PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Agenda ID # 20658**

**ENERGY DIVISION RESOLUTION E- 5207**

**June 23, 2022**

RESOLUTION

Resolution E-5207—Approves Construction, Pursuant to General Order 131-D, of the Ignacio-Alto-Sausalito #1 and #2 60 kV Power Line, SCADA Switch Program in the City of Mill Valley, County of Marin.

PROPOSED OUTCOME:

* This Resolution approves the construction of the Ignacio-Alto-Sausalito #1 and #2 60 kV Power Line, SCADA Switch Program (SCADA Project) to support PG&E's Public Safety Power Shut-off (PSPS) program in the City of Mill Valley, County of Marin.

SAFETY CONSIDERATIONS:

* Electric Infrastructure construction is part of the responsibility of the IOUs to meet their obligations under Public Utilities Code Section 451 to provide services that promote the safety, health, comfort, and convenience of their patrons, employees, and the public.

ESTIMATED COST:

* The SCADA switch Program cost to ratepayers is not known at this time.

# Summary

This Resolution approves PG&E Advice Letter 6186-E-B seeking approval to construct four new Supervisory Control and Data Acquisition (SCADA) Switches on the Ignacio-Alto-Sausalito #1 and #2 60 kV Powerline as needed to effectively implement PG&E's Public Safety Power Shut-off Program. The four new SCADA Switches will replace two manually operated switches. The CPUC approves the construction of the new SCADA switches and associated infrastructure (SCADA Project).

# Background

On May 4, 2021, PG&E filed AL 6186-E: Submits Notice of Construction, Pursuant to General Order 131-D for the Construction of Ignacio-Alto-Sausalito #1 and #2 60 kV Powerline SCADA Switch Program in the City of Mill Valley, County of Marin. The proposed SCADA Project would replace two manually operated power switches with four new SCADA Switches enabling PG&E to effectively implement its PSPS program in Mill Valley. The SCADA Project is located on a hillside in Mill Valley, west of US 101and is part of PG&E's efforts to address wildfire protection and minimize customer outages.

One existing approximately 95-foot-tall lattice steel tower (currently supporting the #1 and #2 Power lines), located in an existing easement between Keats Drive and Seaver Drive and approximately 145 feet northeasterly of Roque Moraes Drive in the City of Mill Valley, would be replaced by two new approximately 100-foot-tall tubular steel poles, each to support one circuit. One of the new tubular steel poles was proposed to be installed approximately 20 feet north of the existing lattice steel tower and the second tubular steel pole was proposed to be installed approximately 20 feet south of the existing lattice steel tower. One new approximately 87-foot-tall light duty steel pole was proposed to be installed approximately 54 feet west of the existing lattice tower to maintain ground clearance of the Ignacio-Alto-Sausalito #1 Powerline over the residential area west of the project.

Between May 17 and May 24, 2021, PG&E's AL 6186-E was timely protested by numerous Mill Valley residents who raised concerns with the proposed SCADA Project. Protests were submitted by Jeremiah Revitch, Gail Katz, Michael Green, Janet Oelklaus, Katherine Hale, Cherie Whitmore, Gregory, Jessica and Patrick Mullin, Regina and Rich Garcia, Peter Riaboff, Dave and Penny Chenoweth, Mark and Julianna Hayes, Danielle and Erik Lundgren, and Carlos and Emily Montalvan (Protestants).

On May 24, 2021, due to the concerns raised in the protests, PG&E requested that the CPUC suspend the advice letter while PG&E explored other design and construction options for revising the SCADA Project to minimize impacts. The CPUC suspended   
AL 6186-E on May 25, 2021.

On November 1, 2021, PG&E filed PG&E Additional Reply to Protests to Advice Letter 6186-E, providing an update on progress toward revising the SCADA Project to minimize impacts. The letter stated that PG&E engineers and other experts had thoroughly examined the design issues and determined that a 2-pole design with a somewhat smaller construction footprint was feasible with the use of two, rather than one, mobile generator sites (new design).

The new design removes the third structure and moves the other two poles closer together. A third, temporary pole, will be installed nearby during construction and then removed. One permanent pole will be placed at the location of the existing lattice steel tower and the second will be placed approximately 20 feet north of the first pole. Two SCADA switches will be placed on each pole. While mobile generators would have been needed at Alto Substation for either of the designs to provide electricity to area residents and businesses during construction, the mobile generators will need to operate about 3 days longer at the Alto Substation with the new design--for a total of 10-14 days. 18-20 generators will be installed in an open area at the substation. In addition, the new design will also require the temporary use of 12-14 mobile generators for the same duration in Sausalito, which are planned for location in the parking lot Marin Gateway Shopping Center, next to the freeway in Marin City.

The new design allows the work areas to be reduced. Three crane pads will still be required, but they will be smaller, and the work area to the west toward the nearest residence will not require removal of screening vegetation (trees, brush) at that location. While construction will require removal of other vegetation and some trees that are not highly visible, any disturbed areas will be reseeded. Much of the vegetation to be removed is French Broom, a highly invasive weed, which will be replaced with native grass seed. Care will be taken to bag and remove all invasive species plants to minimize spread during construction.

**PG&E Response to Concerns Raised by Protestants**.

Alternatives Considered:

In response to community concerns, PG&E reconsidered alternatives to the SCADA Project. PG&E reports that the site was chosen because it is at the junction of the lines leading to Alto Substation. PG&E explored moving 2 switches to a nearby location but ultimately determined that construction would put too many customers at risk, even with mobile generators, and the impacts would be greater, including impacts at two separate worksites and additional vegetation removal. Similarly, they claim that rerouting the lines would create greater impacts in different locations. PG&E believes that placing the existing lines underground would cause delays in providing reliability to the system, would create substantially greater impacts including those raised by Protestants related to vegetation, habitat, drainage, erosion, and other ground disturbance issues, would be prohibitively expensive, and is not legally justified. PG&E argues that the new 2-pole design is feasible and addresses most potential environmental impacts to aesthetic values, wildlife habitat, and vegetation.

EMF:

No change in EMF will occur as they do not increase the electric current on either the Ingnacio-Alto-Sausalito #1or #2 60 kV Power Lines. The SCADA switches use standard cellular technology and comply with FCC standards. PG&E states that the SCADA Project complies with the low cost/no cost EMF requirement specified in D.06-01-042.

Drainage, Erosion, and Landslides

PG&E has completed geotechnical investigation and analysis at the project site to assess and address ground related issues. Test-pits confirmed that the soil is approximately 5 feet deep, on top of bedrock. The main issue with the site is water runoff, a concern raised by several nearby residents. The civil engineer has reviewed the test results and the resulting recommendations were used to design specific Best Management Practices (BMPs) to address drainage concerns, ensuring that the existing drainage issues are not made worse by the project. Water at the project site will be collected and diverted per the grading plan and the site-specific Erosion and Sediment Control Plan (S-ESCP). Water will be redirected away from areas that could be subject to erosion or landslides. The roads leading to and around the project will be permanently improved. The water collected by the access roads will be channeled away from eroded downhill slopes. PG&E also plans to install ground grid reinforcement to help stabilize steep slopes while enabling reduction of the overall project footprint.

The S-ESCP will depict site-specific BMP locations and the site will be inspected monthly with monitoring before and after storm events to ensure the BMP remain intact and functional.

Lead Paint Abatement:

The soil near the existing lattice steel tower has been tested and any contaminated soil will be removed and hauled off site for proper disposal.

Construction Noise:

PG&E will limit construction noise to daytime hours, with the use of noisy equipment limited to 8 a.m. to 5 p.m. except when there is a safety or line clearance issue.

Property Values:

Property Values are not within the scope of GO 131-D.

Impacts Related to Mobile Generators:

18-20 mobile generators will be placed at Alto Substation in Mill Valley and an additional 12-14 in a commercial parking lot in Marin City. They will operate 24/7 for 10-14 days to provide customers with power during the construction period. A brief outage of electric service may be needed when transferring Power Lines.

PG&E conducted a sound analysis of the mobile generators at both the Alto Substation location and the Marin City location. The study indicated that maximum noise levels would range from 60-65 dBA outside the nearest residences--comparable to the sound level of normal conversation.

PG&E will obtain all necessary Bay Area Air Quality Management District (BAAQMD) permits, or alternately use statewide Portable Equipment Registration Equipment (PERP) registered units.

On November 4, 2021, PG&E filed AL 6186-E-A to provide supplemental information to AL 6186-E as needed to update the project description with the new project design described above.

On November 17, 2021, after requests from residents, PG&E provided a preliminary grading plan for the new design.

On November 23, 2021, Carlos and Emily Montalvan, and Gail Katz and Rodolfo Broullon protested AL 6186-E-A, raising questions related to: 1) grading, drainage, and erosion; 2) land use; 3) environmental impact; 4) project management; 5) site security; 6) visual impact; and 7) alternatives.

On December 7, 2021, PG&E filed a Reply to Protest to Advice Letter 6186-E-A. In its reply, PG&E addressed each technical question raised by protestants.

On March 9, 2022, PG&E filed AL 6186-E-B Second Supplemental to provide supplemental Information to AL 6186-E-A. The second supplemental filing contained plans and drawings submitted to the City of Mill Valley as part of PG&E's application for a grading permit. The documents attached included: 1) detailed grading plan; 2) pole foundation plan; 3) Geotechnical Report; 4) Erosion and Sediment Control Plan. PG&E also reported that due to the surface area of the project site and mobile generation site at Alto Substation, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared for the project.

On March 25, 2022, PG&E AL 6186-E-B was protested by Carlos and Emily Montalvan, regarding concerns specific to their property at 69 Keats Drive in Mill Valley. The protest states that the SCADA Switch project grading plan creates conditions that prevents reasonable access to certain parts of the property in violation of the original Grant of Right of Way. Carlos and Emily Montalvan are requesting that PG&E construct stairs to provide access across the rock fill slope identified in the Grading Plan. Additionally, the Protesters are requesting that PG&E construct a fence to secure the site from trespassers that have previously accessed the property and will likely continue to do so.

PG&E has communicated to Carlos and Emily Montalvan that PG&E will not itself construct the requested stairs and fencing but has encouraged Carlos and Emily to seek bids from a contractor of their choosing. The Montalvans would then submit the cost estimate to PG&E which would compensate the Montalvans for the reasonable cost of constructing stairs and security fencing.

On April 27, 2022, the City of Mill Valley issued PG&E a Grading Permit for the project.

# Notice

Notice of Resolution E-5207 is made by publication in the Commission’s Daily Calendar. A copy of Draft Resolution E-5207 was mailed and distributed in accordance with Section 4 of General Order 96-B and Rule 15.6 of the CPUC Rules of Practice and Procedure.[[1]](#footnote-2)

# Discussion

PG&E explains that the powerline SCADA Switch Program is one of PG&E’s key mitigation programs designed to help meet PG&E’s commitment to keeping customers and communities safe during times of high wildfire risk. The SCADA Switches reduce the duration of outages and provide operational flexibility. Specifically, the SCADA Switches provide PG&E Electric Operations with the ability to open and close transmission line switches remotely from the Grid Control Center, negating the need for PG&E personnel to drive to a physical location. Remote switching can be done in minutes versus hours allowing line sections to be restored significantly faster, thereby reducing outage durations for customers. The SCADA Switches will also reduce the number of customers affected by PSPS events by adding sectionalizing capability to powerlines, allowing only the necessary sections of the line to be de-energized during extreme weather events. Throughout the year, SCADA Switches can be used to isolate the damaged portions of powerlines so that the remainder of the line can be   
re-energized to serve customers.

PG&E has significantly modified the proposed SCADA Switch project design first proposed in AL 6186-E, in response to protests received from Mill Valley residents whose properties border or are close the proposed project site. Specifically, the project revision proposed by PG&E eliminates one of the three poles and moves the remaining two poles closer together to reduce the size of the project footprint.

Several Mill Valley homes are situated at the base of the hill below where the proposed project would be constructed. Project construction would involve road improvements and construction of two permanent level graded pads from which construction equipment necessary to build the project would be temporarily placed. Following construction, the pads would remain for maintenance and operation purposes. The remainder of the site would be restored with native vegetation to preserve the natural setting of the site.

Of greatest concern to the Protestants is the impact of the proposed project on site drainage as surface water sheeting off the hilltop during rainstorms quickly flows downhill. Protestants note that drainage issues and water intrusion have occurred in the past and are concerned that the project could exacerbate the existing drainage problems.

The proposed project is subject to local jurisdiction regarding the issuance of construction permits. The proposed SCADA Switch project is located within the jurisdiction of the City of Mill Valley. The impact of the proposed project grading and the effect on site hydrology was evaluated by the City of Mill Valley Department of Public Works. Following evaluation of the required Grading Plan, Soils Engineering Report, Geology Report, and Erosion Control Plan, the City of Mill Valley Department of Public Works issued the necessary Grading Permit on April 27, 2022. The Grading Permit approves the plan submitted by PG&E to control stormwater runoff.

The new SCADA Switch project described in AL 6186-E-A will significantly lessen the permanent project impacts. To accomplish the removal of a third permanent pole, to reduce the project footprint, PG&E will need to operate portable generators at two locations, operating around the clock for up to 2 weeks.

PG&E is effectively working with the most impacted residents, Emily and Carlos Montalvan, to ensure that they are fairly compensated for improvements needed to access the affected portions of their property and to secure their property from trespassers that may be attracted to the project site.

**CONCLUSION**

The proposed SCADA Switch project first proposed in AL 6186-E, and with the project description modified to minimize impacts submitted in AL 6186-E-A, provides a necessary tool needed by PG&E Electric System Operators to effectively implement the PSPS program. The SCADA Switch project also enhances system flexibility for maintenance and operations purposes.

PG&E has expended considerable effort to design the SCADA Switch project in the proposed location and has been responsive to concerns raised in protests. The new project footprint is smaller and less impactful. The temporary project impacts associated with the temporary generation are a reasoned approach to achieve the minimum   
long-term project impacts.

The SCADA Switch project as proposed will provide significant community benefit from enhanced electric system flexibility.

# Comments

Public Utilities Code section 311(g)(1) provides that this Draft Resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g)(2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding. Comments on Draft Resolution E-5207 must be received by the CPUC Tariff Unit within 20 days of service of the Resolution. The reply comment period is 10 days. Instructions to parties on how to serve comments are provided in the attached comment letter. Contact [edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov) to receive a copy of the comment letter.

# Findings

1. On May 4, 2021, PG&E Submitted *AL 6186-E Notice of Construction, Pursuant to General Order 131-D, for the Construction of Ignacio-Alto-Sausalito #1 and #2 60 kV Powerline, SCADA Switch Program in the City of Mill Valley, County of Marin*.
2. Between May 17 and May 24, 2021, AL 6186-E was timely protested by numerous Mill Valley residents.
3. On May 24, 2021, in response to protests, PG&E requested that AL 6186-E be suspended to allow PG&E time to explore alternative SCADA Switch design and construction options.
4. On November 1, 2021, PG&E filed *PG&E Additional Reply to Protests to AL 6186-E*, providing an update on progress revising the SCADA Switch design to minimize impacts
5. The new SCADA design removes the third structure and moves the other two poles closer together and reduces the size of the work area needed to construct the project.
6. Mobile generators are required to maintain electrical system power during the anticipated two-week construction period.
7. On November 4, 2021, PG&E filed *AL 6186-E-A to provide supplemental information to AL 6186-E* as need to update the original project description with the new project description.
8. On November 23, 2021, PG&E AL 6186-E-A was protested.
9. On December 7, 2021, PG&E filed a *Reply to Protest to Advice Letter 6186-E-A.*
10. On March 9,2022, PG&E filed *AL 6186-E-B Second Supplemental*.
11. On March 25, 2022, PG&E AL 6186-E-B was protested.
12. On April 6, 2022, CPUC staff requested information from PG&E to better understand how the proposed SCADA switches would benefit PG&E’s Community Wildfire Safety Program.
13. On April 7, 2022, PG&E responded to staff’s request for information with an explanation of how the proposed SCADA Switches would benefit the Community Wildfire Safety Program and provide enhanced powerline flexibility.
14. On April 27, 2022, PG&E was granted the SCADA Switch project grading permit by the City of Mill Valley.

**THEREFORE, it is ordered** that:

1. PG&E compensate Carlos and Emily Montalvan for the reasonable costs associated with their construction of stairs needed to access the affected upper area of their property and fencing to discourage potential trespassers.
2. PG&E AL 6186-E-B 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   
June 23, 2022, the following Commissioners voting favorably thereon:

Rachel Peterson

Executive Director

1. The CPUC Rules of Practice and Procedure. https://www.cpuc.ca.gov/rpp/ [↑](#footnote-ref-2)