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November 28, 2005

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

RE West-wide Energy Corridor Programmatic EIS

Dear Gentlemen,

Pacific Gas and Electric Company is eager to participate in the West-wide Energy Corridor Programmatic EIS. Previous comments were provided for the record during the public workshop held on November 1, 2005 in Sacramento, California (see attachments). This letter is intended to supplement previous comments and provide suggestions or recommendations to the project team.

Pacific Gas and Electric Company supports the provisions in the Energy Policy Act of 2005 that direct relevant agencies to establish corridors for utility facilities upon federal lands. Corridors address energy resource needs by allowing well planned utility infrastructure to be built quickly in response to the public demands ensuring continued strong economic growth. They also help to ensure the life long maintenance and operation of utility infrastructure.

Our comments are summarized in three sections. The first section is intended to provide the project team with an understanding of how corridors are useful to Pacific Gas and Electric Company. Specifically, it will describe desired features of the new corridors. The second section is intended to offer suggestions and comments regarding the corridor planning and implementation process to better ensure the success of the project and usefulness to end users. The third section will list utility corridors Pacific Gas and Electric Company wishes to put forth to the Project team for inclusion in your studies.

In general, Pacific Gas and Electric Company meets this project with guarded enthusiasm. It remains unclear how we can help the process or ensure the usefulness of the outcome. For this reason, our comments carry the common theme of a desire for more and intimate interaction with the project team. At this stage of the project it appears that information should be provided at a level to stimulate discussion. We look for future opportunities to work more closely with project team members to discuss issues and future plans.

Map Designation	County	Project Need and Description	Status	Federal Lands
3	Humbolt Trinity Shasta Tehama	System capacity and reliability improvements in response to future electric generation needs near Eureka, CA. This would include electric transmission lines and natural gas pipelines extending from Eureka to the Northern Sacramento Valley.	5 – 10 years	USFS
4	San Bernardino Kern	System capacity and reliability improvements. Construction of a parallel pipeline to existing L-300 between Arizona border near Topock and Bakersfield.	5 – 10 years	BLM
5	Placer Nevada El Dorado	Gas and electric system capacity and reliability improvements. Utility corridor(s) between Nevada border and Auburn, California.	10+ years	USFS
6	San Mateo, San Francisco	Jefferson Martin 230 kV project. System capacity and reliability improvements for the San Francisco peninsula area.	Underway	NPS
7	Various	Table Mountain to Midway 500 kV line(s) to accommodate future generation sources and bulk system power transfers from WECC. Construction of 500 kV transmission line(s).	Various (<5, 5-10, 10+ years)	BLM, USFS
8	Madera, Merced	Gregg – Los Banos. Crosstie between east and west side bulk 500 kV systems	5-10 years	USFWS
9	Calaveras, San Joaquin	Bellota – Tracy. Crosstie between east and west side bulk 500 kV systems	5-10 years	BLM
10	Kern	Midway – Vincent – Adelanto. System improvement to facilitate power transfers between northern and southern California and new generation in Southern California and desert Southeast.	5-10 years	BLM, DOD
11	Butte, Tehema, Plumas, Shasta, Lassen, Modoc	Frontier Project interconnection to accommodate future generation sources and bulk system power transfers.	10+ years	USFS

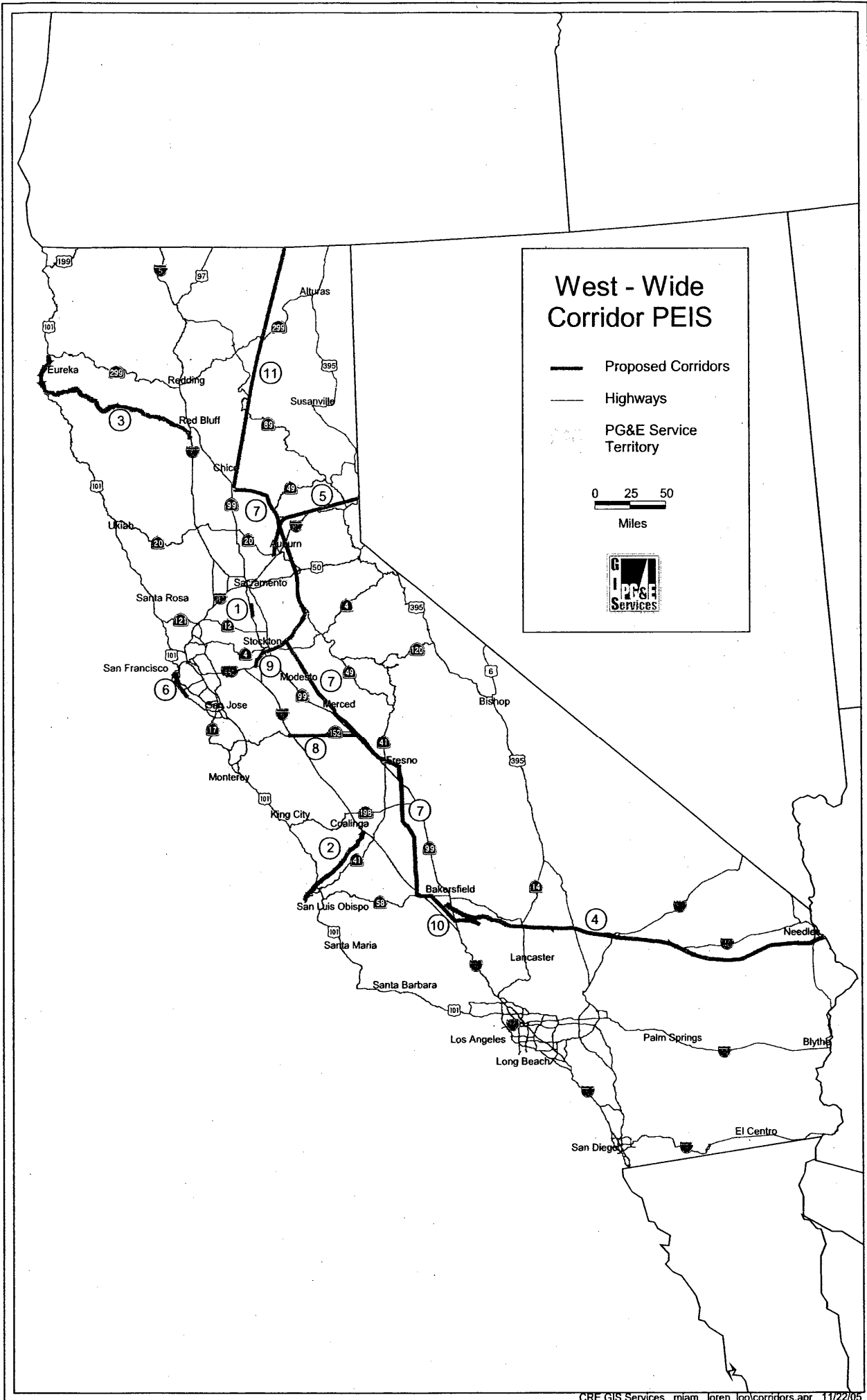
The listed corridor needs may change as projects are implemented. In addition, the list does not summarize existing infrastructure, which we believe should be considered for corridor designation. It is assumed existing infrastructure is being analyzed for corridor designation. A map depicting recommended corridors in their approximate location is included as Exhibit A.

We appreciate the opportunity of participating in this important activity. We are looking forward to continued interaction and the eventual implementation of these corridors. Please contact me at (415) 973-5696 or Loren Loo throughout this process.




Sincerely,

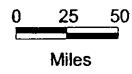


Diane Ross-Leech
Manager, Environmental Support and Services



West - Wide Corridor PEIS

-  Proposed Corridors
-  Highways
-  PG&E Service Territory





October 31, 2005

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: Public Scoping Initial Response
West-wide Energy Corridor Programmatic EIS

Dear Gentlemen,

Pacific Gas and Electric Company appreciates the opportunity to participate in the West-wide Energy Corridor Programmatic EIS. We look forward to the November 1, 2005 workshop scheduled in Sacramento, California and offer the following comments to assist in defining relevant issues.

Pacific Gas and Electric Company supports the combined federal agency focus on the effort to establish corridors for utility facilities crossing federal lands. Corridors will facilitate interstate energy resource planning and increase the collaboration between the Western States energy providers. A robust energy network is the backbone to strong economic growth in the region. The corridors will assist utilities as they respond to growth in local cities and counties.

The establishment of corridors across federal lands and the subsequent adoption in land management plans is the first step towards maximizing effectiveness this project. The benefit is realized when the designation actually results in "streamlining and expediting the processing of energy-related permits and projects", anything less than this is likely a waste of time and money.. Success can be achieved if the project team incorporates specific policies within each agency's land management plan to:

- Specify utility facilities as the primary designated activity within corridors and restrict alternate uses that constrain utility facilities.
- Examine the corridors sufficiently to ensure NEPA compliance can be performed as environmental assessments or categorical exclusions.
- Implement a streamlined permitting process for projects in designated corridors.
- Require that corridor designation runs with the land even if removed from federal ownership.

Past utility corridor studies (i.e. Trans-Sierra Crossing) were unable to fully achieve their objectives due to resource and/or funding constraints. We are keenly aware of the constraints of funding and manpower that affects our federal agencies. We urge this team to implement mechanisms now to address those issues instead of waiting for a direct impact to the project.



In California state, county and city agencies have significant impact and an important role on the siting of utility projects once they leave federal lands. Please engage them directly to participate in this process. This will assist in developing a harmonious integration with other on-going utility corridor studies (i.e. California Energy Commission 2005 Strategic Transmission Planning Project).

In summary, Pacific Gas and Electric Company applauds the agencies for demonstrating such forward thinking on an important national issue and reiterate our desire to actively participate in this process. We believe that this current effort will help bring one step closer to reality proposals critical to regional and interstate interests such as the Frontier Project. Pacific Gas and Electric Company will provide additional comments as this process progresses.

If there are questions or a need to discuss any of our comments in greater detail, please contact me or Loren Loo, (415) 973-5817.

Sincerely,

Diane Ross-Leech
Manager
Environmental Affairs
Pacific Gas and Electric Company

West-Wide Energy Corridor
Programmatic EIS

Public Workshop
Sacramento, CA
11/1/2005

PACIFIC GAS AND ELECTRIC COMPANY
Comments

Pacific Gas and Electric Company supports the West-Wide Energy Corridor EIS Project:

- Corridors help facilitate interstate energy resource planning
- Supports interdependency of the Western States energy delivery systems
- Ensures continued strong economic growth for the Western States region
- Assists utilities in responding to the continuing development at the state and local level

Corridors are the first step - specific policies within each federal or state agency's land management plan should be established to:

- Outline streamlined permitting processes and actions required to implement projects in designated corridors such as allowing future actions to be authorized as categorical exclusions or environmental assessments
- Specify the primary designated activity within corridors is for utility facilities
- Corridors need to be protected from incompatible uses that might constrain ability to site and construct future utility facilities
- Require that corridor designation runs with the land even if removed from federal ownership

To ensure success of this project, we should learn from the past:

- Past utility corridor studies were unable to fully achieve their objectives due to resource and/or funding constraints - these issues should be addressed up front
- Keep the process simple and manageable
- Consider fewer corridor designations that meet most of the needs
- Build in flexibility and adaptability over time

Process should:

- Address endangered species and cultural resource consultation
- Actively lobby state and local agencies to participate in process
- Consider on-going utility corridor studies being performed at the state level

Summary on Process:

- PG&E supports the project and process
- Address permit streamlining and future agency actions
- Protect designated corridors from incompatible uses
- Build in flexibility over time due to market changes and new information