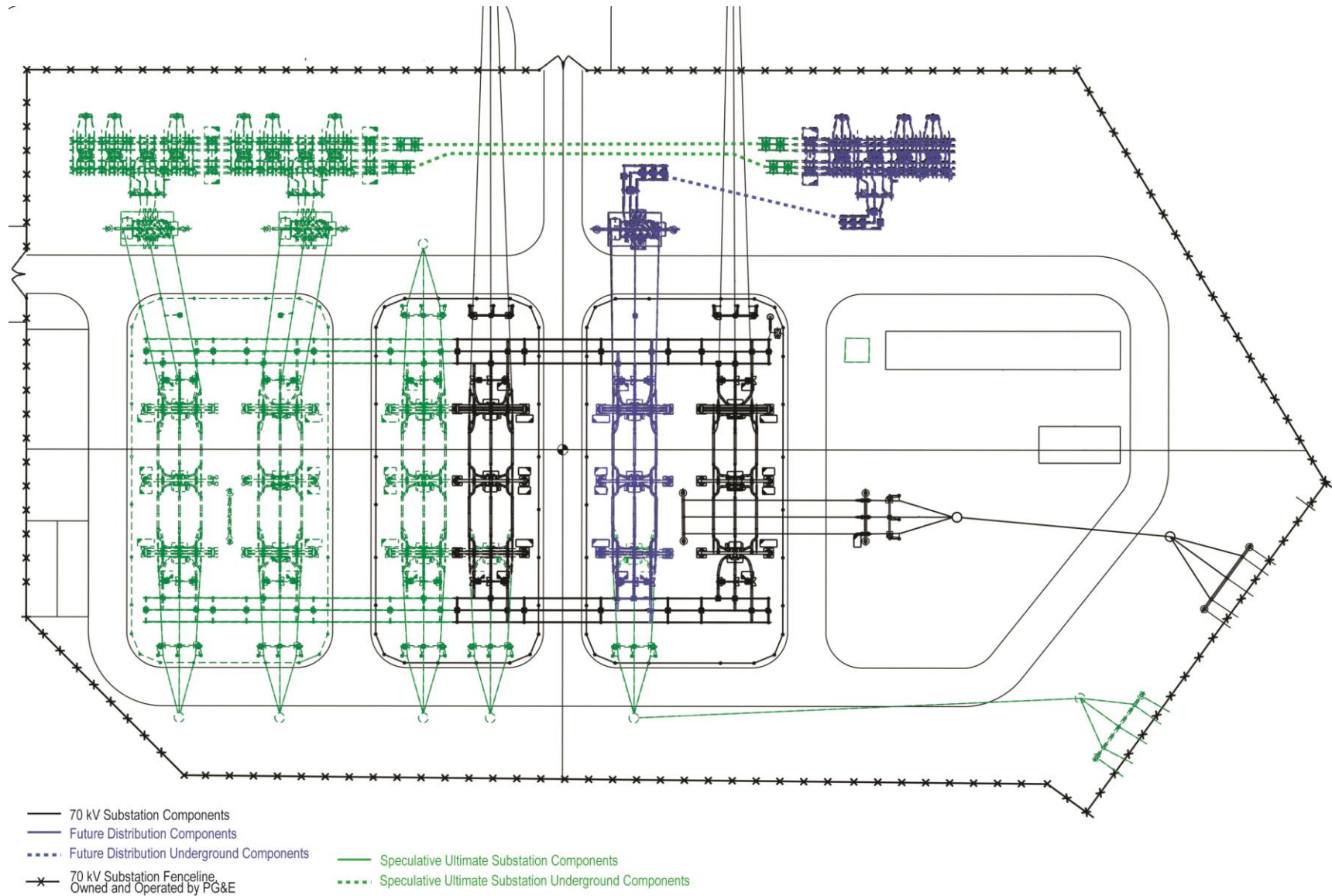
As described in the response to Deficiency 2-18 above, since the design of the ultimate build-out is not yet known and is not planned, designed, or reasonably foreseeable, its impacts are speculative and not analyzed in the PEA. The 70 kV substation and future distribution facilities will be owned and operated by PG&E.

PEA Figure 2-8 was updated in the Revised PEA to show the 70 kV Substation with the planned future distribution facilities, including one transformer and three feeders. In response to Deficiency 2-21, the applicants have further updated PEA Figure 2-8 to include a speculative view of an ultimate build-out including three future 70/21 kV transformers and associated 70 kV breakers, 21 kV breakers, and switches (Figure 2-8b below). Since the ultimate build-out shown on Figure 2-8 is intended to show only distribution facilities and does not include the necessary 230 kV transmission tie-line, the future 230 kV tie-line alignment is not shown. Current technology is assumed for purposes of the illustration.

**PEA Figure 2-8a. 70 kV Substation General Arrangement**



**PEA Figure 2-8b. 70 kV Speculative Ultimate Substation General Arrangement**



**Deficiency 2-22:**

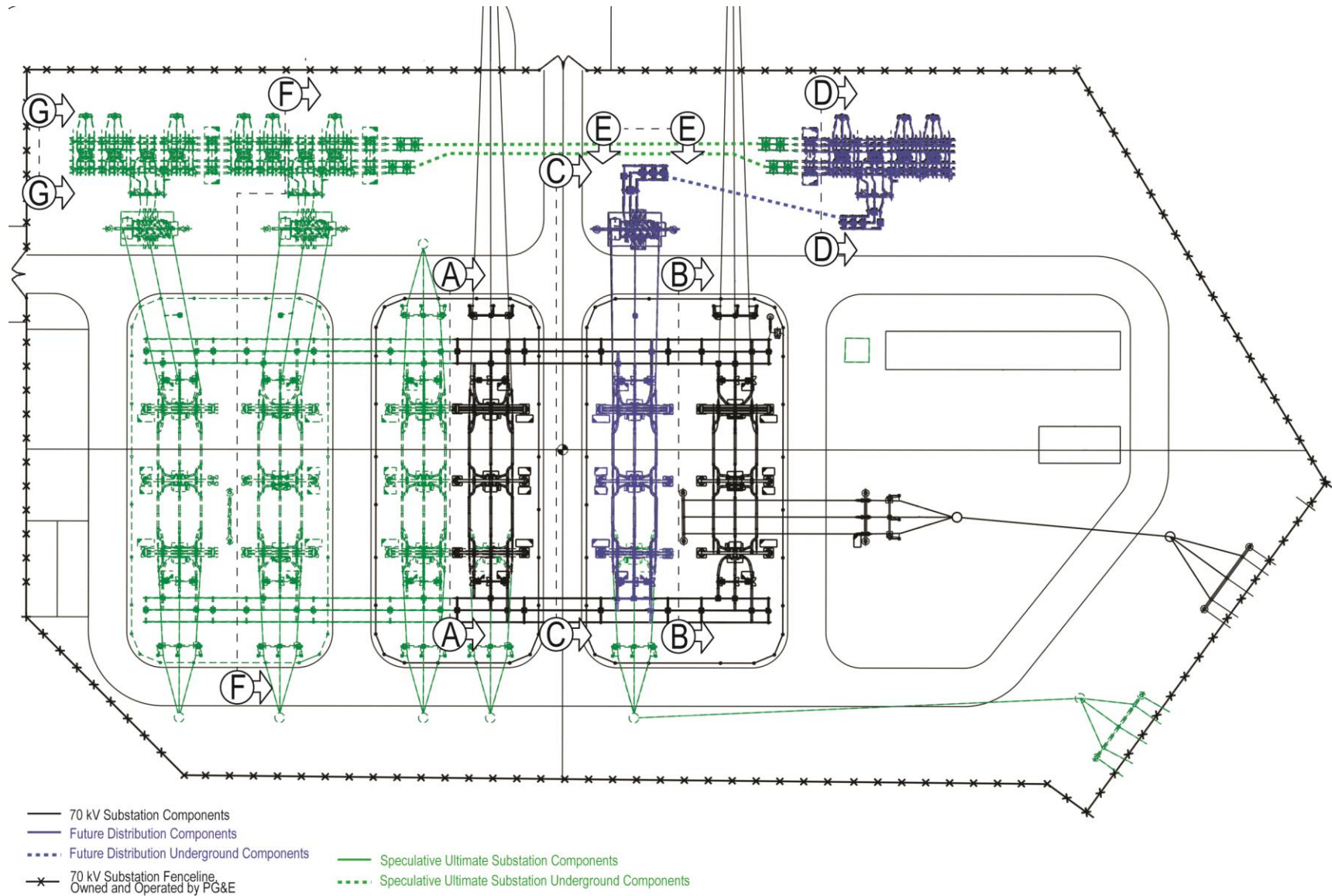
*Update Figures 2-9 and 2-10 with all future 70-kV and distribution facilities. Use a color or other means to indicate future/estimated build out.*

**Response:**

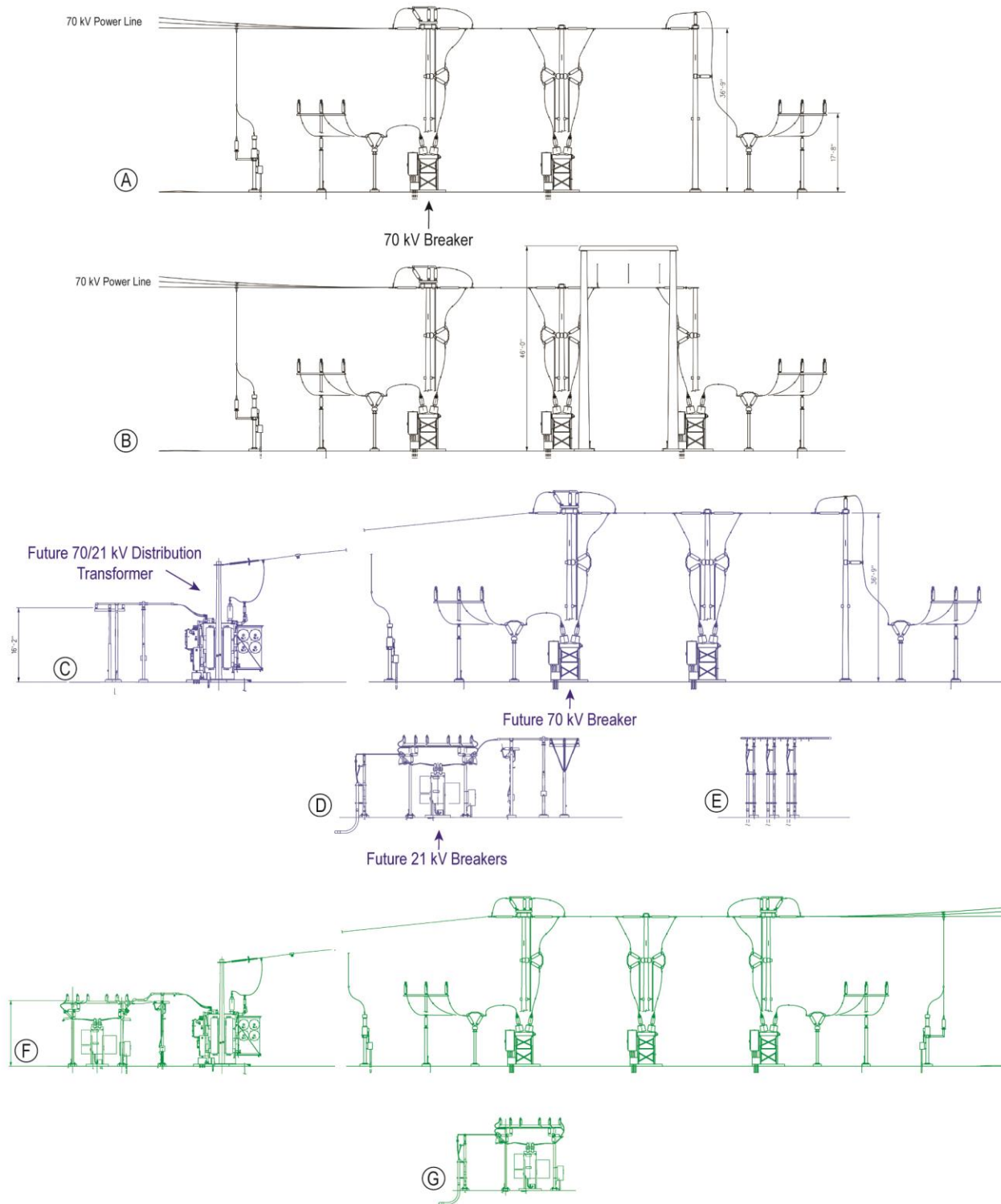
As described in the response to Deficiency 2-18, since the design of the ultimate build-out is not yet known, and is not planned, designed, or reasonably foreseeable, its impacts are not analyzed in the PEA.

PEA Figure 2-9 is the profile view of the initial build-out of the 70 kV substation. Figure 2-10 was updated in the Revised PEA to show the profile view of the 70 kV substation with the planned future distribution facilities. PEA Figures 2-9 and 2-10 have been updated again to include a speculative view of an ultimate arrangement including three future 70/21 kV transformers and associated 70 kV breakers, 21 kV breakers, and switches (Figures 2-9 and 2-10). Current technology is assumed for purposes of the illustration.

PEA Figure 2-9. 70 kV Substation Profile Viewpoints



**PEA Figure 2-10. 70 kV Substation Profile View**



- 70 kV Substation Components
- Future Distribution Components
- Speculative Ultimate Substation Components



## Chapter 3. Environmental Setting and Impacts Summary

### **Deficiency 3.1-1 (Aesthetics):**

*Please provide a visual simulation of the proposed Estrella substation at full-buildout (i.e., depicting all future components)*

### **Response:**

PEA Figure 3.1-7 provides a visual simulation of Estrella Substation from Key Observation Point (KOP) 1 looking northeast. PEA Figure 3.1-7c below provides a simulated view of the Speculative Ultimate Estrella Substation.

### **Deficiency 3.1-2 (Aesthetics):**

*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 visual analysis focuses on the foreground viewshed.*

### **Response:**

As described in PEA Section 3.1.2.2, Methodology, viewsheds are used in the Visual Sensitivity – Visual Change analysis to help characterize viewer exposure. The project viewshed is also described in the environmental setting for the visual analysis in PEA Section 3.1.3.3. The viewshed delineation identifies those areas from which the project may have a clear line of sight based on elevation modeling, and is a useful tool in defining the final area of analysis and facilitating the selection of KOPs. The Estrella PEA viewshed analysis was conducted in the following manner:

- Digital Elevation Model (DEM) data files from the National Elevation Dataset, with a resolution of 1/3 arc second (approximately 10 meters), converted to State Plane Feet, were joined into a mosaic with an extent expansive enough to include the viewshed for each distance to generate the three-dimensional (3-D) environment necessary for the viewshed delineation. The model is conservative and uses bare earth elevation that does not account for existing vegetation or structures that may obstruct views. The “Potentially Visible” area resulting from the analysis indicates which areas an observer may be able to see from the project area.
- An average of 5 feet in height was assumed for the “potentially visible” parameter (i.e., a viewer height of 5 feet zero inches was assumed for the average viewer; 5 feet was used to capture both a human standing as well as a human sitting in a vehicle).
- SWCA was provided information from the project proponents, which included the assumed heights of project facilities.
- Estrella Substation’s elevation was assumed using a feature class with ground elevations and heights for each component of the facility (e.g., fencing, interconnection structures, and other infrastructure).

**PEA Figure 3.1-7c. Key Observation Point 1: Looking Northeast – Simulated View of the Speculative Ultimate Estrella Substation**



- For the 230 kV interconnection towers and 70 kV power line poles, elevations were assumed using a feature class with ground elevations and structure heights for each pole.

Figures 3.1-3 and 3.1-2 are 2-mile and 5-mile viewshed delineations for Estrella Substation, and Figure 3.1-5 is the 2-mile viewshed delineation for the power line. The 2- and 5-mile viewshed figures are provided for general informational purposes, and because potential viewers can range beyond the foreground. The analysis does not focus on these broader viewsheds because the farther away a viewer is from the facilities, the less likely they are to see them. However, by illustrating the middle and background views on the viewshed figures, viewer groups outside of the foreground can refer to these figures when reviewing the project plans.

***Deficiency 3.3-1 (Air Quality):***

*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 provide the data required to complete the air quality analysis and update the analysis.*

***Response:***

Helicopter emissions were included in the CalEEMod analysis. There is not a specific “Helicopter” category in the CalEEMod air quality model; therefore, helicopter emissions were included under the category “Other General Construction Equipment.” Helicopter duration and use were overestimated in order to provide a conservative assessment of helicopter emissions and flexibility in their deployment. Helicopters may be used for pole installation for approximately 13 poles (refer to the construction notes in the Revised PEA GIS submittal for locations) and for pulling in the conductor sock line to facilitate conductor installation. CalEEMod conservatively assumed helicopter use for 2 hours a day, 6 days a week, for 16 weeks for pole installation, and up to 5 hours per day, 6 days a week, for 8 weeks for the new power line and 2 hours per day, 6 days a week, for 6 weeks for the reconductoring segment for conductor installation. In reality, helicopters would not typically be used every day during the construction period.

***Deficiency 3.3-2 (Air Quality):***

*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.*

***Response:***

The CalEEMod inputs do not compare directly to the equipment listed in the PEA and are set up very differently than a typical equipment list required per the CPUC PEA checklist:

1. CalEEMod uses categories of off-road equipment and on-road vehicle trips (i.e., worker and on-road equipment trips, vendor trips, and hauling trips) for its calculations. As an example, 1 water truck will be represented in CalEEMod as both 13 on-road vehicle trips per day while it is fetching water, and 1 on-site water truck while it is wetting the grounds.
2. The inputs to CalEEMod are also conservative and reflected a worst-case scenario. For example, the model assumed the overall construction schedule will be compressed to 7

months for a conservative air analysis when the construction timeframe for the noncompetitive bid components, such as the power line and reconductoring components, will likely take longer. If the same amount of construction work was evenly spread out over a longer period of time, the amount of work being completed each week would decrease. A reduced construction daily workload would require use of less construction equipment and fewer workers would be necessary to complete the work. Reduced daily construction equipment usage and worker commuting quantities would result in a reduction of air emissions due to construction on a daily and quarterly basis. Extending the duration of construction would reduce the project's air emissions further beneath SLOAPCD daily and quarterly significance thresholds. Thus, the impact of the project's daily and quarterly air emissions would be reduced by extending the construction schedule.

Generators are included in PEA Table 2-7. Generators were included in the CalEEMod inputs under the "230 kV Substation Transformer" and "Equipment Delivery and Installation" phases of construction and were conservatively assumed to be used for 5 hours per day, 6 days a week, for 5 weeks. In reality, generators would be used intermittently for short periods.

Concrete trucks should be included in Table 2-7 under the "230 kV Substation Foundation Construction" phase and the "70 kV Substation Foundation Construction" phase (see response to Deficiency 2-16).

***Deficiency 3.4-1 (Biological Resources):***

*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.*

***Response:***

As described in PEA Chapter 3.4, biological databases (USFWS, CNPS, and CNDDDB) were queried for records of special-status plants, natural communities, and wildlife that might have potential to occur in the project area. Database searches and literature review were followed by reconnaissance-level surveys of the biological study area (BSA). Reconnaissance surveys were conducted April 20–22 and April 27–30, 2016 to determine where suitable habitat was present for vernal pool fairy shrimp, golden eagle, burrowing owl, and least Bell's vireo, among others.

***Vernal Pool Fairy Shrimp***

Three CNDDDB occurrences for vernal pool fairy shrimp have been recorded within approximately 5 miles of the project between 2001 and 2005. The closest occurrences were recorded in 2005, approximately 0.4 mile west of the project site near the intersection of Niblick Road and Spring Street in small depressions and pools along a gravel access road, and in 2001, approximately 0.5 mile north of Estrella Substation and just south of SR-46 in a vernal pool. A wetland delineation of the project alignment and a 250-foot buffer on each side of the alignment was conducted in April 2017 (see Attachment 3.4-1, Estrella Project Preliminary Delineation of Waters of the US). The delineation mapped all waters and wetlands of the U.S. within the corridor and identified vernal pool fairy shrimp habitat. One palustrine emergent wetland was identified that could provide suitable habitat for vernal pool fairy shrimp. The project was

designed to avoid direct and indirect impacts to this feature by moving pole locations and ensuring no project access that would cause direct or indirect impacts. Protocol surveys were not conducted for the species, as the features have been avoided by project design.

#### *Least Bell's Vireo*

Based on database searches, literature reviews, and field surveys 22 wildlife species, including least Bell's vireo, were determined to be unlikely to occur or absent from the project area based on the lack of suitable habitat or because the project area is located outside of the species range. Suitable least Bell's vireo habitat in the BSA is limited to the Salinas River riparian corridor. The riparian corridor is bounded to the east by River Road, which marks the end of the lateral width of the riparian corridor. The portion of the existing San Miguel-Paso Robles 70 kV line that will be recondored is approximately 200 feet further east of River Road, which means the recondoring work will occur well outside of the least Bell's vireo habitat. In addition, SWCA conducted eight protocol-level surveys for least Bell's vireo in 2012 along the Salinas River riparian corridor along the northern portion of the reconductor segment. In addition, weekly focused surveys were conducted in this location in 2013 and 2014. No least Bell's vireo were detected during the eight protocol-level surveys or weekly focused surveys (SWCA 2012; SWCA 2016). Due to the distance between suitable least Bell's vireo habitat and the project site, and the negative findings from previous survey efforts, protocol surveys were not warranted for this project.

#### *Golden Eagle and Burrowing Owl*

One golden eagle CNDDDB occurrence has been recorded approximately 0.2 mile north of the project in 2006 on the west side of Huerhuero Creek in a blue oak tree, between Golden Hill Road and Airport Road. No burrowing owl CNDDDB occurrences have been recorded within 5 miles of the project. In addition, no golden eagle or burrowing owl individuals or their nests were observed during reconnaissance-level field surveys. Golden eagles, however, are known to nest within the vicinity of the project and burrowing owls have potential to occur in grassland and blue oak woodland habitat observed throughout the BSA. Because these are migratory species, focused surveys would not have provided useful information as to whether these species will be present in the BSA at the commencement of construction. Instead, pre-construction nesting bird surveys will be conducted prior to the start of construction (APM BIO-2). Nest detection surveys will correspond with a standard buffer for individual species in accordance with the species-specific buffers set forth in the project proponent's *Nesting Birds: Specific Buffers for PG&E Activities*.

#### **References:**

- SWCA Environmental Consultants (SWCA). 2012. *Least Bell's Vireo Survey Report for the El Paso de Robles Wastewater Treatment Plant Upgrade Project, Paso Robles, San Luis Obispo County, California*. Prepared for the City of Paso Robles Public Works Department. August 2012.
- SWCA Environmental Consultants (SWCA). 2016. *Biological Assessment for the City of Paso Robles Tertiary Treatment Facilities Project*. Prepared for the City of Paso Robles Public Works Department. January 2016.

**Deficiency 3.4-2 (Biological Resources):**

*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.*

**Response:**

Construction of Estrella Substation will result in the permanent loss of approximately 15 acres of suitable habitat. Although Estrella Substation is located in an active vineyard, a focused kit fox survey was conducted to assess the quality of habitat at and around Estrella Substation (including the 230 kV interconnection). Considering that the new 70 kV power line segment and the reconductoring work consists of constructing/modifying overhead utility lines where permanent impacts to habitat are minimal and primarily adjacent to road shoulders, they will not create migration barriers. Accordingly, focused San Joaquin kit fox surveys were not conducted along the power line portion of the project. Pre-construction survey(s) for kit fox will be conducted immediately prior to construction and in the event kit fox or dens are encountered during the survey(s) or during construction, the project proponents will coordinate with USFWS and CDFW in the application of avoidance and minimization measures (APM BIO-1).

**Deficiency 3.4-3 (Biological Resources):**

*Please indicate where and why nonnative grasslands are subject to frequent mowing or grading.*

**Response:**

The PEA states on page 3.4-14 that several areas of nonnative grasslands throughout the project area are subject to frequent mowing or grading. These activities are from current landowners and are evident on aerial imagery. Observations during the field surveys also showed that fallow agricultural fields and grassland areas around rural and urban residential developments are subject to mowing and grading. Such areas include but are not limited to private lots along Union Road, the grassland habitat immediately north of State Route 46, and the vacant lots along the western edge of Wisteria Lane. The frequency and location of mowing and grading operations likely vary annually. Mowing and grading is presumably implemented as a fire prevention measure.

**Deficiency 3.4-4 (Biological Resources):**

*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.*

**Response:**

As stated in the response to Deficiency 5 for the PEA Deficiency Letter No. 1, wetlands and waters were preliminarily mapped during the reconnaissance-level field surveys in April 2016. A formal delineation was conducted in April 2017 to identify potential wetlands and waters of the United States. All potentially jurisdictional features within 500 feet of the project were

analyzed and mapped using a Trimble Geo XT Global Positioning System unit that is capable of sub-meter accuracy. The wetland delineation report can be provided to the CPUC upon request. The project has been designed to avoid all potentially jurisdictional wetlands and waters identified during the field investigation.

***Deficiency 3.4-5 (Biological Resources):***

*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*

***Response:***

As noted in the response to Deficiency 3.4-1 above, one wetland was determined to provide potential habitat for vernal pool fairy shrimp. Upland areas adjacent to this habitat can indirectly affect the wetland habitat through a loss of watershed, human intrusion, introduced species, or pollution. In cases when the reaches of these effects cannot be determined, all habitat within 250 feet could be considered indirectly affected. After conducting the wetland delineation, PG&E designed the new 70 kV power line spanning this seasonal wetland to ensure that the location of the two poles that would be placed nearest to this feature will not indirectly affect it. The wetland is bound by an adjacent road to the north, and the properties on both the east and west side of the wetland have been graded and leveled for vineyard operations, altering their hydrology. PG&E has engineered the poles east and west of the wetland to be placed along vineyard roads to reduce the project's indirect and direct impacts to the hydrology of the seasonal wetland. Because the existing hydrological impacts and alteration of the roads have already occurred, PG&E will not cause further degradation of the hydrology of these altered areas. The location of this upland habitat and pole placements is depicted on Exhibit 3.4-5, Suitable Vernal Pool Fairy Shrimp Upland Habitat Map.

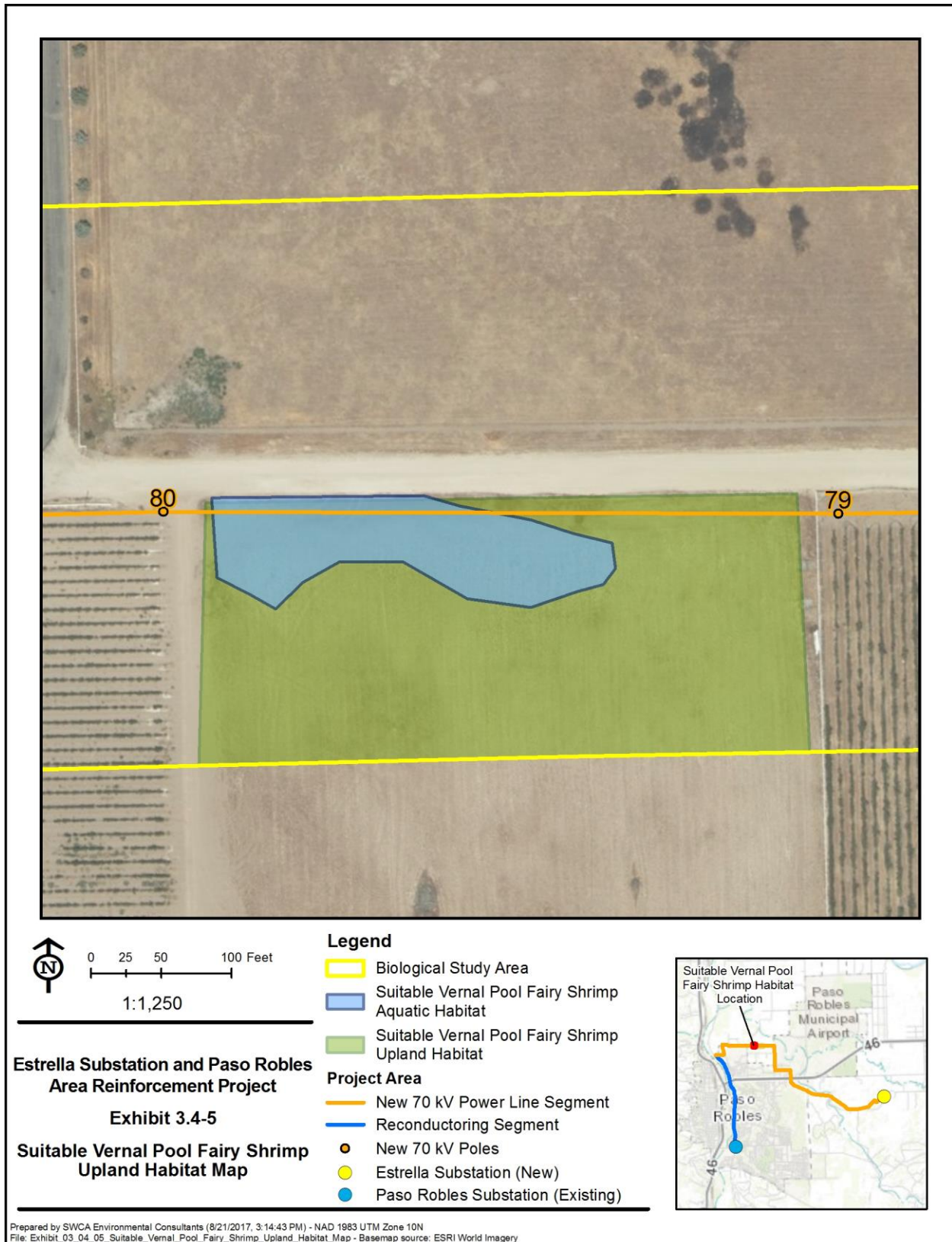
***Deficiency 3.4-6 (Biological Resources):***

*Please indicate whether the "Nesting Birds: Specific Buffers for PG&E Activities" has been approved by CDFW and USFWS.*

***Response:***

The *Nesting Birds: Specific Buffers for PG&E Activities* were developed and sent to both USFWS and CDFW for review and discussion. Though neither agency can approve the guidelines, PG&E has been successfully implementing these guidelines for nesting bird species prior to and following the USFWS and CDFW review date.

**Exhibit 3.4-5. Suitable Vernal Pool Fairy Shrimp Upland Habitat Map**





**Deficiency 3.4-7 (Biological Resources):**

*Please indicate on a GIS-based map the potential location of overland travel and/or staging outside of the substation footprint.*

**Response:**

The GIS data provided for the Revised PEA in response to Deficiency Letter No. 1 shows the location of the potential overland travel and/or staging outside of the substation footprint. Overland routes are called “new unpaved” in the GIS data (see response to PEA Deficiency Letter No. 2, GIS-2).

**Deficiency 3.5-1 (Cultural Resources):**

*Please modify Appendix F, Archaeological Survey Coverage Maps, 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.*

**Response:**

Attachment 3.5-1 provides updated Archaeological Survey Coverage Maps originally provided as Appendix F to the power line cultural resources technical report.

**Deficiency 3.10-1 (Land Use and Planning):**

*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.*

**Response:**

All of the 16 wineries were informed of the project. Wineries either directly received invitations to one or more open houses, or received information through their membership in either the Paso Robles Wine Country Alliance or Paso Robles Chamber of Commerce. Paso Robles Wine Country Alliance and Paso Robles Chamber of Commerce each met with the Estrella project team. The primary concern of participants at the Paso Robles Wine Country Alliance meeting was the aesthetic/visual impact to tasting rooms, with impacts to vineyards being secondary. There were no specific concerns logged from any of the 16 wineries, and the Paso Robles Wine Country Alliance provided a letter of support for the proposed route.

**Deficiency 3.12-1 (Noise):**

*Helicopter is not mentioned during construction noise modeling, but it is mentioned in text below Table 3.12-11 and in the 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 to include helicopters.*

**Response:**

As described in the PEA in Section 3.12.2.2, Methodology, the construction noise level was estimated using the FHWA Roadway Construction Noise Model (RCNM). The maximum noise levels presented at the nearest sensitive receptor are based on a roster of likely construction equipment operating and average distance of construction equipment to the sensitive receptor. Table 3.12-8 lists the equipment used in the construction noise level estimate for Estrella Substation, and Table 3.12-10 lists the equipment used in the construction noise level estimate for the power line. Noise that will be short term and intermittent, such as a helicopter, has little effect on the hourly average noise level estimates.

A discussion of helicopter noise is presented on page 3.12-19 and 3.12-20 of the PEA: “A large single-rotor helicopter such as the Bell 214 produces a maximum sound level of about 79 dBA at a distance of 500 feet under level flight conditions (Nelson 1987). This corresponds to a sound level of about 93 dBA at 100 feet. A small single-rotor helicopter such as the Hughes 500 produces a maximum sound level of 75 dBA at a distance of 500 feet under level flight conditions (Nelson 1987). This corresponds to a sound level of about 89 dBA at 100 feet. Helicopters could produce noise in the range of 89 to 93 dBA in the vicinity of residences that are located as close as 100 feet to helicopter landing zones. Noise from helicopters operating above pole installation locations could be as close as about 250 feet to residences. At this distance, helicopter noise levels could be in the range of about 83 to 87 dBA.”

Helicopter noise impacts resulting from construction are assessed on page 3.12-20 of the PEA. Helicopter construction noise occurs intermittently during construction and only for short periods. The project is also exempt from local land use and zoning regulations and discretionary permitting, including local noise ordinances. APM NOI-1 (Construction Schedule Limits), APM AG-1 (Coordinate with Landowners, Farmers, and Ranchers Regarding Construction Activities), and APM NOI-2 (Noise Minimization) will be implemented and the project will not expose persons to or generate noise levels in excess of applicable standards. Any increases in ambient noise levels in the project vicinity during construction will be short term, intermittent, and temporary. Therefore, impacts from construction will be less than significant.

**Deficiency 3.12-2 (Noise):**

*Concrete trucks are not listed in Table 3.12-8 or 3.12-10.*

**Response:**

Concrete trucks are listed as the second line in PEA Table 3.12-10, Power Line Construction Equipment Roster Used for Noise Analysis. In the CalEEMod air model, all concrete trucks were included under the 70 kV power line component as the schedule for the power line foundation work and substation foundation work overlaps (see response to Deficiency 2-16). PEA Table 3.12-8 has been updated to include concrete trucks. The noise level estimate for construction of Estrella Substation was also updated to include concrete truck use. The updated results of the RCNM model run, which is based on when the maximum quantity of construction equipment would be used at the substation site, is shown in Table 3.12-9. During construction of Estrella Substation, there will be an approximately 17.9 dBA increase in ambient daytime noise levels at the residence nearest the substation with the addition of concrete trucks. As stated in the PEA,

Chapter 3.12 Noise the previous ambient daytime noise level increase was 17.4 dBA. The 0.5 dBA change with the addition of concrete trucks will be imperceptible.

**PEA Table 3.12-8. Estrella Substation Construction Equipment Roster  
 Used for Noise Analysis**

<b>Equipment Type</b>	<b>Quantity</b>	<b>Typical Maximum Noise Levels (dBA at 50 feet)</b>
Bulldozer	4	82
Hole Digger	2	84
Crane	4	81
Bucket Truck	2	75
Forklift	3	79
Grader	1	85
2-Ton Truck	2	77
Water Truck	3	75
Pickup Truck	8	75
Flat Bed Truck	2	74
<u>Concrete Truck</u>	<u>3</u>	<u>79</u>
Bobcat	1	81
Line Truck	2	75
Trencher	2	81

**PEA Table 3.12-9. Calculated Noise Levels at Estrella Substation Due to Construction**

	Calculated L <sub>max</sub> (dBA)	Calculated L <sub>eq</sub> Total (dBA)	Community Noise Level (dBA)	
			L <sub>day</sub>	L <sub>night</sub>
Ambient Baseline Noise Level <sup>1</sup>	--	--	49.4	43.6
Noise Level at Nearest Residence <sup>2</sup>	63.7	<del>66.7</del> <u>67.3</u>	<del>66.8</del> <u>67.3</u>	<del>66.7</del> <u>67.3</u>
Noise Level Attenuated to 2,640 feet (0.5 mile)	50.5	<del>55.6</del> <u>56.0</u>	<del>56.5</del> <u>56.9</u>	<del>55.9</del> <u>56.2</u>

<sup>1</sup> Baseline Noise Level obtained as average of the four noise monitoring location results from the Estrella Substation Baseline Community Noise Survey, located in Appendix K.

<sup>2</sup> A seasonal worker residence is the closest residence to Estrella Substation. The residence is located approximately 584 feet from the center of the 70 kV substation and approximately 1,144 feet from the center of the 230 kV substation.

**Deficiency 3.12-3 (Noise):**

*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.*

**Response:**

Table 3.12-8 from Chapter 3.12 Noise has been updated to reflect the concrete trucks that will be used during construction at Estrella Substation and Table 3.12-9 has been updated to reflect the corresponding changes to the noise levels at Estrella Substation as a result of adding the concrete trucks (see response to Deficiency 3.12-2). Table 3.12-8 below and Table 3.12-10 from the PEA now contain accurate lists of the types of equipment that will be used during construction. Equipment used in the CalEEMod air model represents a worst-case scenario of construction equipment as described in Deficiency 3.3-2 and is not meant to directly correlate to the equipment lists reflective of the types of equipment provided in Chapter 2, Project Description or Chapter 3.12 Noise.

As shown in Table 3.12-9, noise levels have changed slightly with the additions of the concrete trucks. However this change results in an imperceptible 0.5 dBA increase in ambient daytime noise levels at the residence nearest the substation. As stated in the PEA, “During construction of Estrella Substation, there will be an approximately 17.4 dBA increase in ambient daytime noise levels at the residence nearest the substation.” With the changes made, this increases only slightly to a 17.9 dBA increase in ambient noise levels.

**Deficiency 3.16-1 (Transportation and Traffic):**

*Table 3.16-4 does not present capacity utilization (it shows level of service). Please revise the table to include percentage capacity utilization.*

**Response:**

PEA Tables 3.16-3 and 3.16-4 have been updated to include existing capacity utilization.

**PEA Table 3.16-3. Regional Roadway Utilization**

Roadway	Segment	ADT	Existing LOS	Capacity Utilization
US 101	Spring Street to SR-46 (East)	23,290	A	25%
	SR-46 (East) to 13th Street	48,990	B	44%
	Niblick Street to SR-46 (West)	78,150	D	80%
	SR-46 (West) to Main Street	66,660	C	66%
SR-46	US 101 to Union Road	30,320	B	59%
	Union Road to Airport Road	23,990	B	34%
	Airport Road to Dry Creek Road	20,480	C	54%

Source: City of El Paso de Robles 2011.

**PEA Table 3.16-4. Local Roadway Utilization**

Roadway	Segment	ADT	Existing LOS	Capacity Utilization
Niblick Road	Spring Street to South River Road	31,430	D	80%
	South River Road to Melody Drive	16,960	A	52%
	Melody Drive to Creston Road	13,970	A	38%
River Road	Serenade Road to Niblick Road	9,670	A	34%
	Niblick Road to Navajo Road	12,900	A	36%
	Union Road to SR-46 (East)	1,920	A	20%
	SR-46 (East) to North City Limit	30	A	9%
Golden Hill Road	Dallons Drive to SR-46 (East)	6,930	C	13%
	Creston Road to Rolling Hill Road	7,950	C	43%
	Rolling Hill Road to Union Road	10,540	C	51%
	Union Road to SR-46 (East)	7,500	C	40%

**PEA Table 3.16-4. Local Roadway Utilization**

Roadway	Segment	ADT	Existing LOS	Capacity Utilization
Union Road	North River Road to Kleck Road	5,650	C	26%
	Kleck Road to Golden Hill Road	4,670	C	30%
	Golden Hill Road to SR-46 (East)	5,020	C	36%
	SR-46 East to East City Limit	1,530	C	15%
Buena Vista Drive	SR-46 (East) to Experimental Station Road	4,820	C	20%
	North of Cuesta College	2,730	C	12%

Source: City of El Paso de Robles 2011.

**Deficiency 3.16-2 (Transportation and Traffic):**

*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.*

**Response:**

The City of Paso Robles adopted the *Transportation Impact Analysis Guidelines City of El Paso De Robles*, dated July 2013, as an implementation of an action item of the 2011 Circulation Element of the General Plan. The guidelines are intended for new development or transportation projects that would result in permanent, new trip generation (see page 3, Determining the Need for a Transportation Analysis). As stated on page 3.16-19 of the PEA, effects on traffic resulting from operations and maintenance of the project will be negligible and no long-term operational impacts on traffic load or capacity will occur as a result of the project. Therefore, a traffic impact study is not needed.

In addition, as part of the PEA planning process, SWCA contacted City staff on November 21, 2016 and asked if there are any special measures that the City would implement related to construction traffic and transportation impacts. John Falkenstien, City Engineer, replied that special measures are addressed during the encroachment permit process and no special measures are anticipated as long as no lane closures are proposed for Niblick Road.

**Deficiency 3.16-3 (Transportation and Traffic):**

*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.*

**Response:**

Table 2-9 in the PEA, Preliminary Construction Activity and Schedule, provides durations for tasks by month and year per the PEA checklist. As stated in the footnote to Table 2-9, the dates

are provided for duration estimates. PEA Tables 3.16-6 and Table 3.16-8 have been updated to be consistent with the CalEEMod input, which uses a more detailed schedule and list of tasks than provided in PEA Table 2-9 and conservatively estimated worker and truck trips. The updated table provides a worst-case analysis for maximum trips as opposed to a typical maximum.

As stated in Chapter 3.16, Transportation and Traffic, all local and regional roadways in the project area are under their capacity utilization and thresholds of significance. Using the CalEEMod worst-case estimates, even if all construction phases were to occur simultaneously, the construction of Estrella Substation will result in a maximum of 926 one-way vehicle trips per day (i.e., 463 maximum daily round-trips) contributed to average daily traffic. With the addition of 926 one-way vehicle trips, the capacity utilization on local and regional roadways will still remain below 100%, due to the large capacity of these roadways. Additionally, the LOS of the affected roadways during construction will remain the same as existing conditions.

**PEA Table 3.16-6. Estimated Daily Worker and Truck Trips for Construction of Estrella Substation**

Construction Phase	Daily Worker Round-Trips	Daily Truck Round-Trips	Number of Days	Maximum Number of Daily Round-Trips
<b>230 kV Substation</b>				
Access Roads	10	<del>618</del>	12	<del>4628</del>
Site Prep / Grading / Entrance Road / Culverts / Drainage	10	<del>4518</del>	18	<del>2528</del>
Fence and Gate Installation	5	<del>2-445-19</del>	12	<del>4924</del>
Foundation Construction	2-12	<del>4-462-20</del>	36	<del>2832</del>
Ground Grid / Conduit Installation	5	<del>4-441-15</del>	24	<del>4920</del>
Steel / Bus Erection	5	<del>2-452-16</del>	24	<del>2021</del>
Install Yard Rock	8	<del>9-2210-23</del>	18	<del>3031</del>
Transformer & Equipment Delivery and Installation	5-8	<del>4-443-15</del>	30	<del>2223</del>
Control Enclosure Delivery and Installation	6	1	12	7
<del>Remaining</del> Equipment Delivery and Installation	2-5	1-14	24	19
Cable Installation and Termination	5	1	12	6
Testing and Commissioning	2-5	<del>4-443-16</del>	30	<del>4921</del>
Cleanup and Restoration	3	<del>4-442-15</del>	18	<del>4718</del>

**PEA Table 3.16-6. Estimated Daily Worker and Truck Trips for Construction of Estrella Substation**

Construction Phase	Daily Worker Round-Trips	Daily Truck Round-Trips	Number of Days	Maximum Number of Daily Round-Trips
<b>70 kV Substation</b>				
<u>Site Work Area Preparation / Mobilization</u>	6	<u>3-45-6</u>	12	<u>4012</u>
Foundation Construction	<u>4-102-10</u>	<u>5-66-12</u>	30	<u>4622</u>
Ground Grid / Conduit Installation	5	<u>1-42-5</u>	24	<u>910</u>
Steel / Bus Erection	5	<u>1-43-6</u>	24	<u>911</u>
<u>Install Rock Yard</u>	<u>6</u>	<u>8</u>	<u>18</u>	<u>14</u>
Equipment Delivery and Installation	6	<u>4-56-7</u>	18	<u>4113</u>
Control Enclosure Delivery and Installation	3-5	<u>21-2</u>	18	7
Cable Installation and Termination	3-5	<u>1-23</u>	18	<u>78</u>
<u>Testing and Commissioning</u>	<u>5</u>	<u>2</u>	<u>18</u>	<u>7</u>
Install Rock Yard	6	8	18	14
<u>Cleanup and Restoration</u>	<u>4</u>	<u>2</u>	<u>12</u>	<u>6</u>
Testing and Commissioning	5	<u>42</u>	18	<u>67</u>
<b>230 kV Transmission Interconnection</b>				
<u>Site Work Area Preparation / Mobilization</u>	7-8	<u>69</u>	24	<u>4417</u>
<u>Foundation</u> Tower Installation and/ Removal of <u>One</u> Tower	10	<u>6-711</u>	48	<u>4721</u>
Conductor and Telecommunications <u>Installation</u>	15	<u>610</u>	24	<u>2125</u>
<u>Clean up and</u> Restoration	5	<u>57</u>	6	<u>4012</u>



**PEA Table 3.16-8. Estimated Daily Worker and Truck Trips for Construction of the Power Line Route**

Construction Phase	Daily Worker Round-Trips	Daily Truck Round-Trips	Number of Days	Maximum Number of Daily Round-Trips
<b>70 kV Power Line Segment</b>				
Site <u>Work Area</u> Preparation / Mobilization	6	<u>59</u>	24	<u>1415</u>
Pole <u>Installation / Transfer Tower Installation</u>	9	<u>6-816-20</u>	72	<u>4729</u>
Conductor Installation	9	<u>512</u>	48	<u>4421</u>
Cleanup and <u>Site</u> Restoration	6	<u>46</u>	12	<u>4012</u>
<b>Reconductoring Segment</b>				
<u>Site Work Area Preparation Mobilization Site Development</u>	6	<u>58</u>	24	<u>1414</u>
<u>Pole Installation / Transfer / Distribution / Removal Conductor Spreading / Pole Installation / Transfer Distribution / Pole Removal</u>	9	<u>717</u>	72	<u>4626</u>
Conductor Installation	9	<u>510</u>	64	<u>4419</u>
Cleanup and Site Restoration	6	<u>35</u>	12	<u>911</u>

**Deficiency 3.16-4 (Transportation and Traffic):**

*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.*

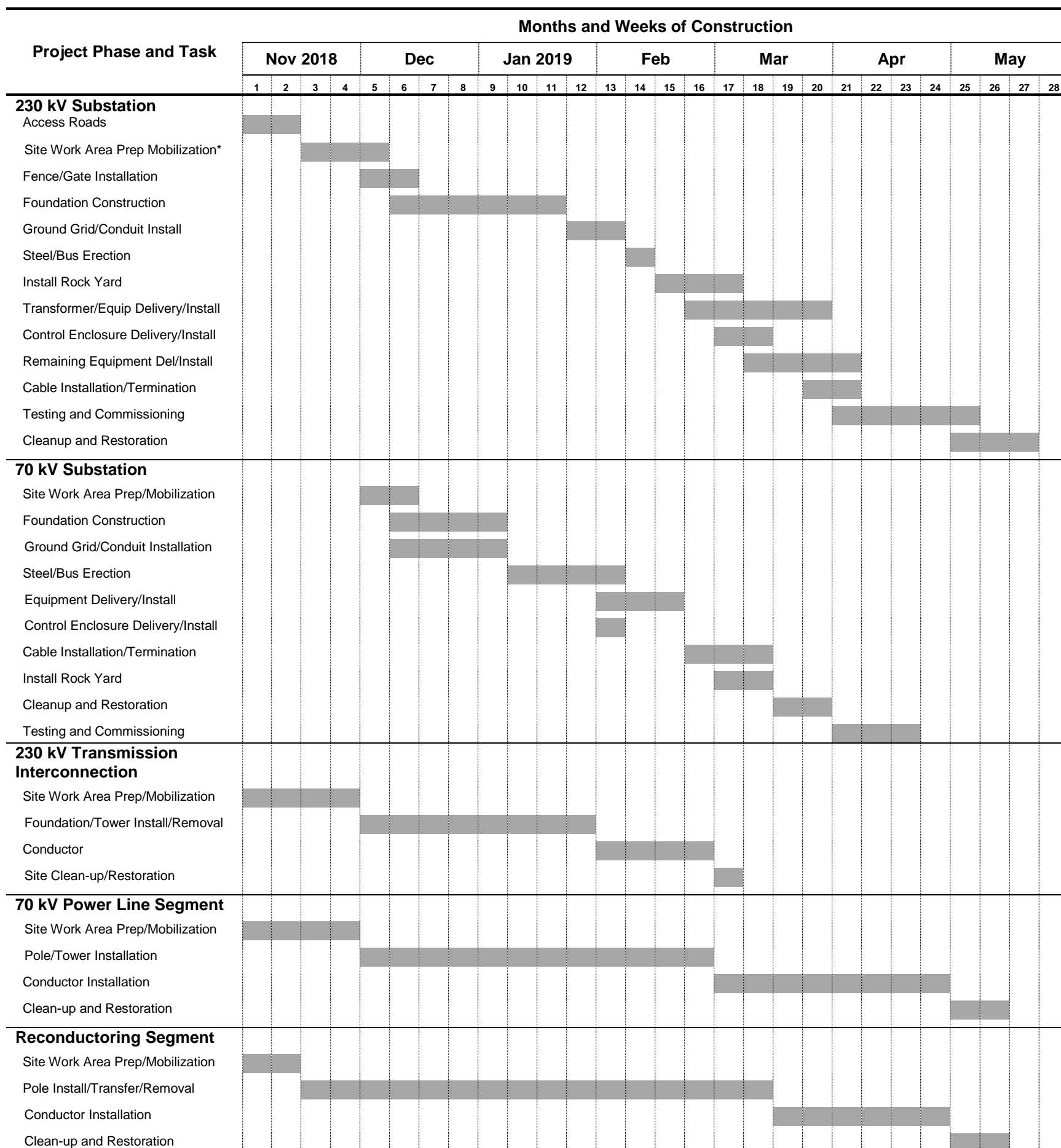
**Response:**

See response to Deficiency 3.16-3. PEA Tables 3.16-6 and 3.16-8, Estimated Daily Worker and Truck Trips for Construction of Estrella Substation and the Power Line provide an updated schedule of activities and generated trips. Exhibit 3.16-3, Preliminary Construction Activity Timeline, is provided below and illustrates the tasks that are simultaneous.

Trips generated by the simultaneous tasks were already added together in the PEA analysis. Trips for construction of Estrella Substation include all phases of substation construction. The generation of trips for the 5-week long transformer installation phase coincides with other phases of the 230 kV substation, 70 kV substation, and 230 kV transmission interconnection construction.

Vehicle trips are now consistent with the CalEEMod input. These numbers are more conservative than the numbers used for the Revised PEA transportation and traffic impact analysis. The revisions to the numbers of vehicle trips do not change the results of impact assessment. The impacts to area roadways will be less than significant.

Exhibit 3.16-3. Preliminary Construction Activity Timeline



\*Includes substation site preparation, grading, entrance road, culverts, and mobilization

**Deficiency 3.16-5 (Transportation and Traffic):**

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.

**Response:**

The PEA analyzed changes to both LOS for roadways within the County and capacity utilization for roadways in the City as a result of the proposed project. Because the changes to capacity utilization were so minimal (typically less than one percent), it was not originally included in the impact tables. Table 3.16-7 has been updated to include capacity utilization during the construction of the Estrella Substation. Similarly, Table 3.16-9 has been updated for the power line. All of the segments in the tables are located in the City of Paso Robles, with the exception of US 101 and SR-46, which are under the California Department of Transportation’s jurisdiction. Roadway data for portions of roadway that are located in unincorporated portions of the County are expected to be the same as segments located within City limits as they part of the same road and located within close proximity. For example, roadway data for Union Road (SR-46 to East City Limit) is expected to be the same for portions of roadway to the east that are located in unincorporated portions of the County. Therefore, no additional data or roadway data is necessary for the analysis. See response to CPUC Item 3.16-8.

**PEA Table 3.16-7. LOS and Capacity Utilization of Affected Roadways During Construction of Estrella Substation**

Roadway	Existing ADT	Existing LOS	<u>Existing Capacity Utilization</u>	ADT During Construction	LOS During Construction	<u>Capacity Utilization During Construction</u>
US 101 (SR-46 East to 13 <sup>th</sup> Street)	48,990	B	<u>44%</u>	<u>49,12249,176</u>	B	<u>44%</u>
SR-46 (US 101 to Union Road)	30,320	C	<u>59%</u>	<u>30,42230,506</u>	C	<u>59%</u>
Union Road (SR-46 to East City Limit)	1,530	C	<u>15%</u>	<u>1,6521,716</u>	C	<u>16%</u>

**PEA Table 3.16-9. LOS and Capacity Utilization of Affected Roadways During Construction of Power Line Route**

Roadway	Existing ADT	Existing LOS	<u>Existing Capacity Utilization</u>	ADT During Construction	LOS During Construction	<u>Capacity Utilization During Construction</u>
Golden Hill Road (Dallons Drive to SR-46)	6,930	C	<u>13%</u>	<u>6,9967,086</u>	C	<u>13%</u>
US 101 (SR-46 East to 13 <sup>th</sup> Street)	48,990	C	<u>44%</u>	<u>49,05649,146</u>	C	<u>44%</u>
SR-46 (US 101 to Union Road)	30,320	C	<u>59%</u>	<u>30,38630,476</u>	C	<u>59%</u>
Buena Vista Drive (SR-46 to Experimental Station Road)	4,820	C	<u>20%</u>	<u>4,8864,976</u>	C	<u>20%</u>
Niblick Road (Spring Street to South River Road)	31,430	D	<u>80%</u>	<u>31,49631,586</u>	D	<u>80%</u>
Union Road (SR-46 to East City Limit)	1,530	C	<u>15%</u>	<u>1,5961,686</u>	C	<u>16%</u>
River Road (Serenade Road to Niblick Road)	9,670	A	<u>34%</u>	<u>9,7369,826</u>	A	<u>34%</u>
River Road (Niblick Road to Navajo Road)	12,900	A	<u>36%</u>	<u>12,96613,056</u>	A	<u>36%</u>
River Road (Union Road to SR-46 (East))	1,920	A	<u>20%</u>	<u>1,9862,076</u>	A	<u>21%</u>
River Road (SR-46 to North City Limit)	30	A	<u>9%</u>	<u>96186</u>	A	<u>56%</u>

**Deficiency 3.16-6 (Transportation and Traffic):**

*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.*

**Response:**

The roads listed in the PEA are the primary arterials, freeways, and expressways in the project area that would be used for general project access. Other, secondary roadways that could be used for individual pole and work area access include, but are not limited to, Riverglen Drive, Via Carnelia, Via Magnolia, Cary Street, Penman Springs Road, Clubhouse Drive, Kleck Road, Wisteria Lane, Danley Court, Kit Fox Lane, Rafter Way, Montebello Oaks Drive, Combine Street, Tractor Street, Germaine Way, Alameda Drive, Robie Court, Traditions Loop, Palo Alto Court, River Oaks Drive, Vista Oaks Way, Via Fuchsia, Via Manzanita, Via Promesa, Creston Road, Navajo Avenue, and Cheyenne Drive.

**Deficiency 3.16-7 (Transportation and Traffic):**

*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 map.*

**Response:**

Roadways that may potentially be affected by temporary road and lane closures for construction of the power line include: Union Road (temporary crossing structure), SR-46 (temporary crossing structure), Germaine Way (temporary crossing structure), Engine Avenue (temporary crossing structure), Buena Vista Drive (temporary crossing structure), River Oaks Drive (temporary crossing structure), Via Magnolia (temporary crossing structure), Via Camelia (temporary crossing structure), El Dorado Court (temporary crossing structure), Via Promesa (temporary crossing structure), Union Road (temporary crossing structure), Creston Road (temporary crossing structure), Navajo Avenue (temporary crossing structure), and Cary Street (temporary crossing structure), River Road (crane access), Cheyenne Drive (crane access), and Golden Hill Road (crane access).

**Deficiency 3.17-1 (Utilities and Service Systems):**

*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?*

**Response:**

NEET West and PG&E do not plan to disturb stormwater facilities, but if any storm drains, culverts, V-ditches, or other public facilities are inadvertently impacted, they will be restored.

## **Chapter 4. Alternatives**

### ***Deficiency 4-1:***

*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.*

### ***Response:***

The California Independent System Operator (CAISO) Functional Specifications for the Estrella Substation Project state that “the scope of this project is to construct a new 230/70 kV substation, Estrella, approximately 5 miles east of the existing Paso Robles Substation. The Estrella Substation would also be located relatively close to the Morro Bay-Gates and Templeton-Gates 230 kV transmission corridor.” Based on this description, NEET West began locating parcels along the 230 kV transmission corridor that met the above description provided by CAISO. As stated in the PEA, this initial scope resulted in the identification of approximately 60 potential parcels that met the specifications for proximity to the existing Paso Robles Substation and minimum size and topography suitable for substation development.

Shortly after the Functional Specifications were provided, CAISO compiled a Transmission Competitive Solicitation Questions/Answer Matrix from the questions posed by developers. On May 28, 2014, CAISO updated the description of the preferred substation location to state, “the distribution interconnection point for Estrella Substation should be within a 2.2-mile radius from the intersection of Highway 46 and the Morro Bay-Gates and Templeton-Gates 230 kV Transmission corridor, east of Paso Robles.” NEET West subsequently mapped the new location, and limited the targeted parcels to only those along the 230 kV transmission corridor and inside/adjacent to the 2.2-mile radius identified by CAISO. As stated in the PEA, NEET West examined a geographic area bounded by Union Road to the south and just north of Estrella Road to the north for sites potentially suitable for the Estrella Substation. Figure 3 in the updated Appendix G to the PEA illustrates the 2.2-mile radius identified by CAISO.

In addition to CAISO’s pre-determined geographical range, NEET West searched for parcels that were centered along the existing 230 kV transmission line corridor to minimize the length of the 230 kV transmission interconnection (loop-in) from the new substation to the existing 230 kV circuits. Additionally, potential substation sites needed to be available for outright purchase, and of the size and topography necessary to support the substation design. Lastly, due to reliability issues in crossing an existing 500 kV transmission line, NEET West focused on potential sites that were located on the east side of the 230/500 kV transmission corridor to avoid crossing the existing 500 kV transmission line. As indicated in the PEA, Chapter 4, Alternatives, there were approximately 19 parcels identified along this corridor that contained potential sites for the Estrella Substation as shown in Exhibit 4-1. At this point, NEET West secured a land agent who began outreach efforts with landowners. This is part of the “outreach effort” that was referred to in the PEA, Chapter 4, Alternatives.

A desktop critical issues analysis was conducted while the NEET West land agent and developer made contact with the landowners on the list of parcels. As part of this effort, subject matter experts from the development, engineering, and environmental teams also conducted site visits to screen the 19 parcels and identify high level constraints based on field conditions. Parcels were removed from the list when a landowner indicated they were not interested in selling a portion of their land, or when it was clear that the parcel was not ideal for hosting a substation from a constructability or land use standpoint. In some cases, the parcels were too close to a private airstrip or had significant slope/terrain complications. In other cases, the dimensions required for the substation could not fit easily into the existing parcel dimensions, or the remaining parcel size after selling a portion for the substation was not compliant with the Subdivision Map Act. In other cases, the presence of residences eliminated the parcel from the priority parcel list.

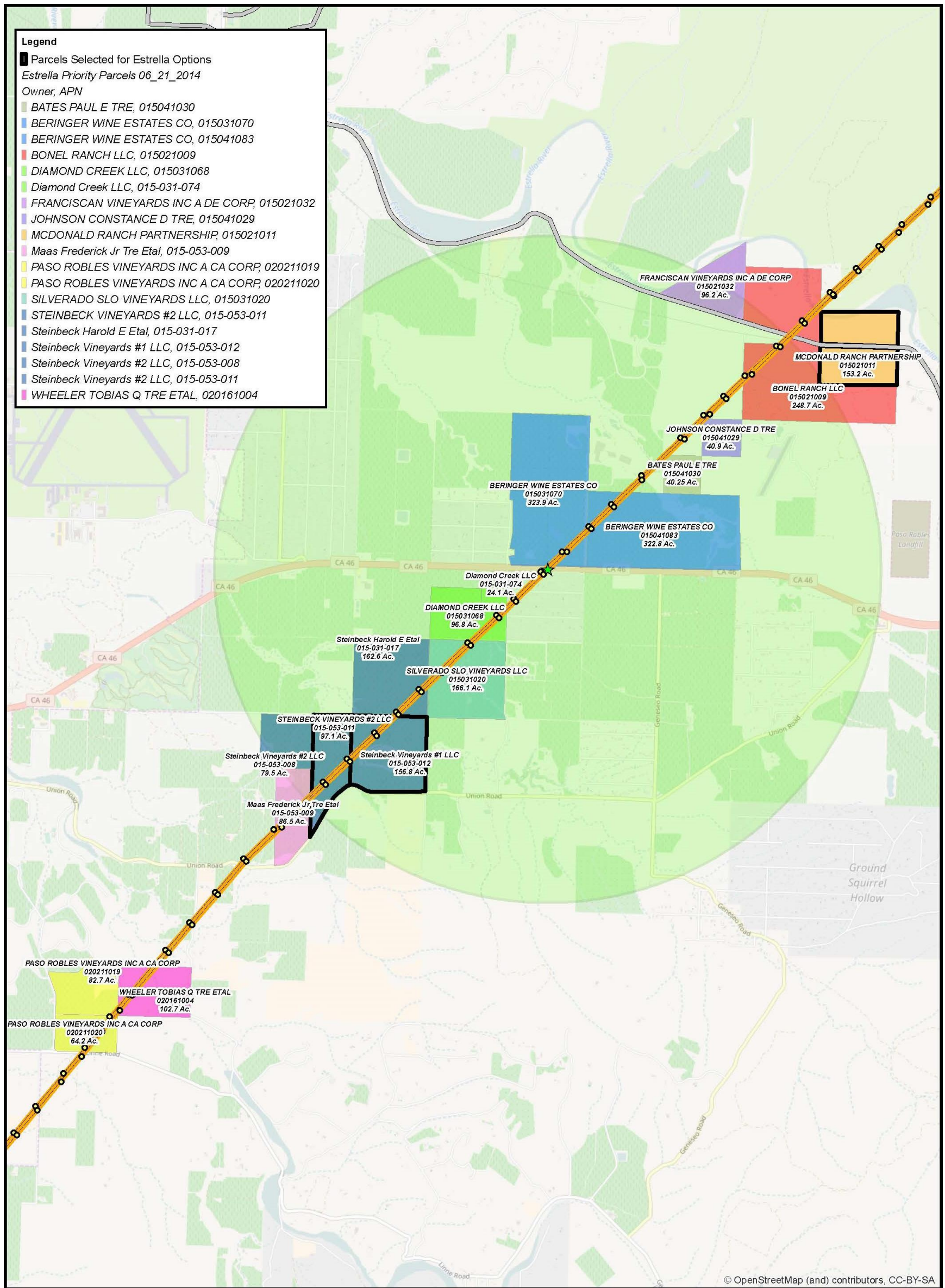
NEET eventually narrowed the list to three landowners that were willing to sell a portion of their parcel, which met the requirements for developing a substation, including:

- location along, and in close proximity to, the 230 kV transmission line corridor;
- location within the 2.2-mile radius defined by CAISO;
- minimal land use constraints or environmental resources visibly apparent on the site (e.g., of waterways, large stands of trees, etc.); and
- civil engineering requirements could be satisfied.

Once the potential sites were narrowed down to three, a more detailed evaluation of the three sites was implemented as described in the PEA, Chapter 4, Alternatives. A priority was placed on Steinbeck Vineyards because it minimized the length of the 230 kV transmission interconnection (loop-in) from the new substation to the existing 230 kV transmission corridor as well as the distance of the 70 kV power line route needed for PG&E to connect into the existing San Miguel-Paso Robles circuit.

Stakeholder outreach activities for the project were initiated in July 2015. NEET West and PG&E also hosted a two-part series of joint open houses for the project. The open houses were designed to solicit input from landowners and the public on the three potential substation sites and power line routes. The majority of comments received were neutral; however, the project team identified aesthetic/visual impacts as the primary areas of concern from the public. Ultimately, the proposed site was selected over the Mill Road West and McDonald Ranch sites because it met the CAISO's Functional Specifications, involved the shortest 230 kV loop-in, was close to Union Road and would avoid road improvements and conflicts with active vineyard operations, and had the presence of a willing seller. In addition, due to the shorter 230 kV loop-in and direct access off of Union Road, the environmental impacts (air quality, biological resources, cultural resources, wetlands and water resources, transportation and traffic, etc.) would be fewer as compared to the Mill Road West and McDonald Ranch alternative substation sites, which would involve greater ground disturbance or potential impacts to other environmental resources such as waters or riparian areas. Refer to Chapter 4, Alternatives for additional discussion on the McDonald Ranch and Mill Road West alternative sites.

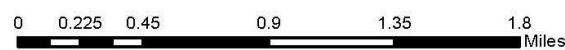
**Exhibit 4-1. NEET West Priority Parcels**



NextEra Energy Transmission  
**CAISO Project: Estrella Substation**

**Exhibit 4-1**

July 28, 2014





**Deficiency 4-2:**

*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.*

**Response:**

Stakeholder outreach activities for the project were initiated in July 2015. PG&E conducted briefings and presentations on the proposed power line for the project that reached a number of stakeholders, including local elected officials, city and county staff, community members, agriculture and business groups, and environmental organizations, among others. The following is a brief summary of the feedback received during these briefings concerning the various routing options for the proposed power line:

- The height and placement of the power line structures could interfere with the navigable airspace associated with Paso Robles Municipal Airport for routes in that the airport area.
- Power line routes in and around downtown Paso Robles (e.g., Niblick Road and portions of Union Road) could be infeasible due to existing residential and commercial development along the roads, existing utilities within these areas, and the potential disruption to traffic.
- The project could reduce the production of current vineyards and other agricultural operations due to the anticipated removal of vines and crops for the placement of power line structures and permanent access roads.
- Construction of the power line could generate dust in the vicinity of vineyards, which has the potential to harm the production of grapes.
- Overhead conductors in the vicinity of vineyards could generate additional perching locations for avian species. Avian species, in turn, eat fruit from the vines, thus reducing vineyard production. The introduction of additional perches for avian species could also introduce various bacteria and other potential diseases that are harmful to the vines.

PG&E and NEET West also hosted a two-part series of joint open houses for the project. Please see the response to Deficiency 1-2 above for additional detail regarding the dates and times for the joint open houses PG&E and NEET West hosted. The open houses were designed to solicit input from landowners on the potential substation sites and routes. The majority of comments received were neutral; however, the project team identified two primary areas of concern from the public—potential impacts to agricultural uses and potential aesthetic impacts associated with overhead power lines. The concerns related to the agricultural uses in the area were consistent with those received during earlier outreach on the power line routes. The community also expressed concern over the potential visual impact associated with routing the new power line in close proximity to residences and commercial uses (e.g., winery tasting rooms) and the potential for a decline in property value.

After notification letters were sent out for biological and cultural surveys along South River Road PG&E received strong opposition from three Homeowner Associations (HOAs) located

along South River Road. They had concerns about the large number of heritage oaks scattered along the roadway (heritage oaks are the part of the historical blue oak forest) and concerns that many would need to be removed or roots would be damaged if a power line were routed along South River Road. The HOAs also expressed concerns about any construction that might impact the cultural resources (specifically, buried resources) along this roadway, as well as impacts on the existing viewshed and views from HOA residences.

***Deficiency 4-3:***

The response to 4-3 has been redacted from the public version of this deficiency response and is being provided under separate cover due to the confidential and commercially sensitive nature of the information provided by NEET West and PG&E. The response to 4-3, including Attachments 4-3a and 4-3b, should not be disclosed to the public. In addition, Attachment 4-3a should not be disclosed to PG&E, and Attachment 4-3b should not be disclosed to NEET West.

**Appendix G. Estrella Distribution Need Analysis**

***Deficiency G(1):***

*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.*

*b. File the fully updated PEA Appendix G with the CPUC’s Docket Office.*

***Response:***

Sections III.B and C have been replaced in the Updated Appendix G to reflect the updated LoadSEER forecast. Responses to the deficiency items related to the original Appendix G are set forth below. All references to “Appendix G” in the deficiency responses refer to the original Appendix G; the updated Appendix G is referred to as the “Updated Appendix G.”

***Deficiency G(2):***

*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.*

*b. Update Table 2 with rows for 0%, 10%, 20%, 30%, 40%, 50%, 60%, 70%, 80%, 90%, and 100% DER.*

***Response:***

- a. The forecast has been updated in accordance with the August 9, 2017, Assigned Commissioner’s Ruling on the Adoption of Distributed Energy Resources Growth Scenarios (A.15-07-002 through A15-07-008). For the Paso Robles Distribution Planning Area (DPA), the residential solar adjustments from the 2016 IEPR are well below the solar adjustments in the 2015 Distribution Resource Plan. Therefore, reductions in the forecast due to DERs have greatly decreased. Moreover, updated adjustments for new business growth in Paso Robles, based upon available information from the City of Paso

Robles, are also included in the updated LoadSEER forecast. The new forecast indicates area load will exceed area capability by 2024.

- b. Multiple forecasts using incremental percentages of the 2015 DRP DER forecast are no longer relevant since the CPUC has directed utilities to use the 2016 Updated IEPR, along with certain updated load adjustments. The new LoadSEER forecast for the Paso Robles DPA has been prepared in accordance with the latest CPUC directive.

**Deficiency G(3):**

*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.*

**Response:**

The LoadSEER forecast presented in Appendix G has been updated. The updated forecast is not based upon power flow data; however, substation bank and feeder load data is included in the updated LoadSEER forecast. Please see Updated Appendix G for additional details. A meeting might be helpful if more information is needed.

**Deficiency G(4):**

*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.*

*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.*

**Response:**

- a. The foreseeable distribution project will have a capacity of 29.7 MW with one distribution bank and three feeders. No other distribution is planned within the foreseeable future, although there will be room at Estrella substation for an additional two distribution banks as needed.

As indicated on page 5 of Appendix G, “Atascadero and San Miguel substations are single-transformer facilities (30 and 16 MVA, respectively) with limited space for expansion or 70 kV transmission constraints.” San Miguel Substation, which has a limited transmission source for new distribution, would need to be completely rebuilt to

support another distribution bank. It would still have a limited transmission source from Coalinga and would be limited to only 18 MW in the event the feed from Estrella or Paso Robles is lost. Atascadero has no space at the substation to support another distribution transformer and, in addition, is far from the load growth that needs to be served.

- b. The PG&E planning standard that covers substation siting is TD-3350P-09 (07/14/2014 Rev. 3) (See Attachment G(4): Utility Procedure TD-3350P-09, Revision 3, Property Review). The anticipated growth areas north of SR-46 and south of Paso Robles Airport in Paso Robles are located in an urban environment dominated by growing commercial and industrial load. In urban areas, TD-3305P-09 specifies a 4-mile radius from the substation for 21 kV distribution facilities' sphere of influence. The Estrella site meets this criterion, whereas Templeton Substation does not. The straight-line distance from the Estrella site to the Golden Hill Industrial Park is approximately 3.4 miles; the straight-line distance from Templeton Substation to this location is approximately 6.6 miles.

**Deficiency G(5):**

*In the best case DER scenarios (both 100% and 75% DER), the proposed substation would be unneeded through 2026; please explain.*

*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.*

**Response:**

The updated LoadSEER forecast projects a need for additional distribution facilities in 2024. See Updated Appendix G.

**Deficiency G(6):**

*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?*

*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.*

*c. Define the length that a feeder becomes “problematic” with respect to service reliability.*

**Response:**

- a. Put simply, if a line is three times as long, it will have three times as much exposure to potential outages such as car-pole accidents or vegetation/storm-related line failures as compared to a line 1/3 as long. Multiple feeders are already planned from Estrella Substation and could be installed from Templeton Substation if Estrella were not to be built. The length of these feeders is determined by the various routes from Estrella or Templeton to the area of anticipated growth north of SR-46 and south of Paso Robles Airport. The length of the feeders cannot be determined by the implementation of a particular strategy of using longer feeders instead of a series of shorter feeders. For Templeton, in particular, short feeders are simply not an option.

If an accident takes out a long line feeding a remote load center, it is likely that many more customers would be affected than if the line were served from a local source. This is due to additional customers that must be served between the distant substation and the load center. In order to serve an area with a series of shorter feeders, a closer substation site is required; in this case Estrella is capable of serving the growth area with shorter feeders. The use of longer but more segmented feeders from Templeton would not be an effective reliability strategy because the urban areas with most of the demand would be at the far end of the feeders (i.e., on the last segment of main line that would be out whenever one of many source-side segments is lost). Moreover, the areas north of SR-46 south of the airport are sensitive commercial-industrial areas that not only require a high degree of service reliability, but also a high degree of power quality because of sensitive light manufacturing processes, etc. Longer feeders result in increased line impedance which degrades power quality.

- b. Three 21 kV feeders will be installed from Estrella Substation when the distribution substation facilities are constructed. In no particular order, the first Estrella feeder—“Union Road North”—will consist of 1.67 circuit miles of new or reconducted distribution line and a total main-line length of 11.76 circuit miles (including 10.09 circuit miles of existing line). The second Estrella feeder—“Mill Road Central”—will consist of 6.14 circuit miles of new or reconducted distribution line and a total main-line length of 8.54 circuit miles. The third Estrella feeder—“Union Road South”—will consist of 3.54 circuit miles of new or reconducted distribution line and a total main-line length of 5.96 circuit miles. If distribution facilities were to be added at Templeton Substation when additional capacity becomes necessary, an equivalent system would include three new 21 kV feeders as well as 4.35 circuit miles of new or reconducted distribution line on the existing Templeton 2109 feeder, which is already routed toward the area of anticipated growth north of SR-46. The new and reconstructed line on the Templeton 2109 would be required to clear a route for two of the new 21kV feeders and to extend Templeton 2109 capacity further into the anticipated growth area. The first new 21 kV feeder from Templeton “Rural Areas East” would consist of 15.41 circuit miles of new or reconducted distribution line and a total main-line length of 17.12 circuit miles (including 1.71 circuit miles of existing line). The role of the Rural Areas East feeder would be to absorb 11 MW of existing Templeton 2109 load to free up 2109 capacity since the 2109 feeder already extends to the growth area. The second new feeder from Templeton “Branch Road North” would consist of 10.57 circuit miles of new

or reconducted distribution line and a total main-line length of 18.13 circuit miles. The third new feeder from Templeton “Mill Road Central” would consist of 12.20 circuit miles of new or reconducted distribution line and a total main-line length of 14.60 circuit miles.

- c. Many factors affect service reliability including line length, exposure of lines to traffic or vegetation, and line loading. Line length alone is not the only factor, but the longer the line, the more likely it is to traverse areas detrimental to service reliability and to affect more customers if the line goes out of service.

**Deficiency G(7):**

*There is very little data provided to substantiate many of the statements and conclusions in Appendix G.*

*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.*

**Response:**

This information was obtained primarily from the City of Paso Robles Director of Public Works from the City’s website. The City is confident that the growth will occur north of SR-46 and south of Paso Robles Airport, even if the timing is uncertain. The City expects the current population of Paso Robles to increase by 50% by 2045.

See Updated Appendix G, Table 2, Section III.C.

**Deficiency G(8):**

*Quantify (in miles or feet) the phrase, “far closer” to anticipated growth areas. Define the specific points from which measurements were taken.*

**Response:**

Both the Estrella and Templeton options provide two feeders that extend to the area of anticipated growth north of SR-46 and south of Paso Robles Airport. Estrella provides two new 21 kV feeders, Union Road South and Mill Road Central, that meet near the intersection of Golden Hill Rd and Wisteria Lane: 35° 39’ 0.5” N and 120° 39’ 29” W (35.6501,-120.6581). The Templeton option also would provide two 21 kV feeders that meet at this intersection, the Existing Templeton 2109 and a longer version of Mill Road Central. For comparison purposes, Golden Hill and Wisteria will be considered the “growth area.” The precise location of potential new feeders is estimated in this response.

The shorter route from Estrella to the growth area, Union Road South, is 4.58 circuit miles and the longer route, Mill Road Central, is 7.77 circuit miles.

The Templeton option provides one new 21 kV feeder to the growth area and does circuit work to release capacity on an existing Templeton 21 kV feeder, 2109, that extends from Templeton to the growth area.

The shorter route to the growth area at Golden Hill and Wisteria from Templeton Substation is the Existing Templeton 2109, which is 11.70 circuit miles and takes much of the same route as the Union Road South feeder from Estrella. The longer route from Templeton to the growth area, also called Mill Road Central, is 13.83 circuit miles and follows much of the same route as the Mill Road Central route from Estrella.

Both shorter routes to the growth area, Union Road South from Estrella and Existing 2109 from Templeton, meet at the intersection of Union Road and Penman Springs Road: 35° 37' 48.5" N and 120° 36' 51.5" W (35.6302,-120.6143). From this point on-ward the routes are identical all the way to the growth area. The route from Templeton to the meeting point at Union and Penman Springs is 7.12 circuit miles longer than the route from Estrella to the meeting point. This is a significant difference, 155% farther, making Estrella far closer to the growth area.

Similarly, both longer routes to the growth area, Mill Road Central from Estrella and Mill Road Central from Templeton, meet at a common point on Mill Road: 35° 38' 41" N and 120° 37' 12.5" W (35.6447,-120.6202), and from this point on the routes are identical all the way to the growth area. The route from Templeton to the common point on Mill Road is 6.02 circuit miles longer than the route from Estrella. This is also a significant difference, 78% farther, again making Estrella far closer.

***Deficiency G(9):***

*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.*

*Describe to what extent the distribution systems described in these figures and text are looped or radial.*

***Response:***

There are 12 existing 21-12 kV pad-mounted transformers in the field (outside of substations) in the Paso Robles DPA that provide the existing circuit ties between 21 kV and 12k V feeders. The construction of Estrella Substation will require the installation of three additional 21-12 kV pad-mounted transformers in the field. The equivalent distribution system from Templeton Substation would require four additional 21-12 kV pad-mounted transformers.

The figures indicate all distribution lines whether they be looped or radial. In general, main lines, 4/0 Al or larger OH and UG conductor sizes, are part of looped systems. In general, smaller conductor sizes are radial systems tapped off of the looped-main-line systems.

**Deficiency G(10):**

*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).*

**Response:**

The gold lines are not relevant to the Estrella project or to providing power to the growth area of Paso Robles; therefore, the figures have not been updated. However, please see Figure 1 for those details on the Templeton feeders.

**Deficiency G(11):**

- a. Provide the GIS data for the New Overhead Distribution Lines identified on Figure 4.*
- b. Explain why these two segments, specifically, were identified.*
- c. Provide the length of each segment and estimate number of poles to be installed.*

**Response:**

- a. Accurate GIS data is not yet available because the mapping is extremely high level. The exact locations of these facilities are not yet known.
- b. These two segments were specifically identified because they are the only gaps in the existing distribution system necessary to create one of new the feeders (Mill Road Central). All other distribution lines that make up this feeder, and the other two Estrella feeders are existing lines. These are approximate locations, preliminary and subject to change, as indicated on Figure 4. The segment of new line extending from Estrella Substation, the southern segment, is an accessible route along a farm road, and the northern segment is within a franchise location. These appear feasible based on a preliminary review of land and environmental factors.
- c. The southern segment is 0.6 mile of new distribution line installed in a utility easement on private property to the north of the Estrella site to connect the Mill Road Central feeder to existing distribution on Mill Road. An additional segment of new line will be installed to extend the reach of the Mill Road Central feeder to serve the new load anticipated in northern Paso Robles. This northern segment will be approximately 1.1 miles long installed along SR-46. New overhead distribution lines will typically be supported by 18 poles per mile; therefore, a total of 1.7 miles of new distribution line would require about 31 new wood poles.

**Deficiency G(12):**

- a. For Figure 5, describe in detail the assumptions that cause a steep increase in load growth after year 2024?*



*b. Identify and describe the methodology used to extrapolate out to 2030 and later for the 100% and 75% DER scenarios (see Figure 5)?*

**Response:**

a. & b. The LoadSEER forecast presented in Appendix G has been updated as directed by the CPUC. The updated forecast projects a need for additional distribution facilities in 2024. See Updated Appendix G, Section III.B.

**Deficiency G(13):**

*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.*

**Response:**

The timing is unknown, but the proposed project provides the opportunity to add an additional transmission line to Cholame Substation in the future to create a looped circuit to improve reliability and operational flexibility.

Cholame Substation serves approximately 1,500 customers including the communities of Shandon and Parkfield through a 27-mile radial transmission line from Arco Substation in the San Joaquin Valley. This line must be cleared for maintenance every 18 to 24 months requiring most of the 1,500 customers to be notified of multiple planned outages over a several-day period because there is no alternate 70 kV transmission source for the substation. The alternative to planned outages is to install temporary generation at Cholame Substation during these maintenance periods; however, the cost to do this is approximately \$1 million every 18 to 24 months. Moreover, aside from the maintenance periods, the service reliability for all 1,500 customers is negatively impacted during normal system configuration (when all facilities are in service) because of the single transmission source. The Estrella 230/70 kV substation would provide a second transmission source approximately 17 circuit miles from Cholame Substation that could be used to eliminate the maintenance clearances and improve service reliability for all customers served by Cholame Substation. In addition, a future 21 kV distribution feeder from Estrella Substation could provide a cost-effective temporary solution to the transmission maintenance problem until such time that the 70 kV line could be built.

**Appendix J. Air Quality Calculations**

**Deficiency J(1):**

*The footnote for #2 in Table J-1 is missing. Please provide.*

**Response:**

"2) Quarterly Tier 1 and Tier 2 Thresholds apply to construction projects lasting more than one quarter of the year (3 months). As stated in PEA Chapter 2, Project Description, the project is estimated to be constructed in 7 months."

## **PEA GIS**

### ***Deficiency GIS-1:***

*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.*

### ***Response:***

NEET West and PG&E do not have GIS data files showing the boundaries of the existing and proposed easements for the proposed project. Once final engineering is completed, NEET West and PG&E will obtain easement information and provide it to the CPUC.

### ***Deficiency GIS-2:***

*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.*

### ***Response:***

The GIS data provided for the Revised PEA in response to Deficiency Letter #1 shows the location of the potential overland travel and/or staging outside of the substation footprint. Overland routes are called “new unpaved” in the GIS data. Pull/splice boxes were not included in the GIS data in response to Deficiency Letter #1 because this design work is not yet completed.