

PUBLIC UTILITIES COMMISSION

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August 15, 2019

Advice Letter 5500-E

Erik Jacobson, c/o Megan Lawson
Director, Regulatory Relations
Pacific Gas and Electric Company
77 Beale Street, Mail Code B13U
San Francisco, CA 94177

Subject: Construction of the Fulton-Calistoga 60kV Power Line Reconductoring Project in the City of St. Helena, Counties of Napa and Sonoma, Pursuant to General Order 131-D

Dear Mr. Jacobson:

The Energy Division has determined that the proposed project qualifies for exemption from permitting requirements in accordance with General Order (GO) 131-D, Section III.B.1.g. This disposition letter approves the Pacific Gas and Electric Company (PG&E) advice letter (AL) 5500-E-A effective August 15, 2019.

Background:

On March 20, 2019, PG&E filed PG&E AL 5500-E with the Commission seeking exemption from a Permit to Construct under GO 131-D to rebuild twelve miles of the Fulton-Calistoga 60 kV line in Sonoma and Napa Counties.

The Fulton-Calistoga 60 kV line was de-energized and removed from service in February 2019. On February 27, 2019, PG&E representatives briefed Energy Division about the condition of the line and the necessity to replace it.

Summary of Request:

PG&E proposes to replace conductors and support structures to comply with General Order 95 minimum ground-to-conductor clearance requirements and maintain safe and reliable electric service. PG&E claims the proposed project is exempt from permitting requirements based on CPUC General Order 131-D, Section III.B.1. (g) as the existing line had been constructed in public utility easement or franchise areas.

Energy Division issued a Suspension Notice on March 29, 2019 to allow additional time for Staff Review. PG&E submitted a Substitute Sheet to Commission on April 24, 2019 to make minor revisions to the project description involving quantity or type of poles. For

example, the quantity of new lattice steel structures was changed from 92 to 75. PG&E identified that it would install 16 tubular steel poles. PG&E changed the height of replacement structures to “10 to 35 feet taller” instead of the previous description which stated they would be “10 to 30 feet taller”.

Energy Division staff received seven late-filed comments or letters identified as late-filed protests. PG&E submitted supplemental AL 5500-E-A on July 19, 2019. Energy Division staff issued a further suspension notice on July 24, 2019 to allow additional time for Staff review.

Discussion:

Energy Division reviewed the filing, protests, and comment letters for compliance with Commission General Order 131-D and General Order 96-B. A detailed technical review and analysis is attached as Attachment 1. Energy Division has determined that PG&E’s supplemental AL 5500-E-A complies with applicable requirements of both General Orders. The Energy Division staff finds the utility claim for GO 131-D exemption from permitting to be reasonable. The late-filed letters providing comments or concerns including those identified as protests do not provide valid technical reasons to justify rejecting the AL.

We recognize the extensive time, energy and resources that California Department of Fish and Wildlife, Napa County and City of St. Helena felt compelled to exert to achieve improved outcomes for their constituents. Energy Division acknowledges that these jurisdictions along with a local business and several property owners expressed concern and significant disappointment because PG&E inadequately communicated the scope of work including intentions to install an interset pole in a residential backyard. We regret that this experience was inordinately difficult for parties seeking to be heard.

We understand parties expect PG&E to be more forthcoming and transparent with project information. Because of these circumstances, we agree to set additional expectations for PG&E’s direct communication with impacted project stakeholders, that are detailed in the Attachment.

AL 5500-E-A is effective August 15, 2019. Please contact Joyce Steingass of Energy Division staff at (415) 703-1810 (jws@cpuc.ca.gov) if you have any questions.

Sincerely,

 FOR

Edward Randolph,
Deputy Executive Director for Energy and Climate Policy/
Director, Energy Division

Attachment (1): Technical Review and Analysis

Cc:

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Attachment 1 Technical Review and Analysis

I. Background

PG&E proposes to replace conductors and support structures to comply with General Order (GO) 95 minimum ground-to-conductor clearance requirements and maintain safe and reliable electric service. PG&E claims the proposed project is exempt from permitting requirements based on CPUC GO 131-D, Section III.B.1. (g) as the existing line had been constructed in public utility easement or franchise areas.

Energy Division issued a Suspension Notice on March 29, 2019 to allow additional time for Staff Review. During the initial 20-day protest period, no protests were filed. However, Energy Division staff was concerned that General Order (GO) 131-D Section III.B.2 exceptions to the Section III.B.1 exemptions may apply due to biological resources in proximity of the project. Therefore, Energy Division suspended the Advice Letter (AL) on March 29, 2019 to allow time for Staff review.

Suspension of an AL precludes the utility from starting construction. However, PG&E notified Energy Division staff on April 2, 2019, that given the poor condition of the power line, PG&E intended to decommission and remove the power line beginning the week of April 8, 2019. GO 131-D does not require permits in this instance; consequently, a utility does not need CPUC permission to decommission a power line.

PG&E submitted a Substitute Sheet to the Commission on April 24, 2019 to make minor revisions to the project description involving quantity or type of poles. For example, the quantity of new lattice steel structures was changed from 92 to 75. PG&E identified that it would install 16 tubular steel poles. PG&E changed the height of replacement structures to “10 to 35 feet taller” instead of the previous description which stated they would be “10 to 30 feet taller”.

During June and July 2019, Energy Division staff received seven late-filed comments or letters identified as late-filed protests and directed PG&E to provide written responses.¹

PG&E submitted supplemental AL 5500-E-A on July 19, 2019. Energy Division staff issued a further suspension notice on July 24, 2019 to allow additional time for Staff review.

¹ Seven parties submitted letters providing comments or concerns: California Department of Fish and Wildlife (CDFW), City of St. Helena (COSH), Ms. Jessica Richardson-Hague and Mr. Kevin Hague, Ms. Andrea Antonaccio Wagner and Mr. William Wagner, Napa County, Cain Wine Cellars (Cain) and nine Calistoga residents (Laurel Gourd et.al.). The letters submitted by Napa County, Cain and Laurel Gourd et al. were labeled as Protests, but none of these Protests were timely filed.

II. Party Protest and Comments

California Department of Fish and Wildlife (CDFW)

The California Department of Fish and Wildlife (CDFW) provided the Energy Division a letter dated May 9, 2019 to offer concerns, comments and recommendations in its role as a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA). CDFW has jurisdiction over the conservation, protection, and management of wildlife, native plants, and habitat necessary to maintain biologically sustainable populations. CDFW may also act as a Responsible Agency in situations where discretionary permits are needed under CDFW jurisdiction.

In its letter, CDFW expressed concern that special-status species may be located within and adjacent to the proposed project and that there was a reasonable possibility that the project would have a significant impact on the environment as proposed. CDFW offered 3 comments and 12 recommended mitigation measures.

The comments focused on the Foothill Yellow Legged Frog (frog), the Northern Spotted Owl (owl) and certain jurisdictional streams such as Weeks Creek, Sulphur Creek and Santa Rosa Creek:

- 1) The frog is a threatened candidate species under the California Endangered Species Act (CESA), is found in the vicinity of streams in a variety of habitats, some of which have been identified in the project area.
- 2) The owl is listed as a threatened species under CESA. PG&E and CDFW staff identified a nesting owl within 0.25 miles of the project site and potentially suitable habitat occurs within the project site.
- 3) CDFW stated that some of PG&E's proposed work was within or adjacent to certain CDFW jurisdictional streams. CDFW asserted that project related activities may be subject to CDFW regulatory authority under Section 1600 Fish and Game Code which protects streambeds.

Energy Division requested PG&E to review and respond to CDFW recommendations. In its June 19, 2019 response, PG&E provided its legal arguments claiming that the "exceptions to the exemptions" in GO 131-D Section III.B.2 would not apply. PG&E performed additional analysis regarding species concerns including records review of California Natural Diversity Database and California Native Plant Society, aerial imagery, and site visits for constructability or habitat assessments. PG&E prepared Appendix I, "Response to CDFW Recommended Mitigation Measures".² PG&E stated that it had modified the project to allow helicopter operations or similar work activities from July 15 to January 31. Additionally, PG&E revised the project to avoid a crossing of Weeks Creek.

PG&E committed to implement the Avoidance and Minimization Measures (AMMs) found in Appendix II to the PG&E response letter in the event the frog or owl are encountered during project activities. PG&E's response indicated that PG&E assessed the proposed project and has declined

² Letter from PG&E Chief Counsel, Environmental, to Energy Division, dated June 19, 2019 Re: PG&E Response to CDFW's May 9, 2019 Letter Concerning AL 5500-E.

to seek “take” authorization for the frog or the owl because PG&E states that the project will not result in “take” of either species. Further, PG&E disputed the need to apply for a Lake or Streambed Alteration Agreement because PG&E does not intend to perform work within channels nor substantially impact them.

City of St. Helena (COSH) and Hudson Avenue Neighbors

The City of St. Helena (COSH) submitted a comment letter dated June 12, 2019 to request CPUC immediate review and to request CPUC to halt construction of the line. COSH stated that PG&E had failed to disclose the actual scope of the project and the PG&E intention to add one or more new poles including at least one pole in a residential backyard. COSH concerns involved allegations of lack of adequate accurate notice; improper citing of exemption from GO 131-D due to lack of legal authority involving lack of easement; not engaging with COSH to consider potential project alternatives and environmental and aesthetic impacts to COSH and other properties.

Two homeowners of Hudson Avenue, St. Helena,³ transmitted late-filed comments on June 12, 2019 to express concerns and opposition to the placement of a 75-foot tubular steel pole in the backyard of a Hudson Avenue residential property. The concerns included allegations of lack of direct written notice; lack of legal authority to increase the number of poles due to lack of utility easement; lack of investigating alternatives; and lack of disclosure about the need for a 75-foot pole. The Hudson Avenue Neighbors indicated that an unrecorded easement document prohibited installation of additional utility poles. The property owners requested that PG&E restore power on the existing 60 kV line followed by rerouting the 60 kV line and installing it on the route followed by a 115 kV line, or alternatively, by undergrounding the impacted 0.15 miles of power line presently crossing single-family backyards by relocating in utility easements on the closest proximity city streets.

PG&E responded by revising the project design in some respects to eliminate the need for one interset pole in a residential backyard. PG&E committed to file a Supplemental Advice Letter to augment the description of the scope of work to reflect this project modification. PG&E’s response stated that PG&E’s project is exempt from Permit to Construct (PTC) permitting requirements because the project would be within existing public utility easements, none of the exceptions to the exemptions are applicable and that existing conductors and structures would be replaced. Regarding COSH claims of lack of accurate notice, PG&E responded that they followed explicit noticing requirements of GO 131-D, Section IX.B.1-4. They argue that the provision for communicating with local jurisdictions regarding land use matters applies only when locating projects, claiming it is not relevant in this situation where the existing line is being rebuilt in the same location. PG&E responds to COSH requests to consider potential project alternatives by asserting that considering alternatives is infeasible due to the outage status of the line, time, ratemaking principles, and likelihood of other community opposition to a new alternative location. PG&E asserts that maximizing existing rights of way by rebuilding the line in the existing location

³ Ms. Jessica Richardson-Hague and Mr. Kevin Hague; Ms. Andrea Antonaccio Wagner and Mr. William Wagner.

is consistent with CEQA principles for less significant environmental impacts, past Commission siting decisions, and the State's Garamendi Principles⁴ for siting transmission facilities.

COSH transmitted a comment letter to the Supplemental AL 5500-E-A dated July 29, 2019 to request CPUC to require PG&E to consider alternatives to the project when future reconductoring work and pole modifications are made on the 115kV line. COSH stated that it does not know if retaining the 60 kV line routed through the city or relocating the line along the 115 kV line is optimal.

PG&E responded by letter, dated August 5, 2019, claiming that relocating the Fulton-Calistoga line would be infeasible, likely resulting in greater environmental impacts, increased costs to ratepayers, community opposition, and prolonged operation of Calistoga Substation diesel generators. PG&E disputed the necessity for considering additional alternatives, citing lack of substantial evidence that the proposed project would cause significant impacts. Finally, PG&E asserted that CEQA requires a Lead Agency to prepare an EIR and consider alternatives only in the situation where a proposed project results in significant impacts that remain after implementing mitigations.

Napa County

Napa County transmitted a late-filed letter identified as a Protest dated June 20, 2019 in which Napa County opposed the project. Napa County joined with the City of St. Helena and residents of Hudson Avenue, St. Helena, in requesting that CPUC reject the Advice Letter and require formal CEQA review. Citing to inadequate notice, failure to comply with General Order 131-D by using an improper exemption and failing to communicate with Napa County about land use matters, Napa County requested CPUC to direct PG&E to file an application seeking a Permit to Construct and perform environmental review.

PG&E disputed Napa County's contention that PG&E provided inadequate notice, stating that the Napa County Director of Planning, Building, and Environmental Services was provided a copy of the notice and the Substitute Sheets, and that the Supplemental AL would provide more detailed project information. PG&E maintains that GO 131-D, Section XIV.B provision for communicating about land use matters is not relevant when an existing line is rebuilt in the same location.

PG&E filed Supplemental AL 5500-E-A on July 19, 2019. Therein, PG&E clarifies the project alignment remains unchanged; however, some replacement structures will be 10-35 feet taller than existing structures. PG&E provided additional specifics about pole locations and pole heights to clarify plans and scope of work. The construction schedule is modified to tentatively begin in Sonoma County (Phase 1) in August 2019. Construction within Napa County and the City of St. Helena is slated to begin in September or October 2019, or as soon as practicable after project approval.

⁴ The Garamendi Principles were passed in Senate Bill (SB) 2431 (Stats. 1988, Ch. 1457) regarding the role of transmission in California's future development. The legislation acknowledged that construction of new high-voltage transmission lines within new rights-of-way may impose financial hardships and adverse environmental impacts on the state and its residents.

In response to PG&E AL 5500-E-A, Napa County provided its letter dated July 29, 2019 in protest stating that the County's Planning, Building, & Environmental Services (PBES) Department needs more information to assess the project. Napa County sought information about what PG&E intends to do, and when, where, and how it plans to do it, so that PBES can adequately plan for the project and to coordinate with PG&E. Napa County stated that it needs detailed information about PG&E's construction plans and a direct line of communication with PG&E. By way of example, Napa County expressed concern about the fourteen diesel powered generators operating 12 to 17 hours per day at the Calistoga Substation, significantly impacting quality of life for nearby residents. PBES had not become aware of the generators until recent events including two code enforcement cases filed with Napa County because of generator noise levels. Napa County's letter further states that Napa County supports PG&E's safety and reliability related infrastructure projects and does not wish to see the Fulton-Calistoga project unduly delayed.

In response, PG&E agreed to continue discussions with Napa County concerning access roads and other project issues. PG&E indicated that project representatives met with Napa County on July 31, 2019 (and will continue to meet) to work collaboratively to identify measures to address access roads and other issues. PG&E expressed regret that it did not meet with local government to discuss project details in advance of filing for Advice Letters or permit applications and stated it will strive to engage with the County at an earlier stage on future projects.

Cain Wine Cellars

Cain Wine Cellars transmitted a late-filed protest with the CPUC on June 25, 2019, which was accepted by ED staff. Cain Wine Cellars stated that PG&E failed to directly notify Cain about the project and that the proposed work would be ineligible for a GO 131-D exemption because the proposed work would exceed the scope of an existing easement. Subsequently, Cain Wine Cellars withdrew its Protest by transmitting a notice of withdrawal of protest dated July 12, 2019.

Laurel Gourd, et. al (Residents of Calistoga)

Nine residents of Calistoga provided five late-filed letters protesting the project on the basis that material factual issues remain and requested that AL 5500-E-A be rejected pursuant to GO 96-B Section 7.5.1. They request the Commission reject the permitting exception because of GO 131-D section III. B.2.c: "there is reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances". Calistoga residents claim that PG&E did not disclose that the proposed project includes 14 diesel-powered industrial generators operating 16 hours per day on most days. They state that the generators run at decibel levels exceeding limits set forth in Napa County Ordinances 8.16.060 and 8.16.070.

PG&E responded by explaining the 14 temporary diesel generators are not part of the proposed project. The diesel generators are needed to provide reliable service to Calistoga and the surrounding area while the Fulton-Calistoga line is out of service. While the line is out of service, the Konocti-Middleton 60 kV line -- which is the remaining power line feeding Calistoga Substation -- cannot support the entire load during summer peak demand. PG&E explained that if the CPUC required PG&E to obtain a permit and conduct a CEQA review, PG&E could be

required to run the generators for another two years or more because of the estimated duration of the permitting and environmental review process. PG&E indicated that GO 131-D Section III.A. requires Commission approval for constructing electric generation facilities if a project exceeds 50 megawatts, while the temporary installation is 21 megawatts. The temporary diesel generators are authorized under the California Air Resources Board Portable Equipment Registration Program. PG&E says that it constructed a temporary wall for noise dampening, restricted operating hours, and agreed to notify City of Calistoga 24 hours prior to each use of the generators.

III. Discussion and Energy Division Findings

Energy Division staff reviewed the Party Protests and Comments as stated above. Regarding respondents and protestants concerns about lack of notice, staff notes that the AL filing has been kept open for an additional two months past the Commission's receipt of late-filed comments from local jurisdictions, businesses and property owners.

Energy Division respects the specialized expertise CDFW provides as a Trustee Agency and as a Responsible Agency. Staff appreciates receiving comments, concerns and recommendations related to the proposed PG&E project. CDFW is authorized to enforce the relevant Fish and Game regulations and the California Endangered Species Act. We expect PG&E to fully comply with all applicable laws and regulations in constructing the project.

Staff participated in a conference call with PG&E and CDFW to discuss the biological resource assessment performed by PG&E and encouraged PG&E to attend a site visit with CDFW, which was conducted on April 30, 2019.

Staff met with PG&E representatives on June 21, 2019 to review the PG&E June 19, 2019 response to the CDFW concerns. Energy Division recognizes that PG&E performed records reviews, including review of aerial imagery to detect habitat, and site visits to perform surveys of species. PG&E modified the project in response to CDFW concerns to ensure that no helicopter operations or similar work activities will occur within a quarter mile of known occupied owl nesting locations, historic owl detection locations, and potentially suitable nesting habitat, until owl nesting season has concluded.

Energy Division staff supports CDFW's authority in providing guidance about the Foothill Yellow Legged Frog and acknowledges that CDFW recommended PG&E review a guidance document for PG&E's reference and use.⁵ In PG&E's response, PG&E states that it used a recommended protocol survey method from the guidance document to survey for the frog. Staff understands that PG&E will be in communication with CDFW about its guidance document, which describes the range of the frog and its ability to be present in wetted channels and within upland habitat.

Energy Division reviewed and determined that the exceptions to the exemptions from GO 131-D do not apply. However, we find it reasonable to rely on CDFW's definition of nesting season, which CDFW communicated ends on July 31 each year. Similarly, we find it reasonable to rely on CDFW's definition of the post-fledgling timeframe, which CDFW identifies as July 31 to January 31.

⁵ "Considerations for Conserving the Foothill Yellow-Legged Frog", (CDFW 2018)

Energy Division understands that during construction of this project, as with all its projects, PG&E shall comply with all applicable environmental laws and is subject to the full enforcement power of the CDFW in the event of noncompliance.

COSH asserts that mailed notice procedures to the City and notice to impacted landowners and local agencies needs to be improved. They contend that landowners within 300 feet on the Project in any area should be notified. Public utilities under CPUC jurisdiction are required to give notice of construction of power line facilities between 50 kV and 200 kV in accordance with General Order 131-D, Section XI.B. While PG&E may have met the explicit requirements of GO 131-D for Fulton-Calistoga, the general order sets the minimum requirements for noticing. When a utility has information indicating that some individuals or property owners may be disproportionately impacted by proposed construction, then it is incumbent on the utility to perform additional public outreach.

Given the circumstances of this project where local jurisdictions perceived that PG&E provided inadequate and incomplete notification, particularly to the Hudson Avenue residents, Energy Division finds COSH's request to be reasonable and appreciates PG&E's commitment to adopt COSH's request to provide accurate, timely notice. Energy Division understands that PG&E will provide mailed notice to COSH and to the landowners impacted by subsequent changes to Fulton-Calistoga project plans, for landowners within 300 feet.

Energy Division encourages PG&E to keep an open dialogue with the cities impacted by construction, impacted landowners, and local agencies. It is reasonable to expect PG&E to expand its outreach with Napa County and affected communities as Napa County has requested. Outreach should include but not be limited to scheduling informational meetings with local planning departments, identifying construction milestones and necessary permits. Energy Division notes the positive development that PG&E met with Napa County during the week of July 29, 2019. Accordingly, with Napa County's line of communication open, Energy Division concludes that there is no technical reason to justify rejecting the project based on a lack of adequate or accurate notice.

The proposed project is focused on restoring service of a decommissioned line. The 60 kV power line was de-energized in February 2019 and decommissioned during April 2019 due to its deteriorated condition. Prior to decommissioning, PG&E stated to Energy Division staff that the overhead line was at risk of breaking and falling into the underbuilt distribution facilities, which posed potential hazard of ignition in a high fire threat area. Due to the de-energized line, PG&E is supplying the City of Calistoga temporary service through use of diesel generators. Consistent with PG&E's obligation to ensure reliable service to its customers and its role in operating and maintaining its system, PG&E can operate diesel generators to provide temporary power because of an outage to a transmission line. Once the Fulton-Calistoga line is returned to service, the need to operate diesel generators will be eliminated. Consequently, Energy Division finds it unreasonable to further delay reconstruction of the line. Staff concludes that the protests regarding diesel generators⁶ are erroneous, and there is no technical reason to justify rejecting the project related to diesel generators.

⁶ Protests of Laurel Gourd, et. al, residents of Calistoga.

Finally, the request by COSH to co-locate the 60 kV line on the 115 kV line is a separate matter that CPUC would take under consideration when PG&E submits its application or notice of construction for the 115kV line. In situations like this one, where CPUC grants a utility an exemption from the requirement to file a permit-to-construct, GO 131-D does not require the electric public utility to evaluate alternatives to a project, such as undergrounding or placing a wire on a different and pre-existing set of poles. Alternatives to projects are considered in situations where impacts caused by a project are significant and mitigation measures cannot be designed which reduce the impacts to less than significant. Upon the Commission receiving PG&E plans for future reconductoring work, the Commission will evaluate utility plans and permitting requirements in accordance with the governing General Orders. In summary, Energy Division sees no technical reason to justify rejecting the project for lack of considering alternatives.



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July 19, 2019

Advice 5500-E-A

(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

Subject: Supplement: Additional and updated information to Advice Letter 5500-E concerning Construction of the Fulton-Calistoga 60kV Power Line Reconductoring Project in the City of St. Helena, Counties of Napa and Sonoma, Pursuant to General Order 131-D

Pacific Gas and Electric Company (“PG&E” or “the Company”) hereby provides supplemental and updated information to Advice Letter 5500-E, which provided notice of construction pursuant to General Order (G.O.) 131-D, by filing additional information in accordance with GO 95, Section 7.5.1. The project description below supersedes and updates the project description in Advice Letter 5500-E.

Purpose

This advice letter provides supplemental and updated information to Advice Letter 5500-E.

Background

PG&E submitted Advice Letter 5500-E with the California Public Utilities Commission (“CPUC” or “Commission”) on March 20, 2019, concerning its proposal to replace conductors and structures on approximately 12 miles of the existing Fulton-Calistoga 60 Kilovolt (kV) Power Line in the City of St. Helena and unincorporated Napa and Sonoma Counties. A Substitute Sheet was submitted on April 24, 2019 in accordance with CPUC General Order 96-B, Section 7.5.1, indicating minor revisions in the project description. As indicated in the advice letter, the project is exempt from permitting requirements under the Commission’s General Order 131-D (“GO 131-D”), Section III. B.1, subsection (g).

Late-filed comments to Advice Letter 5500-E were submitted by Jessica Richardson-Hague and Kevin Hague, Andrea Antonaccio Wagner and William Wagner, and the City of St. Helena, dated June 12, 2019 and received by PG&E on June 13, 2019. A protest by the County of Napa was dated and received June 20, 2019. After receiving the comments, PG&E studied the project design, made revisions where feasible, and provided an updated,

more detailed project description and additional information in a Reply letter dated July 15, 2019. PG&E now submits this Supplement to formally update the project description.

Supplemental Information

The fundamental purpose of the project remains unchanged. To comply with CPUC General Order ("GO") 95 minimum ground-to-conductor clearance requirements and maintain safe and reliable electric service, PG&E is proposing to replace conductors (wires) and supporting structures on approximately 12 miles of the existing Fulton-Calistoga 60 Kilovolt (kV) Power Line in the City of St. Helena and unincorporated Napa and Sonoma Counties.

In Advice Letter 5500-E, as revised, PG&E indicated that the project would replace approximately 83 existing lattice steel structures, 3 existing light duty steel poles and 7 existing wood poles with approximately 75 new lattice steel structures and 16 tubular steel poles.

Since submitting Advice Letter 5500-E, PG&E has continued to progress in its project engineering and has made minor design changes in response to resident concerns. Through this supplement, PG&E updates the project description to indicate that it will now replace approximately 91 existing lattice steel poles, 5 existing light-duty steel poles and 6 existing wood poles with approximately 75 new lattice steel poles and 22 new steel poles (including 9 tubular steel poles with foundations, 9 engineered directly-embedded poles, and 4 light-duty steel poles).

In Advice Letter 5500-E, as revised, PG&E indicated that replacement structures would be approximately 10 - 35 feet taller than the existing structures. The existing structures are approximately 50 - 85 feet tall. Through this supplement, PG&E updates the project description to indicate that within the City of St. Helena, the replacement poles will be up to approximately 25 feet taller than the existing structures. In order to maintain safe clearances, two permanent interset poles will be installed in-line within the city limits, one along Hudson Avenue near the corner of Madrona Avenue and one adjacent to a parking lot at 1663 Voorhees Circle. An additional temporary pole will be installed in an existing corridor across Charter Oak Avenue from the St. Helena City Corporation Yard at 1405 Charter Oak Avenue. Two existing wood poles near the intersections of Madrona Avenue and Reisling Way and Madrona Avenue and Hudson Avenue will be shortened to carry only low voltage distribution wires. Outside of the city limits, replacement poles will range from 0 - 62 feet taller, with several poles eliminated and no additional poles added. The taller replacement poles are not in locations that will adversely impact scenic viewsheds. A wood pole at 2080 Calistoga Road in Sonoma County will be shortened.

The Project alignment remains unchanged and PG&E provides additional specificity herein. The Project alignment begins at the intersection with PG&E's Rincon No. 1 and No. 2 115 kV Tap Power Line, approximately 875 feet north of the northern terminus of Baird Road in Sonoma County. The Project route continues east for approximately 7 miles, then into Napa County for just over 3 miles, traveling through a combination of vineyards, open

space, and Sugarloaf Ridge State Park until the line reaches the town of St. Helena. Once in St. Helena, the alignment travels northeast along Madrona Avenue for approximately 0.4 miles to the intersection with Hudson Avenue, where a popular tree known as the Mary Novak tree is located. The route turns southeast and continues along Hudson Avenue for approximately 0.3 miles. At the intersection of Hudson Avenue and Spring Street, the alignment runs through the backyards of a residential area for approximately 0.15 miles. The alignment then turns to the northeast for approximately 370 feet, where the new pole is proposed near a parking lot at 1663 Voorhees Circle, and continues for approximately 0.3 miles to end at an existing structure located approximately 0.15 miles west of the intersection of Charter Oak Avenue and Main Street. Helicopters will be used to facilitate construction and minimize ground disturbance.

Through this supplement, PG&E updates the construction schedule. Construction is tentatively scheduled to begin in Sonoma County (Phase 1) in August 2019, or as soon as practicable after project approval. Construction in Napa County and the City of St. Helena (Phase 2) is expected to begin in September or October 2019, or as soon as practicable after project approval. Construction will take approximately 4 months to complete and is expected to be completed in late 2019, early 2020, or as soon as possible after construction begins.

Protests

PG&E asks that the Commission, pursuant to GO 96-B, Section 7.5.1, maintain the original protest and comment period designated in Advice 5500-E.

Effective Date

PG&E requests that this Tier 2 advice letter become effective as soon as possible.

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, as well as to all persons who have filed a protest or response. 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/>.

/S/

Erik Jacobson
Director, Regulatory Relations

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

Attachments



ADVICE LETTER 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 WATER
 PLC HEAT

Contact Person: Yvonne Yang

Phone #: (415) 973-2094

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: Yvonne.Yang@pge.com

EXPLANATION OF UTILITY TYPE

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

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 5500-E-A

Tier Designation: 2

Subject of AL: Supplement: Additional and updated information to Advice Letter 5500-E concerning Construction of the Fulton-Calistoga 60kV Power Line Reconductoring Project in the City of St. Helena, Counties of Napa and Sonoma, Pursuant to General Order 131-D

Keywords (choose from CPUC listing): Compliance, Power Lines, G.O. 131-D

AL Type: Monthly Quarterly Annual One-Time Other:

If AL submitted 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: N/A

Confidential treatment requested? Yes No

If yes, specification of confidential information: N/A

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information: N/A

Resolution required? Yes No

Requested effective date: 7/19/19

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

¹Discuss in AL if more space is needed.

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

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, CA 94102
Email: EDTariffUnit@cpuc.ca.gov

Name: Erik Jacobson, c/o Megan Lawson
Title: Director, Regulatory Relations
Utility Name: Pacific Gas and Electric Company
Address: 77 Beale Street, Mail Code B13U
City: San Francisco
State: California Zip: 94177
Telephone (xxx) xxx-xxxx: (415) 973-1877
Facsimile (xxx) xxx-xxxx: (415) 973-3582
Email: PGETariffs@pge.com

Name:
Title:
Utility Name:
Address:
City:
State: District of Columbia Zip:
Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

Notice Distribution List

Fulton-Calistoga 60kV Power Line Reconductoring Project - (City of St. Helena and Counties of Napa and Sonoma, PM 74024721)

Advice 5500-E-A

Energy Commission

Mr. Drew Bohan, Executive Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
Sacramento, California 95814
Drew.Bohan@energy.ca.gov

Ms. Courtney Smith, Deputy Director
California Energy Commission
1516 Ninth Street, Mail Stop 39
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California Department of Fish and Wildlife

Ms. Karen Weiss, North Bay Supervisor
California Department of Fish and Wildlife, Bay Delta Region (3)
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
Karen.Weiss@wildlife.ca.gov

Sonoma County

Mr. Tennis Wick, Director
Permit and Resource Management
2550 Ventura Avenue
Santa Rosa, CA 95403

Napa County

Mr. David Morrison, Director
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1195 Third Street, 2nd Floor
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David.Morrison@countyofnapa.org

City of St. Helena

Mr. Noah Housh, Director
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1. Mark T. Prestwich, City Manager, City of St. Helena,
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2. Andrea Antonaccio Wagner and William Wagner, andreaantonaccio@gmail.com
3. Jessica Richardson-Hague and Kevin Hague, jesshague@gmail.com
4. Andrea A. Matarazzo and Teresa L. Zuber, Pioneer Law Group, LLP,
andrea@pioneerlawgroup.net, jean@pioneerlawgroup.net
5. Megan Somogyi, Counsel for the County of Napa,
msomogyi@goodinmacbride.com
6. Mr. Drew Bohan, California Energy Commission, Drew.Bohan@energy.ca.gov
7. Ms. Courtney Smith, California Energy Commission,
Courtney.Smith@energy.ca.gov
8. Ms. Karen Weiss, North Bay Supervisor, California Department of Fish and
Wildlife, Karen.Weiss@wildlife.ca.gov
9. Mr. David Morrison, Director, Planning, Building Environmental Services,
David.Morrison@countyofnapa.org
10. Mr. Noah Housh, Director, NHoush@cityofsthelena.org
11. Mike Napolitano, San Francisco Bay Regional Water Quality Control Board,
Michael.Napolitano@waterboards.ca.gov
12. Laurel Gourd, laurel.gourd@gmail.com
13. Ryan Gourd, ryan.gourd@gmail.com
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16. Autumn Grove, autumngrove707@gmail.com
17. Jeremy Grove, superjgrover@gmail.com
18. Kelly Giannini, kgiannini3@gmail.com
19. Elizabeth Tangney and Jeremiah Moore, etangney@yahoo.com and
Rasjeremiah@hotmail.com

PG&E Gas and Electric Advice Submittal List

AT&T	Downey & Brand	Pioneer Community Energy
Albion Power Company	East Bay Community Energy	Praxair
Alcantar & Kahl LLP	Ellison Schneider & Harris LLP	
	Energy Management Service	
Alta Power Group, LLC	Engineers and Scientists of California	Redwood Coast Energy Authority
Anderson & Poole	Evaluation + Strategy for Social	Regulatory & Cogeneration Service, Inc.
	Innovation	SCD Energy Solutions
Atlas ReFuel	GenOn Energy, Inc.	
BART	Goodin, MacBride, Squeri, Schlotz &	SCE
	Ritchie	SDG&E and SoCalGas
Barkovich & Yap, Inc.	Green Charge Networks	
P.C. CalCom Solar	Green Power Institute	SPURR
California Cotton Ginners & Growers Assn	Hanna & Morton	San Francisco Water Power and Sewer
California Energy Commission	ICF	Seattle City Light
California Public Utilities Commission	International Power Technology	Sempra Utilities
California State Association of Counties	Intestate Gas Services, Inc.	Southern California Edison Company
Calpine	Kelly Group	Southern California Gas Company
	Ken Bohn Consulting	Spark Energy
Cameron-Daniel, P.C.	Keyes & Fox LLP	Sun Light & Power
Casner, Steve	Leviton Manufacturing Co., Inc. Linde	Sunshine Design
Cenergy Power	Los Angeles County Integrated Waste	Tecogen, Inc.
Center for Biological Diversity	Management Task Force	TerraVerde Renewable Partners
City of Palo Alto	Los Angeles Dept of Water & Power	Tiger Natural Gas, Inc.
	MRW & Associates	
City of San Jose	Manatt Phelps Phillips	TransCanada
Clean Power Research	Marin Energy Authority	Troutman Sanders LLP
Coast Economic Consulting	McKenzie & Associates	Utility Cost Management
Commercial Energy		Utility Power Solutions
County of Tehama - Department of Public	Modesto Irrigation District	Utility Specialists
Works	Morgan Stanley	
Crossborder Energy	NLine Energy, Inc.	Verizon
Crown Road Energy, LLC	NRG Solar	Water and Energy Consulting Wellhead
Davis Wright Tremaine LLP		Electric Company
Day Carter Murphy	Office of Ratepayer Advocates	Western Manufactured Housing
	OnGrid Solar	Communities Association (WMA)
Dept of General Services	Pacific Gas and Electric Company	Yep Energy
Don Pickett & Associates, Inc.	Peninsula Clean Energy	
Douglass & Liddell		