February 19, 2016

Advice Letter 4616-E

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

Subject: Notice of Construction Advice Letter 4616-E Filed 4/6/2015 Pursuant to General Order (GO) 131-D for the Vaca Dixon–Lakeville 230-kV Transmission Line Reconductoring Project in the cities of Napa and Vacaville; counties of Napa, Solano, and Sonoma

Dear Ms. Allen,

Advice Letter (AL) 4616-E is rejected without prejudice. AL 4616-E erroneously states that the State Water Resources Control Board (SWRCB) adopted its Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project on March 19, 2015.

Background:
PG&E filed AL 4616-E on April 6, 2015 for approval to reconductor approximately 40 miles of a double-circuit 230-kV transmission line. To prepare the 230-kV line for reconductoring, PG&E would modify 44 of the line’s 189 lattice steel towers. PG&E would add 17-foot cage top extensions to 39 of the towers and reinforce the foundation of one tower. PG&E would install a temporary line of wood poles (approximately 1,000-feet long) adjacent to Tulucay Substation. Helicopters would be used to access project sites, deliver materials, and conduct work on the towers and along the 230-kV line throughout the project. The proposed project would result in varied impacts on a range of environmental resource areas from helicopter use, land disturbance, waterway and wetland disturbance, installation of Federal Aviation Administration required lighting, and other activities.

No protest was filed to AL 4616-E. Energy Division staff suspended AL 4616-E to allow sufficient time for review.

Discussion:
AL 4616-E misstates that SWRCB’s IS/MND for the proposed project was adopted. The IS/MND was completed by SWRCB staff in September 2014, but the associated Clean Water Act 401 certification permit has not been issued, and the IS/MND has not been adopted or certified.

This fact was not apparent to Energy Division staff until late 2015 and is part of the reason for delay in AL 4616-E review. AL 4616-E lists a State Clearinghouse number and a date of IS/MND adoption. Although the State Clearinghouse number (SCH No. 2014092051) is correct, the IS/MND adoption date provided (March 19, 2015) is erroneous. The only March 19, 2015 events associated with the proposed project that SWRCB staff identified in a records search were communications with PG&E staff that indicate the IS/MND is not adopted.
AL 4616-E states that the proposed project qualifies for the following two exemptions from filing an application for a Certificate of Public Convenience and Necessity (CPCN) listed in GO 131-D Section III.A:

1. The minor relocation of existing power line facilities; and
2. The placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built.

Regardless of whether the proposed project may qualify for one or more CPCN application exemptions pursuant to GO 131-D, a CEQA document must be adopted for the proposed project to proceed. SWRCB and California Department of Fish and Wildlife permits are required, and these permits require CEQA review. United States Army Corps of Engineers and United States Fish and Wildlife Service permits are also required. If the CEQA document is not adopted by SWRCB, Energy Division staff would welcome the opportunity to work with PG&E should PG&E need a certified environmental document.

A number of other complexities further challenged Energy Division’s review of AL 4616-E, and these complexities should be addressed by PG&E in any future filing with the Commission. The complexities include:

- The project was included in the California Independent System Operator (CAISO) 2005 Coordinated Grid Planning Process and approved by the CAISO Board of Governors in 2006, but PG&E delayed approaching an agency to conduct the required CEQA review until September 2013;
- The original reliability need identified by CAISO related to the possible loss of Delta Energy Center. Apparently, the current need for the project is related to the anticipated closure of Pittsburg Generation Station on December 31, 2017 to meet once-through cooling requirements and is not based on the need identified by CAISO in 2005/2006;
- In 2006, CAISO staff established a threshold for project re-evaluation of $119 million, and the project’s cost, estimated by PG&E at $108 million in 2015, is approaching that threshold;
- There is a portion of the project (a 10.2-mile-long segment) that could be rerated without any construction to allow for a higher emergency rating that matches the rating on all other segments of the transmission line. This change would provide a reliability benefit that was not contemplated in the transmission planning process; and
- The project connects to the service area of two Community Choice Aggregators (CCAs) that now serve the region (i.e., Marin Clean Energy since 2010 and Sonoma Clean Power since 2014) and future power forecasts may show that the CCAs can reduce demand and potentially change the need or timing of the need for the proposed Vaca Dixon–Lakeville 230-kV Transmission Line upgrade.

Due to the information provided in this letter, AL 4616-E is rejected without prejudice.

Sincerely,

Edward Randolph, Director
Energy Division
Copied (by e-mail):
PG&E
Megan Lawson (Senior Manager, Regulatory Relations)
David Kraska (Director and Attorney, Regulatory/Permitting)

SWRCB
Jonathan Bishop (Chief Deputy Director, Division of Water Quality)
Mariela Carpio-Obeso (Ocean Unit Chief, Division of Water Quality)
Bill Orme (Supervisor, 401 Certification Unit)
Johanna Jensen (Environmental Scientist, 401 Certification Unit)
Cliff Harvey (Environmental Scientist, 401 Certification Unit)
Brian Dailey (Environmental Scientist, 401 Certification Unit)
Serena Liu (Attorney)

CPUC
Cynthia Walker (Deputy Director, Energy Division)
Arocles Aguilar (General Counsel)
Jason Reiger (Assistant General Counsel)
Jack Mulligan (Legal Counsel)
Molly Sterkel (Program Manager, Infrastructure Planning and Permitting)
Mary Jo Borak (Supervisor, Infrastructure Permitting and CEQA)
April 6, 2015

Advice 4616-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 Vaca Dixon-Lakeville 230 kV Transmission Line Reconductoring Project in the Cities of Napa and Vacaville; Counties of Napa, Solano, and Sonoma

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 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

PG&E is proposing to replace the wires (reconduct or) on the approximately 40-mile-long Vaca Dixon-Lakeville 230 Kilovolt (kV) Transmission Line to maintain service reliability and meet increasing electric load demands in Lake, Mendocino, Sonoma, Napa, and Marin Counties. The existing transmission line extends between Vaca Dixon Substation, located at 5221 Quinn Road in the City of Vacaville, and Lakeville Substation, located at 2455 Frates Road in Sonoma County near the City of Petaluma. From Vaca Dixon Substation, the transmission line travels approximately 4.1 miles west to approximately Gibson Canyon Road north of the City of Vacaville, and then travels approximately 19.1 miles southwest to Tuluca y Substation (located near the intersection of Highway 221 and Anderson Way) south of the City of Napa. From Tuluca y Substation, the transmission line travels approximately 16.9 miles west to Lakeville Substation. The transmission line primarily spans undeveloped, rural residential and agricultural areas, and crosses Interstate 505 and Highways 12, 29, 116, 121,
and 221. To accommodate the new wires, PG&E will modify approximately 44 of the line’s 189 lattice steel towers by adding approximately 17-foot cage top extensions on approximately 39 towers and reinforcing the foundation of approximately one tower. In addition, PG&E will install Federal Aviation Administration red obstruction lighting on approximately 4 towers. PG&E will also install a temporary line of wood poles, approximately 1,000 feet long, adjacent to Tulucay Substation to maintain power to customers during construction (minor relocation). Minor modifications will be made to the Lakeville, Tulucay, and Vaca Dixon Substations to accommodate the transmission line modifications. Approximately one tubular steel pole will be installed within Tulucay Substation. Construction is tentatively scheduled to begin in June 2015, or as soon as project plans and approvals are in place. The project is scheduled to be completed in March 2017, or as soon as possible after construction begins. The State Water Resources Control Board has completed an environmental review and adopted a Mitigated Negative Declaration for this project on March 19th, 2015 (State Clearinghouse Number 2014092051) in connection with its Clean Water Act 401 Certification.

CPUC General Order 131-D, Section III, Subsection A 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),

- “the placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built”

- “the minor relocation of existing power line facilities”

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:

- Increase the height of overhead lines, more than otherwise required, to reduce EMF strength at ground level in residential areas;

- Optimize phase configuration by “cross-phasing” individual circuits to cancel magnetic fields.

This filing will not 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 April 27, 2015, which is 21 days¹ after the date of this filing. Protests should be mailed to the following address:

CPUC Energy Division
ED Tariff Unit
505 Van Ness Avenue, 4th Floor
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.

¹ The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.
**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 4616-E.

**Effective Date**

The Company requests that this advice filing become effective on May 6, 2015, 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
Senior Director – 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**

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

<table>
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<th>Utility type:</th>
<th>Contact Person: Kingsley Cheng</th>
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<tr>
<td>☑ ELC</td>
<td>Phone #: (415) 973-5265</td>
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<tr>
<td>☑ PLC</td>
<td>E-mail: <a href="mailto:k2c0@pge.com">k2c0@pge.com</a> and <a href="mailto:PGETariffs@pge.com">PGETariffs@pge.com</a></td>
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**EXPLANATION OF UTILITY TYPE**

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**Advice Letter (AL) #:** **4616-E**  
**Tier:** **N/A**

**Subject of AL:** **Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Vaca Dixon-Lakeville 230 kV Transmission Line Reconductoring Project in the Cities of Napa and Vacaville; Counties of Napa, Solano, and Sonoma**

**Keywords (choose from CPUC listing):** Power Lines

**AL filing type:** ☑ One-Time  

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? ☑ No

Requested effective date: **May 6, 2015**  

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 21 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**

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1 The 20-day protest period concludes on a weekend. PG&E is hereby moving this date to the following business day.
PROJECT NAME: VACA DIXON-LAKEVILLE 230 KV TRANSMISSION LINE RECONDUCTORING PROJECT  
(Cities of Napa and Vacaville; Counties of Napa, Solano, and Sonoma, P. No. 03535)  
ADVICE LETTER NUMBER: 4616-E  

Proposed Project: PG&E is proposing to replace the wires (re conductor) on the approximately 40-mile-long Vaca Dixon-Lakeville 230 Kilovolt (kV) Transmission Line to maintain service reliability and meet increasing electric load demands in Lake, Mendocino, Sonoma, Napa, and Marin Counties. The existing transmission line extends between Vaca Dixon Substation, located at 5221 Quinn Road in the City of Vacaville, and Lakeville Substation, located at 2455 Frates Road in Sonoma County near the City of Petaluma. From Vaca Dixon Substation, the transmission line travels approximately 4.1 miles west to approximately Gibson Canyon Road north of the City of Vacaville, and then travels approximately 19.1 miles southwest to Tulucay Substation (located near the intersection of Highway 221 and Anderson Way) south of the City of Napa. From Tulucay Substation, the transmission line travels approximately 16.9 miles west to Lakeville Substation. The transmission line primarily spans undeveloped, rural residential and agricultural areas, and crosses Interstate 505 and Highways 12, 29, 116, 121, and 221. To accommodate the new wires, PG&E will modify approximately 44 of the line’s 189 lattice steel towers by adding approximately 17-foot cage top extensions on approximately 39 towers and reinforcing the foundation of approximately one tower. In addition, PG&E will install Federal Aviation Administration red obstruction lighting on approximately 4 towers. PG&E will also install a temporary line of wood poles, approximately 1,000 feet long, adjacent to Tulucay Substation to maintain power to customers during construction (minor relocation). Minor modifications will be made to the Lakeville, Tulucay, and Vaca Dixon Substations to accommodate the transmission line modifications. Approximately one tubular steel pole will be installed within Tulucay Substation. Construction is tentatively scheduled to begin in June 2015, or as soon as project plans and approvals are in place. The project is scheduled to be completed in March 2017, or as soon as possible after construction begins. The State Water Resources Control Board has completed an environmental review and adopted a Mitigated Negative Declaration for this project on March 19th, 2015 (State Clearinghouse Number 2014092051) in connection with its Clean Water Act 401 Certification.

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:

- Increase the height of overhead lines, more than otherwise required, to reduce EMF strength at ground level in residential areas;
- Optimize phase configuration by “cross-phasing” individual circuits to cancel magnetic fields.

Exemption from CPUC Permit Requirement: CPUC General Order 131-D, Section III, A, 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:

- “the placing of new or additional conductors, insulators, or their accessories on or replacement of supporting structures already built”
- “the minor relocation of existing power line facilities”

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 April 27, 2015 at the following address:

Director, Energy Division  
ED Tariff Unit  
California Public Utilities Commission  
With a copy mailed to:  
David Kraska, Law Department  
(P.No. 03535/SAP Order No. 30782983/MWC 60)
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 4616-E.
Notice Distribution List

Vaca Dixon-Lakeville 230 kV Transmission Line Reconductoring Project
(Cities of Napa and Vacaville; Counties of Napa, Solano, and Sonoma)

Advice 4616-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

California Regional Water Quality Control Board, Central Valley Region

Ms. Elizabeth M. Lee, P.E.
401 Water Quality Certification/Municipal Storm Water Unit Supervisor
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

City of Napa

Planning Department
Ken MacNab, Planning Manager
1600 First Street
Napa, California  94559

City of Vacaville

Community Development Department
Reyman Behvand, City Planner
650 Merchant Street
Vacaville, California 95688
**Napa County**
Planning Department  
County Administrative Building  
John McDowell, Deputy Planning Director  
1195 Third Street, 2nd Floor  
Napa, California 94559

**Solano County**
Department of Resource Management  
Planning Services Division  
Mike Yankovich, Planning Manager  
675 Texas St., Suite 5500  
Fairfield, CA 94533-6341

**Sonoma County**
Planning Department  
Jennifer Barrett, Deputy Director of Planning  
2550 Ventura Avenue  
Santa Rosa, CA 95403

**Newspapers**
Fairfield Daily Republic  
Napa Valley Register  
Santa Rosa Press Democrat  
Vacaville Reporter
PG&E Gas and Electric
Advice Filing List

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