| From: | corridoreiswebmaster@anl.gov |
|--------------|------------------------------------------------|
| То: | Corridoreisarchives; |
| CC: | |
| Subject: | Energy Corridor Programmatic EIS Comment 80086 |
| Date: | Monday, November 28, 2005 6:59:47 PM |
| Attachments: | 112805_West_Wide_letter2a_80086.doc |

Thank you for your comment, Loren Loo.

The comment tracking number that has been assigned to your comment is 80086. Please refer to the tracking number in all correspondence relating to this comment.

Comment Date: November 28, 2005 06:59:40PM CDT

Energy Corridor Programmatic EIS Scoping Comment: 80086

First Name: Loren Last Name: Loo Organization: Pacific Gas and Electric Company Address: 245 Market Street, Room 1009, N10A City: San Francisco State: CA Zip: 94105 Country: USA Email: lhl1@pge.com Privacy Preference: Don't withhold name or address from public record Attachment: C:\Documents and Settings\lhl1\Desktop\112805 West Wide letter2a.doc

Comment Submitted: Gentlemen,

Attached please find Pacific Gas and Electric Company's formal response to the Notice of Preparation of a PEIS on the West-wide Corridor Project. A faxed copy will also be sent today. A hard copy will be forthcoming.

Sincerely,



245 Market Street San Francisco, CA 94105

Mailing Address: Mail Code N10A P.O. Box 770000 San Francisco, CA 94177

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.

Pacific Gas and Electric Company's desired conditions for future corridors:

- 1. Provide a site specific corridor sufficiently wide to accommodate a forecast energy need and all ancillary activities.
- 2. Provide corridors suitable in terrain and free from physical constraints that prevent cost effective construction and management of utility facilities. Be mindful that underground pipelines have different corridor constraints than overhead electric power lines.
- 3. Restrict the corridor to comparable uses that would not displace or conflict with the intended use.
- 4. Provide a mechanism to allow a utility to reserve corridor space, but not to exclude free market use at the exclusion of other viable plans from competitors.
- 5. Provide a provision to modify corridors to accommodate specific proposals.
- 6. Streamline or simplify environmental and public review. Possibly implementing review or approval timeframes.
- 7. Allow modifications to facilities within corridors as categorical exclusions or without federal action.
- 8. Provide meaningful interstate connections.
- 9. Allow perpetual entitlements within future corridors once approved.
- 10. Consider the need for diversity and national security, and risk factors relevant to the reliability of the grid.

Pacific Gas and Electric Company desired features for the approval and planning process include the following:

- 1. PG&E would meet directly and initially with Federal and State agency staff to discuss future needs, system plans, proprietary or security restricted information that may factor in selecting corridors.
- 2. Consult with EEI and WECC regarding characteristics of the western grid.
- 3. Meet later in the process, and prior to the public release of the recommended corridors, to confirm the feasibility of corridors.
- 4. Hold utility working group meetings to share expectations, address needs, examine previous studies, and review progress.
- 5. Allow a utility advisor or working group member from Pacific Gas and Electric Company to participate in the process.
- 6. Continued active involvement by local and state agencies

Pacific Gas and Electric Company has examined existing and future needs in regards to the corridors across federal lands and has identified the following as an initial list:

| Map Designation | County | Project Need and Description | Status | Federal Lands |
|--------------------|-----------------|----------------------------------------------|----------|------------------|
| 1 | Sacramento | System capacity and reliability | Underway | USFWS |
| | | improvements. Construction of 14 miles of | | |
| | | 24-inch pipeline between Elk Grove and Galt, | | |
| | | Sacramento County | | |
| 2 | San Luis Obispo | System capacity and reliability | 5 – 10 | USFS |
| | Kings | improvements. Construction of a 70 miles | years | |
| | - | natural gas pipeline between Morro Bay and | - | |
| | | Avenal, CA. | | |

CORRIDOR NEEDS WITHIN CALIFORNIA

| Map Designation | County | Project Need and Description | Status | Federal Lands |
|--------------------|-----------------|-------------------------------------------------|---------------------|------------------|
| 3 | Humbolt | System capacity and reliability improvements | 5 - 10 | USFS |
| | Trinity | in response to future electric generation needs | years | |
| | Shasta | near Eureka, CA. This would include electric | | |
| | Tehama | transmission lines and natural gas pipelines | | |
| | | extending from Eureka to the Northern | | |
| | | Sacramento Valley. | | |
| 4 | San Bernardino | System capacity and reliability | 5 - 10 | BLM |
| | Kern | improvements. Construction of a parallel | years | |
| | | pipeline to existing L-300 between Arizona | | |
| | | border near Topock and Bakersfield. | | |
| 5 | Placer | Gas and electric system capacity and | 10+ years | USFS |
| | Nevada | reliability improvements. Utility corridor(s) | | |
| | El Dorado | between Nevada border and Auburn, | | |
| | | California. | T T 1 | NDC |
| 6 | San Mateo, San | Jefferson Martin 230 kV project. System | Underway | NPS |
| | Francisco | capacity and reliability improvements for the | | |
| 7 | XZ | San Francisco península area. | X 7 | DIM |
| / | various | Table Mountain to Midway 500 KV line(s) to | various | BLM, |
| | | bulk system power transfers from WECC | (<5, 5-10, 10) | 0353 |
| | | Construction of 500 kV transmission line(s) | 10+ | |
| 8 | Madera Merced | Gragg Los Banos Crosstie between east | 5 10 | USEWS |
| 0 | Wadera, Wierced | and west side bulk 500 kV systems | J-10 | 031 WS |
| 9 | Calaveras San | Bellota – Tracy Crosstie between east and | 5-10 | BI M |
| | Loaquin | west side bulk 500 kV systems | vears | DLW |
| 10 | Kern | Midway – Vincent – Adelanto System | 5-10 | BLM |
| 10 | itein | improvement to facilitate power transfers | vears | DOD |
| | | between northern and southern California and | J | _ |
| | | new generation in Southern California and | | |
| | | desert Southeast. | | |
| 11 | Butte, Tehema, | Frontier Project interconnection to | 10+ years | USFS |
| | Plumas, Shasta, | accommodate future generation sources and | - | |
| | Lassen, Modoc | bulk system power transfers. | | |

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 cc:

Ben Morris – PG&E Todd Hogenson – PG&E Dan Kim – PG&E Pam Lacey – AGA Bud Anderson – WUG Margaret Hunt – EEI Rick Loughery – EEI Lisa Beal – INGAA

Diane Ross-Leech Manager, Environmental Support and Services Mail Code B24A 77 Beale Street San Francisco, California 94105 Phone (415) 973-55696

Loren Loo Land Projects Manager Mail Code N10A 245 Market Street San Francisco, California 94105 Phone (415) 973-5817

Attachments

EXHIBIT A (Corridor Map) November 1, 2005 Letter November 1, 2005 Powerpoint Presentation Loren Loo (415) 973-5817

Questions about submitting comments over the Web? Contact us at: corridoreiswebmaster@anl.gov or call the Energy Corridor Programmatic EIS Webmaster at (630)252-6182.