

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of Pacific Gas and Electric
Company (U 39 E) for a Certificate of Public
Convenience and Necessity Authorizing the
Construction of the Northern San Joaquin 230
kV Transmission Project.

Application 23-09-001
(Filed September 1, 2023)

OPENING BRIEF OF THE CITY OF LODI

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OPENING BRIEF OF THE CITY OF LODI

Pursuant to Article 13, Rule 13.11 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure, and the schedule set forth in the January 20, 2026 Administrative Law Judge Ruling, the City of Lodi, California and its Electric Utility (City of Lodi) submits this Opening Brief in Application (A.) 23-09-001, PG&E's Application for a Certificate of Public Convenience and Necessity (CPCN) Authorizing the Construction of the Northern San Joaquin 230 kV Transmission Project (Application), filed on September 1, 2023.

I. Executive Summary

In the Application, PG&E seeks approval of the Northern San Joaquin 230 kV Transmission Project (Project), which is intended to provide numerous electric system benefits to the region. The purpose of the Project is to address reliability and capacity issues identified by the California Independent System Operator (CAISO) on the existing PG&E 230 kV and 60 kV systems serving the area between PG&E Lockeford and PG&E Lodi substations in northern San Joaquin County (Northern San Joaquin area).¹

¹ Application, p. 2.

As PG&E describes in the Application “[e]nergy demand in the Northern San Joaquin area is increasing steadily with residential development as well as agricultural and industrial growth. The current PG&E Lockeford-Lodi system has a load serving capability of approximately 194 MW under normal operating condition, and an emergency load serving capability of approximately 152 MW under a modeled NERC Category P1 contingency.”² This capacity is insufficient to meet current and projected load growth.

No party has disputed the need for the Project. PG&E’s Opening Testimony clearly demonstrates that the upgrades are necessary to ensure the safe and reliable provision of electricity in the Northern San Joaquin area, including to the Lodi Electric Utility, which itself serves approximately 27,750 customers.³ Testimony submitted by the California Independent System Operator⁴ and the City of Lodi⁵ further demonstrated the significant adverse impacts to area reliability should the Project not be approved.

The Project is also consistent with the values of the communities in which it is located. While it is not without impacts on those communities, as demonstrated in PG&E’s testimony the adverse impacts can be mitigated.⁶ This includes a commitment by PG&E to work with the agriculture community and inclusion of the Agricultural Community Communication Plan to ensure minimization of impacts on agricultural lands in the Project area.⁷ Furthermore, the Project would provide a direct economic benefit to the City of Lodi. As set forth in the City of Lodi’s testimony, the Commission’s approval of the Project and granting of the CPCN is also

² Application, p. 6.

³ PG&E-1; Witnesses Kevin Kozminski, Marco Rios and Qing Zhang.

⁴ CAISO-1; Witness Binaya Shrestha.

⁵ Lodi-1; Witness Jeff Berkheimer.

⁶ PG&E-4; Witnesses Colleen Taylor, Sanjeev Bhatawadekar and Erin Rice.

⁷ PG&E-4, pp. 6-7.

consistent with meeting the current and future community needs within the City of Lodi and its sphere of influence, and supports those community values. The City of Lodi offers a range of community-oriented programs the future and value of which would be severely compromised in the absence of the much-needed upgrades that will be provided by the Project.⁸

PG&E has met its burden of proof as required by Public Utilities Code section 1001(a). Based on the clear demonstration in the testimony provided by PG&E, the CAISO, and the City of Lodi, the Commission should approve PG&E's Application and grant the CPCN to construct the Project.

II. The City of Lodi

The City of Lodi is a general law city located in Central California with a population of approximately 68,500. The City of Lodi operates its own publicly owned electric utility, the Lodi Electric Utility (LEU). LEU is a customer-owned city-operated utility providing reliable electrical service to residential, commercial and industrial customers since 1910. The Electric Utility contributes approximately \$12 million dollars per year to the City of Lodi's General Fund in the form of a Payment in Lieu of Taxes (PILOT) as well as cost of service which helps fund parks, police, fire and other critical city services. The City of Lodi's Electric Utility service approximately 28,000 customer accounts within fourteen (14) square miles. The City of Lodi is dependent on reliable electric transmission capacity to ensure service to its electric customers is not compromised. The ongoing constraints on the current system will continue without the improvements contemplated by the Project. These constraints jeopardize residents, businesses, and essential public safety throughout the City of Lodi.

⁸ Lodi-1, p. 4.

III. Burden of Proof

PG&E, as the applicant in this proceeding, has the burden of “affirmatively establishing the reasonableness of all aspects of its application.”⁹ In determining whether the applicant has met that burden, the Commission will apply the preponderance of evidence standard.¹⁰ The “preponderance of evidence” standard is “defined in terms of probability of truth, e.g., such evidence as, when weighed with that opposed to it, has more convincing force and greater probability of truth.”¹¹

PG&E has put forth testimony showing the Project is needed to meet current and projected load growth, which has not been challenged by any of parties to this proceeding. In fact, only two other parties submitted testimony, the CAISO and the City of Lodi, and both reiterated and underscored the need for greater electricity reliability in the region and the appropriateness of the Project to meet that need. PG&E has affirmatively established the reasonableness of the Application, and the City of Lodi recommends that the Commission approve the CPCN for construction of the Project.

IV. The Project Serves a Current and Future Public Convenience and Necessity

Energy demand in the Northern San Joaquin area is increasing steadily with residential development as well as agricultural and industrial growth. The current PG&E Lockeford-Lodi system has a load serving capability of approximately 194 MW under normal operating conditions, and an emergency load serving capability of approximately 152 MW under a modeled NERC Category P1 contingency.¹² Furthermore, the CAISO concluded that to improve system reliability and accommodate existing and forecasted growth in electrical needs beyond

⁹ D.10-12-052.

¹⁰ *Utility Consumers’ Action Network v. Public Utilities Comm’n of California*, 187 Cal.App.4th 688 at 698-699.

¹¹ *Id.*, p. 699

¹² Application p. 6

the existing capacity, the system needs to shift load from the 60 kV system to a new 230 kV source. CAISO identified this project in its 2017-2018 Transmission Plan to address the reliability, thermal overload, and voltage issues on the 60 kV network between PG&E Lockeford and PG&E Lodi substations and the 230 kV system serving the area.¹³ For clarification, “Category P1 requires that the emergency thermal ratings of equipment will not be exceeded with the loss of a single circuit, generator, or transformer or of a single circuit and a single generator. In addition, the voltage must be maintained within post-contingency limits under these conditions, and the voltage deviation from the system pre-contingency voltage must be less than eight percent (8%).¹⁴

Based on this identified need, PG&E submitted this Application seeking a CPCN to construct the Project. The August 14, 2025, Assigned Commissioner’s First Amended Scoping Memo and Ruling included within the scope of the proceeding a review of whether “the Proposed Project serves a present or future public convenience and necessity.”¹⁵ In order to grant the Application, the Commission must find that the Project serves a current or future public convenience and necessity. California Public Utilities Code section 1001 provides that:

“an electrical corporation ... shall not begin the construction of a street railroad, of a line, plant, or system, or of any extension thereof, without having first obtained from the commission a certificate that the present or future public convenience and necessity require or will require its construction.”

As demonstrated by the preponderance of evidence submitted by PG&E, the CAISO, and City of Lodi, the Northern San Joaquin area faces significant need for new transmission. As PG&E notes:

¹³ Application, pp. 7-8; *see also* CAISO 2017-2018 Transmission Plan at 118.

¹⁴ PG&E-1, p. 16.

¹⁵ Amended Scoping Memo, p. 2.

“The Project will provide a new 230 kV transmission system in northern San Joaquin County in central California. The Project will loop PG&E’s existing overhead Brighton-Bellota 230 kV transmission line through PG&E’s Lockeford substation, install a new PG&E switching station (the “Thurman Switching Station”) at the existing Fred M. Reid Industrial Substation (the “Industrial Substation”) owned by the City of Lodi’s municipal utility, Lodi Electric Utility (“LEU”), and install a new overhead double-circuit 230 kV transmission line between Lockeford Substation and the new Thurman Switching Station.”¹⁶

In addition to the necessary upgrades constructed by PG&E as part of the Project, the City of Lodi has planned improvements to address capacity and reliability needs that would be impacted if the Project is not approved. As Mr. Berkheimer noted, “[t]he City of Lodi is poised for significant growth on three of its sides and anticipates needing between 100-125MW of additional capacity over the next 30 years. Unfortunately, the City’s existing transmission feeds are operating near their limits and are greatly constraining the ability for load growth and economic development.”¹⁷ By granting PG&E the CPCN to construct the Project, the Commission would be enabling significant capacity benefits for a broad swath of the population in the Northern San Joaquin area, including the City of Lodi which is directly impacted by the current restraints.

V. The Project is Needed for Reliability

No party has disputed the need for the Project. In fact, the only other parties that submitted testimony in this proceeding, the City of Lodi and the CAISO, underscored just how necessary it is for the Project to be approved and for construction to commence as expeditiously as possible.

¹⁶ PG&E-1, p. 4, *ll.* 11-17.

¹⁷ Lodi-1, p. 3.

The CAISO first articulated the need for the Project more than a decade ago when it determined that several transmission lines in the Project area were not meeting thermal and voltage requirements.¹⁸ While no action was recommended for several years, need for the Project was raised again by the CAISO in the 2017-2018 Transmission Plan. At that time the CAISO identified thermal overload and voltage issues on the 60kV network between Lockeford and Industrial substations following P1 contingencies.¹⁹

In the CAISO's most current Transmission plan – the 2024-2025 Transmission Plan – the CAISO determined that the “Lockeford-Lodi Area 230 kV Development Project is still needed, and the CAISO's current transmission planning assumes that the Project will be constructed and operated when it evaluates the performance and reliability of the grid.”²⁰

CAISO Witness Shrestha, a licensed Professional Electrical Engineer and manager of the CAISO's Regional Transmission – North, articulated the need for the project in her testimony as follows:

“I recommend the CPUC authorize the Project to proceed for the following reasons: The Project will address identified thermal overloads and voltage concerns on Pacific Gas and Electric Company's (PG&E) 230/60 kV transmission system during contingencies, which NERC Reliability Standard TPL-001-5 (Transmission System Planning Performance Requirements) requires the CAISO to address. *This outcome will improve system reliability for PG&E's 10,000 customers in the service area, one of which is Lodi Electric Utility (LEU), which itself serves approximately 27,750 customers.* The Project will also increase capacity to accommodate projected growth in demand. To improve system reliability and forecasted growth, the system needs to shift load from the 60 kV system to a new 230 kV facility.”²¹

¹⁸ PG&E-1, p. 5, *ll.* 1-2; *see also* CAISO 2012-2013 Transmission Plan, pp. 69-70; 2012-2013 Transmission Plan appendix B; B-44 to B-47.

¹⁹ CAISO 2017-2018 Transmission Plan, at p. 118.

²⁰ PG&E-2, p. 6, *ll.* 5-7.

²¹ CAISO Testimony, p. 2, *ll.* 1-8, emphasis added.

As PG&E notes, separately, the City of Lodi is conducting improvements on the lines in the same area.

“[City of Lodi] will construct a new 230/60 kV substation, referred to as Guild Substation, to receive the new 230 kV source from PG&E’s new Thurman Switching Station. LEU’s Guild Substation will step down the new 230 kV source to 60 kV and connect to LEU’s Industrial Substation following certain modifications by LEU to that substation. PG&E would disconnect the three existing 60 kV lines currently connected to LEU Industrial Substation, Lodi-Industrial, Industrial Tap and Lockeford- Industrial, and reconfigure them outside of LEU Industrial Substation when the new 230 kV source is in-service.”²²

These upgrades and timely construction of the Project are needed to meet the growing demand in and around the City of Lodi. “LEU and PG&E have a long history of coordination in operating interconnected transmission and distribution systems serving northern San Joaquin County. The City has worked with PG&E and the [CAISO] solutions to the capacity constraints hindering the economic growth and development in and around the City for more than a decade.”²³ Failure to address these constraints will have significant cost impacts for the City of Lodi. The urgency in moving this proposal forward was underscored by a 2022 incident in the City of Lodi, when an unexpected P-1 event occurred on LEU’s existing transmission feeds. As previously submitted in the City of Lodi’s testimony:

“The primary and backup 167 protective relays failed, causing the Lockeford 60kV sub-transmission feed to be forced out of service, which forced LEU’s customers into rotating power outages. For several hours, without warning, LEU was required to shed 35MW of customer load on a 1-hour rotating outage basis; this outage went on for multiple hours. Residents and business throughout Lodi had power outages forced on them on a day where temperatures reached around 109-outages rotated throughout the day, approximately 75% of all LEU customers were impacted.”²⁴

²² PG&E-2; *see also*, CAISO/Shrestha; p. 2, *ll.* 16-23.

²³ Lodi-1, p. 3.

²⁴ Lodi-1, p. 3.

These kinds of events cannot be allowed to occur. Not only do they threaten the safety and well-being of the residents and business of Lodi, but they also cause cascading economic harm, and jeopardize the clean energy and electrification goals that are so important to the City of Lodi and the state. For that reason, “LEU will construct a new 230/60 kV Guild Substation that will receive power from the new Thurman Switching Station. Together, these facilities will increase voltage stability, improve capacity, and reduce thermal constraints on the regional network. The Project benefits approximately 38,000 PG&E and LEU customers in the northern San Joaquin area, including the residents and businesses of Lodi, and is pivotal to the City’s future growth.”²⁵ All of which is integrally linked with the Project and the Commission’s approval of the CPCN.

The Project is needed in order to improve system reliability for PG&E customers in the Northern San Joaquin area, including the Lodi Electric Utility, which itself serves approximately 27,750 customers.

VI. The Project Provides Benefits to the Effected Communities and is Consistent with the Communities’ Values

The Project is consistent with the City of Lodi’s adopted Strategic Vision, as well as the broader plan of the south San Joaquin valley and associated areas. It is critically important to note here that community values not only encompass the outreach and services the City of Lodi provides to its customers through its Community Benefit Programs,²⁶ but these programs also provide resources to ratepayers to address affordability challenges, implement energy efficiency and conservation programs, and ultimately, facilitate the transition to full electrification wherever feasible to do so. However, the lack of reliable electricity undermines those

²⁵ Lodi-1, p. 3.

²⁶ Lodi-1, p. 4.

customers-specific goals and benefits, and compromises the ability of the entire City to meet its economic development and sustainability goals.²⁷ By enabling the provision of reliable electric service in the area and accommodating projected increases in electrical demand, the Project supports the economic development goals of San Joaquin County, as set forth in the San Joaquin County General Plan.”²⁸

VII. Conclusion

The Project serves both present and future needs for the City of Lodi and LEU customers, and is necessary to meet critical capacity shortages needed to ensure electricity reliability in the impacted area, which includes the service territory of LEU. The Project is also necessary to meet load growth projections in the City of Lodi’s sphere of influence and is consistent with and complements the local community values that the Commission must consider in granting the CPCN.

Therefore, the City of Lodi respectfully request that the Commission approve the Application, grant the CPCN, and authorize PG&E to begin construction of the Projects as soon as possible.

Dated March 20, 2026

Respectfully submitted,



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²⁷ Lodi-1, p. 4; PG&E-4, p. 9.

²⁸ PG&E-4, p. 10; *see also* San Joaquin County, General Plan Policy Document, dated December 2016.