

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 8, 2015

Advice Letter 4481-E

Ms. Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177

Subject: Notice of Construction under General Order (GO) 131-D, for Cooley Landing – Stanford 60kV Power line reconductoring project in the cities of Atherton and Menlo Park

Dear Ms. Allen,

Summary: Energy Division approves PG&E's request to construct facilities pursuant to GO 131-D a connection for Cooley Landing – Stanford 60kV Power line. The protest by Mr. Stephen Peckler is denied for failure to state a proper reason.

Background: The California Public Utilities Commission's General Order (GO) 131-D governs the planning and construction of electric generation, transmission/power/distribution line facilities and substations.

To improve and maintain safe electrical service to the Menlo Park and Atherton area, PG&E is requesting replacement of the electrical wires on approximately two miles of the existing Cooley Landing-Stanford 60kV power line. It is located along the streets in Menlo Park and Atherton. PG&E is also replacing of 45 existing wood poles with new wood poles which are 15 feet taller to be in compliance with CPUC's General Order (GO) 95 minimum ground-to-conductor clearance requirements.

PG&E will temporarily relocate 170 feet of the power line within Menlo Substation property, during the construction process. Furthermore, PG&E is planning to incorporate Electric and Magnetic Field (EMF) mitigation measures into the project design, although PG&E's notice incorrectly indicated there would be no EMF mitigation. In compliance with CPUC Decision D.06-01-041 and PG&E's EMF Design Guidelines, PG&E has incorporated into the design of the project the following EMF reduction measure:

Thirteen utility poles in the school land use area will be raised to a height five feet taller than required for meeting General Order 95.

General Order 131-D, Section III, Subsection B.1, exempts projects meeting specific conditions from CPUC's requirement to file an application requesting authority to construct, also known as a Petition to Construct (PTC).

PG&E believes this project qualifies for the following exemptions:

- b. the replacement of existing power line facilities or supporting structures with equivalent facilities or structures.
- c. the minor relocation of existing power line facilities up to 2,000 feet in length, or the intersetting of additional support structures between existing support structures.
- g. power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement; or in a utility corridor designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies for which a final Negative Declaration or EIR (Environmental Impact Report) finds no significant unavoidable environmental impacts.

This project will not increase rates or charges, cause the withdrawal of service, or conflict with any other rate schedule or rule.

PG&E's Advice Letter AL 4481-E was timely protested by Stephen Peckler.

PG&E responded to the protest of Stephen Peckler, on September 16, 2014.

The protest claims that: 1) the procedure used by PG&E to notify residents within the EMF range of the Cooley Landing - Stanford 60 kV recondutoring project was improper and inadequate; 2) there is a lack of installing and imposing EMF restrictions; and 3) the length of the recondutoring project is over two miles, which is over the 2,000 feet limit set by GO131-D Section IIIB.1.c.

Commission staff has reviewed the Advice Letter, protest, and PG&E's response to the protest. Commission staff finds that PG&E published the notice of construction in the San Jose Mercury News for two consecutive weeks, on August 20 and 27, 2014 and posted a Notice of Construction along the project route as required by GO 131-D. PG&E also mailed the Notice of Construction to the planning and development directors for the municipalities crossed by the project (Menlo Park and Atherton), as well as to the California Energy Commission's Executive Director and Deputy Director and to the California Department of Fish and Wildlife. Finally, PG&E filed an advice letter containing the Notice of construction with the CPUC. Notice requirements in GO 131-D do not require direct notice to every resident living near a proposed project.

Commission staff finds that PG&E has complied with the Commission's Electric and Magnetic Field (EMF) Requirements, although PG&E's notice incorrectly indicated there would be no EMF mitigation. In compliance with CPUC Decision D.06-01-041 and PG&E's EMF Design Guidelines, PG&E has incorporated into the design of the project the following EMF reduction measure:

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Thirteen utility poles in the school land use area will be raised to a height five feet taller than required for meeting General Order 95.

Commission staff finds that PG&E's temporary line relocation qualifies for Exemption (c). In order to keep the power flowing during construction, PG&E plans to reroute an approximately 170-foot portion of the power line within Menlo Substation. This portion qualifies for "the minor relocation of existing power line facilities up to 2,000 feet in length", as described in GO 131-D, Section III.B.1C. PG&E is not claiming that the entire two-mile Reconductoring project is a minor relocation under this section. The Reconductoring work is in existing franchise or on PG&E property and qualifies for Section III.B.1 (g). The other two exemptions (subsections (b) and (c)) provide additional, overlapping grounds for exemption for portions of the project.

This project falls within and qualifies for the exemptions cited by PG&E in their Advice Letter 4481-E. None of the concerns raised by the protestor fits outside the specific exceptions of GO 131-D nor does the protestor's claims support a misapplication of an exemption by PG&E. Therefore, the protest is denied for failure to state a valid reason.

According to CPUC's General Order 96-B, Section 7.6.1:

Notwithstanding a timely protest, the reviewing Industry Division may approve an advice letter that is subject to disposition under this rule and is otherwise proper, if the protest either (1) is not made on proper grounds as set forth in General Rule 7.4.2, (2) may be rejected on a technical basis as discussed in this rule, or (3) is clearly erroneous.

Hence, PG&E's request to construct facilities pursuant to an exemption from a Permit to Construct is approved, effective January 8, 2015.

Sincerely,



Edward Randolph
Director, Energy Division

cc: Stephen Peckler

August 20, 2014

Advice 4481-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 Cooley Landing – Stanford 60kV Power Line Reconductor Project, in the Cities of Atherton and Menlo Park

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.

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

To improve reliability and maintain safe electrical service to the Menlo Park and Atherton area, PG&E will replace the wires (reconductor) on approximately 2 miles of the existing Cooley Landing–Stanford 60 Kilovolt (kV) Power Line, located along city streets in Menlo Park and Atherton (existing franchise). The project begins at Glenwood Substation (Glenwood Drive east of El Camino Real, Atherton) and continues southwest on Glenwood and Valparaiso Avenues for approximately 1¾ miles before turning southeast approximately 900 feet on Cloud Avenue and then southwest on Ashton Avenue approximately 600 feet to enter Menlo Substation at Ashton Avenue and Alameda De Las Pulgas, Menlo Park. The project will replace approximately 45 existing wood poles with new wood poles (equivalent facilities). The current poles are approximately 70 to 85 feet tall, and the new poles will be approximately 5 to 15 feet taller to comply with California Public Utilities Commission (CPUC) General Order 95 minimum ground-to-conductor clearance requirements. In addition, four existing distribution poles will be replaced with approximately 80-foot-tall poles to allow the distribution and power line wires to be placed on the same poles. Additionally,

PG&E will temporarily relocate approximately 170 feet of the power line within the Menlo Substation property while substation modifications occur (minor relocation). Construction is tentatively scheduled to begin in October 2014, or as soon as project plans and approvals are in place. Construction is scheduled to be completed in December 2014, or as soon as possible after construction begins.

CPUC General Order 131-D, Section III, Subsection B.1, exempts 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),

- b. "the replacement of existing power line facilities or supporting structures with equivalent facilities or structures."
- c. "the minor relocation of existing power line facilities up to 2,000 feet in length, or the intersetting of additional support structures between existing support structures."
- g. "power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement; or in a utility corridor designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies for which a final Negative Declaration or EIR [Environmental Impact Report] finds no significant unavoidable environmental impacts."

Additionally, G.O. 131-D requires utilities to employ "no cost" and specified "low cost" measures to reduce public exposure to electric and magnetic fields (EMFs) in accordance with CPUC Decision 06-01-042 and the "EMF Guidelines for Electrical Facilities." The following measures are proposed for this project:

- Because there are no EMF mitigation measures available on this project that would meet the CPUC's benchmark of 4% or less of the total project cost, no "no cost" or "low-cost" measures will be employed.

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 September 9, 2014, which is 20 days after the date of this filing. Protests should be mailed to the following address:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102

Facsimile: (415) 703-2200
E-Mail: EDTariffUnit@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

Meredith Allen
Senior Director, Regulatory Relations
Pacific Gas and Electric Company
P.O. Box 770000, Mail Code B10C
San Francisco, California 94177

Facsimile: (415) 973-7226
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.

Public Comment

Individuals or groups who do not file an official protest may still submit a comment on the request to the Energy Division at the address noted above, referencing Advice Letter 4481-E.

Effective Date

The Company requests that this advice filing become effective on September 19, 2014, 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/>.

Meredith Allen /KHC

Vice President – Regulatory Relations

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 E)**

Utility type:

ELC GAS
 PLC HEAT WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4481-E**

Tier: N/A

Subject of AL: **Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Cooley Landing – Stanford 60kV Power Line Reconductor Project, in the Cities of Atherton and Menlo Park**

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 #: N/A

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 AL: _____

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

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: **September 19, 2014**

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 proposed: 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:

California Public Utilities Commission
Director, Energy Division
505 Van Ness Ave., 4th Floor
San Francisco, CA 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Pacific Gas and Electric Company
Attn: Meredith Allen, Senior Director, Regulatory Relations
77 Beale Street, Mail Code B10C
P.O. Box 770000
San Francisco, CA 94177
E-mail: PGETariffs@pge.com

NOTICE OF PROPOSED CONSTRUCTION

Para más detalles llame 1-800-660-6789

**PROJECT NAME: COOLEY LANDING – STANFORD 60kV POWER LINE RECONDUCTOR PROJECT
(Cities of Atherton and Menlo Park)
ADVICE LETTER NUMBER: 4481-E**

Proposed Project: To improve reliability and maintain safe electrical service to the Menlo Park and Atherton area, Pacific Gas and Electric Company (PG&E) will replace the wires (reconductor) on approximately 2 miles of the existing Cooley Landing–Stanford 60 Kilovolt (kV) Power Line, located along city streets in Menlo Park and Atherton (existing franchise). The project begins at Glenwood Substation (Glenwood Drive east of El Camino Real, Atherton) and continues southwest on Glenwood and Valparaiso Avenues for approximately 1¼ miles before turning southeast approximately 900 feet on Cloud Avenue and then southwest on Ashton Avenue approximately 600 feet to enter Menlo Substation at Ashton Avenue and Alameda De Las Pulgas, Menlo Park. The project will replace approximately 45 existing wood poles with new wood poles (equivalent facilities). The current poles are approximately 70 to 85 feet tall, and the new poles will be approximately 5 to 15 feet taller to comply with California Public Utilities Commission (CPUC) General Order 95 minimum ground-to-conductor clearance requirements. In addition, four existing distribution poles will be replaced with approximately 80-foot-tall poles to allow the distribution and power line wires to be placed on the same poles. Additionally, PG&E will temporarily relocate approximately 170 feet of the power line within the Menlo Substation property while substation modifications occur (minor relocation). Construction is tentatively scheduled to begin in October 2014, or as soon as project plans and approvals are in place. Construction is scheduled to be completed in December 2014, or as soon as possible after construction begins.

Electric and Magnetic Fields (EMF): PG&E will employ “no cost” and specified “low cost” measures to reduce public exposure to EMF in accordance with California Public Utilities Commission (CPUC) Decision 06-01-042 and PG&E’s “EMF Design Guidelines for Electrical Facilities.” The following measures are proposed for this project:

- Because there are no EMF mitigation measures available on this project that would meet the CPUC’s benchmark of 4% or less of the total project cost, no “no cost” or “low cost” measures will be employed.

Exemption from CPUC Permit Requirement: CPUC General Order 131-D, Section III, B.1, exempts a utility from the CPUC’s requirement to file an application requesting authority to construct if a project meets specific conditions. This project qualifies for the following exemption(s):

- b. “the replacement of existing power line facilities or supporting structures with equivalent facilities or structures.”
- c. “the minor relocation of existing power line facilities up to 2,000 feet in length, or the intersetting of additional support structures between existing support structures.”
- g. “power line facilities or substations to be located in an existing franchise, road-widening setback easement, or public utility easement; or in a utility corridor designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies for which a final Negative Declaration or EIR [Environmental Impact Report] finds no significant unavoidable environmental impacts.”

Additional Project Information: To obtain further information on the proposed project, please call PG&E’s Project Information Line at (415) 973-5530.

Public Review Process: Individuals or groups may protest the proposed construction if they believe that PG&E 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 September 9, 2014 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

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

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

Public Comment: Even if you do not want to file an official protest, you may still comment on the request. To do so, send your comments to the Energy Division at the address noted above. Please reference Advice Letter 4481-E.

Notice Distribution List

Cooley Landing – Stanford 60 kV Power Line Reconductor Project
(Cities of Atherton and Menlo Park)

Advice 4481-E

Energy Commission

Mr. Robert Oglesby, Executive Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, California 95814

Mr. Drew Bohan, Deputy Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, California 95814

California Department of Fish and Wildlife

Mr. Serge Glushkoff
California Department of Fish and Wildlife, Bay Delta Region
7329 Silverado Trail
Yountville, California 94559

City of Atherton

Lisa Costa Sanders
Deputy Town Planner
91 Ashfield Road
Atherton, CA 94027

City of Menlo

Arlinda Heineck
Community Development Director
701 Laurel Street
Menlo Park, CA 94025

Newspaper

San Jose Mercury News

PG&E Gas and Electric Advice Filing List

AT&T	Douglass & Liddell	Occidental Energy Marketing, Inc.
Alcantar & Kahl LLP	Downey & Brand	OnGrid Solar
Anderson & Poole	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
BART	G. A. Krause & Assoc.	Praxair
Barkovich & Yap, Inc.	GenOn Energy Inc.	Regulatory & Cogeneration Service, Inc.
Bartle Wells Associates	GenOn Energy, Inc.	SCD Energy Solutions
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
CENERGY POWER	Green Power Institute	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Hanna & Morton	SPURR
California Energy Commission	In House Energy	San Francisco Public Utilities Commission
California Public Utilities Commission	International Power Technology	Seattle City Light
California State Association of Counties	Intestate Gas Services, Inc.	Sempra Utilities
Calpine	K&L Gates LLP	SoCalGas
Casner, Steve	Kelly Group	Southern California Edison Company
Center for Biological Diversity	Linde	Spark Energy
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of San Jose	Los Angeles Dept of Water & Power	Sunshine Design
Clean Power	MRW & Associates	Tecogen, Inc.
Coast Economic Consulting	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Commercial Energy	Marin Energy Authority	TransCanada
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Cost Management
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
Davis Wright Tremaine LLP	Morgan Stanley	Verizon
Day Carter Murphy	NLine Energy, Inc.	Water and Energy Consulting
Defense Energy Support Center	NRG Solar	Wellhead Electric Company
Dept of General Services	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Division of Ratepayer Advocates	North America Power Partners	