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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

**I.D. # 12702
RESOLUTION E-4603
February 5, 2014**

R E S O L U T I O N

Resolution E-4603. Pacific Gas and Electric Company requests approval of a deviation from California Public Utilities Code Section 320 for a project in the City of Placerville.

PROPOSED OUTCOME: This resolution grants the request and authorizes Pacific Gas and Electric (PG&E) to relocate approximately 245 feet of primary and secondary overhead wires, and relocate and replace two joint poles in an existing distribution pole line located along the north side of U.S. Highway 50 at the Mosquito Road undercrossing in the City of Placerville. Highway 50 is within a state scenic corridor.

SAFETY CONSIDERATIONS: This resolution provides a onetime authorization for PG&E to deviate from California Public Utilities Code Section 320. Utilities are expected to comply with all federal and state safety regulations, including Public Utilities Code Section 451.

ESTIMATED COST: This project costs \$985,500. It is to be funded by the U.S. Department of Transportation, Federal Transit Administration (FTA) Section 5309 Grant Program.

By Advice Letter 4217-E, Filed on April 24, 2013.

SUMMARY

The California Public Utilities Commission (CPUC) approves PG&E's California Public Utilities Code Section 320 (Section 320) deviation request, because it has a much lower cost than undergrounding the facilities and falls within the FTA grant budget, is visually consistent with the existing facilities, and it can be seen with certainty that the project will not have a significant effect on the environment. Additionally, the project is supported by the City

of Placerville.

On April 24, 2013, PG&E requested authorization from the CPUC for deviation from the scenic highway undergrounding requirements of Section 320 through a Tier 3 Advice Letter 4217-E.

No protests were received.

This Resolution approves PG&E's request to relocate approximately 245 feet of primary and secondary overhead wires, and relocate and replace two joint poles along the north side of U.S. Highway 50 at the Mosquito Road undercrossing in the City of Placerville.

BACKGROUND

California P.U. Code Section 320 was enacted in 1971 and reads in part as follows:

The legislature hereby declares that it is the policy of this state to achieve, whenever feasible and not inconsistent with sound environmental planning, the undergrounding of all future electric and communication distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 of the Streets and Highways Code and which would be visible from such scenic highways if erected above ground. The Commission shall prepare and adopt by December 31, 1972, a statewide plan and schedule for the undergrounding of all such utility distribution facilities in accordance with the aforesaid policy and the rules of the Commission relating to the undergrounding of facilities.

The CPUC is responsible for the administration of Section 320. After hearings conducted in Case 9364, CPUC Decision (D.) 80864 implemented Section 320. D.80864 states that:

In order to facilitate administration, letter requests for deviations will be accepted, reviewed by the Commission staff and, where appropriate, approved by Commission resolution. (74 CPUC 457, D.80864)

D.80864 stipulates that no communications or electric utility shall install overhead distribution facilities "in proximity to" and "visible from" any prescribed corridor on a designated scenic highway in California unless a showing is made before the CPUC and a finding made by the CPUC that undergrounding would not be feasible or would be inconsistent with sound environmental planning. The Decision also defines "in proximity to" as being within 1,000 feet from each edge of the right-of-way of designated State Scenic Highways.

D.80864 also stipulates that when repairs or replacement of existing overhead facilities in the same location do not significantly alter the visual impact of the Scenic Highway, they should not be considered as new construction and need not be converted to underground.

Utilities and local agencies have submitted Advice Letters and letter requests to the Commission for PU Code Section 320 deviations, and the Commission has granted these requests based on economic feasibility on almost all occasions.

NOTICE

Notice of AL 4217-E was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

PROTESTS

Advice Letter AL 4217-E was not protested.

DISCUSSION

Higher undergrounding cost and the consistency of the project with the existing environmental conditions are the determining factors in the CPUC staff finding that undergrounding is infeasible.

CPUC staff evaluated this deviation request taking into account a number of considerations, including:

- nature of the project;
- local government recommendation;
- visibility, aesthetics, and environmental impact; and

- economic feasibility.

Nature of the Project

This joint City of Placerville (City) and Department of Transportation (Caltrans) project plans to widen the southbound lane of Mosquito Road by one lane to improve traffic circulation, and to create 75 new automobile parking spaces along with two oversize spaces for buses and recreational vehicles in the southwest corner of Mosquito Road and Clay Street. The project is to be funded by a grant from the U.S. Department of Transportation, FTA Section 5309 Grant Program in the amount of \$990,000.

The following overhead facilities information at this location were provided by PG&E in AL 4217-E, and AT&T's email data response dated July 23, 2013.

Utility	Total Existing Overhead Facilities
PG&E	Four Poles, cables 310 feet each Three Primary Wire and Two Secondary Wire
AT&T	Four Poles, cables 450 feet each BKTA-900 cable, 1.99" diameter ANMW-200 cable, 1.25" diameter BKTA-300 cable, 1.09" diameter BHAA-200 cable, 1.45" diameter
	Cables along the last two poles (northern part of the project) for 170 feet each BHAA-300 cable with a 1.68" diameter BKTH-400 cable with a 1.43" diameter ADAC-600 cable with a 2.5" diameter
Comcast	Four Poles, One Cable, 310 feet
Guy Anchor	One Pole, 260 feet

PG&E proposes to relocate and replace two of the four existing utility poles further away from the Highway 50 Scenic Corridor at the Mosquito Road undercrossing, and eliminate the other two poles and a guy pole.

PG&E's relocated facilities will have three primary cables located at the top of the poles and one secondary cable consisting of a bundled triplex located underneath. A single phase transformer will be installed on the northerly pole.

A primary riser will be installed on the new primary riser pole at the southeast portion of the project.

The new design also reduces the number of AT&T cables and the length by approximately 10 feet.

The City and PG&E plan to begin construction in June 2014 and complete the project by November 2014. This relocation of line and replacement of poles will be permanent deviations.

Economic Feasibility

The existing overhead utilities consist of electric (PG&E), telephone (AT&T) and cable television (Comcast). PG&E and AT&T have developed cost estimates to place the existing overhead facilities underground. Comcast has determined that there will be no cost to place their facilities underground. PG&E indicated that the current project estimate for design engineering for the parking lot and Mosquito Road, construction of the parking light and road widening, paving, landscaping, lighting, signing and stripping, construction support for the construction work, and city staff support and administration is in the range of \$745,000. The following table shows the costs of undergrounding the existing overhead facilities as compared to the costs of relocating the existing overhead lines.

Options	Cost of Relocate Overhead Facilities	Cost to Underground Cables	Comparative Cost Ratio
PG&E	\$90,500	\$705,000	7.79
AT&T	\$150,000	\$400,000	2.67
Total	\$240,500	\$1,105,000	4.59

Total estimated cost to relocate and replace two poles and 245' of aerial cables is \$240,000. The estimated cost of putting this pole line segment underground is \$1,105,000. The cost ratio is 4.6 to 1, and undergrounding this pole line segment would increase the total project cost by \$864,500, exceeds the FTA grant by \$119,500, and make the underground option infeasible.

Local Government Recommendation

On October 23, 2012, the Placerville City Council passed Resolution Number 8052 authorizing the City manager to apply to the CPUC for an exemption from PU Code Section 320 and approve the additional design engineering services for Omni-Means, Ltd. By a letter dated January 10, 2013, City of Placerville Development Service Department also indicated total support of the overhead alternative.

Visibility, Aesthetics, and Environmental Impact

The designated scenic portion of Highway 50 in El Dorado County is 58 miles long, and spans from the suburban foothills of the Sierra Nevada through the American River Canyon, over the granite peaks of Echo Summit, then descends to the Tahoe Basin. There are existing power lines within this scenic portion of the highway.

In order to enhance the aesthetic features of the existing overhead facilities, substantially reduce project costs, and avoid construction delays, the City has developed an alternative overhead design that eliminates half of the poles, and screens the relocated lines to improve aesthetics from the scenic highway. This proposed design will significantly decrease the amount and length of the existing aerial facilities, as well as the length of guy wires, which will improve the view shed and aesthetics for motorists traveling in either direction on Highway 50. PG&E also indicated that new landscaping with eleven new trees will be planted along the frontage of Mosquito Road. These trees, once mature, will effectively block the relocated utility lines from the Mosquito Road off-ramp view.

Following is a table depicting the utility facilities in existing condition as compared to the proposed design.

Utility	Existing Utility Facilities	Proposed Utility Facilities	Summary
PG&E	Four Poles 310 Feet - Three Primary Wire 310 Feet - Two Secondary Wire	Two Poles 245 Ft. - Three Primary Wire 245 Ft. - Two Secondary Wire	Reduce Two Poles Reduce 65 Feet Reduce 65 Feet
AT&T	Four Poles 450 Feet - Four Cables 170 Feet - Three Cables	Two Poles Two Cables 440 Feet	Reduce Two Poles Reduce Two Cables Reduce 10 Feet Cable

	along the Last Two Poles		
Comcast	Four Poles One Cable 310 Feet	Two Poles One Cable 245 Feet	Reduce Two Poles Reduce 65 Feet Cable
Guy Anchor	One Pole 260 Feet Wire	Three Poles 90 Feet Wire	Add Two Poles Reduce 170 Feet Wire

Photographs and project drawing submitted by PG&E showing the proposed relocation indicate that the project will improve the visibility and aesthetics of the highway.

CEQA requires the Commission to consider the environmental consequences of its discretionary decisions. The CPUC has reviewed the City’s determination finding that the project is categorically exempt from CEQA because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment. We agree with the City’s conclusions.

Analysis

Since the factors discussed above favor the relocation of overhead cables and poles instead of undergrounding along the north side of U.S. Highway 50 at the Mosquito Road undercrossing, and this requested deviation is in compliance with D.80864, the CPUC should approve and grant this deviation. The option to underground the facilities is infeasible given the FTA grant budget and the project as designed significantly complies with the intent of Section 320. The project will improve the aesthetics of the area according to the review of the proposed redesign.

COMMENTS

P.U. Code section 311(g)(1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the CPUC. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

All parties in the proceeding have stipulated to waive the 30-day waiting period required by P.U. Code section 311(g)(1) and the opportunity to file comments on the draft resolution. Accordingly, this matter will be placed on the CPUC's agenda directly for prompt action.

FINDINGS

1. The CPUC administers Section 320 of the P.U. Code requiring undergrounding of utility lines along designated Scenic Highways, and considers Advice Letter requests for deviations, per D.80864.
2. Per D.80864, the applicant must show that undergrounding would not be economically feasible, technically practical, or would be inconsistent with sound environmental planning.
3. By Advice Letter 4217-E dated April 24, 2013, PG&E requested authority for deviation from the undergrounding requirements of Section 320 of the P.U. Code.
4. PG&E requests to relocate approximately 245 feet of aerial power lines, relocate and replace two joint poles, and to eliminate two existing joint poles along Highway 50.
5. There are existing power lines within this scenic portion of highway. Hence, overhead facilities would remain visible from the highway even if we deny PG&E's request.
6. Evidence shows that the project will be an improvement over the aesthetics of the line as it currently exists.
7. The cost of the undergrounding option at this location would exceed placing this segment of power line overhead by 4.6 to 1, exceed the FTA grant by \$119,500, and make the underground option infeasible.
8. By a letter dated January 10, 2013, City of Placerville Development Service Department also indicates total support of the overhead alternative.
9. City of Placerville acted as the Lead Agency pursuant to CEQA for the environmental review of the project. The City determined that the project is categorically exempt from CEQA review because it can be seen with certainty that there is no possibility that the project may have a significant effect on the environment.
10. The CPUC has reviewed and considered the City's CEQA determination and finds that it is adequate.
11. The staff review of AL 4217-E finds that it meets the criteria for deviation from Section 320 per D.80864, especially in that staff finds undergrounding would not be feasible from an economic perspective.

THEREFORE, IT IS ORDERED THAT:

1. The request of PG&E to relocate approximately 245 feet of primary and secondary overhead wires, and relocate and replace two joint poles along Highway 50 as requested in AL 4217-E is approved.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on February 5, 2014; the following Commissioners voting favorably thereon:

PAUL CLANON
Executive Director