

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 6645E
As of August 25, 2022

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Ignacio- Alto 60 kV Power Line Replacement Project in the City of Larkspur

Division Assigned: Energy

Date Filed: 07-07-2022

Date to Calendar: 07-15-2022

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	08-06-2022

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

July 7, 2022

Advice 6645-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 Ignacio- Alto 60 kV Power Line Replacement Project in the City of Larkspur

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

Purpose

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

Background

To improve electric service reliability in Marin County, PG&E will replace poles along a portion the Ignacio- Alto 60 kV Power Line in the City of Larkspur. One existing lattice steel pole (LSP) and 1 existing wood pole are proposed to be replaced with 1 new tubular steel pole and 1 new wood pole (replacement of existing facilities) approximately 17 to 43 feet taller than existing structures. Height increases are required to meet California Public Utilities Commission (CPUC) General Order (GO) 95 minimum ground-to-conductor (wire) clearance requirements. The project will also include installation of 1 new approximately 39-foot-tall wood guy stub pole and an associated guy wire anchor.

The project will occur along an approximately 935-foot segment of the power line north of Sir Francis Drake Boulevard and east of Highway 101 to south of Corte Madera Creek near the intersection of Greenbrae Boardwalk and Redwood Highway. The project proposes to remove 1 LSP located within Corte Madera Creek and relocate approximately 135 feet to the north within the adjacent northern upland area (minor relocation of existing facilities) at the southeast intersection of Highway 101 and Sir Francis Drake Boulevard, and replace 1 wood pole in the same existing pole location to

the east of Highway 101 northbound onramp north of Sir Francis Drake Boulevard. The project also proposes installation of a new wood guy stub pole off an existing wood pole to the west of Redwood Highway and south of Greenbrae Walkway. PG&E may need to install Federal Aviation Administration (FAA) obstruction lighting on some or all of the new structures in accordance with FAA requirements. Construction is tentatively scheduled to begin in the third quarter of 2022, or as soon as practicable after project approval. Construction is tentatively scheduled to be completed in the first quarter of 2023, or as soon as possible after construction begins.

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

Exemption Under G.O. 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 exemption(s):

- b. "the replacement of existing power line facilities or supporting structures with equivalent facilities or structures."
- c. "the minor relocation of existing power line facilities up to 2,000 feet in length, or the intersetting of additional support structures between existing support structures."
- e. "the placing of new or additional conductors, insulators, or their accessories on supporting structures already built."

This project consists of the replacement of outdated 60 kV structures; 1 existing LSP will be replaced with 1 new tubular steel pole and 1 existing wood pole with 1 new wood pole. The project also consists of installing 1 new wood guy pole and an associated guy wire anchor to an existing wood pole. The work is within the same utility corridor, following the same route as the existing lines, and the existing structures will be removed and replaced in approximately the same location except for one LSP relocated from within Corte Madera Creek to an adjacent upland area approximately 135 feet to the north and offset to the east approximately 8 feet from the existing alignment; and a new guy stub pole located approximately 70 feet to the west of the existing alignment.

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: While the proposed activities will occur in designated critical habitat as established by the National Marine Fisheries Service (NMFS) for green sturgeon (southern distinct population segment "DPS") and coastal cutthroat trout (central California coast DPS) the project activities were evaluated in the pending United States Army Corps' of Engineers Regional General Permit for Pacific Gas and Electric Company's Bay Area Operation and Maintenance Program ("RGP"). Under the RGP's implementing provisions, the proposed activities are "covered activities" that have been reviewed by NMFS for impacts to green sturgeon and steelhead and associated critical habitat. All activities will comply with mandatory avoidance and minimization measures. As per RGP mitigation requirements, mitigation for temporary impacts to green sturgeon and steelhead will be charged against existing mitigation bank credits that PG&E has already acquired for this species. The RGP was adopted only after full environmental review under the National Environmental Protection Act (NEPA) to minimize and mitigate the impacts of any taking "to the maximum extent practicable" (Endangered Species Act of 1973, section 10(a)(2)(B)), a higher standard than mitigating to a "less-than-significant" level under CEQA. As such, the mitigation ratios in the RGP capture a net increase in available habitat for the species, and temporarily impacted sites such as those in this project will return to preexisting conditions. The RGP's AMMs and compensatory mitigation ensure that there is no "reasonable possibility" of a significant impact that would negate use of the advice letter process.

Additionally, 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 project 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 electrical 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 and tower replacement projects throughout its territory, most of which require replacement, removal and/or addition of

structures. Numerous replacement projects have established staging areas, used cranes for construction, required vegetation removal or surface recontouring, 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.

In addition, there is no evidence of a reasonable possibility of a significant impact. This project consists of replacing existing poles with similar facilities in a largely urban area. PG&E plans to remove an existing structure within Corte Madera Creek and replace in an upland ruderal habitat area thus improving the estuarine habitat. The construction and operation would not result in any potentially significant impacts. The project 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 July 27, 2022, which is 20 days after the date of this submittal. Protests should be emailed to the following address:

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 file an official protest may still submit a comment on the request to the Energy Division at the address noted above, referencing Advice Letter 6645-E.

Effective Date

The Company requests that this Tier 2 advice letter become effective on August 6, 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/>.

/S/

Sidney Bob Dietz II
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: 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) #: 6645-E

Tier Designation: 2

Subject of AL: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Ignacio- Alto 60 kV Power Line Replacement Project in the City of Larkspur

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: 8/6/22

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: Ignacio- Alto 60 kV Power Line Replacement Project- (City of Larkspur, P.5781898)**ADVICE LETTER NUMBER: 6645-E**

Proposed Project: To improve electric service reliability in Marin County, Pacific Gas and Electric Company (PG&E) will replace poles along a portion the Ignacio- Alto 60 kV Power Line in the City of Larkspur in Marin County. One existing lattice steel pole (LSP) and 1 existing wood pole are proposed to be replaced with 1 new tubular steel pole and 1 new wood pole (replacement of existing facilities) approximately 17 to 43 feet taller than existing structures. Height increases are required to meet California Public Utilities Commission (CPUC) General Order (GO) 95 minimum ground-to-conductor (wire) clearance requirements. The project will also include installation of 1 new approximately 39-foot-tall wood guy stub pole and an associated guy wire anchor.

The project will occur along an approximately 935-foot segment of the power line north of Sir Francis Drake Boulevard and east of Highway 101 to south of Corte Madera Creek near the intersection of Greenbrae Boardwalk and Redwood Highway. The project proposes to remove 1 LSP located within Corte Madera Creek and relocate approximately 135 feet to the north within the adjacent northern upland area (minor relocation of existing facilities) at the southeast intersection of Highway 101 and Sir Francis Drake Boulevard, and replace 1 wood pole in the same existing pole location to the east of Highway 101 northbound onramp north of Sir Francis Drake Boulevard. The project also proposes installation of a new wood guy stub pole off an existing wood pole to the west of Redwood Highway and south of Greenbrae Walkway. PG&E may need to install Federal Aviation Administration (FAA) obstruction lighting on some or all of the new structures in accordance with FAA requirements. Construction is tentatively scheduled to begin in the third quarter of 2022, or as soon as practicable after project approval. Construction is tentatively scheduled to be completed in the first quarter of 2023, or as soon as possible after construction begins.

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(s):

- b. "the replacement of existing power line facilities or supporting structures with equivalent facilities or structures."
- c. "the minor relocation of existing power line facilities up to 2,000 feet in length, or the intersetting of additional support structures between existing support structures."
- e. "the placing of new or additional conductors, insulators, or their accessories on supporting structures already built."

Additional Project Information: To obtain further information on the proposed project, please call PG&E's [Project Information Line at \(415\) 973-5530](tel:4159735530).

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 July 27, 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 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 6645-E.

Notice Distribution List

Ignacio- Alto 60 kV Replacement Project (City of Larkspur)

Advice 6645-E

Energy Commission

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

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, Regional Manager
California Department of Fish and Wildlife, Bay Delta Region 3
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
Erin.Chappell@Wildlife.ca.gov

City of Larkspur

Ms. Elise Semonian, Community Development Director
Community Development, Planning Division
400 Magnolia Avenue
Larkspur, CA 94939
esemonian@cityoflarkspur.org

Newspapers

Marin Independent Journal

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		