

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND
ELECTRIC COMPANY, a California
corporation, for a Permit to Construct
the Moraga-Oakland X 115 kV
Rebuild Project Pursuant to General
Order 131-D. (U39E)

Application 24-11-005

**DECISION GRANTING PACIFIC GAS AND ELECTRIC COMPANY A PERMIT
TO CONSTRUCT THE MORAGA-OAKLAND X 115 kV REBUILD PROJECT**

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DECISION GRANTING PACIFIC GAS AND ELECTRIC COMPANY A PERMIT TO CONSTRUCT THE MORAGA-OAKLAND X 115 kV REBUILD PROJECT**Summary**

This decision grants Pacific Gas and Electric Company a permit to construct the Moraga-Oakland X 115 kV Rebuild Project; makes California Environmental Quality Act (CEQA) Findings and Statements of Overriding Consideration for the Project; adopts mitigation measures required to be implemented for the Project identified in the Mitigation Monitoring and Reporting Plan, and certifies the Final Environmental Impact Report (FEIR) prepared for the Project pursuant CEQA. As the lead agency for environmental review of the Project, we find that the FEIR prepared for this Project meets the requirements of CEQA. The total estimated cost of this Project is \$276.8 million.

This proceeding is closed.

1. Background**1.1. Factual Background**

Pursuant to Section IX.B of General Order (GO) 131-D¹ and Rules 2.1 through 2.5 of the California Public Utilities Commission's (Commission) Rules of Practice and Procedure (Rules), Pacific Gas and Electric Company (PG&E) seeks a Permit to Construct (PTC) the Moraga-Oakland X 115 Kilovolt (kV) Rebuild Project (Project or Proposed Project).² The Moraga-Oakland X 115kV line is a four-circuit power line that runs between the Moraga Substation in the City of Orinda, through unincorporated Contra Costa County, over the Oakland

¹ GO 131-E became effective on January 1, 2025. This application was filed prior to the enactment of GO 131-E and therefore will be reviewed under GO 131-D.

² See application at 1.

Hills³ south of State Route 24, and through the Cities of Oakland and Piedmont in Alameda County to the Oakland X Substation in Oakland. Project maps can be found in Appendix A of this decision. The line is part of a local 115kV system that delivers power to approximately 200,000 customers, including large industrial customers, such as the Port of Oakland.⁴

The existing Moraga-Oakland X 115kV Circuits 1 and 2 were built in 1908, and Circuits 3 and 4 were built in 1931.⁵ The two existing parallel double-circuit power lines (4 circuits total) are located within the existing PG&E right-of-way. All four circuits are ready for replacement. The Project will rebuild the four existing overhead lines into overhead (approximately four miles) and underground (approximately one mile) segments.⁶ The Project is intended to replace power line equipment that has reached the end of its useful life for the safe operation of the lines. The Project will replace structures with modern equipment that meets reliability and safety requirements.⁷

Existing towers, poles, and conductors would be replaced with either overhead rebuild or underground components, and minor modifications would be made within the existing substations. Some recently replaced power line structures will be reused or modified. Additionally, the rebuild would include

³ The Oakland Hills is an informal term for the area that extends along the eastern side of the City of Oakland, rising from the flatlands to an elevation of about 1,500 feet near Skyline Boulevard and Manzanita Drive.

⁴ See Application at 1.

⁵ See Application at 4.

⁶ See FEIR at ES-2, Section ES.2.2 Project Summary.

⁷ See Application at 2.

installing optical ground wire⁸ on above-ground structures, with the communication cable continuing within the underground portion.⁹ The total estimated cost of the project is \$276.8 million.¹⁰

1.2. Procedural Background

PG&E filed its application on November 15, 2024. On November 25, 2024, PG&E filed its compliance filing in accordance with GO 131-D, Section XI.A.3, positing notice of its application for a permit to construct. On December 16, 2024, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) filed a protest.

On March 11, 2025, the initial Assigned Commissioner's Scoping Memo and Ruling (Scoping Memo) was issued. The initial Scoping Memo states that it was "not possible to meaningfully assess and determine the need for evidentiary hearing or otherwise proceed on the remaining Issues Nos. 5 through 8 until the environmental review process is completed."¹¹ The initial Scoping Memo states that a prehearing conference (PHC) would be set at or near completion of the environmental document. It continues by stating that the need for an evidentiary hearing and the formal schedule may be revisited and modified by the assigned Administrative Law Judge (ALJ).

The Draft Environmental Impact Report (DEIR) was released for a 45-day public review and comment period on August 12, 2025. The public review and

⁸ A specialized cable serving as a grounding wire and a fiber-optic communication wire.

⁹ See FEIR at ES-2, Section ES.2.2 Project Summary.

¹⁰ See Application at 2.

¹¹ Scoping Memo at 5.

comment period ended on September 26, 2025. The DEIR was made available on the Commission's CEQA webpage¹² and distributed to responsible agencies and interested parties who requested to be included on the mailing list during and after the public scoping period. Two public information meetings on the DEIR were held virtually on September 3, 2025.

A PHC was held on November 7, 2025. Prior to holding the PHC, on November 4, 2025, PG&E filed a PHC statement addressing Issues 5 through 8 of the initial Scoping Memo. On November 4, 2025, Cal Advocates also filed a notice of withdrawal as a party to the proceeding. Cal Advocates reiterated this request via an oral motion at the PHC, which was granted by the ALJ. The withdrawal of Cal Advocates as a party leaves PG&E, the applicant, as the only party to this proceeding.

On January 14, 2026, the Final Environmental Impact Report (FEIR) was published.¹³ The FEIR documents, and responds to, all written and oral comments on the DEIR, as required by CEQA. On January 15, 2026, the ALJ admitted the FEIR into the record of the proceeding via a ruling.

On January 28, 2026, a Commissioner's Amended Scoping Memo was filed, setting the remaining schedule and confirming the issues to be addressed in the remainder of the proceeding.

¹² <https://ia.cpuc.ca.gov/environment/info/aspen/moraga-oakland/moraga-oakland.htm>

¹³ The FEIR for PG&E's Moraga-Oakland X 115kV Rebuild Project is available for viewing and download at <https://ia.cpuc.ca.gov/environment/info/aspen/moraga-oakland/moraga-oakland.htm>.

On March 16, 2026, PG&E filed its brief and served testimony to the service list.

1.3. Submission Date

This matter was submitted on April 21, 2026, upon admission of the exhibits into the evidentiary record.

2. Jurisdiction

PG&E is a public utility providing electrical and gas services to customers in northern California, and therefore subject to the Commission's jurisdiction. The Commission is the lead agency reviewing PG&E's request for approval of the Project, responsible for both administering the statutory duties of CEQA and fulfilling the statutory requirements related to a PTC pursuant to GO 131-D.

3. Issues Before the Commission

The issues to be determined in this proceeding are:

1. What are the significant environmental impacts of the proposed project, if any?
2. Are there potentially feasible mitigation measures that will avoid or lessen the identified significant environmental impacts?
3. Between the proposed project and the project alternatives, which is environmentally superior?
4. Are the mitigation measures or environmentally superior project alternatives infeasible for economic, social, legal, technological, or other considerations?
5. To the extent that the proposed project and/or project alternatives result in significant and unavoidable impacts, are there overriding considerations that nevertheless merit Commission approval of the proposed project or project alternative?

6. Did the Commission review and consider the environmental document (EIR or MND), was the environmental document completed in compliance with CEQA, and does it reflect the Commission's independent judgment?
7. Is the proposed project and/or environmentally superior project alternative designed in compliance with the Commission's policies governing the mitigation of electromagnetic field (EMF) effects using low-cost and no-cost measures?
8. Does the proposed project have any impacts on environmental and social justice communities? And if so, does/do such impact(s) promote(s) the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan?

Scoped Issues 1 through 4 pertain to the CEQA process and are addressed in the FEIR. The remaining scoped Issues 5 through 8 pertain to the Commission's review and approval of the FEIR.¹⁴

4. CEQA

CEQA applies to discretionary projects proposed to be carried out or approved by public agencies, unless the project is exempt from CEQA...¹⁵ In evaluating whether to approve a proposed project, CEQA requires the lead agency¹⁶ to determine whether there is substantial evidence, in light of the who

¹⁴ See Assigned Commissioner's First Amended Scoping Memo and Ruling, filed January 28, 2026, at 5.

¹⁵ See Public Resources Code Section 21080(a), as amended.

¹⁶ The lead agency is the public agency which as the principal responsibility for carrying out or approving a project. The lead agency must also decide whether an EIR or Negative Declaration will be required for the project and prepare the appropriate environmental document. CEQA Guidelines (Cal. Code Regs. Tit. 14, Div. 6, Ch. 3) § 15367.

record before the lead agency, that a project may have a significant effect on the environment. If so, the lead agency must prepare an environmental impact report.¹⁷

The Commission is the lead agency under CEQA¹⁸ and has prepared a Final Environmental Impact Report FEIR to inform the public and to meet the needs of other permitting agencies.

The FEIR evaluates the impacts of the Proposed Project and project alternatives.¹⁹ The FEIR reflects the Commission's independent judgment and analysis of the Project pursuant to Section 15090 of the CEQA Guidelines.

The Commission is responsible for implementing mitigation measures identified in the FEIR, including review and approval of various pre-construction compliance plans and ensuring that the project modifications and operations are conducted in accordance with the adopted mitigation measures.²⁰

An EIR is required to identify an "environmentally superior" alternative among all of the alternatives studied.²¹ If the "no project" alternative is the environmentally superior alternative, then the EIR must identify which of the other alternatives is environmentally superior.²²

¹⁷ Public Resources Code Section 21080(e).

¹⁸ See FEIR at 1-1, Introduction.

¹⁹ See FEIR at ES-1, Section ES.1.1. Project Application and Purpose.

²⁰ See FEIR at ES-1, Section ES 1.2, Agency Process.

²¹ See CEQA Guidelines Section 15126.6.

²² See FEIR at ES-1, ES 1.3, CPUC Conclusion Regarding Environmentally Superior Alternative.

4.1. Permit to Construct

To issue a PTC pursuant to GO 131-D, the Commission must find that the Project complies with CEQA. In evaluating whether to approve a proposed project, CEQA requires the Commission to conduct a review to identify the potential environmental impacts of a proposed project and ways to avoid or reduce them. If the Commission determines that a project may cause a significant environmental impact, the Commission must ensure that the project's potential impacts are analyzed and mitigated, to the extent feasible, in an EIR. The Commission has the authority to mitigate the potential environmental impacts of a proposed project by adopting mitigation measures within its jurisdiction to avoid or minimize environmental impacts. Mitigation measures are intended to reduce the potential environmental impacts of the proposed project to less than significant levels.

Accordingly, the FEIR identified significant impacts, mitigation measures, alternatives, and an environmentally superior alternative, as discussed below.

4.2. Procedural Compliance with CEQA

The Commission published a DEIR on August 12, 2025, an FEIR on January 14, 2026, and Errata to the FEIR in March and April 2026, in compliance with CEQA requirements. The FEIR has been prepared for the Commission in accordance with CEQA and CEQA Guidelines, as amended. As permitted under CEQA Guidelines Section 15084(d)(2), the Commission retained a consultant to assist in preparing the environmental documents. The Commission, as the lead agency, directed, reviewed, and, as necessary, edited all material prepared by the consultant. Such material reflects the Commission's independent judgment. In

addition, an extensive public involvement and agency notification effort was conducted to solicit input on the scope and content of the EIR and on the results of the environmental analysis presented in the DEIR.²³

The Commission reviewed and considered all comments received on the DEIR, including comments proposing additional mitigation measures, alternative project designs, and alternative siting or alignment options. The FEIR includes written responses to all substantive comments received on the DEIR, as required by CEQA Guidelines Section 15088. The Commission finds that the responses to comments provide good-faith, reasoned analysis and adequately explain why certain mitigation measures or alternatives proposed in comments were adopted, modified, or not adopted.

4.3. Project Objectives

The PG&E-identified Project objectives,²⁴ which the Commission considered in developing a reasonable range of alternatives, are:

- Provide lifecycle updates of the Moraga-Oakland X 115 kV four circuit power line path by removing and replacing four circuits to avoid future reliability issues while maintaining safe operations.
- Replace four project power line circuits using a larger size conductor that will accommodate the region's reasonably foreseeable future energy demands.
- Ensure the project at completion meets power line reliability and safety requirements, and industry standards.

²³ See FEIR at ES-4, Section ES.4 Summary of Public Involvement Activities.

²⁴ See FEIR at ES-2, Section ES.3 Project Objectives.

- Construct a safe, economical, and technically feasible project that minimizes environmental and community impacts.

4.4. Alternatives Evaluated

Five alternatives were considered in the FEIR, including a “No Project” alternative. Numerous public scoping comments including one agency comment requested that all of the overhead 115 kV lines be removed and installed underground. Therefore, multiple routing options for underground installation of the 115 kV lines east of Estates Drive were evaluated in the FEIR.²⁵

The following alternatives were determined to have the potential to avoid or substantially lessen significant effects of the Proposed Project and to be potentially feasible:

- Alternative 1: No Project Alternative.²⁶
- Alternative 2: Skyline-Colton-Snake Underground Alternative.²⁷
- Alternative 3: Shepherd Canyon Underground Alternative.²⁸
- Alternative 4: Skyline-Ascot Underground Alternative.²⁹
- Alternative 5: Estates Drive Underground Alternative.³⁰

²⁵ See FEIR, Chapter 4.

²⁶ See FEIR at pages 4-7 through 4-8, Section 4.3.4.

²⁷ See FEIR at pages 4-8 through 4-9, Section 4.3.5.

²⁸ See FEIR at pages 4-9 through 4-10, Section 4.3.6.

²⁹ See FEIR at pages 4-10 through 4-11, Section 4.3.7.

³⁰ See FEIR at pages 4-11 through 4-12, Section 4.3.8.

Due to the steep, narrow, and sharply winding roads in the Oakland Hills, placing all four circuits underground in one road may not be feasible due to the width required for two separate double-circuit duct banks. Therefore, each of the three underground alternatives between Manzanita Drive and State Route 13 (Alternatives 2, 3, and 4) was assumed to support two 115kV circuits.³¹ Installing the four circuits in two different underground roadways would also increase reliability in the event of an outage in one of the roadways, since the other two circuits would remain operational. Each underground power line segment would also require the construction of transition poles or stations at each point where the lines transition between overhead and underground, particularly where the line crosses the Hayward Fault. The FEIR includes a detailed comparison of the environmental impacts of these alternatives relative to the Proposed Project, including an alternatives comparison table that evaluates impacts across all resource areas analyzed in the FEIR.

The Commission finds that the range of alternatives analyzed in the FEIR reflects a good-faith effort to identify feasible alternatives that would reduce environmental impacts while meeting the Project's fundamental objectives.

4.5. Environmental Impacts and Findings

No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur unless the public agency makes one or more of the following findings with respect to each significant impact.³²

³¹ See FEIR at ES-9, Section ES.8.2, Alternatives Fully Evaluated in the EIR.

³² See Public Resources Code Section 21081 and CEQA Guidelines Section 15091.

- Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
- Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
- Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

The Commission has made one or more of these specific written findings regarding each significant impact associated with the Project. Those findings are contained in Appendix B, along with supporting facts, and are summarized in Section 4.9 below. Project activities that would result in normal, no impacts, or beneficial impacts are not discussed herein.

In accordance with CEQA, a Mitigation Monitoring and Reporting Plan (MMRP) has been prepared for the Project, which can be found in Chapter 7 of the FEIR. The evaluation of Project impacts and the level of significance of these impacts are contained in Chapter 3 of the FEIR.

The FEIR evaluation included a detailed analysis of impacts across 17 environmental disciplines, fully evaluating the Project and five alternatives, including the No Project Alternative. The FEIR discloses the environmental impacts expected to result from the construction and operation of the Project, which the FEIR determined is environmentally superior to all of the alternatives

evaluated in the FEIR.³³ Where possible, mitigation measures were identified to avoid or minimize significant environmental effects.

PG&E commits to implementing Applicant Proposed Measures (APMs)³⁴ to reduce the direct and indirect impacts that would result from Project activities.³⁵ The analysis in the FEIR included APMs as part of the Project. The mitigation measures (MMs) identified in the FEIR are additional measures required by the Commission as the lead agency to reduce adverse and significant impacts.³⁶

4.6. Project Alternatives and Rationale for Selection of Environmentally Superior Alternative

The FEIR concludes that the Proposed Project would be the environmentally superior alternative.³⁷ This is because the Proposed Project would result in substantially less disruptive construction impacts compared to underground construction of four 115kV circuits in steep, narrow, and/or winding roadways. The analysis also demonstrates that no significant and unavoidable impacts of the Proposed Project would be eliminated by the underground alternatives and that the Proposed Project offers a major

³³ See FEIR at pages ES-5 and ES-6, Section ES.6, Environmental Impacts.

³⁴ See PG&E Brief, generally.

³⁵ See FEIR at pages 2-47 through 2-67, Section 2.9, Applicant-Proposed Measures.

³⁶ See CEQA Guidelines Section 15126.4(a)(1)(A).

³⁷ In accordance with CEQA Guidelines Section 15126.6.

improvement over the existing setting by reducing wildfire risk associated with the older 115kV lines.³⁸

As discussed below, although the Proposed Project would still result in significant and unavoidable impacts on transportation and wildfire, the Commission finds that the Proposed Project avoids or substantially reduces environmental impacts to the greatest extent feasible, and therefore, constitutes the environmentally superior alternative under CEQA.

Based on its review of the FEIR and the entire administrative record, the Commission finds that the Proposed Project is the environmentally superior alternative.

4.6.1. Less Than Significant Impacts

Based on the FEIR, the Commission finds the Proposed Project would result in less than significant impacts on certain aspects of the following issue areas as described in detail in Appendix B.³⁹

4.6.2. Significant Impacts Than Can Be Reduced to a Less Than Significant Level

The FEIR identifies that implementation of the Proposed Project would result in certain potentially significant environmental impacts, but those impacts can be reduced to a less than significant level through the implementation of feasible mitigation measures, APMs, best management practices, compliance

³⁸ See FEIR at ES-2, Section ES.1.3, CPUC Conclusion Regarding Environmentally Superior Alternative.

³⁹ For more information on Significant Impacts Than Can Be Reduce to a Less Than Significant Level, see Appendix B, CEQA Findings and Statement of Overriding Considerations, Section 1.4.1, pages 4-15.

with applicable regulatory requirements, and implementation of the adopted MMRP. For each of the impacts in these issue areas, the Commission finds that changes or alterations have been required in, or incorporated into, the Project that mitigate or avoid the significant effects on the environment.⁴⁰

**4.6.3. Significant Impacts That Cannot Be Avoided
or Reduced to a Less Than Significant Level**

As identified in the FEIR, implementation of the Project (Proposed Project) would result in significant and unavoidable environmental impacts in the following resource areas:

**4.6.3.1. Transportation: Impact T-1
Conflict with a Program, Plan, Ordinance, or Policy
Addressing the Circulation System, Including Transit,
Roadway, Bicycle, and Pedestrian Facilities
(Construction)**

Construction of the overhead power line rebuild would require repeated full and partial road closures, lane reductions, and traffic detours on narrow, steep roadways that also function as designated evacuation routes, transit corridors, bicycle routes, and pedestrian facilities; particularly in the Oakland Hills, Orinda, and Piedmont. These constraints would conflict with multiple adopted plans and policies, including fire evacuation guides, general plan safety and circulation policies, pedestrian and complete streets policies, and emergency

⁴⁰ Pursuant to Public Resources Code Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1).

access requirements by restricting or delaying evacuation, emergency response, transit operations, and safe pedestrian and bicycle travel during construction.

Although APMs and multiple MMs (including preparation of a Traffic Management Plan, advance notification, school timing restrictions, and limits on full road closures during wildfire season) would reduce the severity of effects, the physical constraints of the roadway network, limited alternative routes, dense residential development, and wildfire risk would prevent adequate emergency access, evacuation capacity, and safe multimodal circulation from being maintained at all times during construction. As a result, even with mitigation, conflicts with circulation and emergency access policies would remain, resulting in significant and unavoidable impacts.

The Commission finds that changes or alterations have been required in or incorporated into the Project, which mitigate the significant effects on the environment from Impact T-1. The APMs and MMs would reduce conflicts with transportation, circulation, and emergency access policies;⁴¹ however, even with their implementation, significant and unavoidable impacts from the Project would result.

**4.6.3.2. Transportation: Impact T-4
Result in Inadequate Emergency Access (Construction –
Overhead Power Line Rebuild)**

Construction of the overhead power line rebuild would require repeated full road closures, lane closures, and use of cranes on narrow, steep, and constrained roadways in the Oakland Hills and surrounding areas that already

⁴¹ Specifically, APMs TRA-1, TRA-2, WFR-1, WFR-2 and FEIR MMs T-1a and N-1b.

have limited emergency ingress and egress, including locations with only one vehicular access route. During crane operations, emergency access could be delayed by up to 45 minutes if a crane is holding a load, and even short-term delays could be critical given the area's history of wildfire, steep topography, dense residential development, narrow winding roads, and reliance on these corridors for evacuation and emergency response.

While APMs and mitigation measures such as traffic planning, advance notification, and coordination with emergency responders would reduce risks and improve planning, these measures would not eliminate the physical limitations of the roadway network or the need for temporary road blockages, nor would they ensure adequate emergency access at all times during construction. As a result, even with mitigation, emergency response times potentially could be increased, and evacuation routes impaired, resulting in significant and unavoidable impacts for the overhead power line rebuild.

The CPUC finds that changes or alterations have been required in or incorporated into the Project which would mitigate the significant effects on the environment from Impact T-4. The APMs and MMs are intended to reduce impacts on emergency access;⁴² however, even with their implementation, significant and unavoidable impacts would result from the Project.

**4.6.3.3. Transportation: Impact T-5
Create Potentially Hazardous Conditions for Residents,
People Walking, Bicycling, or Driving or for Public
Transit Operations (Construction – Overhead Power Line
Rebuild)**

⁴² Specifically, APMs TRA-1, WFR-1, WFR-2 and EIR MMs T-1a and N-1b, and WF-1c.

Construction of the overhead power line rebuild would require repeated full road closures, lane closures, crane operations, temporary guard structures, and detours on narrow, steep, and constrained residential roadways that already pose safety challenges, particularly in the Oakland Hills and surrounding neighborhoods. These construction activities would disrupt pedestrian sidewalks, bicycle routes, trails (including temporary closures of the Montclair Railroad Trail), and bus routes and stops, forcing users onto longer, steeper, or less suitable alternative routes, increasing the risk of traffic conflicts and accidents.

Although APMs and MMs would provide traffic controls, safety measures, safe transport provisions, advance notification, and coordination with transit agencies and schools; these measures cannot fully eliminate hazards created by the physical roadway constraints, limited alternate routes, and prolonged construction duration, nor can they ensure safe conditions for all users at all times. Consequently, even with mitigation, construction would continue to create hazardous conditions for multiple transportation users, resulting in significant and unavoidable impacts for the overhead power line rebuild segment.

The Commission finds that changes or alterations have been required in, or incorporated into the Project, to mitigate the significant effects on the environment from Impact T-5. The APMs and MMs are intended to reduce potentially hazardous conditions for residents and transportation users;⁴³

⁴³ Specifically, APMs TRA-1, TRA-2, WFR-1, WFR-2 and FEIR MMs T-1a, N-1b, and WF-1c.

however, even with their implementation, significant and unavoidable impacts would result.

**4.6.3.4. Transportation: Impact T-6
Interfere with Walking or Bicycling Accessibility
(Construction – Overhead Power Line Rebuild)**

Construction of the overhead power line rebuild would require repeated road and lane closures, detours, and temporary trail closures on a circulation network characterized by narrow, steep roadways with limited alternative routes, particularly in the Oakland Hills. These activities would potentially interrupt bicycle routes, sidewalks, and shared-use trails, including temporary closures of segments of the Montclair Railroad Trail, a key pedestrian and bicycle connection to Montclair Village, forcing pedestrians and bicyclists onto longer, steeper, and less suitable streets with higher exposure to vehicular traffic.

Although mitigation measures would provide detours, advance notification, and coordination with recreation agencies, the physical constraints of the roadway network and the lack of safe, equivalent substitute routes would potentially cause walking and bicycling access to be substantially degraded during construction. As a result, even with mitigation, interference with pedestrian and bicycle accessibility would remain significant and unavoidable.

The Commission finds that changes or alterations have been required in, or incorporated into the Project, which would mitigate the significant effects on the environment from Impact T-6. The APMs and MMs are intended to reduce

interference with walking or biking accessibility;⁴⁴ however, even with their implementation, significant and unavoidable impacts would result.

**4.6.3.5. Transportation: Impact T-7
Substantially Delay Public Transit (Construction)**

Construction would require temporary lane closures, full roadway closures, equipment movements, and work within transit corridors, particularly along Park Boulevard and nearby streets served by transit routes, resulting in bus stop closures or relocations, route detours, and increased travel times. These disruptions could affect hundreds of daily riders and cause delays along entire bus lines, not just within the immediate construction area. These disruptions could especially affect riders during peak commute periods.

Although APMs and MMs require coordination with transit agencies, temporary bus stop relocation, advance notification, and traffic management planning; the duration, frequency, and geographic extent of construction activities combined with constrained roadway conditions and uncertainty about exact staging needs would result in delays to transit services that cannot be fully avoided or reduced to a minor level. Therefore, even with mitigation, Project construction would continue to have the potential to substantially delay public transit operations, resulting in significant and unavoidable impacts.

The Commission finds that changes or alterations have been required in, or incorporated into the Project, to mitigate the significant effects on the environment from Impact T-7. The APMs and MMs are intended to reduce

⁴⁴ Specifically, APMs TRA-1, TRA-2, WFR-1, WFR-2 and FEIR MMs T-1a, N-1b, and WF-1c.

public transit delays;⁴⁵ however, even with the implementation of APMs and MMs, significant and unavoidable impacts would result.

**4.6.3.6. Wildfire: WF-1
Substantially Impair an Adopted Emergency Response
Plan or Emergency Evacuation Plan (Construction –
Overhead Power Line Rebuild)**

Construction of the overhead power line rebuild would temporarily obstruct or constrain adopted emergency evacuation routes in very high fire hazard areas, increasing Evacuation Time Estimates (ETE) during a potential wildfire when life safety risks are greatest. The Project would require crane operations, guard structure installation, rolling stops, and temporary full or partial road closures, some lasting up to approximately 10 consecutive working days, on narrow local roads, dead-end streets, and designated evacuation routes in the Oakland Hills, where limited ingress and egress already exist. If a wildfire were to occur during construction, construction vehicles and equipment could block or delay evacuation and emergency responder access, even if moved as quickly as practicable, and detours would be longer and less direct, increasing evacuation times for both nearby residents and the broader affected population.

Although multiple APMs and MMs would improve notification, coordination, timing, and traffic management, these measures cannot eliminate the fundamental conflict between necessary construction activities and the need for immediate, unconstrained evacuation during a wildfire emergency; therefore, increased ETE and impairment of emergency evacuation plans would still occur, resulting in significant and unavoidable impacts.

⁴⁵ Specifically, APMs TRA-1, TRA-2, WFR-1 and FEIR MMs T-1a, N-1b, and T-7a.

The Commission finds that changes or alterations have been incorporated into the Project, thereby reducing significant effects on the environment from Impact WF-1. Although multiple APMs and MMs are intended to reduce impairment of an adopted emergency response plan or emergency evacuation plan.⁴⁶ However, even with their implementation, significant and unavoidable impacts would result.

4.7. Mitigation Measures

With respect to mitigation measures, the Commission finds as follows:

- Feasible mitigation measures have been identified in the FEIR that would avoid or substantially lessen significant environmental impacts and are required to be implemented as conditions of project approval.
- Certain mitigation measures or alternatives proposed in public comment on the DEIR were not adopted because they were determined to be infeasible, already incorporated into the project, are beyond the Commission's jurisdiction, or would not further reduce impacts beyond the mitigation already adopted, as explained in the FEIR's responses to public comments.
- The Commission finds that it has adopted all feasible measures within its authority, but that additional avoidance of significant impacts on transportation and wildfire is not feasible due to the existing steep, narrow, and winding roadways, evacuation routes, landslide risk, and wildfire risk in the project area.

The Commission further finds that the FEIR's discussion of mitigation measures, including those proposed in comments, demonstrates that the

⁴⁶ Specifically, APMs TRA-1, NOI-1, WFR-1, WFR-2 and FEIR MMs T-1a, N-1b, WF-1a, WF-1b, and WF-1c.

Commission has considered and adopted all feasible mitigation measures and that no additional feasible measures exist that would avoid or reduce the Project's remaining significant and unavoidable impacts.

4.8. Overriding Considerations

Because Project impacts remain significant and unavoidable, the Commission adopts a Statement of Overriding Considerations for the Project (see Appendix B to this decision).

After adoption of mitigation, the Project will still have significant and unavoidable impacts related to transportation and wildfire. Mitigation for these effects has been adopted, and the extent of impacts will be substantially reduced, but the Commission cannot assure that impacts will be reduced to less than significant levels. California Code of Regulations (CCR) Section 15093 allows approval of a project, even when significant impacts remain, subject to the following guidance:

- a. CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."
- b. When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the FEIR but are not avoided or substantially lessened, the agency shall state in writing the specific reasons to

support its action based on the FEIR and/or other information on the record. The statement of overriding considerations shall be supported by substantial evidence in the record. (CCR Section 15093).

The Commission has determined that despite the significant and potentially unavoidable effects of the Project as it relates to Transportation and Wildfire, the economic, legal, social, technological, and environmental benefits of implementing the Project outweigh and override these unavoidable adverse effects. The Commission has determined that the benefits of the Project, when balanced against all adverse effects, cause the effects remaining after mitigation to be acceptable because of the following considerations:

- The Project has been designed to meet current power line reliability, safety, and industry standards with the stated objective to avoid future reliability issues while maintaining safe operations.
- The Project would reduce wildfire risk compared to existing conditions. The Project would replace aging 115kV power line infrastructure with newer, fire-resistant steel structures and modern conductors, reducing the likelihood of ignition from equipment failure or vegetation contact.
- Undergrounding the western segment of the Project and removal of the overhead power lines in this area would eliminate approximately one mile of wildfire ignition risk during operation.
- By reducing wildfire ignition risk relative to existing conditions, the Project would lower the potential for wildfire-related damage and injury, emergency response expenses, and service interruptions during operation.
- The Project would improve system reliability and long-term operability. Lifecycle updates of the four existing

- circuits would avoid higher long-term costs associated with aging infrastructure by avoiding piecemeal repairs, emergency maintenance, and future reliability issues associated with aging infrastructure.
- By improving electric system reliability, the Project would reduce the risk of outages that could disrupt residences, businesses, schools, emergency services, and other sensitive receptors in the Project area.
 - The Project would enhance public and worker safety. The replacement of aging structures would reduce the risk of structural failure, conductor drop, or electrical hazards. Modern design standards and implementation of APMs and mitigation measures would address construction safety, electrical shock hazards, and emergency response preparedness while minimizing environmental and community impacts.
 - The Project would reduce seismic and geotechnical (landslide) risk in areas of the Project right-of-way. Removing existing overhead facilities in seismically active and liquefaction-prone areas west of Estates Drive would eliminate long-term exposure of electrical infrastructure to geologic hazards in those locations.
 - Larger-sized conductors would be used to accommodate reasonably foreseeable future energy demands, supporting improved system performance and reliability.
 - Section 4 (Alternatives) of the FEIR concludes that the proposed Project would result in substantially less disruptive construction impacts compared to underground construction of four 115kV circuits in steep, narrow, and/or winding roadways. The analysis in the FEIR also demonstrates that many of the significant and unavoidable impacts of the proposed Project would not be avoided by the underground alternatives, which would introduce additional or more disruptive construction effects in steep,

narrow, and/or widening roadways, and that the Proposed Project offers a major improvement over the existing setting by reducing the wildfire risk associated with the older existing 115kV lines.

Each of the Overriding Considerations is sufficient to approve the Proposed Project. For each of the reasons stated above, the Proposed Project should be implemented notwithstanding the significant unavoidable adverse impacts identified in the FEIR. The Commission finds that the economic, legal, social, technological, and other benefits of the Project outweigh its significant and unavoidable environmental impacts.

4.9. Certification of the Final EIR

The Commission finds the following:

- The FEIR was completed in compliance with CEQA. The Commission has received, reviewed, and considered the information contained in the FEIR, which reflects the Commission's independent judgment and analysis.
- The MMs identified in the FEIR are feasible and shall be adopted as conditions of approval.
- The MMRP identified in the FEIR is designed to ensure compliance with the mitigation measures and shall be adopted.
- The FEIR identifies that significant and unavoidable impacts would occur during the construction of the Project in the resource areas of transportation and wildfire, even after adoption of feasible mitigation measures.
- The Commission has adopted all feasible mitigation measures and, by selecting the Proposed Project for approval, has adopted the alternative that avoids or substantially reduces impacts to the extent feasible.

- No additional feasible mitigation measures or feasible alternatives have been identified that would avoid or reduce to a less than significant level the Project's significant and unavoidable impacts to transportation and wildfire.
- The Project will provide benefits, including improvements to system reliability and long-term operability, and a reduction in wildfire risk.
- Significant and unavoidable environmental impacts will result from approval of the Project; however, the Commission has adopted all feasible mitigation measures, selected the environmentally superior alternative, recognized all significant unavoidable impacts, and balanced the benefits of the Project against its significant and unavoidable impacts.
- The benefits of the Project outweigh and override its significant and unavoidable impacts to transportation and wildfire, for the reasons set forth in the Statement of Overriding Considerations adopted in Section 4.10 and discussed further in Appendix B to this decision.

5. Electromagnetic Field (EMF)

The Commission must evaluate whether the Project was designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures. Section X(A) of GO 131-D requires that applications for a PTC include a description of the measures taken or proposed by the utility to reduce the potential exposure to EMF generated by the Proposed Project. The Commission's EMF Design Guidelines for Electrical Facilities, dated July 21, 2006, provide a checklist for new substations in excess of 50 kV. Additionally, Decision 06-01-042 determined that respondent electric

utilities shall implement low-cost or no-cost EMF mitigation measures in new and upgraded transmission line projects.⁴⁷

In accordance with Commission requirements, PG&E provided a Field Management Plan (FMP) with its application that indicates the specific no-cost and low-cost field reduction measures taken to reduce EMF exposure. PG&E describes a multitude of land uses surrounding or adjacent to the Project route. These include schools or daycare facilities, residential areas, commercial and industrial areas, recreational areas, and rural undeveloped land. PG&E proposes a variety of no-cost and low-cost EMF mitigation measures. PG&E states the estimated cost of this EMF mitigation is approximately \$3.852 million.⁴⁸ Given that the Project cost is \$276.8 million, the Commission agrees that \$3.852 million is low incremental cost considering the total cost of the overall Project.

5.1.1. Phasing Optimization

Optimal phase configurations can be used as a field cancellation technique. The phases from one circuit of a multi-circuit line can be used to reduce the field from another circuit, thereby reducing the total magnetic field strength. For this reason, multi-circuit lines, such as Moraga-Oakland X may have lower magnetic fields than single circuit lines.⁴⁹

Twisting cable also produces lower magnetic field levels than three individual conductors sharing the same conduit because the twisted cable

⁴⁷ Decision 06-01-042, OP 2.

⁴⁸ A.25-11-005, Exhibit D.

⁴⁹ See A.24-11-005 at 4.

maintains a uniform, compact and concentric configuration that increases phase-to-phase cancellation of the magnetic field.⁵⁰

In the above-ground Project segments, the FMP proposes to arrange the phasing in a way that reduces the EMF strength. PG&E considers this a no-cost measure. The FMP proposes to use twisted cable technology in the underground segments to further reduce EMF levels. PG&E also considers this a no-cost measure.⁵¹

5.1.2. Increasing Distance from EMF Source

Reducing magnetic field strength by increasing the distance from the source can be accomplished by either increasing the height or depth of the conductor from ground level. Furthermore, locating the lower lines as far away from the edge of the right-of-way (ROW) or as close to the centerline as possible will result in lower field levels at the edge of the ROW at thirty feet.⁵²

In the above-ground Project segments, the FMP proposes to raise the height of approximately 36 structures in the residential and school land use areas by ten feet taller than required for meeting clearance requirements. PG&E considers this a low-cost measure.

In the below-ground Project segments in the school and residential land use areas, the FMP proposes to lower the depth of the trench five feet lower than the base case design. PG&E also considers this a low-cost measure.

⁵⁰ See Application, Exhibit D, at 5.

⁵¹ See Application, Exhibit D, at 5.

⁵² See Application, Exhibit D, at 5-6.

We find that PG&E has complied with the Commission's policies governing the mitigation of EMF effects. The Moraga-Oakland X Project proposes multiple no-cost and low-cost mitigation measures designed to reduce EMF levels. This is consistent with Commission requirements. Therefore, the no-cost and low-cost measures included in the FMP satisfies the Commission's requirements.

6. Impacts on Environmental and Social Justice Communities

The Commission also considers the Moraga-Oakland X Project's impacts on environmental and social justice (ESJ) communities, including the extent to which it furthers any of the nine goals of the Commission's ESJ Action Plan.

PG&E asserts that the Moraga-Oakland X Project will not have any significant impacts on ESJ communities, as the Project is not located within any ESJ communities.⁵³ PG&E states that there may be temporary impacts to public transit during construction that may impact ESJ communities outside the Project area to the extent the impacted bus routes serve ESJ communities. However, PG&E also states that these impacts will be reduced by the APMs and MMs required in the FEIR.⁵⁴

PG&E asserts that the Project will have long-term secondary benefits to ESJ communities, including improved electric reliability, accommodating the

⁵³ See PG&E Brief at 36-37.

⁵⁴ See PG&E Brief at 37.

region's reasonably foreseeable energy demands, and reducing environmental health impacts from the potential of wildfire-related smoke, among others.⁵⁵

The Moraga-Oakland X Project supports the following goals of the Commission's ESJ Action Plan:

- Goal 4: Increase climate resiliency in ESJ Communities
- Goal 7: Promote high road career paths and economic opportunity for residents of ESJ Communities.

Based on the record, we find that the Moraga-Oakland X Project is consistent with the goals of the Commission's ESJ Action Plan.

7. Minor Project Refinements

The Commission's Energy Division may approve requests by PG&E for minor project refinements that may be necessary due to the final engineering of the project, so long as such minor project refinements are located within the geographic of the study area of the FEIR and do not: (1) result, without mitigation, in a new significant impact based on the criteria used in the FEIR; (2) substantially conflict with any mitigation measure or applicable law or policy; or (3) trigger an additional discretionary permit requirement.

A minor project refinement should be strictly limited to a minor project change that will not trigger other discretionary permit requirements, that does not increase the severity of an impact or create a new impact, and that clearly and strictly complies with the intent of the mitigation measure. PG&E shall seek any project changes that do not fit within these criteria by a petition to modify

⁵⁵ See PG&E Brief at 37.

this decision. A change to the approved project that has the potential for creating significant environmental effects will be evaluated to determine whether supplemental CEQA review is required.

Any proposed deviation from the approved project and adopted APMs or MMs, including correction of such deviation, shall be reported immediately to the Commission and the mitigation monitor assigned to the construction for their review and Commission approval.

8. Summary of Public Comment

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding.

As of May 1, 2026, no public comment has been received on the Docket Card for this proceeding.

9. Conclusion

This decision grants PG&E a permit to construct the Moraga-Oakland 115kV Rebuild Project with mitigation identified in the MMRP contained in Appendix C. The Commission also finds that the FEIR prepared for this Project meets the requirements of CEQA. The Commission finds that the Project is consistent with the goals of the ESJ Action Plan.

10. Procedural Matters

This decision affirms all rulings made by the Administrative Law Judge and assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

11. Comments on Proposed Decision

The decision grants the authority requested. Cal Advocates withdrew its party status and does not protest the application. Accordingly, as provided in Rule 14.6(c)(2) of the Commission's Rules, the otherwise applicable 30-day public review and comment period for this decision is waived.

12. Assignment of Proceeding

Karen Douglas is the assigned Commissioner and David R. Van Dyken is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. PG&E seeks a permit to construct the Moraga-Oakland X 115kV Rebuild Project.
2. The Moraga-Oakland X 115kV line is a four-circuit power line that runs between the Moraga Substation in the City of Orinda, travels through unincorporated Contra Costa County, over the Oakland Hills through the Cities of Oakland and Piedmont in Alameda County to the Oakland X Substation.
3. The line is part of a local 115kV system that delivers power to approximately 200,000 customers, including large industrial customers, such as the Port of Oakland.
4. The existing Moraga-Oakland X 115kV Circuits 1 and 2 were built in 1908, and Circuits 3 and 4 were built in 1931.
5. The Project is intended to replace power line equipment that has reached the end of its useful life for the safe operation of the lines.
6. The Project will rebuild the four existing overhead lines into four new lines, with both overhead (approximately four miles) and underground (approximately one mile) segments.

7. CEQA applies to discretionary projects proposed to be carried out or approved by public agencies, unless the project is exempt. A CEQA lead agency must prepare, review, and approve an environmental review document before action is taken on the project.

8. The Commission is the lead agency under CEQA and has prepared an EIR for the Moraga-Oakland X 115kV Rebuild Project.

9. The Commission published a DEIR on August 12, 2025, an FEIR on January 14, 2026, and Errata to the FEIR in March and April 2026, in compliance with CEQA requirements. The FEIR includes written responses to all substantive comments received on the DEIR, as required by CEQA.

10. The Commission finds the responses to comments provide good-faith, reasoned analysis and adequately explain why certain mitigation measures or alternatives proposed in comments were adopted, modified, or not adopted.

11. Five alternatives were considered in the FEIR, including a “No Project” alternative.

12. The MMRP identified in Chapter 7 of the FEIR and Appendix C is feasible and should be adopted as conditions of approval.

13. The FEIR identifies significant and unavoidable impacts that would occur during the construction of the Project in the resource areas of transportation and wildfire, even after adoption of feasible mitigation measures.

14. The Commission has the authority to mitigate the potential environmental impacts of a Proposed Project through the approval of mitigation measures within the Commission’s jurisdiction, unless the changes or alterations are infeasible for specific reasons.

15. The Commission has adopted all feasible mitigation measures and, by selecting the Proposed Project for approval, has adopted the alternative that avoids or substantially reduces impacts to the extent feasible.

16. The Project will provide benefits, including improvements to system reliability and long-term operability, and a reduction in wildfire risk.

17. The benefits of the Project outweigh and override its significant and unavoidable impacts to transportation and wildfire.

18. The application for a permit to construct includes a description of the measures proposed by the utility to reduce the potential exposure to EMF generated by the Project in compliance with GO 131-D.

19. Decision 06-04-042 determined that respondent electric utilities shall implement low-cost or no-cost EMF mitigation measures in new and upgraded transmission line projects.

20. PG&E proposes a variety of no-cost and low-cost EMF mitigation measures.

21. The Project will not have any significant impacts on ESJ communities as the Project is not located within any ESJ communities.

22. There may be temporary impacts to ESJ communities outside the Project area to the extent impacted transit routes serve ESJ communities.

23. The Project will have long-term secondary benefits to ESJ communities, including improved electric reliability, accommodating the region's reasonably foreseeable energy demands, and reducing environmental health impacts from the potential of wildfire-related smoke, among others.

24. The Commission finds the Project is consistent with the goals of the Commission's ESJ Action Plan.

Conclusions of Law

1. PG&E is a public utility providing electrical and gas services to customers in northern California, and therefore subject to the Commission's jurisdiction.

2. As lead agency under CEQA, the Commission finds that the Project complies with CEQA and thus issues a permit to construct pursuant to GO 131-D.

3. The FEIR is reasonable and in compliance with all CEQA requirements.

4. The Project is the "environmentally superior" alternative among all of the alternatives studied in the FEIR.

5. The Project meets the requirements to implement low-cost or no-cost EMF mitigation measures per D.06-01-042.

O R D E R

IT IS ORDERED that:

1. Pacific Gas and Electric Company is granted a permit to construct the Moraga-Oakland X 115kV Rebuild Project.

2. The Final Environmental Impact Report is adopted.

3. The Mitigation Measures identified in the Mitigation Monitoring and Reporting Plan included in Appendix C herein shall be adopted as conditions of approval.

4. The Commission's Energy Division may approve requests by Pacific Gas and Electric Company for minor project refinements that may be necessary due

to the final engineering of the project, so long as such minor project refinements are located within the geographic study area of the Final Environmental Impact Report (FEIR) and do not: (1) result, without mitigation, in a new significant impact based on the criteria of the FEIR, (2) substantially conflict with any mitigation measure or applicable law or policy; or (3) trigger an additional discretionary permit requirement.

5. Any proposed deviation from the approved project and adopted Applicant Proposed Measures or Mitigation Measures, including correction of such deviation, shall be reported immediately to the Commission's Energy Division and the mitigation monitor assigned to the construction for their review and Commission approval.

6. Application 24-11-005 is closed.

This order is effective today.

Dated _____, at Fort Bragg, California