

PUBLIC UTILITIES COMMISSION



██████████
████████████████████
June 9, 2016

Mr. Nate Lishman
████████████████████
████████████████████

RE: Request for Additional Data – Permit to Construct the Fulton-Fitch Mountain Reconductoring Project – Application No. A.15-12-005

Dear Mr. Lishman:

The California Public Utilities Commission's (CPUC) Energy Division CEQA Unit has completed its first review of Pacific Gas and Electric Company's (PG&E) Application (A.15-12-005) and related Proponent's Environmental Assessment (PEA) for a Permit to Construct (PTC) the Fulton-Fitch Mountain Reconductoring Project.

The CPUC identified a number of data needs that do not rise to the level of deficiencies during review of the Application, PEA, and PG&E's responses to Deficiency Reports #1, #2, and #3. A portion of these data needs are identified in the attached Data Needs #1. The CPUC requests that PG&E respond in writing to this request and provide the additional data identified in Data Needs #1.

Information provided by PG&E in response to the Energy Division's Request for Additional Data should be filed as supplements to Application A.15-12-005. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, in both hardcopy and electronic format. We request that PG&E respond to this report no later than July 9, 2016. Please let us know if you cannot provide the information by this date. Delays in responding to these data needs will result in associated delays to preparation of the environmental document.

The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should PG&E's PTC be approved.

Please direct questions related to this application to me at ██████████ or ██████████.

Sincerely,

MJ Orsaba

Lisa Orsaba

Project Manager
Energy Division, CEQA Unit

cc: Mary Jo Borak, Supervisor
Elizabeth Dorman, CPUC Attorney
Jo Lynn Lambert, PG&E Attorney
Tania Treis, Project Manager, Panorama Environmental
Aaron Lui, Deputy Project Manager, Panorama Environmental

PG&E FULTON-FITCH MOUNTAIN RECONDUCTORING PROJECT – APPLICATION NO. A.15-12-005

Table 1 Data Needs #1

ID	Applicant References	Issue	Data Need						
Project Description (PD)									
PD-01	<p>PEA: 2.7.2.4 Helicopter Landing Zones</p> <p>Other: Response to DR #2 (PD-01)</p>	<p>Staging areas and helicopter landing zone classifications</p> <p>PG&E has provided maps and GIS data that identify proposed work areas by category including staging areas, helicopter landing zones, and a combination of staging areas/landing zones.</p> <p>The PEA Project Description states, "Helicopter sites will also be used to facilitate other project activities, such as staging and storing construction materials and equipment, refueling, and assembling construction materials."</p> <p>Additional information is needed regarding the proposed activities at these locations.</p>	<p>a. Please identify the construction activities and typical equipment to be used at each of the staging areas, landing zones, and combination staging area/landing zone locations. A table format would suffice, as shown below.</p> <table border="1" data-bbox="1251 688 1890 810"> <thead> <tr> <th>Staging/Landing/Combined Area</th> <th>Activities</th> <th>Typical Equipment</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table> <p>b. Please clarify if staging areas and landing zones in the Southern Segment may be used to support construction in the Northern Segment¹ and vice versa, or if the locations would only be used to support construction activities at the nearest pole sites.</p>	Staging/Landing/Combined Area	Activities	Typical Equipment			
Staging/Landing/Combined Area	Activities	Typical Equipment							
PD-02	<p>PEA: 2.7.2.4 Helicopter Landing Zones</p> <p>Other: Response to DR #1 (PD-07 and PD-13)</p>	<p>Helicopter use</p> <p>The PEA Project Description states that helicopters are required to facilitate access (e.g., transport workers, poles, materials, equipment, and concrete) due to steep terrain, ground conditions, or other project restrictions. Helicopters are also proposed to support pole setting and reconductoring.</p> <p>It may be feasible for PG&E to entirely construct the Southern Segment using conventional ground-based</p>	<p>a. Please identify which, if any, proposed work areas would not be accessed aerially by helicopters due to potential hazards, noise considerations, available flat and cleared workspace, or other limiting factors).</p> <p>b. Please clarify if and how project construction would change if all proposed activities in the Southern Segment were completed using conventional ground-based equipment, such as bucket trucks and cranes, and without the use of helicopters. Please clarify if any</p>						

¹ The Southern Segment refers to the Fulton-Shiloh Segment as defined in the PEA. The Northern Segment refers to the Shiloh-Fitch Segment.

DATA NEEDS #1 – JUNE 9, 2016

ID	Applicant References	Issue	Data Need
	Response to DR #2 (PD-01 and PD-03) Preliminary Helicopter Use Plan	equipment (i.e., bucket trucks and cranes) and the use of helicopters may not be needed in the Southern Segment, particularly near the densely populated residential areas in Larkfield-Wikiup.	new equipment would be required and how the proposed construction schedule may be affected. Please identify any anticipated impacts to traffic and transportation that may be required if additional workspace is needed within existing roadways. c. Please state if helicopters were previously used to construct any component of the Southern Segment or Fulton Substation. d. Please state if PG&E currently uses helicopters for operation and maintenance activities in the Southern Segment (i.e., annual inspection). Provide the nature, duration, and frequency of such maintenance activities.
Noise (NS)			
NS-01	PEA: 2.7.7.5 Construction Workforce and Equipment 2.7.7.6 Construction Schedule 3.12.5.3 Potential Impacts Other: Response to DR #1 (PD-07 and PD-13) Response to DR #2 (PD-01 and PD-03) Preliminary Helicopter Use Plan	Schedule and project construction phasing To adequately address construction noise impacts for both helicopters and conventional ground based equipment, more information is needed regarding the approximate duration of proposed activities (i.e., days of work per phase) and dispersal assumptions.	Tables A and B (attached) summarize CPUC's understanding of the duration of work and dispersal assumption (i.e., if daily activities would be either continuous at each work site or periodic because work would be dispersed across multiple work sites). Information in Tables A and B is based on information provided by PG&E to date and estimates from past PG&E projects. a. Please review Table A (attached) and address CPUC's questions regarding the project schedule and anticipated phasing of construction. CPUC understands timelines are preliminary and subject to a variety of factors. This information is needed to understand overlapping and potentially concurrent construction activities. Please provide a revised version of the table with any comments and corrections that better reflect the proposed schedule and phasing. b. Please review Table B (attached) and address CPUC's questions regarding the duration of proposed construction activities broken down by project segment, construction phase, and work area type, and separated between conventional ground based

DATA NEEDS #1 – JUNE 9, 2016

ID	Applicant References	Issue	Data Need
			<p>equipment and helicopters. Please provide a revised version of the table as indicated.</p> <p>c. Please describe all nighttime construction activities that could occur, applicable project locations, and safety and land owner considerations that may require night time work.</p>
Traffic (TT)			
TT-01	<p>Other: Response to DR #1 (PD-04)</p>	<p>Construction vehicle and helicopter trips PG&E provided a revised version of Table 2.0-2 from the PEA project description in response to DR #1 that provided peak and non-peak estimated vehicle trips. Additional information is needed to determine if vehicle trips in Table 2.0-2 include equipment that would travel off of public roadways, and how vehicle trips may be focused or dispersed across the project and between construction phases. This information will be used to determine peak and non-peak construction vehicle trips on public roadways that may occur during simultaneous construction phases. Additional information is also needed to estimate the dispersal of helicopter trips and to identify fluctuations in helicopter trips by construction phase and location.</p>	<p>a. Please review Table B (attached) and address CPUC's questions regarding the dispersal of daily vehicle trips on public roadways, as well as helicopter trips, and dispersal assumption across between construction phases and work areas. Please provide a revised version of the table with any comments and corrections that better reflect construction traffic and dispersal considerations.</p>

DATA NEEDS #1 – JUNE 9, 2016

ATTACHMENTS

Table A Anticipated Construction Schedule

Component	Anticipated Start	Anticipated End	Approximate Duration
Southern Segment			
Site Development	October 2018	October 2018	? weeks
TSP Hardware Replacement	October 2018	November 2018	2 months
60 kV and 230 kV Reconductoring	December 2018	December 2018	1 months
Cleanup and Restoration	December 2018	December 2018	? weeks
Total Segment Construction	October 2018	December 2018	3 months
Northern Segment			
Site Development	July 2018	July 2018	? weeks
Pole Installation	July 2018	March 2019	10 months
Pole Removal	October 2018	July 2019	4 months
60 kV Reconductoring	October 2018	March 2019	4 months
Cleanup and Restoration	July 2019	July 2019	? weeks
Total Segment Construction	July 2018	July 2019	12 months
Fitch Mountain Substation			
All Substation Modifications	March 2019	April 2019	2 months
Total Project Construction	July 2018	July 2019	12 months

DATA NEEDS #1 – JUNE 9, 2016

Table B Proposed Construction Activities by Phase and Work Area

Work Areas	Number of Individual Locations	Ground Based Vehicles and Equipment ¹				Helicopters		
		Approx. Duration of Work per Location	Daily Work Schedule Assumption	Peak Daily Vehicle Trips per Location	Non-Peak Daily Vehicle Trips per Location	Approx. Duration of Work per Location	Daily Work Schedule Assumption	Total Trips per Location (5-10 mins. Each)
Southern Segment (Fulton-Shiloh Segment)								
Site Development	n/a	1-2 days	Periodic	? trips	? trips	n/a	n/a	n/a
Structure Modification (e.g., TSP arm replacement)	21	2-4 days	Continuous	? trips	? trips	2-4 days	Near Continuous	50-80 trips
Pull Sites	5	? days	Continuous	? trips	? trips	? days	Periodic	? trips
Structure Reconductoring ^{2,3}	21	1-2 days	Periodic	? trips	? trips	1-2 days	Periodic	? trips
Lavell Road Landing Zone	1	3 months	Continuous	? trips	? trips	2-3 months	Near Continuous	? trips
Lavell Road Staging Area	1	3 months	Continuous	? trips	? trips	? days	Periodic	? trips
The Cove Staging Area	1	3 months	Continuous	? trips	? trips	? days	Periodic	? trips
Fraught Road Landing Zone	1	3 months	Continuous	? trips	? trips	2-3 months	Near Continuous	? trips
Northern Segment (Shiloh-Fitch Segment)								
Site Development	n/a	1-2 days	Periodic	? trips	? trips	n/a	n/a	n/a
Structure Replacement (Installation/Removal) ⁴	67	2-4 days	Continuous	? trips	? trips	2-4 days	Near Continuous	50-80 trips
Structure Removal/Reframe Only ⁴	4	1-2 days	Continuous	? trips	? trips	1-2 days	Periodic	15-30 trips
Pull Sites	4	? days	Continuous	? trips	? trips	? days	Periodic	? trips
Structure Reconductoring ^{2,3}	67	1-2 days	Periodic	? trips	? trips	1-2 days	Periodic	? trips

DATA NEEDS #1 – JUNE 9, 2016

Work Areas	Number of Individual Locations	Ground Based Vehicles and Equipment ¹				Helicopters		
		Approx. Duration of Work per Location	Daily Work Schedule Assumption	Peak Daily Vehicle Trips per Location	Non-Peak Daily Vehicle Trips per Location	Approx. Duration of Work per Location	Daily Work Schedule Assumption	Total Trips per Location (5-10 mins. Each)
Shiloh Ranch Regional Park Staging Area	1	10-12 months	Continuous	? trips	? trips	? days	Periodic	? trips
Shiloh Ridge Road Staging Area/Landing Zone	1	10-12 months	Continuous	? trips	? trips	10 months	Near Continuous	? trips
Chalk Hill Road Staging Area/Landing Zone	1	10-12 months	Continuous	? trips	? trips	10 months	Near Continuous	? trips
Brooks Road Staging Area/Landing Zone	1	10-12 months	Continuous	? trips	? trips	10 months	Near Continuous	? trips
Minaglia Ranch Landing Zone	1	n/a	n/a	? trips	? trips	10 months	Near Continuous	? trips
Fitch Mountain Substation								
All Substation Modifications	1	2 months	Continuous	? trips	? trips	n/a	n/a	n/a
<p>Notes:</p> <p>¹ Conventional equipment includes all proposed construction equipment other than helicopters.</p> <p>² Reconductoring in the Southern Segment would take approximately twice as long as the Northern Segment because both the 230 kV transmission line and 60 kV power line would be replaced.</p> <p>³ Reconductoring at structures includes installing pulleys, clipping the line in, and removing the pulleys.</p> <p>⁴ Structure replacement in the Northern Segment would be near 1:1; however, there would be three locations (E36, E46, and E104) where existing poles would be removed without replacement with a new pole, and one location where a structure would be reframed (E104). New poles would be installed within approximately 35 feet of existing poles. Three-poled structures are counted as one structure.</p> <p>* Construction will typically take place between 7 a.m. and 7 p.m. It is anticipated that construction crews will work concurrently on a rotating schedule of 11 days on and 3 days off. Infrequent and short term nighttime work may be necessary to reach a safe stopping point or if scheduled electrical outages must be scheduled during nighttime hours to reduce interruption to electrical services.</p>								