

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



Pacific Gas & Electric Company
ELC (Corp ID 39)
Status of Advice Letter 7127E
As of June 28, 2024

Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of HP-3 115 kV Power Line Relocation Project in the City and County of San Francisco

Division Assigned: Energy

Date Filed: 01-10-2024

Date to Calendar: 01-22-2024

Authorizing Documents: None

Disposition:	Accepted
Effective Date:	06-21-2024

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

edtariffunit@cpuc.ca.gov

AL Certificate Contact Information:

Kimberly Loo

(279)789-6209

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- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)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

January 10, 2024

Advice 7127-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 HP-3 115 kV Power Line Relocation Project in the City and County of San Francisco

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 accommodate the future development of the India Basin Shoreline Park in the City and County of San Francisco (City), PG&E will relocate the HP-3 115 kV Power Line by replacing approximately 845 feet of overhead power line (line) with approximately 1,448 feet of underground power line within the City. The line relocation will begin underground near the intersection of Hawes Street and Hunters Point Boulevard. The underground line will continue north within the paved street of Hunters Point Boulevard, turn into PG&E’s former Hunters Point Power Plant driveway and transition to overhead within the fenced substation area on a newly-installed riser structure. From this structure, the line will span approximately 34 feet to the existing HP-3 substation interconnection point. The existing overhead HP-3 line facilities between Hunters Point Boulevard and the substation, including the riser structure, lattice towers, and conductors, will then be removed. The underground line segment being relocated will be buried at a typical depth of 3 to 13 feet. Construction is tentatively scheduled to begin in February 2024, or as soon as practicable after project approval. Construction is tentatively scheduled to be completed in October of 2024, 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

California Public Utilities Commission (CPUC) G.O. 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):

- 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."

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: The new underground segment located in the former Hunters Point Power Plant driveway and one of the existing overhead lattice towers to be removed are located on the former Hunters Point Power Plant site, which was previously remediated under the oversight of the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC). PG&E received a final Certificate of Completion from DTSC in December 2018 for the entire Hunters Point Power Plant site. The minor portion of the proposed project to be located on this site will be executed in full compliance with a project-specific DTSC approved soil management plan to ensure it will not impact the site or present an unacceptable risk to present and future health or safety or the environment. The rest of the project area, including the energized substation, underground to overhead transition structure property, street franchise and India Basin Shoreline Park, is within an urban setting that contains no known environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies.

- 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 relocation projects throughout its territory, most of which require replacement, removal and/or addition of structures as well as replacement of the conductors. Numerous relocation projects have established staging areas, used cranes for construction, required trench excavation, 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 less than 2000 feet of existing overhead power line facilities with underground facilities in a largely urban area. The construction and operation would not result in any potentially significant impacts.

Protests

Anyone wishing to protest this submittal may do so by letter sent electronically via E-mail with the CPUC and the Company by January 30, 2024, 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



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 #: (279)789-6209

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) #: 7127-E

Tier Designation: 2

Subject of AL: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of HP-3 115 kV Power Line Relocation Project in the City and County of San Francisco

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: 2/9/24

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:

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: HP-3 115 kV Power Line Relocation Project - (City and County of San Francisco, P.No. 5803358)**ADVICE LETTER NUMBER: 7127-E**

Proposed Project: To accommodate the future development of the India Basin Shoreline Park in the City and County of San Francisco (City), Pacific Gas and Electric Company (PG&E) will relocate the HP-3 115 kV Power Line by replacing approximately 845 feet of overhead power line (line) with approximately 1,448 feet of underground power line within the City. The line relocation will begin underground near the intersection of Hawes Street and Hunters Point Boulevard. The underground line will continue north within the paved street of Hunters Point Boulevard, turn into PG&E's former Hunters Point Power Plant driveway and transition to overhead within the fenced substation area on a newly-installed riser structure. From this structure, the line will span approximately 34 feet to the existing HP-3 substation interconnection point. The existing overhead HP-3 line facilities between Hunters Point Boulevard and the substation, including the riser structure, lattice towers, and conductors, will then be removed. The underground line segment being relocated will be buried at a typical depth of 3 to 13 feet. Construction is tentatively scheduled to begin in February 2024, or as soon as practicable after project approval. Construction is tentatively scheduled to be completed in October of 2024, 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):

- 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."

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 January 30, 2024 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 7127-E.

Notice Distribution List

HP-3 115 kV Power Line Relocation Project - (San Francisco County)

Advice 7127-E

Energy Commission

Mr. Drew Bohan, Executive Director
California Energy Commission
715 P Street
Sacramento, California 95814
Drew.Bohan@energy.ca.gov

Ms. Jennifer Martin-Gallardo, Chief Deputy Director
California Energy Commission
715 P Street
Sacramento, California 95814
Jennifer.Martin-Gallardo@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 and County of San Francisco

Daniel Sider, Chief of Staff
City of San Francisco
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
dan.sider@sfgov.org

Newspaper

San Francisco Examiner

PG&E Gas and Electric Advice Submittal List

AT&T Albion Power Company	East Bay Community Energy Ellison Schneider & Harris LLP	Pioneer Community Energy
Alta Power Group, LLC Anderson & Poole	Electrical Power Systems, Inc. Fresno Engineers and Scientists of California	Public Advocates Office
Atlas ReFuel BART Buchalter Barkovich & Yap, Inc. Braun Blaising Smith Wynne, P.C. California Community Choice Association California Cotton Ginners & Growers Assn California Energy Commission	GenOn Energy, Inc. Green Power Institute Hanna & Morton ICF iCommLaw International Power Technology Intertie	Resource Innovations SCD Energy Solutions San Diego Gas & Electric Company
California Hub for Energy Efficiency Financing	Intestate Gas Services, Inc.	SPURR San Francisco Water Power and Sewer Sempra Utilities
California Alternative Energy and Advanced Transportation Financing Authority California Public Utilities Commission Calpine	Johnston, Kevin Kelly Group Ken Bohn Consulting Keyes & Fox LLP Leviton Manufacturing Co., Inc.	Sierra Telephone Company, Inc. Southern California Edison Company Southern California Gas Company Spark Energy Sun Light & Power Sunshine Design Stoel Rives LLP
Cameron-Daniel, P.C. Casner, Steve Center for Biological Diversity	Los Angeles County Integrated Waste Management Task Force MRW & Associates Manatt Phelps Phillips Marin Energy Authority McClintock IP McKenzie & Associates	Tecogen, Inc. TerraVerde Renewable Partners Tiger Natural Gas, Inc.
Chevron Pipeline and Power City of Palo Alto	Modesto Irrigation District NRG Solar	TransCanada Utility Cost Management Utility Power Solutions Water and Energy Consulting Wellhead Electric Company Western Manufactured Housing Communities Association (WMA) Yep 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	OnGrid Solar Pacific Gas and Electric Company Peninsula Clean Energy	
Dept of General Services Don Pickett & Associates, Inc. Douglass & Liddell Downey Brand LLP Dish Wireless L.L.C.		