

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6527E
As of April 8, 2022

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of the Los Banos-Padre Flat Switching Station 230 kV Reconductoring Project in Merced County

Division Assigned: Energy

Date Filed: 03-11-2022

Date to Calendar: 03-16-2022

Authorizing Documents: None

| | |
|------------------------|-------------------|
| Disposition: | Accepted |
| Effective Date: | 04-10-2022 |

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

415-973-4587

PGETariffs@pge.com

PUBLIC UTILITIES COMMISSION
505 Van Ness Avenue
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to
edtariffunit@cpuc.ca.gov



Sidney Bob Dietz II
Director
Regulatory Relations

Pacific Gas and Electric Company
77 Beale St., Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Fax: 415-973-3582

March 11, 2022

Advice 6527-E
(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of the Los Banos-Padre Flat Switching Station 230 kV Reconductoring Project in Merced County.

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

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

Pacific Gas and Electric Company (PG&E) is proposing to reconductor (replace wires on) approximately 3.71 miles of the Central Valley's 230 kilovolt (kV) transmission system to enhance reliability and enable deliverability of approximately 1000 megawatts of planned and existing renewable energy currently being curtailed. The project will replace the existing conductors and accessories on existing structures on the Los Banos-Padre Flat Switching Station 230 kV Transmission Line within Merced County. PG&E will add extensions to raise the heights of five lattice steel towers by approximately 16 feet (additional accessories on supporting structures already built), permanently remove one wood pole and replace one 70 foot tall light-duty steel pole with an 81 foot tall tubular steel pole inside Los Banos Substation. Height increases are required to meet California Public Utilities Commission (CPUC) General Order (GO) 65 minimum ground-to-conductor clearance requirements, magnetic field reduction and design standards. The proposed project will also include the installation of peaks on each lattice steel tower to support future fiber communication wire and shield wire positioned above the conductors.

The project extends almost entirely through rural and mountainous terrain. The existing double-circuit transmission line begins at PG&E's Los Banos Substation at 16182 South Jasper Sears Road, then runs south for approximately 0.56 miles through grazing lands. The transmission line then continues southwesterly for approximately 2 miles before crossing over Billy Wright Road, then continues through rural lands and undulating hills for approximately 1.51 miles to Padre Flat Switching Station located in unincorporated Merced County. Helicopters may be used to facilitate construction. Construction is tentatively scheduled to begin in October 2022, or as soon as project plans and approvals are in place, with a completion in February 2023.

CPUC General Order 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" prepared in compliance with that decision. 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;
- Optimize phase configuration by "cross-phasing" individual circuits to cancel magnetic fields.

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

Exemption Under GO 131-D

CPUC General Order 131-D, Section III, Subsection 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(s):

- "the replacement of existing power line facilities or supporting structures with equivalent facilities."

This project consists of the replacement of outdated 230 kV conductors and related accessories with new 230 kV conductors and accessories. The replacement work is within the same utility corridor, following the same route as the existing lines.

None of the exceptions to the exemptions in Section III, Subsection A, as specified in CEQA Guidelines section 15300.2, exist to disqualify this project from the NOC process.

The exceptions, and why they do not apply, include the following:

- a. There is a reasonable possibility that the activity may impact an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies.

Discussion: There is no federally- or state-designated critical habitat for any special-status species within the project area. No other designated, mapped and officially-adopted resources of hazardous or critical concern are known to occur in the project area.

- b. The cumulative impact of successive projects of the same type in the same place, over time, is significant.

Discussion: PG&E is not aware of any other projects of the same type in the same place, or over time, that would result in significant cumulative impacts. Moreover, the proposed project would minimize the frequency of repairs and reduce the need for similar work within the transmission corridor in the future.

- c. There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

Discussion: There is no reasonable possibility that the project will have a significant effect on the environment due to unusual circumstances. In *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086 (Berkeley Hillside), the California Supreme Court found that, to apply this exception, the lead agency must find both (a) an unusual circumstance that makes this project different from others in the class, and (b) a reasonable possibility of a significant impact due to that unusual circumstance. (Id. at 1104-1105.) Thus, the first question is whether there is an unusual circumstance that would make this project different from others in the class.

PG&E is continually undertaking reconductoring projects throughout its territory, all of which require replacement of the conductors and often other accessories. This project is largely in rural and mountainous areas, but PG&E's power lines pass through all different land-use types. Numerous reconductoring projects have established laydown yards, used helicopters for construction, required vegetation removal or surface recontouring, used overland access, and adjusted structure locations to avoid resources or other impacts. There is nothing about this project that is different from others in its class. In litigation over the meaning of "unusual circumstances," most courts have declined to find that circumstances were unusual; examples where unusual circumstances were identified were striking in their difference from the norm, including, e.g., a project in a leaking landfill (*Azusa Land Reclamation Company v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App. 4th 1665, 1207), involving a particular historic wall (*Committee to Save the Hollywoodland Specific Plan v. City of Los Angeles* (2008) 161 Cal.App 4th 1168, 1187), and stock car racing at a fairgrounds near residences (*Lewis v. Seventeenth Dist. Agricultural Ass'n* (1985) 165 Cal App. 3d 823). Each of these cases presented circumstances that were atypical for the type of project proposed and created potentially significant effects due to the unusual circumstances. There is no similar anomaly present in this project.

Even if unusual circumstances were present, which they are not, there is no reasonable possibility of a significant impact. This project consists of replacing existing power line

facilities with similar facilities in a largely remote, mountainous area. As explained above, no significant impacts of any kind have been identified.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail, no later than March 31, 2022, which is 20 days after the date of this submittal. Protests must be submitted to:

CPUC Energy Division
ED Tariff Unit
E-mail: EDTariffUnit@cpuc.ca.gov

The protest shall also be electronically sent to PG&E via E-mail at the address shown below on the same date it is electronically delivered to the Commission:

Sidney Bob Dietz II
Director, Regulatory Relations
c/o Megan Lawson
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 submit an official protest may still submit a comment on the request to the Energy Division at the address noted above, referencing Advice Letter 6527-E.

Effective Date

The Company requests that this Tier 2 advice letter become effective on April 10, 2022, which is 30 days after the date of submittal. (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 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 submittals can also be accessed electronically at <http://www.pge.com/tariffs/>.



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: Kimberly Loo

Phone #: (415)973-4587

E-mail: PGETariffs@pge.com

E-mail Disposition Notice to: KELM@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) #: 6527-E

Tier Designation: 2

Subject of AL: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of the Los Banos-Padre Flat Switching Station 230 kV Reconductoring Project in Merced County

Keywords (choose from CPUC listing): Compliance, 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 #:

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:

Confidential treatment requested? Yes No

If yes, specification of confidential information:

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:

Resolution required? Yes No

Requested effective date: 4/10/22

No. of tariff sheets: 0

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

California Public Utilities Commission
Energy Division Tariff Unit Email:
EDTariffUnit@cpuc.ca.gov

Contact Name: Sidnev Bob Dietz II. c/o Megan Lawson
Title: Director, Regulatory Relations
Utility/Entity Name: Pacific Gas and Electric Company

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email: PGETariffs@pge.com

Contact Name:
Title:
Utility/Entity Name:

Telephone (xxx) xxx-xxxx:
Facsimile (xxx) xxx-xxxx:
Email:

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

Clear Form

NOTICE OF PROPOSED CONSTRUCTION

Para más detalles llame 1-800-660-6789

PROJECT NAME: Los Banos-Padre Flat Switching Station 230 kV Reconductoring Project - (Merced County - T. No. 0003016.01)**ADVICE LETTER NUMBER: 6527-E**

Proposed Project: Pacific Gas and Electric Company (PG&E) is proposing to reconductor (replace wires on) approximately 3.71 miles of the Central Valley's 230 kilovolt (kV) transmission system to enhance reliability and enable deliverability of approximately 1000 megawatts of planned and existing renewable energy currently being curtailed. The project will replace the existing conductors and accessories on existing structures on the Los Banos-Padre Flat Switching Station 230 kV Transmission Line within Merced County. PG&E will add extensions to raise the heights of five lattice steel towers by approximately 16 feet (additional accessories on supporting structures already built), permanently remove one wood pole and replace one 70 foot tall light-duty steel pole with an 81 foot tall tubular steel pole inside Los Banos Substation. Height increases are required to meet California Public Utilities Commission (CPUC) General Order (GO) 65 minimum ground-to-conductor clearance requirements, magnetic field reduction and design standards. The proposed project will also include the installation of peaks on each lattice steel tower to support future fiber communication wire and shield wire positioned above the conductors.

The project extends almost entirely through rural and mountainous terrain. The existing double-circuit transmission line begins at PG&E's Los Banos Substation at 16182 South Jasper Sears Road, then runs south for approximately .56 miles through grazing lands. The transmission line then continues southwesterly for approximately 2 miles before crossing over Billy Wright Road, then continues through rural lands and undulating hills for approximately 1.51 miles to Padre Flat Switching Station located in unincorporated Merced County. Helicopters may be used to facilitate construction. Construction is tentatively scheduled to begin in October 2022, or as soon as project plans and approvals are in place, with a completion in February 2023.

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 the "EMF Design Guidelines for Electrical Facilities" prepared in compliance with that decision. The following measures are proposed for this project:

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

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):

- "the replacement of existing power line facilities or supporting structures with equivalent 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, email 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 March 31, 2022 at the following address:

Director, Energy Division
ED Tariff Unit
California Public Utilities Commission
E-mail: EDTariffUnit@cpuc.ca.gov

With a copy emailed to:
PG&E Tariffs
Pacific Gas and Electric Company
E-mail: PGETariffs@pge.com

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 6527-E.

Notice Distribution List

Los Banos-Padre Flat Switching Station 230 kV Reconductoring Project - (Merced County)

Advice 6527-E

Energy Commission

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

Linda Spiegel, Chief Deputy Director
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
Linda.Spiegel@energy.ca.gov

California Department of Fish and Wildlife

Ms. Laura Peterson Diaz
California Department of Fish and Wildlife, Regional Manager - Central Region
1234 E. Shaw Avenue
Fresno, CA 93710
Laura.Peterson-Diaz@wildlife.ca.gov

City of Los Banos

Ms. Stacy Souza Elms, Community Development Director
City of Los Banos
5 W. J Street
Los Banos, CA 93635
Stacy.Elms@losbanos.org

Merced County

Mark Hendrickson, Planning Director
Merced County Development Department
2222 M Street, Second Floor
Merced, CA 95340
mark.hendrickson@countyofmerced.com

Newspaper

Los Banos Enterprise

Merced Sun-Star

PG&E Gas and Electric Advice Submittal List

| | | |
|--|--|--|
| AT&T Albion Power Company | East Bay Community Energy Ellison Schneider & Harris LLP Engineers and Scientists of California | Pioneer Community Energy Public Advocates Office |
| Alta Power Group, LLC Anderson & Poole | GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF International Power Technology | Redwood Coast Energy Authority Regulatory & Cogeneration Service, Inc. SCD Energy Solutions San Diego Gas & Electric Company |
| Atlas ReFuel BART | | SPURR San Francisco Water Power and Sewer Sempra Utilities |
| Barkovich & Yap, Inc. Braun Blasing Smith Wynne, P.C. California Cotton Ginners & Growers Assn California Energy Commission | Intertie | Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc. |
| California Hub for Energy Efficiency Financing | Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc. | TransCanada Utility Cost Management Utility Power Solutions Uplight Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy |
| California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine | Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates | |
| Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity | Modesto Irrigation District NLine Energy, Inc. NRG Solar | |
| Chevron Pipeline and Power City of Palo Alto | OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy | |
| City of San Jose Clean Power Research Coast Economic Consulting Commercial Energy Crossborder Energy Crown Road Energy, LLC Davis Wright Tremaine LLP Day Carter Murphy | | |
| Dept of General Services Don Pickett & Associates, Inc. Douglass & Liddell | | |