

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



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 6599E**  
**As of June 20, 2022**

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of

Division Assigned: Energy

Date Filed: 05-19-2022

Date to Calendar: 05-25-2022

Authorizing Documents: None

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>06-18-2022</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Kimberly Loo

(415)973-4587

[PGETariffs@pge.com](mailto: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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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](mailto:edtariffunit@cpuc.ca.gov)**



**Sidney Bob Dietz II**  
Director  
Regulatory Relations

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

Fax: 415-973-7226

May 19, 2022

**Advice 6599-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 Ravenswood-Ames 115kV Reconductor and Tower Replacement Project in the City of Mountain View**

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

**Purpose**

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

**Background**

To replace aging infrastructure, ensure electrical reliability, and replace outdated facilities with newer, more resilient ones, Pacific Gas and Electric Company (PG&E) is proposing to replace conductors (wires) over approximately 0.9 mile of the existing Ravenswood-Ames No. 1 115 kilovolt (kV) Power Line within the City of Mountain View, Santa Clara County. To support the new conductors PG&E will replace approximately 7 existing lattice steel towers (towers) with 6 new towers, and 2 tubular steel poles (TSPs) at one existing tower location. Replacement structures will be approximately 3 feet to 13 feet taller than the existing structures with 1 new structure decreasing in height. Taller structures are needed to comply with California Public Utilities General Order 95 minimum ground-to-conductor clearance requirements.

The project begins at an existing PG&E tower approximately 750 feet southwest of the intersection of RT Jones Road with Hunsaker Road (Nasa Ames Research Center, Moffett Field) and runs west approximately 500 feet crossing over Stevens Creek and Stevens Creek Trail, then north approximately 0.8 mile parallel with Stevens Creek and

Stevens Creek Trail, terminating at an existing PG&E tower located approximately 200 feet southeast of the intersection of Stevens Creek Trail with the Bay Trail.

The project will span over Stevens Creek. No work will occur within the bed or bank of the stream or riparian areas and no removal of riparian vegetation is required. Construction is tentatively scheduled to begin in October 2022 or as soon as practicable after project approval. Construction will be completed in February 2023, or as soon as possible after construction begins.

### **Exemption Under GO 131-D**

CPUC General Order 131-D, Section III, Subsection 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 exemptions:

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

This project consists of the replacement of outdated 115 kV conductors and supporting structures with new 115 kV conductors and supporting structures that have the same form and function as the existing facilities. Approximately 7 existing lattice steel towers are being replaced with approximately 6 new lattice steel towers and 2 tubular steel poles. The line replacement is within the same utility corridor, following the same route as the existing lines.

None of the exceptions to the exemptions in Section III B.2, 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. Jurisdictional waters and wetlands within the project area will be avoided. 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, most of which require replacement, removal and/or addition of structures as well as replacement of the conductors. Numerous reconductoring projects have established laydown yards, used cranes 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 due to an unusual circumstance. As explained above, no significant impacts of any kind have been identified. This project consists of replacing existing power lines with similar facilities. It has been designed to avoid impacts to biological resources, and no other potential impacts have been identified.

### **Protests**

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail with the CPUC and the Company by June 8, 2022, which is 20 days after the date of this submittal. Protests should be emailed to the following address:





# 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) #: 6599-E

Tier Designation: 2

Subject of AL: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Ravenswood-Ames 115kV Reconductor and Tower Replacement Project in the City of Mountain View

Keywords (choose from CPUC listing): 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: 6/18/22

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 proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss 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](mailto: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: Ravenswood-Ames No. 1 115 kV Reconductor and Tower Replacement Project - (City of Mountain View, P.No. 5791338)****ADVICE LETTER NUMBER: 6599-E**

**Proposed Project:** To replace aging infrastructure, ensure electrical reliability, and replace outdated facilities with newer, more resilient ones, Pacific Gas and Electric Company (PG&E) is proposing to replace conductors (wires) over approximately 0.9 mile of the existing Ravenswood-Ames No. 1 115 kilovolt (kV) Power Line within the City of Mountain View, Santa Clara County. To support the new conductors PG&E will replace approximately 7 existing lattice steel towers (towers) with 6 new towers, and 2 tubular steel poles (TSPs) at one existing tower location. Replacement structures will be approximately 3 feet to 13 feet taller than the existing structures with 1 new structure decreasing in height. Taller structures are needed to comply with California Public Utilities General Order 95 minimum ground-to-conductor clearance requirements.

The project begins at an existing PG&E tower approximately 750 feet southwest of the intersection of RT Jones Road with Hunsaker Road (Nasa Ames Research Center, Moffett Field) and runs west approximately 500 feet crossing over Stevens Creek and Stevens Creek Trail, then north approximately 0.8 mile parallel with Stevens Creek and Stevens Creek Trail, terminating at an existing PG&E tower located approximately 200 feet southeast of the intersection of Stevens Creek Trail with the Bay Trail.

The project will span over Stevens Creek. No work will occur within the bed or bank of the stream or riparian areas and no removal of riparian vegetation is required. Construction is tentatively scheduled to begin in October 2022 or as soon as practicable after project approval. Construction will be completed in February 2023, or as soon as possible after construction begins.

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

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

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

- b. “the replacement of existing power line facilities or supporting structures with equivalent facilities or structures.”

**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;

- 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
- The cumulative impact of successive projects of the same type in the same place, over time, is significant; or
- 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 June 8, 2022 at the following address:**

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

With a copy emailed to:  
Pacific Gas and Electric Company  
PG&E Tariffs  
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](mailto: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 6599-E.

## **Notice Distribution List**

Ravenswood-Ames No. 1 115 kV Reconductor and Tower Replacement Project - (City of Mountain View)

### **Advice 6599-E**

#### **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. Linda Spiegel, Chief Deputy Director  
California Energy Commission  
1516 Ninth Street, Mail Stop 39  
Sacramento, California 95814  
Linda.Spiegel@energy.ca.gov

#### **California Department of Fish and Wildlife**

Ms. Erin Chappell  
California Department of Fish and Wildlife, Bay Delta Region  
2825 Cordelia Road, Suite 100  
Fairfield, CA 94534  
Erin.Chappell@wildlife.ca.gov

#### **City of Mountain View**

Ms. Aarti Shrivastava, Director  
Community Development Department  
500 Castro Street  
Mountain View, CA 94041  
city.mgr@mountainview.gov

#### **Newspaper**

Mountain View Voice

## 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
Alta Power Group, LLC Anderson & Poole	GenOn Energy, Inc. Goodin, MacBride, Squeri, Schlotz & Ritchie Green Power Institute Hanna & Morton ICF International Power Technology	Public Advocates Office  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 Stoel Rives LLP
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc. Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
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	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep Energy
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		