



**Pacific Gas and
Electric Company™**

David T. Kraska

Mailing Address
P.O. Box 7442
San Francisco, CA 94120

Street/Courier Address
Law Department
77 Beale Street
San Francisco, CA 94105

(415) 973-7503
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September 2, 2011

BY HAND DELIVERY

Julie Fitch, Director
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Fourth Floor
San Francisco, CA 94102

Re: Response to (Purported) Protest of [Redacted] Reconductoring Project,
[Redacted] Switching Station Project, and [Redac] Switching Station Project
Advice Letter 3842-E

Dear Ms. Fitch:

I. INTRODUCTION

This response concerns the purported protest to Pacific Gas and Electric's ("PG&E") Advice Letter 3842-E that was apparently submitted by Kern Minority Contractors Association ("protestant") dated May 23, 2011. PG&E was not served with this protest and has been unable to secure a copy of it, and for this alone reason the protest is invalid and must be dismissed, as requested in our letter dated July 15, 2011 (A copy is attached as Exhibit A). Moreover, the Project at issue is plainly eligible for the claimed exemption, as demonstrated by an Environmental Impact Report certified by San Luis Obispo County.

Given the impending scheduled construction dates, PG&E has made diligent and repeated efforts to obtain a copy of the protest. PG&E has requested a copy of the protest in four separate telephone conversations with Mr. Marvin Dean of the Kern Minority Contractors Association. In each conversation, Mr. Dean stated that he would provide a copy of the protest but has failed to do so. Given the failure to timely serve the protest in the first instance and furthermore the failure to provide a copy to PG&E, the protest should be considered invalid. No requests for hearings, responses, or other protests were filed in connection with this advice letter, and the need to move forward is now urgent. Thus, PG&E respectfully requests the prompt issuance of an Executive Director's Resolution dismissing the protest.

II. BACKGROUND

Pursuant to the California Public Utility Commission's ("CPUC") General Order ("GO") 131-D, PG&E filed Advice Letter 3842-E on May 5, 2011, regarding the need to reconductor an

approximately 35-mile section of the Morro Bay-Midway 230 kV transmission line and to construct two new switching stations in order to accommodate up to 800 MW of new renewable energy from the SunPower California Valley Ranch and the First Solar Topaz Solar Farm Projects. (A copy of the Advice Letter is attached as Exhibit B.)

These three interconnection projects were included in the California Environmental Quality Act (“CEQA”) review conducted by the County of San Luis Obispo, which certified an Environmental Impact Report (“EIR”) on April 19, 2011 for the SunPower California Valley Ranch Project, the first approval of the two major solar projects. The CPUC’s Energy Division provided comments and was closely involved in the CEQA process. The EIR confirmed that there were no unavoidable significant impacts resulting from the PG&E facilities. Construction of PG&E’s switching stations is thus exempt from the requirement that PG&E file an application for a Permit to Construct (“PTC”) under GO 131-D because Section III.B.1.f exempts “power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document finds no significant unavoidable environmental impacts.” In addition, because the 230 kV reconductoring work involves the placing of new conductors on supporting structures already built, it is exempt under GO 131-D, Section III.A (exempting “the placing of new or additional conductors . . . on or replacement of supporting structures already built”).

Because protestant has failed to sustain its burden of showing that PG&E’s Notice of Construction is invalid through a properly served protest, PG&E requests that the Executive Director of the Commission promptly issue a Resolution finding that the protest is dismissed. Unless the CPUC otherwise confirms that no valid protest is now pending, PG&E cannot begin construction on these critical interconnection facilities until an Executive Director’s Resolution is issued. (GO 131-D, § XIII.)

III. DETAILED DESCRIPTION OF INTERCONNECTION PROJECTS

In order to accommodate up to 800 MW of new renewable energy from the SunPower California Valley Ranch Project and the First Solar Topaz Solar Farm Project, both in San Luis Obispo County, PG&E must replace existing wires with new wires (“reconductor”) on an approximately 35-mile section of the double-circuit Morro Bay-Midway 230 kV Transmission Line between Redact Switching Station in the community of California Valley in San Luis Obispo County, approximately Redacted of the Kern County border, and Redacted Substation, in the town of Redacted in Kern County. To support the new conductor and conform to ground clearance requirements, approximately 85 of the 171 existing lattice structures (approximately every other tower) will be modified by raising the height by approximately 20 feet from an average height of 118 feet to a new average height of approximately 127 feet tall. No lattice structures will be replaced or added. A new optical ground wire (OPGW) and static ground wire will also be

installed. Work must be completed by December 2012 in order to interconnect the solar projects to the electrical grid.

PG&E will also construct the [Redacted] Switching Station as part of SunPower's California Valley Ranch Project (San Luis Obispo County Conditional Use Permit: DRC2008-00097). The 4.7-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the Temblor Mountains. A new 0.7-mile, 24-foot wide access road will connect the switching station to an existing access road off of [Redacted]. Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 kV Transmission Line, and two new towers will be installed on both sides of the switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 700 feet long on the west and 950 feet long on the east, will be installed between the [Redacted] Switching Station and the Morro Bay-Midway 230kV Transmission Line. SunPower's 230kV generation interconnection line will connect to the PG&E transmission system at the [Redacted] Switching Station. Before the permanent interconnection is established, a temporary line will be constructed from SunPower's generation interconnection line to the existing Morro Bay-Midway 230 kV Transmission Line. Three wood or light-duty steel poles and one circuit will be temporarily installed from SunPower's interconnection line [Redacted] to the existing Morro Bay-Midway 230 kV Transmission Line. The temporary facilities will be removed when the permanent interconnection is established. Work is scheduled to be completed by September 2012.

To connect new electric load from First Solar's Topaz Solar Farm Project (San Luis Obispo County Conditional Use Permit: DRC2008-00009), PG&E will construct the [Reda] Switching Station, which was also analyzed in the environmental review for SunPower's California Valley Ranch Project. The 6.3-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the community of California Valley. First Solar will construct an access road to connect the [Redac] Switching Station Site to [Redacted]. Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 kV Transmission Line, and two new towers will be installed on both sides of the new switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 105 feet long, will be installed to connect PG&E's [Reda] Switching Station to First Solar's [Redact] Substation. Work is scheduled to be completed by October 2012.

IV. DISCUSSION

A. The Protest Was Never Served on PG&E and Should Be Dismissed As Invalid

PG&E was never served with a copy of the protest, as required by GO 131-D, section XIII, and for that reason alone should be summarily dismissed.

The service requirements in GO 131-D's notice process create the certainty and efficiency needed by utilities to meet their obligations to serve their customers. Protestant's failure to follow the notice requirements have already resulted in a three-month delay, jeopardizing the start of construction and potentially delaying interconnection of up to 800 MW of solar power. These service requirements must be preserved so that utilities can continue to construct needed facilities in a timely and cost-effective manner. In addition, PG&E has spoken with the Protestant by telephone on four separate occasions requesting a copy of the protest and has followed up by email. In each conversation, the Protestant stated that he would provide PG&E with a copy of the protest but has failed to do so.

B. PG&E's project is exempt from the requirement to file a formal application requesting authority to construct under GO 131-D

Section IX.A of GO 131-D requires PG&E to obtain a Permit to Construct ("PTC") issued by the Commission prior to the construction of a switching station unless one or more of several exemptions apply. Similarly, section IX.B of GO 131-D requires PG&E to obtain a Certificate of Public Convenience and Necessity ("CPCN") prior to the construction of transmission line facilities 200 kV and over unless one of several exemptions apply. Section III.B of GO 131-D provides, in pertinent part, that "no electric utility shall begin construction . . . of any electric power line facilities or substations which are designed for immediate or eventual operation at any voltage between 50 kV or 200 kV . . . without this Commission's having first authorized the construction of said facilities by issuance of a permit to construct . . ." (GO 131-D, § III.B.)

GO 131-D provides express exemptions to the requirement to obtain advance Commission permission for the construction of power line and substation facilities. Specifically, GO 131-D provides, in pertinent part, that compliance with the PTC application process is not required for "power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (Environmental Impact Report (EIR) or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation." (GO 131-D, § III.B.1(f).) GO 131-D also exempts from the CPCN requirement "the placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built." (GO 131-D, § III.A.) In this case, San Luis Obispo County has undertaken a full environmental review of the project and concluded that there will be no significant impacts as a result of PG&E's activities. In addition, the proposed project will replace existing wires with new wires (reconductor) on an approximately 35-mile section of the double-circuit Morrow Bay-Midway 230 kV transmission line. As such, the project is exempt from the PTC and CPCN requirements.

GO 131-D does list several conditions that, if present, would prevent PG&E from claiming an exemption to the PTC requirement:

Julie A. Fitch
September 2, 2011
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- a. there is reasonable possibility that the activity may have impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies;
- b. the cumulative impact of successive projects of the same type in the same place, or over time, is significant; or
- c. there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(GO 131-D, § III.B.2.)

None of these conditions applies to these interconnection projects, as is plainly demonstrated by the County's conclusion in its certified Final EIR that the PG&E projects will not result in any significant unavoidable impacts. As such, and given the failure of Protestant to timely serve a valid protest, there is no basis upon which the Commission can sustain a protest to PG&E's Advice Letter.

IV. CONCLUSION

For the reasons stated above, PG&E respectfully requests that the Executive Director issue a Resolution pursuant to Section XIII of GO 131-D, finding that protestant's protest is dismissed for invalid service. Due to the delay caused by protestant's failure to serve PG&E and the fact that PG&E has not been able to secure a copy of the protest, the construction schedule is now in jeopardy and it is urgent that the Executive Director Resolution be expeditiously issued.

Thank you for your prompt attention to this request.

Very truly yours,



David T. Kraska

DTK/dl

Enclosures

cc: Paul Clanon, Executive Director, CPUC
Mary Jo Borak, CPUC Energy Division
Marvin Dean, Kern Minority Contractor's Association

EXHIBIT A

Redacted

ATTORNEY AT LAW

707 BROOKSIDE AVENUE
REDLANDS, CALIFORNIA 92373-5101

TELEPHONE Redacted
CELLULAR

FACSIMILE: (909) 793-8944
EMAIL: Redacted

July 15, 2011

Julie Fitch, Director
Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Fourth Floor
San Francisco, CA 94102

Re: Redacted Reconductoring Project, Redacted Switching Station Project, and
Reda Switching Station Project
Advice Letter 3842-E

Dear Ms. Fitch:

I am writing concerning a protest reflected on the Commission's docket calendar as having been filed May 23, 2011 on Pacific Gas and Electric's (PG&E) Advice Letter 3842-E by Kern Minority Contractors Association. PG&E was never served with a copy of this protest. PG&E has contacted the Association (through a telephone number obtained on the internet) and the Commission's Energy Division, and has been unable to secure a copy of the alleged protest. Since the protest was not properly served, PG&E requests confirmation from you that there is no valid protest pending on Advice Letter 3842-E so that construction can begin in August as planned.

By way of background, PG&E filed Advice Letter 3842-E on May 5, 2011, pursuant to the General Order (GO) 131-D, regarding the need to reconductor an approximately 35-mile section of the Morro Bay-Midway 230 kV transmission line and to construct two new switching stations in order to accommodate up to 800 MW of new renewable energy from the SunPower California Valley Ranch and the First Solar Topaz Solar Farm Projects. (A copy of PG&E's Advice Letter is enclosed.)

Construction of PG&E's interconnection facilities is exempt from the requirement that PG&E file an application requesting authority to construct the project because the reconductoring involves the placing of new conductors on supporting structures already built, and because all parts of the project have undergone environmental review pursuant to CEQA by the County of San Luis Obispo, which certified a Final Environmental Impact Report ("FEIR") on April 19, 2011. The reconductoring therefore clearly falls within the exemption provided under GO 131-D, Section III.A (exempting "the placing of new or additional conductors . . . on or replacement of supporting structures already built"), and the switching stations fall under Section III.B.1.f (exempting "power lines or substations to be relocated or constructed which have undergone

Julie Fitch
July 15, 2011
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environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document finds no significant unavoidable environmental impacts”).

Thank you for the prompt consideration of this request.

Very truly yours,

Redacted

Attorney for Pacific Gas and Electric Company

JL/tm
Enclosure

cc: David Kraska, PG&E Law Department

EXHIBIT B



Brian K. Cherry
Vice President
Regulation and Rates

Pacific Gas and Electric Company
77 Beale St., Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-6520

May 5, 2011

Advice 3842-E
(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of [Redacted] Reconductoring Project (Kern County and San Luis Obispo County); [Redacted] Switching Station Project (San Luis Obispo County); and [Redacted] Switching Station Project (San Luis Obispo County)

Pacific Gas and Electric Company (“PG&E” or “the Company”) hereby submits notice pursuant to General Order (“G.O.”) 131-D, Section XI, Subsection B.4, of the construction of facilities that are exempt from a Permit to Construct and Certificate of Public Convenience and Necessity.

Purpose

This advice letter provides a copy of the Notice of Proposed Construction (Attachment I) and the Notice Distribution List, which comply with the noticing requirements found in G.O. 131-D, Section XI.

Background

In order to accommodate up to 800 MW of new renewable energy from the SunPower California Valley Ranch Project and the First Solar Topaz Solar Farm Project, both in San Luis Obispo County, PG&E must replace existing wires with new wires (reconductor) on an approximately 35-mile section of the double-circuit Morro Bay-Midway 230 kV Transmission Line between [Redacted] Switching Station in the community of California Valley in San Luis Obispo County, approximately [Redacted] of the Kern County border, and [Redacted] Substation, in the town of [Redacted] in Kern County. The line begins approximately [Redacted] in California Valley and trends eastbound approximately [Redacted] through the Temblor Mountains. The line continues [Redacted] through the San Joaquin Valley in Kern County approximately [Redacted] terminating at [Redacted] Substation approximately [Redacted] To support the new

conductor and conform to ground clearance requirements, approximately 85 of the 171 existing lattice structures (approximately every other tower) will be modified by raising the height by approximately 20 feet from an average height of 118 feet to a new average height of approximately 127 feet tall. No lattice structures will be replaced or added. A new optical ground wire (OPGW) and static ground wire, supported by peak extensions, will be installed along the top of the existing transmission line from [Redacted] Switching Station to [Redacted]. The OPGW line will then transfer to an existing distribution wood pole line and trend [Redacted] to an existing underground conduit box at [Redacted] Substation. The static wire will terminate at a tower location [Redacted]. Four new wood poles will accommodate an OPGW clearance under existing foreign lines located [Redacted] in Kern County. Work is scheduled to begin in July 2011, or as soon thereafter as possible, and will be completed by December 2012, or as soon thereafter as possible.

PG&E will also construct the [Redacted] Switching Station as part of SunPower's California Valley Ranch Project (San Luis Obispo County Conditional Use Permit: DRC2008-00097). The 4.7-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the Temblor Mountains. A new 0.7-mile, 24-foot wide access road will connect the switching station to an existing access road off of [Redacted]. Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 kV Transmission Line, and two new towers will be installed on both sides of the switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 700 feet long on the west and 950 feet long on the east, will be installed between the [Redacted] Switching Station and the Morro Bay-Midway 230kV Transmission Line. SunPower's 230kV generation interconnection line will connect to the PG&E transmission system at the [Redacted] Switching Station. Before the permanent interconnection is established, a temporary line will be constructed from SunPower's generation interconnection line to the existing Morro Bay-Midway 230 kV Transmission Line. Three wood or light-duty steel poles and one circuit will be temporarily installed from SunPower's interconnection line [Redacted] to the existing Morro Bay-Midway 230 kV Transmission Line. The temporary facilities will be removed when the permanent interconnection is established. Work is scheduled to begin in August 2011, or as soon thereafter as possible, and will be completed by September 2012, or as soon thereafter as possible.

To connect new electric load from First Solar's Topaz Solar Farm Project (San Luis Obispo County Conditional Use Permit: DRC2008-00009), PG&E will construct the [Redacted] Switching Station, which was also analyzed in the environmental review for SunPower's California Valley Ranch Project. The 6.3-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the community of California Valley. First Solar will construct an access road to connect the [Redacted]

Switching Station Site to [Redacted] Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 kV Transmission Line, and two new towers will be installed on both sides of the new switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 105 feet long, will be installed to connect PG&E's [Redacted] Switching Station to First Solar's [Redacted] Substation. Work is scheduled to begin in September 2011, or as soon thereafter as possible, and will be completed by October 2012, or as soon thereafter as possible.

CPUC General Order 131-D, Section III, Subsections A and B.1, exempt projects meeting specific conditions from the CPUC's requirement to file an application requesting authority to construct. The Company believes this project qualifies for the following exemption(s):

III.A: "The placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built."

III.B.1.f: "Power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (Environmental Impact Report (EIR) or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation."

The County of San Luis Obispo certified an Environmental Impact Report for the SunPower California Valley Ranch Project on April 19, 2011, finding no significant unavoidable environmental impacts resulting from PG&E's proposed facilities. (State Clearinghouse #2009021009)
<http://www.slocounty.ca.gov/planning/environmental/EnvironmentalNotices/sunpower.htm>)

This filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

Protests

Anyone wishing to protest this filing may do so by filing a protest with the CPUC and the Company by **May 25, 2011**, which is 20 days after the date of this filing. Protests should be mailed to the following address:

CPUC Energy Division
Tariff Files, Room 4005
DMS Branch
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-Mail: jjj@cpuc.ca.gov and mas@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address show above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

David T. Kraska
Attorney, Law Department
Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, California 94120

Facsimile: (415) 973-0516

Brian K. Cherry
Vice President, Regulation and Rates
Pacific Gas and Electric Company
P.O. Box 770000, Mail Code B10C
San Francisco, California 94177

Facsimile: (415) 973-6520
E-Mail: PGETariffs@pge.com

Persons or groups may protest the proposed construction if they believe that the Company has incorrectly applied for an exemption or that the conditions set out in Section III.B.2 of G.O. 131-D exist.

Effective Date

The Company requests that this advice filing become effective on **June 4, 2011**, which is 30 days after the date of filing. (In accordance with G.O. 131-D, construction will not begin until 45 days after notice is first published.)

Notice

A copy of this advice letter is being sent electronically and via U.S. Mail to parties shown on the attached list, including the parties listed in G.O. 131-D, Section XI, Paragraphs B.1 and B.2. These parties are identified in the "Notice Distribution List" included in Attachment I. All electronic approvals should be sent to e-mail PGETariffs@pge.com. Advice letter filings can also be accessed electronically at <http://www.pge.com/tariffs/>.

A handwritten signature in black ink that reads "Brian Cherry" followed by a vertical line and the word "ent".

Vice President - Regulation and Rates

cc: Parties Listed in G.O. 131-D, Paragraphs B.1 and B.2

Attachments

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 M)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person:

Phone #:

E-mail:

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **3842-E**

Tier: **N/A**

Subject of AL: **Reconductoring Project (Kern and San Luis Obispo Counties), Switching Station Project (San Luis Obispo County), Switching Station Project (San Luis Obispo County)**

Keywords (choose from CPUC listing): Power Lines

AL filing type: Monthly Quarterly Annual One-Time Other _____

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL¹: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for:

Confidential information will be made available to those who have executed a nondisclosure agreement: Yes No

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: _____

Resolution Required? Yes No

Requested effective date: **June 4, 2011**

No. of tariff sheets: N/A

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: N/A

Service affected and changes proposed¹: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division

Tariff Files, Room 4005

DMS Branch

505 Van Ness Ave.,

San Francisco, CA 94102

jnj@cpuc.ca.gov and mas@cpuc.ca.gov

Pacific Gas and Electric Company

Attn: Brian K. Cherry

Vice President, Regulation and Rates

77 Beale Street, Mail Code B10C

P.O. Box 770000

San Francisco, CA 94177

E-mail: PGETariffs@pge.com

NOTICE OF PROPOSED CONSTRUCTION

PROJECT NAME: [Redacted] Reconductoring Project (Kern County and San Luis Obispo County); [Redacted] Switching Station Project (San Luis Obispo County); and [Redacted] Switching Station Project (San Luis Obispo County)

ADVICE LETTER NUMBER: 3842-E

Proposed Project: In order to accommodate up to 800 MW of new renewable energy from the SunPower California Valley Ranch Project and the First Solar Topaz Solar Farm Project, both in San Luis Obispo County, PG&E must replace existing wires with new wires (reconductor) on an approximately 35-mile section of the double-circuit [Redacted] [Redacted] Transmission Line between [Redacted] Switching Station in the community of California Valley in San Luis Obispo County, approximately [Redacted] of the Kern County border, and [Redacted] Substation, in the town of [Redacted] in Kern County. The line begins approximately [Redacted] in California Valley and trends [Redacted] approximately [Redacted] through the Temblor Mountains. The line continues [Redacted] through the San Joaquin Valley in Kern County approximately [Redacted] and [Redacted] terminating at [Redacted] Substation approximately [Redacted]. To support the new conductor and conform to ground clearance requirements, approximately 85 of the 171 existing lattice structures (approximately every other tower) will be modified by raising the height by approximately 20 feet from an average height of 118 feet to a new average height of approximately 127 feet tall. No lattice structures will be replaced or added. A new optical ground wire (OPGW) and static ground wire, supported by peak extensions, will be installed along the top of the existing transmission line from [Redacted] Switching Station to [Redacted]. The OPGW line will then transfer to an existing distribution wood pole line and trend [Redacted] to an existing underground conduit box at [Redacted] Substation. The static wire will terminate at a tower location [Redacted] [Redacted]. Four new wood poles will accommodate an OPGW clearance under existing foreign lines located [Redacted] in Kern County. Work is scheduled to begin in July 2011, or as soon thereafter as possible, and will be completed by December 2012, or as soon thereafter as possible.

PG&E will also construct the [Redacted] Switching Station as part of SunPower's California Valley Ranch Project (San Luis Obispo County Conditional Use Permit: DRC2008-00097). The 4.7-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the Temblor Mountains. A new 0.7-mile, 24-foot wide access road will connect the switching station to an existing access road off of [Redacted]. Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 kV Transmission Line, and two new towers will be installed on both sides of the switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 700 feet long on the west and 950 feet long on the east, will be installed between the [Redacted] Switching Station and the Morro Bay-Midway 230kV Transmission Line. SunPower's 230kV generation interconnection line will connect to the PG&E transmission system at the [Redacted] Switching Station. Before the permanent interconnection is established, a temporary line will be constructed from SunPower's generation interconnection line to the existing Morro Bay-Midway 230 kV Transmission Line. Three wood or light-duty steel poles and one circuit will be temporarily installed from SunPower's interconnection line [Redacted] to the existing Morro Bay-Midway 230 kV Transmission Line. The temporary facilities will be removed when the permanent interconnection is established. Work is scheduled to begin in August 2011, or as soon thereafter as possible, and will be completed by September 2012, or as soon thereafter as possible.

To connect new electric load from First Solar's Topaz Solar Farm Project (San Luis Obispo County Conditional Use Permit: DRC2008-00009), PG&E will construct the [Redacted] Switching Station, which was also analyzed in the environmental review for SunPower's California Valley Ranch Project. The 6.3-acre switching station is located approximately [Redacted] of the San Luis Obispo-Kern County border and [Redacted] in the community of California Valley. First Solar will construct an access road to connect the [Redacted] Switching Station Site to [Redacted]. Two existing lattice structures will be replaced and moved in line on the existing Morro Bay-Midway 230 [Redacted] Transmission Line, and two new towers will be installed on both sides of the new switching station to accommodate interconnection with the existing transmission line. Two new circuits, approximately 105 feet long, will be installed to connect PG&E's [Redacted] Switching Station to First Solar's [Redacted] Substation. Work is scheduled to begin in September 2011, or as soon thereafter as possible, and will be completed by October 2012, or as soon thereafter as possible.

Exemption from CPUC Permit Requirement: CPUC General Order 131-D, Sections III.A (reconductoring) and III.B.1 (switching stations) exempts projects meeting specific conditions from the CPUC's requirement to file an application requesting authority to construct. Pacific Gas and Electric Company believes this project qualifies for the following exemption(s):

- III.A: "The placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built."

- III.B.1.f: "Power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (Environmental Impact Report (EIR) or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation."

The County of San Luis Obispo certified an Environmental Impact Report for the SunPower California Valley Ranch Project on April 19, 2011, finding no significant unavoidable environmental impacts resulting from PG&E's proposed facilities. (State Clearinghouse #2009021009)
(<http://www.slocounty.ca.gov/planning/environmental/EnvironmentalNotices/sunpower.htm>)

Public Review Process: Persons or groups may protest the proposed construction if they believe that Pacific Gas and Electric Company has incorrectly applied for an exemption or that the conditions set out in Section III.B.2 of General Order 131-D exist;

- a. There is reasonable possibility that the activity may have an impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies; or
- b. The cumulative impact of successive projects of the same type in the same place, over time, is significant; or
- c. There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

Protests should include the following:

1. Your name, mailing address and daytime telephone number.
2. Reference to the CPUC Advice Letter Number and Project Name.
3. A clear description of the reason for the protest.
4. Whether you believe that evidentiary hearings are necessary to resolve factual disputes.

Protests for this project must be filed by May 25, 2011, at the following address:

Director, Energy Division
California Public Utilities Commission
505 Van Ness Avenue, Fourth Floor
San Francisco, California 94102

With a copy mailed to:

David Kraska, Law Department
Pacific Gas and Electric Company
P.O. Box 7442
San Francisco, California 94120

Pacific Gas and Electric Company must respond within five business days of receipt and serve copies of its response on each protestant and the Energy Division. Within 30 days after Pacific Gas and Electric Company has submitted its response, the Executive Director of the CPUC will send you a copy of an Executive Resolution granting or denying the request and stating the reasons for the decision.

Assistance in Filing a Protest: For assistance in filing a protest, contact the CPUC Public Advisor in San Francisco at (415) 703-2074 or 1-866-849-8390 (toll-free) or TTY (415) 703-5258 or public.advisor@cpuc.ca.gov.

Additional Project Information: To obtain further information on the proposed project, please call Pacific Gas and Electric Company's Project Information Line at (415) 973-5530.

Notice Distribution List

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Reconductoring Project San Luis Obispo and Kern Counties

Advice 3842-E

Energy Commission

Melissa Jones, Executive Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, California 95814

Terry O'Brien, Deputy Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, California 95814

County of Kern

Lorelei H. Oviatt
AICP, Director
Public Services Building
2700 "M" Street, Suite 100
Bakersfield, CA 93301-2370

County of San Luis Obispo

Jason Giffen, Planning Director
SLO County Planning & Building Department - Environmental Division
976 Osos St., Room 200
San Luis Obispo, CA 93408

Newspapers

San Luis Obispo Tribune
Bakersfield Californian

**PG&E Gas and Electric
Advice Filing List**

AT&T	Dept of General Services	Northern California Power Association
Alcantar & Kahl LLP	Douglass & Liddell	Occidental Energy Marketing, Inc.
Ameresco	Downey & Brand	OnGrid Solar
Anderson & Poole	Duke Energy	Praxair
Arizona Public Service Company	Dutcher, John	R. W. Beck & Associates
BART	Economic Sciences Corporation	RCS, Inc.
Barkovich & Yap, Inc.	Ellison Schneider & Harris LLP	Recurrent Energy
Bartle Wells Associates	Foster Farms	SCD Energy Solutions
Bloomberg	G. A. Krause & Assoc.	SCE
Bloomberg New Energy Finance	GLJ Publications	SMUD
Boston Properties	GenOn Energy, Inc.	SPURR
	Goodin, MacBride, Squeri, Schlotz & Ritchie	San Francisco Public Utilities Commission
Braun Blaising McLaughlin, P.C.	Green Power Institute	Santa Fe Jets
Brookfield Renewable Power	Hanna & Morton	Seattle City Light
CA Bldg Industry Association	Hitachi	Sempra Utilities
CLECA Law Office	In House Energy	Sierra Pacific Power Company
CSC Energy Services	International Power Technology	Silicon Valley Power
California Cotton Ginners & Growers Assn	Intestate Gas Services, Inc.	Silo Energy LLC
California Energy Commission	Lawrence Berkeley National Lab	Southern California Edison Company
California League of Food Processors	Los Angeles Dept of Water & Power	Spark Energy, L.P.
California Public Utilities Commission	Luce, Forward, Hamilton & Scripps LLP	Sun Light & Power
Calpine	MAC Lighting Consulting	Sunshine Design
Cardinal Cogen	MBMC, Inc.	Sutherland, Asbill & Brennan
Casner, Steve	MRW & Associates	Tabors Caramanis & Associates
Chris, King	Manatt Phelps Phillips	Tecogen, Inc.
City of Palo Alto	McKenzie & Associates	Tiger Natural Gas, Inc.
City of Palo Alto Utilities	Merced Irrigation District	TransCanada
Clean Energy Fuels	Modesto Irrigation District	Turlock Irrigation District
Coast Economic Consulting	Morgan Stanley	United Cogen
Commercial Energy	Morrison & Foerster	Utility Cost Management
Consumer Federation of California	NLine Energy, Inc.	Utility Specialists
Crossborder Energy	NRG West	Verizon
Davis Wright Tremaine LLP	Navigant Consulting	Wellhead Electric Company
Day Carter Murphy	Norris & Wong Associates	Western Manufactured Housing Communities Association (WMA)
		eMeter Corporation
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