

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 23, 2009

VIA MAIL AND EMAIL

Ms. Jo Lynne Lambert
Attorney at Law
707 Brookside Avenue
Redlands, CA 92373

SUBJECT: Data Request No. 1 for the Pacific Gas and Electric Company's Hollister 115 kV Power Line Reconductoring Project (A. 09-11-016)

Dear Ms. Lambert:

As the California Public Utilities Commission (CPUC) proceeds with our review of Pacific Gas and Electric Company's (PG&E) Application and Proponent's Environmental Assessment (PEA) for the Hollister 115 kV Power Line Reconductoring Project, we have identified additional information required to complete our analysis of the Proposed Project. Please provide the information requested on the pages attached to this letter.

Due to the holidays, we would appreciate your prompt response to this data request by January 13, 2010 which will help us maintain our schedule for analysis and processing of this application. Please submit your response in hardcopy and electronic format to me and also directly to our environmental consultant, ESA, at the mail and e-mail addresses noted below. If you have any questions please direct them to me as soon as possible.

Sincerely,

Monisha Gangopadhyay
CPUC Project Manager for the Hollister Project
Energy Division Transmission Permitting Branch
Phone: (415) 703-5595
mgb@cpuc.ca.gov

Environmental Science Associates
Attn: Jennifer Johnson
225 Bush Street, Suite 1700
San Francisco, CA 94104
jjohnson@esassoc.com

cc: Ken Lewis, CPUC
Jason Reiger, CPUC Legal Division
Christine M. Walwyn, CPUC ALJ
Andy Smith, PG&E Project Manager

Data Request #1

Project Description

Towers and Poles

1. Please verify that the Hollister Tower Segment would include removal of 36 of the 38 existing towers within the ROW and installation of 37 new towers, therefore resulting in a total of 39 towers within the Hollister Tower Segment. Please also confirm that Tower 0/05 would be an entirely new tower to be installed as part of the Proposed Project and would not replace an existing tower.
2. Paragraph Four on Page 3-4 of the PEA states the following:

As noted, approximately 17 wood poles are located in the floodplain of the San Benito River (the existing river alignment) (Figures 3-13 and 3-14). These existing wood poles in the floodplain will be "topped" (i.e., shortened by removing the existing power line and cutting down the excess length to the level of the lower distribution line), allowing the existing distribution line to continue to serve nearby customers. Approximately four additional wood poles that are located in the agricultural field west of the river will be topped in a similar manner. Approximately 10 poles will be removed from this segment as part of the project. Approximately 22 new steel poles (both TSPs [4] and LDS poles [18]) will be installed to accommodate the Proposed River Crossing, which is approximately 3,000 feet north of the existing river alignment.

Regarding this information, please respond to the following:

- a) Please verify that a total of 17 poles would be topped, 13 of which would be in the floodplain and 4 of which are in agricultural lands.
- b) The text states that 10 poles would be removed from the river crossing segment; however, Figures 3-12 and 3-13 only show 6 poles to be removed from the river crossing segment (Poles 15/11; 15/12; 15/13; 15/14; 15/15; and 16/00). Please verify that only 6 poles would be removed.
- c) Given that pole 16/01 of the Proposed River Crossing would replace an existing wood pole, please verify that 21 poles would be installed in new ROW and one existing pole would be replaced for a total of 22 poles in the Proposed River Crossing.

Figures 3-3 through 3-19 (Alignment Sheets)

3. Please verify that there are no existing poles within the Proposed River Crossing and provide updated alignment sheet figures.
4. Installation of culverts is shown in Figures 3-3 through 3-19 but is not described in the PEA Project Description. Please provide a detailed description of each culvert to be installed including: materials used to construct the culvert, the culvert diameter, and the amount of cut and fill required to install each culvert. Please describe construction activities that would be required to install culverts and

typical construction equipment that would be used. If any soil would be imported or exported as a result of culvert installation, please provide estimated volumes of material import or export. Also, please indicate whether culverts installed on overland travel routes would remain as permanent features.

Easement Requirements

5. What is the anticipated width of the new ROW to be acquired?

Access

6. For 'road improvements' and 'new roads' provide more details describing what construction activities would occur related to preparation of these types of access. For example, grading, vegetation removal, gravel placement, etc.
7. Please provide details on the assumptions used to determine the temporary and permanent access road disturbance areas.
8. Page 3-5 of the PEA indicates that there are 7.94 miles of existing access roads that would not require upgrades, 2.4 miles of existing roads that would require upgrades and 0.39 miles of new permanent access roads that would be constructed as part of the Proposed Project. This data is inconsistent with information presented in Table 3-1 (found on page 3-6 of the PEA). Please verify the correct amount of access roads required.

Construction of Hollister Tower and Pole Segments

9. Regarding Table 3-4 (found on page 3-11 of the PEA and shown below), please respond to the following:
 - a) The table states that 142 poles would be replaced within the Hollister Pole Segment. However, assuming that 164 poles would be installed, 21 of which would be entirely new and would not replace an existing pole (see Data Request 2a above), there would be a total of 143 replacement poles rather than 142. Please verify that there would be 143 replacement poles and provide updated temporary and permanent disturbance numbers based on this revision.
 - b) The note found at the bottom of the table states that "*Because the majority of towers and poles already exist and are being replaced in kind, the only new permanent disturbance is associated with the Proposed River Crossing*". However, as noted in Data Request item 1, above, there would be permanent disturbance associated with installation of a new tower. Please confirm.
 - c) Which elements described as construction areas are included in the permanent disturbance calculation for the Hollister Tower Segment?
 - d) Footnote c of Table 3-4 refers to Table 3-5 for detailed information on temporary disturbance for construction activities. However, disturbance estimates for the Hollister Tower Segment and Hollister Pole Segment as shown in Table 3-5 are 28.12 acres and 34.3 acres

respectively. These numbers are not consistent with those shown in Table 3-4 below. Please update the tables to be consistent with each other.

Table 3-4. Estimates of Approximate Temporary and Permanent Disturbance

<i>Project Activity</i>	<i>Approximate Temporary Disturbance^a (acres)</i>	<i>Approximate Permanent Disturbance^b (acres)</i>
<i>Replacing towers and poles</i>		
<i>Hollister Tower Segment (37 towers)</i>	1.84	0.33
<i>Hollister Pole Segment (142 poles)</i>	5.84	0.11
<i>Subtotal towers and poles</i>	7.68	0.44
<i>Construction areas (includes lay down [staging] areas, pull sites, and helicopter landing zones, tower removal work areas and work area overland travel route)</i>		
<i>Hollister Tower Segment</i>	35.42	5.1
<i>Hollister Pole Segment</i>	36.6	0.0
<i>Subtotal construction areas</i>	72.02	5.1
<i>Access roads</i>	3.76	4.28
<i>Project total</i>	83.46	9.82

Note: Estimated disturbance acreages are based on the following assumptions: temporary disturbance for the Hollister Tower Segment is 2,500 square feet per tower, and permanent disturbance is 400 square feet per tower. Temporary disturbance for the Hollister Pole Segment is 1,600 square feet, and permanent disturbance is 30 square feet per pole. Because the majority of towers and poles already exist and are being replaced in kind, the only new permanent disturbance is associated with the Proposed River Crossing.

^a *Temporary disturbance represents construction activities associated with installation and removal of towers and poles.*

^b *Permanent disturbance represents the overall footprint area under each tower; limited access remains under each tower (e.g., for cattle grazing).*

^c *Table 3-5 contains the details of the acreage to be temporarily disturbed by construction areas.*

^d *Table 3-1 shows preliminary estimates of access routes.*

10. Please update Table 3-5 (found on page 3-12 of the PEA) to show that TP-1 would be located between Towers 37/232 and 0/3A (the text currently states that TP-1 would be located between Towers 37/231B and 37/232).
11. Table 3-6 (found on page 3-15 of the PEA) states that 159 wood poles would be removed and replaced with 135 LDS poles and 29 TPSs (for a total of 164 new poles). However, assuming 143 existing poles would be replaced with new poles and an additional six (6) poles would be removed from the floodplain, the resulting number of poles to be removed would be 149 rather than 159. Please confirm that 149 poles would be removed rather than 159.

12. For tower installation, please provide the estimated depth of excavation required for tower footings.
13. Please specify the construction methodology should groundwater be encountered during excavation of the holes which may be likely encountered while augering holes close to flood plains.
14. For conductor and cable installation, please confirm that the only locations where guard structures would be required are at SR 156, San Juan Highway, San Justo Road, and the Union Pacific Railroad crossing.
15. The fourth paragraph on page 3-19 appears to be incomplete. The text states that “...*Steel, wire, and hardware [requires set-up project recovery processes] please re-phrase in English – will be recycled? Sorted and disposed of somewhere?*.” Please provide revised text that states where steel, wire, and hardware will be disposed.
16. Paragraph five on page 3-16 of the PEA states the following:

While the Hollister Tower Segment and the Hollister Pole Segment are being constructed, the existing Watsonville–Salinas 60 kV power line, which parallels the Hollister Tower Segment northerly to the Hollister Pole Segment, will be temporarily upgraded to 115 kV and serve as the 115 kV feed to the Hollister Substation. To connect the Watsonville–Salinas 60 kV power line to the 115 kV system, PG&E will temporarily install three wood poles at the southerly end and one wood pole at the northerly end of the Hollister Tower Segment.

Regarding this statement, please respond to the following:

- a) Please confirm that the existing Watsonville-Salinas 60 kV power line is currently configured with insulators that can support 115 kV.
- b) Please describe what would happen to the existing 60 kV feed when the Watsonville-Salinas power line would be temporarily upgraded to 115 kV?

Existing System

17. The Project Description indicates that the existing single-circuit 115 kV power line within the Hollister Pole Segment would be reconstructed as a double-circuit 115 kV power line. Please clarify how/why a second circuit would be added to this segment when the Hollister Tower Segment would continue to support only two circuits (i.e., one of the Hollister Tower 115 kV circuits would continue north and the Hollister No. 2 line and the other 115 kV circuit would go east as the Hollister No. 1 line).

Based on the Project Description and other information in the PEA (e.g., visual simulations and the EMF field report), it does not appear that the position for the second circuit is proposed to be vacant for a future upgrade. Therefore, please indicate why the new facility is proposed to be double circuit and how the proposed new Hollister Pole Segment circuit would be configured at Anzar Junction.

18. The Project Description indicates that the two existing 115 kV circuits along the Hollister Tower Segment would be replaced with 477 kcmil SSAC conductors. Since the Hollister No. 2 line would

not be upgraded to 477 kcmil SSAC conductors, is there potential that the Hollister No. 2 line could be overloaded if the Hollister No. 1 line would go down? If not, please indicate the normal and emergency rating of the Hollister No 2 line.

19. Please revise PEA Figure 3-1 to clearly indicate the configuration/names of lines, substations and voltages of the lines in the project area.

Aesthetics

20. Figure 4.2-1 appears to identify the historical path of State Route 156 including the local route through Hollister. This figure should be updated to include the 1997 bypass that heads in a northeasterly direct due west of Hollister near Union Road, see:
http://www.dot.ca.gov/dist05/planning/sys_plan_docs/fact_sheets/san_benito_sr156.pdf. According to CalTrans, the old routing through town is still signed as State Route 156.

Air Quality

21. Please provide detailed emissions calculation sheets showing emission factors, equipment types and numbers, engine horsepower, maximum daily hours of operation, etc., as well as all other assumptions used to estimate the criteria pollutant and greenhouse gas emissions that would be associated with the project.

Biological Resources

22. Please provide an electronic version of Exhibit 1, *Suitable Habitat for California Red-Legged Frog, California Tiger Salamander, Western Burrowing Owl, and San Joaquin Kit Fox*. If available, please also submit the GIS data layer for the 'Suitable Habitat' overlay shown in Exhibit 1.
23. Appendix F, *The Preliminary Delineation of Wetlands and Other Waters of the United States for the Hollister 115 kV Power Line Reconductoring Project* is missing its figures as well as Appendices A through C. Please provide the associated figures and Appendices A through C.

Geology, Soils and Seismicity

24. Pages 4.6-5 and 4.6-6 describe geologic features within the vicinity of the Proposed Project. Please verify which mapped geologic formations the Proposed Project alignment would actually traverse (Pages 4.6-5 and 4.6-6).
25. With regard to Table 4.6-1 (found on page 4.6-8 of the PEA), please provide the following information:
 - a) What measure of erosion potential is used in the table?
 - b) What is the unit for permeability?
 - c) Why is corrosion to steel provided over that for concrete?

Hazards and Hazardous Materials

26. The first paragraph on PEA page 4.7-17 indicates that PG&E has designed a lighting system for poles 22/00 and 22/01 to comply with Federal Aviation Administration (FAA) recommendations, as stated in an aeronautical study prepared for the project. However, the PEA does not include any further information about the proposed lighting system. Please provide details about PG&E's proposed lighting system for poles 22/00 and 22/01. In addition, please provide a copy of the aeronautical study that was prepared by the FAA for the project.

Hydrology and Water Quality

27. Text on page 4.8-9 of the PEA states the following:

...Holes for the new towers and poles will be augured to a depth of approximately 12–27 feet and backfilled with concrete or imported material.

Assuming that 'imported material' refers to soil or other fill, the information presented above appears to be inconsistent with Table 3-3 of the Project Description which indicates that zero cubic yards of soil would be imported/exported from the site during Proposed Project construction. Please verify whether additional material other than concrete would be imported during construction, and if so please provide an estimate of the amount of fill to be imported.

28. Please provide examples of road design best practices that would be implemented for APM HYDRO-3, particularly for new roads along the tower segment (in sloped terrain).