Decision 26-07-042 July 16, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PACIFIC GAS AND ELECTRIC COMPANY (U39E) for a Certificate of Public Convenience and Necessity Authorizing the Construction of the Northern San Joaquin 230 kV Transmission Project.	Application 23-09-001

DECISION GRANTING PACIFIC GAS AND ELECTRIC COMPANY A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY AUTHORIZING THE NORTHERN SAN JOAQUIN 230 KILOVOLT TRANSMISSION PROJECT

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Summary

This decision grants Pacific Gas and Electric Company's request for a certificate of public convenience and necessity authorizing the construction of the Northern San Joaquin 230 Kilovolt Transmission Project subject to the mitigation measures identified in the Mitigation Monitoring and Reporting Program (Attachment A). This decision finds and certifies that the Final Environmental Impact Report for the Northern San Joaquin 230 Kilovolt Transmission Project meets the requirements of the California Environmental Quality Act.

This proceeding is closed.

1. Background

On September 1, 2023, Pacific Gas and Electric Company (PG&E) filed Application (A.) 23-09-001 for a certificate of public convenience and necessity (CPCN) authorizing construction of the Northern San Joaquin 230 kilovolt (kV) Transmission Project (Northern San Joaquin Project or Project). PG&E indicates that the Northern San Joaquin Project will provide a new 230 kV transmission system in the northern San Joaquin County area of central California. The Project will loop PG&E's existing overhead Brighton-Bellota 230 kV transmission line through PG&E's Lockeford Substation and install a new overhead double-circuit 230 kV transmission line between Lockeford Substation and a new PG&E

switching station at the City of Lodi's Lodi Electric Utility's existing Fred M. Reid Industrial Substation.[1]

PG&E asserts that the Northern San Joaquin Project will 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's Lockeford and Lodi substations in northern San Joaquin County. It indicates these reliability and capacity issues were determined by a CAISO reliability assessment on the 230/60 kV system in the northern San Joaquin County area over a ten-year planning horizon, which identified thermal overload and voltage issues.[2] PG&E contends the Project will address system needs during peak loading conditions where system load exceeds 180 megawatts (MW) of load and eliminate the need for temporary operational procedures when load exceeds 165 MW. It proposes to have the Project operational by March 2029 and estimates that the total construction cost will be approximately $198,815,305 million including contingency.[3]

On October 2, 2023, the California Farm Bureau Federation (Farm Bureau) filed a protest to A.23-09-001. On October 11, 2023, PG&E filed a reply to the Farm Bureau's protest and letters from the community members. The assigned Commissioner issued an initial scoping memo and ruling on January 29, 2024, that determined the initial issues and schedule of the proceeding. The

[1] A.23-09-001 at 2.

[2] *Id.* at 3.

[3] *Id.* at 9 and Exhibit C.

Administrative Law Judge (ALJ) granted party status to Jim Grady on June 19, 2025, and the CAISO on July 15, 2025.

As provided by General Order (GO) 131-D,[4] the Northern San Joaquin Project is subject to environmental review pursuant to the California Environmental Quality Act (CEQA).[5] CEQA requires the lead agency (the California Public Utilities Commission (Commission) in this case) to conduct a review to identify environmental impacts of the Project and ways to avoid or lessen environmental impacts.[6] Environmental review determined that the Project proponent could not revise the Project plan to reduce all Project-related environmental impacts to less-than-significant levels. Therefore, the Commission determined that an environmental impact report (EIR) was appropriate.[7] The Commission released the Draft EIR for public review and comment on December 10, 2024. The public comment period closed on February 7, 2025. PG&E, the Farm Bureau, the California Department of Fish and Wildlife, the San Joaquin Valley Air Pollution Control District, the City of Lodi and numerous individuals submitted comments on the Draft EIR.

A prehearing conference (PHC) was held on July 17, 2025, with PG&E, CFBF, CAISO and Jim Grady in attendance. The First Amended Scoping Memo

[4] Although GO 131-E was adopted on January 30, 2025, by Decision (D.) 25-01-055, this application is subject to GO 131-D because it was filed prior to the adoption date of GO 131-E.

[5] Public Resources Code §§ 21000, *et seq.*

[6] *See* California Code of Regulations, Tit. 14, § 15000, *et seq.* (CEQA Guidelines) § 15060.

[7] CEQA Guidelines § 15063.

and Ruling was issued on August 14, 2025. The ALJ granted party status to the City of Lodi on October 15, 2025.

The Final EIR was issued on August 11, 2025. The Final EIR detailed the environmental impacts of the Northern San Joaquin Project and identified a reasonable range of project alternatives, including the environmentally superior alternative. It also recommended a mitigation program to reduce any potentially significant impacts.

On January 16, 2026, the parties submitted a joint case management statement indicating that all parties agree that there were no material facts in dispute and that there was no need for evidentiary hearings. The parties also requested that the prepared testimony served in this proceeding be received into evidence without direct or cross examination and due dates for concurrent opening and reply briefs be set. The ALJ issued a ruling on January 20, 2026, moving the prepared testimony into the record and setting the briefing schedule. The ALJ issued a subsequent ruling moving the Final EIR into the record on February 13, 2026.

PG&E and the City of Lodi filed opening briefs on March 20, 2026. The Farm Bureau filed a reply brief on April 20, 2026.

1.1. Submission Date

This matter was submitted on April 20, 2026, the filing date for reply briefs.

2. Issues Before the Commission

The issues to be determined in this proceeding are:

1. Does the Northern San Joaquin Project serve a present or future public convenience and necessity?[8]
2. Since the CEQA process resulted in an EIR:
    a. What are the significant environmental impacts of the Northern San Joaquin Project, if any?
    b. Are there potentially feasible mitigation measures that will avoid or lessen the identified significant environmental impacts?
    c. As between the Northern San Joaquin Project and the project alternatives, which is environmentally superior?
    d. Are the mitigation measures or environmentally superior project alternatives infeasible for economic, social, legal, technological, or other considerations?
    e. To the extent that the Northern San Joaquin Project and/or project alternatives result in significant and unavoidable impacts, are there overriding considerations that nevertheless merit Commission approval of the Project or project alternative?[9]
3. Did the Commission review and consider the EIR, was the EIR completed in compliance with CEQA, and does the EIR reflect the Commission's independent judgment?
4. What, if any, are the community values affected by the Northern San Joaquin Project under Public Utilities Code Section 1002(a)(1)?
5. What is the maximum prudent and reasonable cost of the Northern San Joaquin Project?[10]

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[8] *See* Public Utilities Code § 1001.

[9] CEQA Guidelines § 15093.

[10] *See* Public Utilities Code § 1005.5.

6. What are the impacts on environmental and social justice communities, including the extent to which the construction of the Northern San Joaquin Project impacts the achievement of any of the nine goals of the Commission's Environmental and Social Justice Action Plan?
7. Is the Northern San Joaquin Project designed in compliance with the Commission's policies governing the mitigation of electromagnetic field (EMF) effects using low-cost and no-cost measures?

3. Discussion and Analysis

3.1. Project Need

Public Utilities Code Section 1001 requires a utility seeking an authority to construct or extend its line, plant or system, to first obtain a certificate from the Commission that the present or future public convenience and necessity requires or will require such construction of a proposed project.

PG&E asserts the Northern San Joaquin Project is needed to provide reliability and capacity benefits and cites to the CAISO's 2017-2018 Transmission Plan, which found that the Project will address reliability and capacity issues identified by CAISO on the existing PG&E 230 kV and 60 kV systems serving northern San Joaquin area in the vicinity of PG&E's Lockeford Substation and PG&E's Lodi Substation.

PG&E emphasizes that the Project is needed to meet thermal overload issues, which can damage equipment due to overheating, as well as low voltage issues, which can cause local area outages due to voltage collapse.[11] PG&E states

[11] PG&E Opening Brief at 7.

that the current system requires the utilization of a temporary operational procedure during peak loading conditions to address voltage issues. It indicates that the "temporary operational procedure addresses voltage issues by using only the stronger Lockeford-Bellota 230 kV transmission line, resulting in only one 230 kV source serving Lockeford Substation and the Northern San Joaquin area 60 kV system during peak load conditions."[12] PG&E contends that when the temporary operational procedure is in effect, the reliability of the power supply for the northern San Joaquin area is significantly reduced because there is only one 230 kV source. It also cites to CAISO testimony that PG&E's current operating solution does not meet the performance requirement of the applicable North American Electric Reliability Council (NERC) standard, which requires corrective actions to maintain steady state voltages and post-contingency voltage deviations within acceptable limits.[13]

PG&E argues that need for the Northern San Joaquin Project continues to exist, citing to the CAISO 2024-2025 Transmission Plan's reliance on the Project to ensure the reliability of the grid. It states that the CAISO's studies continue to find that the Project is needed to resolve thermal overload and low voltage issues on the PG&E 230/60 kV system and that the absence of the Project creates an unacceptable level of reliability risk from a voltage collapse due to a contingency event.[14] PG&E asserts that the Project will address current reliability issues and

[12] *Id.* at 8.

[13] *Id.* at 10.

[14] *Id.* at 13.

will also ensure system reliability in the future, even with the forecasted load growth in the area. It stresses that the current thermal overload and low voltage issues are forecasted to worsen over time and that without the Project, the number and degree of normal and emergency overloads identified in 2030 will increase and become more severe by 2035.[15]

PG&E asserts that the Northern San Joaquin Project meets the identified system needs by resolving the current low voltage problems and increasing the loading capability of the 230 kV and 60 kV transmission system during normal and peak load conditions.[16] It cites to CAISO testimony that the Project will: (1) address identified thermal overloads and voltage concerns on PG&E's 230/60 kV transmission system during contingencies, (2) improve system reliability for PG&E and Lodi Electric Utility customers and (3) increase capacity to accommodate projected growth in demand.[17] PG&E contends that serving Lodi Electric Utility's Industrial Substation from 230 kV lines instead of 60 kV lines will resolve current and forecasted low-voltage and thermal overload issues on PG&E's 230/60 kV system serving the area, and will eliminate PG&E's need for the current operational procedure to address voltage issues.[18] It emphasizes that there are no new planned generation or transmission resources that would address the needs in the Project's area and that the CAISO found that any

[15] *Id.* at 9.

[16] *Id.* at 11.

[17] *Ibid.*

[18] *Id.* at 12.

potential alternatives to the Project would not address system reliability concerns over the long-term.[19]

PG&E emphasizes that the Northern San Joaquin Project will also provide additional reliability and capacity benefits by increasing "the load serving capability of the PG&E 230 kV and 60 kV transmission facilities serving the Project area from 194 MW to approximately 404 MW under normal operating conditions, and from 152 MW to approximately 456 MW" under a P1 contingency event.[20] PG&E indicates that the Project will increase capacity to accommodate forecasted summer peak load and electrical load growth in the Project area, creating improved service reliability during current and forecasted peak loading conditions for PG&E and Lodi Electric Utility customers.[21] It also asserts that the Project "will provide PG&E operations with more opportunities during the year for clearances to do maintenance work on transmission components in the [P]roject area."[22]

The City of Lodi also asserts that the Northern San Joaquin Project is needed to address the steadily increasing energy demand in the Northern San Joaquin area due to residential development, agricultural and industrial growth.[23] It contends that the Project is needed to address CAISO's determination that the system needs to shift load from the 60 kV system to a new

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[19] *Id.* at 12 to 13.

[20] *Id.* at 14.

[21] *Id.* at 15.

[22] *Ibid.*

[23] City of Lodi Opening Brief at 4.

230 kV source to improve system reliability and accommodate existing and forecasted growth beyond the existing capacity.[24]

The City of Lodi stresses that unless current system constraints are addressed, there will be significant cost impacts for the City of Lodi. To underscore the need for the Project, it cites an incident in 2022 where a NERC Category P1 event[25] occurred on Lodi Electric Utility's existing transmission feeds, resulting in rotating power outages.[26] It states that such events not only "threaten the safety and well-being of the residents and business of [the City 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."[27] The City of Lodi emphasizes that the Project will enable its planned improvements, including a new substation, to address capacity and reliability needs. It indicates that the PG&E and Lodi Electric Utility facilities will increase voltage stability, improve capacity, and reduce thermal constraints on the regional network.[28]

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[24] *Ibid.*

[25] A 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.

[26] City of Lodi Opening Brief at 8.

[27] *Id.* at 9.

[28] *Ibid.*

We find that the record demonstrates that the present and future public convenience and necessity require construction of the Northern San Joaquin Project. The Project is needed to address current reliability and capacity issues identified by the CAISO on the existing PG&E 230 kV and 60 kV systems serving the northern San Joaquin area as well as the Lodi Electric Utility system. The Project is also needed to ensure reliability over the long term due to forecasted load increases in the area. Lastly, the Project is needed to accommodate improvements in the northern San Joaquin area that will: (1) ensure the safety and well-being of the residents and businesses, (2) support state clean energy and electrification goals and (3) allow achievement of regional economic development goals.

3.2. CEQA

To issue a CPCN pursuant to GO 131-D, the Commission must find that a proposed project complies with CEQA. In evaluating whether to approve a proposed project, CEQA requires the lead agency[29] (the Commission in this case) to conduct a review to identify the potential environmental impacts of a proposed project and ways to avoid or reduce environmental impacts.[30]

The Commission has the authority to mitigate the potential environmental impacts of a proposed project through the approval of mitigation measures

[29] The lead agency is the public agency which has the principal responsibility for carrying out or approving a project. (CEQA Guidelines § 15367.)

[30] CEQA defines a "project" as an activity that: (1) is a discretionary action by a governmental agency and (2) will either have a direct or reasonably foreseeable indirect impact on the environment. (Public Resources Code, § 21065.)

within the Commission's jurisdiction, unless the changes or alterations are infeasible for specific economic, legal, social, technical and other considerations. The mitigation measures are intended to reduce the potential environmental impacts of a proposed project to less-than-significant levels.

The Commission prepared an EIR for the Northern San Joaquin Project and circulated it for comment.[31]

3.2.1. Environmental Impacts of the Northern San Joaquin Project

CEQA requires that, prior to approving a proposed project, the lead agency consider the Draft EIR and any comments received during the public review process, and that the lead agency adopt the Final EIR only if it finds on the basis of the whole record that there is no substantial evidence that a project will have a significant effect on the environment.[32] If the lead agency adopts a Final EIR, CEQA requires that it also adopt a program for monitoring or reporting on the changes or conditions required to mitigate or avoid significant environmental effects.[33]

PG&E indicates that the Final EIR finds that after implementation of the recommended mitigation measures, all impacts associated with growth and development that would occur with the construction of the Northern San Joaquin Project would be reduced to a less-than-significant level. It emphasizes that the

[31] The Draft EIR was issued for public review on December 10, 2024, with public comment closing on February 7, 2025. Therefore, the 30-day public notice requirement of CEQA Guideline 15105 is satisfied.

[32] CEQA Guidelines § 15074(a), (b).

[33] CEQA Guidelines § 15074(d).

record supports that there will be no significant adverse effect or impact on the environment due to the Project.[34] PG&E also asserts that the requirements of Public Utilities Code Section 1002(a)(2) – (4) are satisfied because the Commission, through its evaluation of the Final EIR, has found that the Project will not have significant adverse effects on: (1) recreational and park areas, (2) historical and aesthetic values, and (3) influence on the environment.[35]

We find there is no substantial evidence that the Northern San Joaquin Project will have a significant impact on the environment once the mitigation measures are implemented. Although the Draft EIR identified potentially significant impacts during and after construction in some areas, implementation of the mitigation measures will reduce these impacts to less-than-significant levels. Therefore, all Project-related environmental impacts would be avoided or reduced to a less-than-significant level with the implementation of feasible mitigation measures.

3.2.2. Environmentally Superior Project

The Commission must determine what is the environmentally superior alternative between the PG&E's Northern San Joaquin Project and the project alternatives. The Final EIR acknowledges that the "No Project Alternative" would avoid impacts to all resource areas but determines that it would not support the State's goals related to energy efficiency and greenhouse gas emission reductions, and it would not meet any of the Project objectives. The

[34] PG&E Opening Brief at 16.

[35] *Ibid.*

Final EIR identifies PG&E's Project as the environmentally superior alternative. The Final EIR also evaluated two routing alternatives that would result in similar potential for environmental impacts as the Project and would require implementation of the same mitigation measures. However, these alternatives are not environmentally superior because they would have more noticeable aesthetic impacts than the Project. Therefore, we find that the Project is the environmentally superior project.

3.2.3. Feasibility of the Mitigation Measures

If the Commission approves a project, it must require the implementation of the identified mitigation measures, unless they are found to be infeasible for economic, social, legal, technological, or other considerations. PG&E argues that seven of the mitigation measures in the Final EIR for the Northern San Joaquin Project, all related to biological resources, are infeasible as written for several overarching reasons.[36] It recommends changes to these mitigation measures "that should be made to achieve feasibility while still reducing the Project's impacts to below the level of significance[.]"[37] We address each of the mitigation measures in question below.

3.2.3.1. Mitigation Measure BIO-2a

Mitigation Measure BIO-2a relates to the California tiger salamander and imposes requirements regarding surveys and monitoring initial ground disturbance. PG&E requests revisions to Mitigation Measure BIO-2a, claiming

[36] *Id.* at 18.

[37] *Id.* at Exhibit 1.

the current description imposes requirements that are inconsistent with PG&E's requirements under the San Joaquin Valley Operations and Maintenance Program Habitat Conservation Plan (SJVHCP)

PG&E asserts that the SJVHCP regulates certain PG&E construction activities and imposes requirements to minimize and mitigate any impacts in areas of sensitive habitat. Its argues that the SJVHCP covers all the Project construction activities that are planned in the California tiger salamander habitat areas described by Mitigation Measure BIO-2a.[38] PG&E emphasizes that while the SJVHCP does not require stopping work or waiting for a response from US Fish and Wildlife Agency (USFWS) and the California Department of Fish and Wildlife (CDFW) if California tiger salamanders are detected before work may restart, Mitigation Measure BIO-2a would require PG&E to stop work and wait for a response from these agencies before any work could restart. In addition, it indicates additional mitigation related to the California tiger salamander is unnecessary since it is already required to comply with the SJVHCP.[39] PG&E also argues that Mitigation Measure BIO-2a is economically infeasible due to the significant costs associated with potential delays in Project construction that could result from work stoppages.[40]

We note that the SJVHCP Environmental Impact Statement (EIS)/EIR does not provide project-level evaluation of effects from large construction projects,

[38] *Id.* at 29.

[39] *Id.* at 30.

[40] *Id.* at 29.

nor does it provide detailed analysis of potential effects to California tiger salamander; it only addresses impacts of operation and maintenance (O&M) and limited minor construction activities.[41] While PG&E may have authorization for the incidental take of California tiger salamander in the SJVHCP for O&M and limited minor construction activities, it does not have such authorization for Project-related construction activities beyond minor construction. Mitigation Measure BIO-2a is limited to construction activities such as ground-disturbing work, vegetation removal, or staging activities.[42] The requirement to stop work and contact CDFW and USFWS if a listed species is observed during construction is standard for projects without incidental take authorization.

Therefore, we decline to remove the requirements for activities not covered by the SJVHCP. However, to clarify the issue, we revise Mitigation Measure BIO-2a to specify it is only required for activities that are not already covered by the SJVHCP. This revision provides clarification while maintaining the intent of the mitigation measure and not changing the anticipated reduction in environmental effects disclosed in the Final EIR. We revise Mitigation Measure BIO-2a as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.3.2. Mitigation Measure BIO-2b

Mitigation Measure BIO-2b relates to special-status birds, nesting raptors and other native nesting birds and imposes species avoidance requirements

[41] SJVHCP at 2-1 (Chapter 2 - Covered Activities).

[42] Final EIR at 3-21.

during construction activities and for O&M activities. PG&E requests two revisions to Mitigation Measure BIO-2b based on feasibility concerns.

PG&E's first requested revision was to remove "O&M" from the mitigation measure and to require avoidance and minimization of impacts on special-status birds only for construction activities (and not for O&M activities). PG&E argues that the imposition of mitigation measures during O&M is not warranted because the CDFW "already concluded that activities covered by the SJVHCP, including O&M of the Project, will not have significant impacts after implementation of the mitigation measures required under the SJVHCP."[43] It contends that since it already must comply with all federal and state laws during O&M, Mitigation Measure BIO-2b could conflict with requirements of the relevant resource agencies, making compliance with the mitigation measures technically or legally infeasible.[44] Therefore, PG&E states that the additional mitigation measure is unnecessary because it is already required to comply with all federal and state laws during O&M and wetlands will be adequately protected during O&M by the requirements of CDFW and USFWS, which have jurisdiction to enforce all applicable federal and state laws.

We clarify that Mitigation Measure BIO-2b does not apply to PG&E O&M activities that are covered by the SJVHCP. As written, the mitigation measure specifies that the measure applies to "… PG&E and [Lodi Electric Utility] project

[43] PG&E Opening Brief at 19.

[44] *Ibid.*

construction and [Lodi Electric Utility] O&M activities…"[45] Since Lodi Electric Utility is not covered by the SJVHCP, this mitigation measure must also be applied to Lodi Electric Utility O&M activities. Although we do not accept all of PG&E's revisions, we revise Mitigation Measure BIO-2b to specify that it applies to O&M activities for only Lodi Electric Utility project components.

PG&E's second requested revision of Mitigation Measure BIO-2b is to specify that surveys are required within a buffer surrounding the "work area" rather than the "biological study area." It argues that survey buffers are normally applied based on the work area, not the biological study area in state and federal resource agency requirements and agency guidance.[46] PG&E contends that, as written, Mitigation Measure BIO-2b would require conducting surveys of a much larger area, which would result in significantly increased costs.[47] It states that utilizing the expanded area is not necessary to mitigate potential biological resource impacts and may be economically infeasible due to the significantly increased costs associated with the expanded area currently covered in the mitigation measure.

We find PG&E's second requested revision to the Mitigation Measure BIO-2b is reasonable. We revise the second bullet of the mitigation measure so that the survey is based on the work area rather than the biological study area, consistent with the other parts of the mitigation measure and consistent with the

[45] Final EIR at 3-25.

[46] PG&E Opening Brief at 21.

[47] *Id.* at 24.

impact analysis in the Final EIR. The revision maintains the intent and protectiveness of the mitigation measure and does not change the anticipated reduction in environmental effects analyzed and disclosed in the Final EIR.

We revise Mitigation Measure BIO-2b as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.3.3. Mitigation Measure BIO-2c

Mitigation Measure BIO-2c concerns survey buffer areas and avoidance measures related to burrowing owls. PG&E requested two revisions to Mitigation Measure BIO-2c based on feasibility concerns.

PG&E's first requested revision of Mitigation Measure BIO-2c is to specify that surveys are required within a buffer surrounding the "work area" rather than the "biological study area." It argues that survey buffers are normally applied based on the work area, not the biological study area in state and federal resource agency requirements and agency guidance.[48] PG&E contends that, as written, Mitigation Measure BIO-2c would require conducting surveys of a much larger area, which would result in significantly increased costs.[49] It states that utilizing the expanded area is not necessary to mitigate potential biological resource impacts and may be economically infeasible due to the significantly increased costs associated with the expanded area currently covered in the mitigation measure.

[48] *Id.* at 21.

[49] *Id.* at 24.

We find PG&E's first requested revision to the Mitigation Measure BIO-2c is reasonable. We revise the first bullet of the mitigation measure so that the survey is based on the work area rather than the biological study area consistent with the other parts of the mitigation measure and consistent with the impact analysis in the Final EIR. The revision maintains the intent and protectiveness of the mitigation measure and does not change the anticipated reduction in environmental effects analyzed and disclosed in the Final EIR.

PG&E's second requested revision is to reduce Mitigation Measure BIO-2c's required size for both the survey buffer and minimum protective buffer for active burrowing owl burrows from 1,640 feet to 500 feet. It claims the current survey requirement in Mitigation Measure BIO-2c is "beyond utility industry standards and would add substantial and unnecessary expense and risk to [P]roject completion."[50] PG&E argues that the survey buffer of 1,640 feet is inappropriate to use for the Project because it was developed for a different country, a different environmental setting, and a different industry.[51] It maintains that CDFW requires a survey buffer of 500 feet for the burrowing owl and a buffer of 1,640 feet is not necessary to mitigate impacts.[52] PG&E asserts that retaining the 1,640-foot survey buffer poses economic feasibility issues due to the increased costs of surveying, which it estimates as potentially "hundreds

[50] *Id.* at 23.

[51] *Ibid.*

[52] *Ibid.*

of thousands, if not millions, of dollars."[53] PG&E also emphasizes the larger survey buffer could result in delays due to potential work stoppages for "weeks at a time" and that such delays will likely increase costs for ratepayers.[54]

We decline to revise the survey buffer in Mitigation Measure BIO-2c from 1,640 feet to 500 feet. The 500-foot survey buffer referenced by PG&E is based on guidance from the CDFW in 2012. However, the burrowing owl became a candidate for listing under the California Endangered Species Act (CESA) on October 10, 2024, which affords the same protection as a listed species under CESA, including prohibition of take of individuals.[55] Although no official updated guidance from CDFW has been published as a result of the candidacy of burrowing owl, it is likely that further guidance will be published, especially if the species is listed. In the absence of updated, published guidance from CDFW, Mitigation Measure BIO-2c used the largest recommended buffer of 1,640 feet.

Although we decline to reduce the survey buffer in Mitigation Measure BIO-2c, we revise it to provide additional flexibility regarding the no-disturbance buffers around active burrowing owl burrows. The no-disturbance buffer may be adjusted to as small as 500 feet if the qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of various considerations, and a biological monitor is present during all Project activities. Furthermore, additional details are incorporated to emphasize

[53] *Id.* at 24.

[54] *Ibid.*

[55] Final EIR at 2-55 to 2-56.

that only habitats suitable for the burrowing owl, and accessible areas within the survey buffer would be surveyed, which should increase the feasibility of surveying within a 1,640-foot buffer. The revisions address the concerns raised by PG&E, but do not change the anticipated reduction in environmental effects disclosed in the Final EIR.

We revise Mitigation Measure BIO-2c as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.3.4. Mitigation Measure BIO-2d

Mitigation Measure BIO-2d relates to measures to mitigate impacts on Crotch's bumble bees. PG&E's requests two revisions to Mitigation Measure BIO-2d.

PG&E's first requested revision is a change to the description of potential CDFW incidental take permit avoidance measures. PG&E claims that the current mitigation measure directs CDFW to include specific measures to avoid take of Crotch's bumble bee in an incidental take permit and asserts that this current description is legally infeasible because it mandates an action outside of the Commission's jurisdiction since the "development of the [incidental take permit] is the responsibility of CDFW and decisions on which measures to include lie with CDFW alone."[56] PG&E emphasizes that the Commission can suggest measures to include in the incidental take permit, but cannot mandate to the CDFW that certain measures are included.

[56] PG&E Opening Brief at 24.

We disagree with PG&E's assertion. The Commission and CDFW both have jurisdiction to regulate the project and require implementation of mitigation measures, where the Commission is the lead CEQA agency and CDFW is responsible CEQA agency if an incidental take permit is issued. As lead CEQA agency, the Commission must explain how obtaining an incidental take permit would be adequately protective of the species to minimize impacts to a less than significant level. Therefore, it is prudent to describe what specific actions may be required in the incidental take permit to protect the species. However, the language in Mitigation Measure BIO-2d has been revised to clarify the intent of the measure to describe the types of actions that may be required in the incidental take permit that would ensure that impacts are reduced to a less than significant level. The revision maintains the intent and protectiveness of the mitigation measure and does not change the anticipated reduction in environmental effects disclosed in the Final EIR.

PG&E's second requested revision is related to language requiring avoidance of Crotch's bumble bees if observed during Project construction activities (e.g., flying through the Project area). It argues that identification of Crotch's bumble bees in flight is technically infeasible because Crotch's bumble bees are not distinguishable from other common bumble bee species in flight, even by bee experts.[57] PG&E contends that the only way it could comply with Mitigation Measure BIO-2d as written is to stop construction work any time any

[57] *Id.* at 25.

species of bumble bee is observed. It emphasizes that this "is impractical, would cause extensive construction delays, and is economically infeasible."[58]

We find that PG&E's second requested revision to the Mitigation Measure BIO-2d language related to avoidance of individual Crotch's bumble bees (as opposed to nests of Crotch's bumble bees) if observed during Project construction activities is reasonable since differentiating between individual bee species in flight may be technically infeasible.

We remove the second to last bullet of Mitigation Measure BIO-2d that could be interpreted to require avoidance of individual bees as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order. This revision provides clarification while maintaining the intent of the mitigation measure and not changing the anticipated reduction in environmental effects disclosed in the Final EIR.

3.2.3.5. Mitigation Measure BIO-2f

Mitigation Measure BIO-2f relates to bat surveys and implementation of avoidance measures. PG&E's requests three revisions to Mitigation Measure BIO-2f.

PG&E's first requested revision of Mitigation Measure BIO-2f is to specify that surveys are required within a buffer surrounding the "work area" rather than the "biological study area." It argues that survey buffers are normally applied based on the work area, not the biological study area in state and federal

[58] *Ibid*.

resource agency requirements and agency guidance.[59] PG&E contends that, as written, Mitigation Measure BIO-2f would require conducting surveys of a much larger area, which would result in significantly increased costs.[60] It states that utilizing the expanded area is not necessary to mitigate potential biological resource impacts and may be economically infeasible due to the significantly increased costs associated with the expanded area currently covered in the mitigation measure.

We find PG&E's first requested revision to the Mitigation Measure BIO-2f is reasonable. We revise the mitigation measure so that the survey is based on the work area rather than the biological study area, consistent with the impact analysis in the Final EIR. The revision maintains the intent and protectiveness of the mitigation measure and does not change the anticipated reduction in environmental effects disclosed in the Final EIR.

PG&E second requested revision to Mitigation Measure BIO-2f is related to the removal or sealing of bat roosts or hibernation habitat. It argues that, as written, Mitigation Measure BIO-2f would result in an unnecessary loss of habitat and adversely impact the agricultural community.[61] PG&E emphasizes that the only special-status bat species that may occur in the Project area is the Western red bat, which is a solitary bat that nests in tree foliage and hangs in trees to mimic dead leaves. Therefore, it asserts that compliance with Mitigation

[59] *Id.* at 21.

[60] *Id.* at 24.

[61] *Id.* at 27.

Measure BIO-2f's requirement to remove all habitat (trees with foliage) would result in an unnecessary loss of habitat and include the removal of agricultural orchard trees, which would have adverse impacts on the agricultural community. Additionally, PG&E contends that Mitigation Measure BIO-2f mandates measures to exclude the bats from roosting sites that are technically infeasible for non-cavity, foliage nesting bats like the Western red bat.[62]

We disagree with PG&E's assertion. Implementation of Mitigation Measure BIO-2f is required only when trees are proposed to be removed or trimmed by PG&E; the mitigation measure does not require removal of trees. Mitigation Measure BIO-2f has been clarified to avoid any misinterpretation of the measure and to describe what steps must be implemented to protect bat species for any proposed tree removal or trimming by PG&E. The revision does not change the intent or protectiveness of the measure and does not change the anticipated reduction in environmental effects analyzed and disclosed in the Final EIR.

PG&E's third requested revision to Mitigation Measure BIO-2f is the removal of the provision requiring a protective buffer around detected western red bat roosts that would be retained, as well as potential roost habitat replacement requirements in consultation with CDFW if roosts are removed.[63] It did not include a specific rationale for this revision, but we infer from its other

[62] *Id.* at 28.

[63] *Id.* at Exhibit 1.

arguments as to mitigation measure revision that PG&E has economic feasibility concerns.

We decline to adopt PG&E's requested revisions. The protection of active bat roosts and consultation with CDFW to determine if removed roosts require habitat replacement are required to reduce this impact to less than significant under CEQA.

We revise Mitigation Measure BIO-2f as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.3.6. Mitigation Measure BIO-2g

Mitigation Measure BIO-2g is related to the surveys of and protective buffers for the American Badger. PG&E requests revisions to Mitigation Measure BIO-2g requirements for surveys to identify American Badger dens based on the biological study area and mandates a 200-foot buffer around any dens.

PG&E's first requested revision of Mitigation Measure BIO-2f is to specify that surveys are required within a buffer surrounding the "work area" rather than the "biological study area."[64] It argues that survey buffers are normally applied based on the work area, not the biological study area in state and federal resource agency requirements and agency guidance.[65] PG&E contends that Mitigation Measure BIO-2g would require conducting surveys of a much larger

[64] *Id.* at 21.

[65] *Ibid.*

area, which would result in significantly increased costs.[66] PG&E states that utilizing the expanded area is not necessary to mitigate potential biological resource impacts and may be economically infeasible due to the significantly increased costs associated with the expanded area currently covered in the mitigation measure.

We find PG&E's first requested revision to the Mitigation Measure BIO-2g is reasonable. We revise the first bullet of the mitigation measure so that the survey is based on the work area rather than the biological study area, consistent with the other parts of the mitigation measure and impact analysis in the Final EIR. The revision maintains the intent and protectiveness of the mitigation measure and does not change the anticipated reduction in environmental effects disclosed in the Final EIR.

PG&E's second requested revision to Mitigation Measure BIO-2g is to allow for the reduction of the size of the 200-foot protective buffer based on the expert opinion of the qualified biologist and environmental factors.[67] It argues that imposing a buffer that extend beyond resource agency recommendations could greatly increase the time and expense to comply and is therefore economically infeasible.

We find PG&E's requested revisions to Mitigation Measure BIO-2g are reasonable. Since the buffer can only be adjusted based on the expertise of a qualified biologist, the mitigation measure maintains the protectiveness of the

[66] *Id.* at 24.

[67] *Id.* at 21.

original measure and does not change the anticipated reduction in environmental effects disclosed in the Final EIR.

We revise Mitigation Measure BIO-2g as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.3.7. Mitigation Measure BIO-3

PG&E requests revisions to Mitigation Measure BIO-3, which imposes avoidance measures for state and federally protected wetlands during construction activities and for O&M activities. PG&E requests two revisions regarding requirements as to wetland mapping and activities during O&M.

PG&E's first requested revision to Mitigation Measure BIO-3 concerns wetland mapping. The measure requires PG&E to incorporate the boundaries of wetlands and protective buffers into all maps and plans used by Project personnel. PG&E indicates that it is not feasible to replace the large number of different maps and plans that will be created for the construction of the Project to incorporate wetland boundaries and buffers without significant time and expense. It also states that it may not be possible to identify and update each and every map or plan.[68] PG&E proposes revising Mitigation Measure BIO-3 to require that PG&E issue "a single map identifying all wetland boundaries and buffers to relevant [P]roject personnel, and to have the qualified biologist review this map with [P]roject personnel during their environmental training."[69] It

[68] *Id.* at 28.

[69] *Ibid.*

emphasizes that the revised mitigation measure would achieve the same purpose, but in a more feasible way and at far less expense.[70]

With respect to wetland mapping, Mitigation Measure BIO-3 is intended to ensure that relevant staff are aware of the location of wetlands and avoidance requirements. PG&E's requested revision is reasonable and does not change the intent or protectiveness of the mitigation measure. Therefore, we find PG&E's requested revision as to wetland mapping reasonable.

PG&E second requested revision concerns the imposition of mitigation measure during O&M, arguing it is unwarranted because CDFW "already concluded that activities covered by the SJVHCP, including O&M of the Project, will not have significant impacts after implementation of the mitigation measure required under the SJVHCP."[71] It contends that since it already must comply with all federal and state laws during O&M, Mitigation Measure BIO-3 could conflict with requirements of the relevant resource agencies, making compliance with the mitigation measure technically or legally infeasible.[72] Therefore, PG&E states that the additional mitigation measure is unnecessary and wetlands will be adequately protected during O&M by the requirements of CDFW and USFWS, which have jurisdiction to enforce all applicable federal and state laws.[73]

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[70] *Ibid.*

[71] *Id.* at 19.

[72] *Id.* at 20.

[73] *Ibid.*

The EIS/EIR for the SJVHCP determined that the potential impacts of PG&E maintenance activities on wetlands would be less than significant, given compensation requirements in the SJVHCP, but noted that that the specific locations of the individual activities could not be predicted at the time of preparation of the EIS/EIR in 2006.[74] In addition, the SJVHCP EIS/EIR also determined that the impacts would be less than significant based upon PG&E's commitment to fund the acquisition and maintenance of natural vegetated habitat to compensate for documented and projected habitat losses. However, PG&E has not provided the Commission with evidence that the potentially affected wetland acreage has been included in the compensation program. Therefore, the conclusions of the SJVHCP EIS/EIR do not apply.

In the context of the project-level evaluation of the Northern San Joaquin Project, the details regarding the location of sensitive biological resources, including state and federally protected wetlands, were mapped. While PG&E's O&M activities in the San Joaquin Valley are covered under the SJVHCP, these activities associated with the Project are part of the "whole of the action" for CEQA purposes that were therefore analyzed as such in the Final EIR, as required under CEQA. The conclusion in the Final EIR that impacts on state and federally protected wetlands would be less than significant with implementation of Mitigation Measure BIO-3 assumes that wetlands adjacent to Project components are avoided for all activities under the whole of the action, including O&M.

[74] SJVHCP EIS/EIR at 5-16.

Therefore, we do not find that PG&E's second requested revision to omit O&M activities from Mitigation Measure BIO-3 is reasonable and decline to adopt it. However, we revise the measure to emphasize that only O&M activities that would result in ground disturbance are included.

We revise Mitigation Measure BIO-3 as discussed above and incorporate the revisions in the MMRP adopted in the Commission's order.

3.2.4. Overriding Considerations

CEQA requires that a public agency not approve a project that has significant and unavoidable environmental impacts unless it determines that there are overriding considerations that merit project approval despite those unmitigable environmental impacts. PG&E asserts a finding of overriding considerations is not required for approval of the Northern San Joaquin Project because the Final EIR has determined that the Project will not result in any significant adverse environmental impacts with implementation of the mitigation measures identified in the Final EIR.[75]

We find that the issue of overriding considerations is not required for approval of the Project because it will not result in any significant adverse environmental impacts with the implementation of the mitigation measures.

3.3. Final EIR Compliance with CEQA

Pursuant to CEQA Guidelines Section 15090(a), prior to approving a project the Commission must certify that the Final EIR has been completed in compliance with CEQA, that the decision-making body reviewed and considered

[75] PG&E Opening Brief at 30.

the information contained in the Final EIR prior to approving a project, and that the Final EIR reflects the lead agency's independent judgment and analysis.

PG&E asserts that the record shows that the Final EIR for the Northern San Joaquin Project was completed in compliance with CEQA. It states that the Commission's Energy Division complied with the requirements of CEQA in the EIR scoping process, and in preparation of the Draft EIR and Final EIR.[76] PG&E notes that the public had notice and opportunity for public comment on the scope of the environmental review as well as the Draft EIR itself, which was circulated for public review and comment beginning on December 10, 2024.

PG&E indicates that the Final EIR was issued on August 11, 2025, and responds to all comments made on the Draft EIR, as required by CEQA. It emphasizes that the Final EIR is consistent with CEQA because it: (1) examines the environmental impacts of the Project and three alternatives, including the No Project Alternative; (2) identifies their potential significant environmental impacts and the mitigation measures that will avoid or lessen them below the level of significance and (3) identifies the environmentally superior alternative pursuant to CEQA.[77]

The Commission has reviewed and considered the information contained in the Final EIR. We find that the record shows that Final EIR reflects the Commission's independent judgment and analysis. The Commission's thorough and independent analysis shows that no significant environmental impacts from

[76] *Id.* at 32.

[77] *Id.* at 33.

the Project will remain after the implementation of mitigation measures. We find that the Final EIR is a comprehensive, detailed, and complete document that provides all the information and analysis required by CEQA. Lastly, we find that substantial record evidence supports the Final EIR's findings and certify that the Final EIR was completed in compliance with CEQA.

3.4. The Maximum Reasonable and Prudent Cost of the Project

Pursuant to Public Utilities Code Section 1005.5, when issuing a CPCN authorizing new construction, the Commission must specify a maximum reasonable and prudent cost for projects with costs over $50 million.

PG&E requests that the Commission establish a maximum and reasonable cost for the Northern San Joaquin Project of $198,815,305, which includes a 14 percent contingency ($24,200,000).[78] It affirms that, consistent with Public Utilities Code Section 1005.5, the cost estimate considers "the design of the [P]roject, the expected duration of construction, the estimated effects of economic inflation and [P]roject-specific construction considerations."[79] PG&E states that its cost estimate reflects 2025 costs, including equipment and material, labor rates and anticipated labor hours, borrowing costs and low-cost measures to reduce magnetic field exposure.[80]

PG&E's construction cost estimate for the Project was developed by breaking the Project into six major components (three related to transmission line

[78] *Id.* at 34.

[79] *Id.* at 37.

[80] *Id.* at 34.

work and three related to substation work) and then preparing a detailed cost estimate for each major component using a "bottom up" approach.[81] Each component's cost estimate includes primary cost categories, secondary cost categories, and contingencies.

Primary costs include: (1) internal services, (2) material, (3) contracts and (4) other.[82] Primary costs were "developed by [PG&E's] project engineering team using their expertise and professional judgment to determine the amount of labor, materials and equipment, professional services, land acquisition, agency fees and other expenditures that must be utilized or incurred to construct the Project."[83]

Secondary costs include overhead costs associated with materials and equipment, escalation of labor costs, and allowance for funds used during construction (AFUDC). PG&E determined secondary costs by using formulas established by its accounting and finance departments.

Contingency is the last category of costs included for each major Project component. PG&E specifies that a contingency represents "a combination of the uncertainty in the cost estimate and the risk that key conditions for Project completion will not occur" and that its contingency formula is developed based on input from "multiple PG&E departments that are key stakeholders in PG&E's

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[81] *Id.* at 35.

[82] *Ibid.* (The "other" category captures costs not included in the other primary categories, such as fees paid to state and local agencies for permits, licenses and environmental monitoring costs, and fees for outside legal counsel.)

[83] Exhibit PG&E-3 at 8.

comprehensive risk management strategy."[84] It asserts that the proposed contingency of 14 percent is reasonable and at the low end of the reasonable range established by Commission precedent.[85]

PG&E acknowledges that the current cost estimate is higher than the original estimate submitted in in September 2023, but emphasizes that the increases are due to "changes in the market for labor and materials, increased duration to complete construction of the Project, significant price increases for certain materials and equipment such as high voltage circuit breakers, switches and steel structures, and an increase in the AFUDC."[86] It argues that the Commission has previously approved revised cost estimates that were higher than estimated in the application due to factors outside of its control.

We find PG&E's cost estimate for the Northern San Joaquin Project is reasonable and authorize a maximum reasonable and prudent cost of $198,815,305, which includes a 14 percent contingency. This cost cannot be increased absent significant changes to the Project or to project costs that cannot be anticipated at this time. Pursuant to Public Utilities Code Section 1005.5(b), after the CPCN is issued but prior to any expenditure in excess of the maximum reasonable and prudent cost, PG&E may file a Petition for Modification for an increase in the reasonable and prudent maximum cost specified in this decision. The Commission may authorize an increase in the maximum reasonable and

[84] PG&E Opening Brief at 37.

[85] *Id.* at 38.

[86] *Ibid.*

prudent cost if it finds and determines that the cost has in fact increased and that the present or future public convenience and necessity require construction of the Project at the increased cost; otherwise, it shall deny the application. Further, we expect PG&E to secure the Commission's approval of the Petition for Modification prior to seeking recovery of costs in excess of the maximum reasonable and prudent cost established in this decision.

3.5. Community Values

When considering a CPCN, the Commission must evaluate, pursuant to Public Utilities Code Section 1002(a)(1), what, if any, community values are affected by a project. The concept of community values is not strictly defined in statute and is somewhat fluid.[87] As part of its evaluation of community values, the Commission considers the views of the community and elected officials. In this application, the community commented that the Commission should consider preservation of agricultural lands, development of local agritourism and promotion of reliable electric service at a reasonable cost to support economic development.

PG&E indicates that the Final EIR considered the community values in its analysis and found that the Northern San Joaquin Project will have a minimal or no impact on community values with the implementation of the mitigation measures specified in the Final EIR.

As to agricultural resources, the PG&E asserts that the Final EIR found that the impacts will be less than significant after implementation of mitigation

[87] D.21-08-007 at 17; D.10-12-025 at 8.

measures. It emphasizes that the Final EIR found that construction activities would not: (1) convert "Important Farmland"[88] to nonagricultural use, (2) change the characteristics of the physical environment that support "Important Farmland", (3) conflict with existing zoning or Williamson Act contracts or (4) discourage agritourism due to diminished scenic quality or recreational opportunities.[89] PG&E contends that it has taken additional measures to ensure that the agricultural resources are not adversely impacted, including working with the Farm Bureau to minimize impacts on agricultural lands and develop an Agricultural Community Communication Plan.[90]

PG&E states that the Final EIR also considered potential impacts on agritourism in its evaluation of impacts on public services, recreation, and aesthetics, finding that the Project would not substantially impact the characteristics of the area that affect the value of commercial wineries and related recreational opportunities in the Lodi wine region. Additionally, it notes that the Final EIR found that any aesthetic impacts will be less than significant after the incorporation of the applicant proposed measures (APMs) proposed by PG&E and the best management practices proposed by Lodi Electric Utility.

PG&E argues that the Northern San Joaquin Project will support the community values of reliable electric service at a reasonable cost and economic development. It emphasizes that the Project will improve electric capacity and

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[88] Important Farmland is designated based on physical properties, including water supply, soil quality, and topography. (Final EIR at 2-76.)

[89] PG&E Opening Brief at 40.

[90] *Ibid.*

reliability for approximately 38,000 PG&E and Lodi Electric Utility customers in northern San Joaquin County. PG&E cites to testimony from the City of Lodi that the Project supports its goals for reliability, resiliency, affordability, and sustainability.[91] It also maintains that the Project's objectives to provide reliable electric service and accommodate projected increases in electrical demand are both consistent with San Joaquin County General Plan's economic development goals, which include the expansion of communities to meet existing and future residential needs and development of a diverse mix of business and industries for a balanced local economy. PG&E stresses that the achievement of these goals requires sufficient and reliable electrical service.

The City of Lodi asserts that the Northern San Joaquin Project will benefit the affected communities and aligns with their community values. The City of Lodi states that the Project is consistent with the its adopted Strategic Vision and the broader plan of the San Joaquin Valley and associated areas.[92] It emphasizes that community values include the outreach and services that the City of Lodi provides to its residents through its Community Benefit Programs, which help ratepayers address affordability challenges, implement energy efficiency and conservation programs, and transition to full electrification where feasible. The City of Lodi also contends that the Project supports community values of sustainability and economic development by enabling the provision of reliable electric service in the area and accommodating projected increases in electrical

[91] *Id.* at 42.

[92] City of Lodi Opening Brief at 9.

demand.[93] It states that the Project, in conjunction with the related Lodi Electric Utility improvements to its electric system, will also improve voltage stability and provide a substantial capacity increase.[94]

The Farm Bureau indicates that community values regarding agriculture will be supported by the Agricultural Community Communication Plan developed jointly by the Farm Bureau and PG&E to augment mitigation plans addressing impacts to agricultural resources. It states that the Agricultural Community Communication Plan is designed to be phased to match Project construction milestones.[95] The Farm Bureau emphasizes that the Agricultural Community Communication Plan will promote ongoing outreach to the community to streamline the process for impacted parties to connect with those at PG&E and designating a PG&E representative to serve as a primary point of contact for landowners and agricultural stakeholders.[96]

We find that the record in this proceeding supports that the approval of the Northern San Joaquin Project will not have significant adverse effects on community values. Although there may be disruption to the local area community due to construction, this disruption will be limited in scope and short-term in nature. Moreover, the Project will benefit the community due to

[93] *Ibid.*

[94] *Ibid.*

[95] Farm Bureau Reply Brief at 4.

[96] *Ibid.*

increased employment, tax revenues, economic development as well as the improved reliability and capacity of the electric grid in the area.

3.6. Impacts on ESJ Communities

The Commission must consider the Northern San Joaquin Project's impact on ESJ communities. The Commission's ESJ Action Plan provides guidance for implementing the Commission's policies regarding environmental and social justice. The ESJ Action Plan defines ESJ communities as "predominantly communities of color or low-income communities that are underrepresented in the policy setting or decision-making process, subject to a disproportionate impact from one or more environmental hazards, and are likely to experience disparate implementation of environmental regulations and socioeconomic investments in their communities."[97] The ESJ Action Plan includes nine goals that are intended to ensure equity in Commission programs and services.

PG&E argues that the record demonstrates that the Project will not have any significant impact on ESJ communities and will not impact the achievement of any goals in the Commission's ESJ Action Plan. It specifies that the Final EIR confirms that the Project will not have any significant adverse environmental impacts with the implementation of the mitigation measures identified in the final MMRP. PG&E asserts that the Project will provide "substantial long-term benefits to ESJ communities through improved electrical reliability, which is essential for cooling during heat events, powering medical equipment, and

[97] ESJ Action Plan, version 2.0, at 2 (available at: esj-action-plan-v2jw.pdf).

maintaining other essential services."[98] It also indicates that communities in the vicinity of the Project, including ESJ communities, may benefit economically due to construction expenditures and increases in tax revenues.

PG&E maintains that the Northern San Joaquin Project will further the achievement of ESJ Action Plan Goals 1, 2, 4, and 7.

Goal 1 is to consistently integrate equity and access considerations throughout Commission regulatory activities. PG&E states that Goal 1 has been achieved through its engagement throughout the development of the Project with affected local communities and Native American tribes to encourage input and participation in the approval process. It emphasizes that it kept the public informed and engaged them in an equitable and meaningful way throughout the process.[99]

Goal 2 is to increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health. PG&E argues that Goal 2 is furthered because the Project will provide additional electric capacity and increase reliability for nearby ESJ communities, including in the City of Lodi. It indicates that this additional capacity and reliability will help achieve state clean energy goals, which will improve air quality and public health for ESJ communities in the City of Lodi and the Project's area.[100]

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[98] PG&E Opening Brief at 44.

[99] *Id.* at 45.

[100] *Ibid.*

Goal 4 is to increase climate resiliency in ESJ communities. PG&E contends that Goal 4 is furthered by providing additional capacity to the electric grid in the City of Lodi that will help provide critical reinforcement of the electric grid to power homes and businesses. It states that this improved electrical system reliability will increase climate resiliency in ESJ communities by improving access to reliable electrical power during extreme climate events.

Goal 7 is to promote high road career paths and economic opportunity for residents of ESJ communities. PG&E indicates that Goal 7 is met because construction of the Project "will enable economic development in the City of Lodi and San Joaquin County and is likely to spur economic opportunities and benefits for communities within these areas, including ESJ communities."[101]

We find that the approval of the Northern San Joaquin Project is consistent with the goals of the Commission's ESJ Action Plan and will not adversely impact ESJ communities. Goal 1 is met because equity and access considerations were consistently integrated throughout the development and regulatory approval process. Goal 2 is met because approval will increase investment in clean energy resources that will benefit ESJ communities by improving local air quality and public health. Goal 4 is met because the Project will enhance climate resiliency for local ESJ communities. Goal 7 is met because approval will enable the creation of high road careers and increased economic opportunity for residents of ESJ communities.

[101] *Id.* at 46.

3.7. EMF

The Commission must evaluate whether the Northern San Joaquin Project was designed in compliance with the Commission's policies governing the mitigation of EMF effects using low-cost and no-cost measures.[102] Section X(A) of GO 131-D requires that applications for a CPCN include a description of the measures taken or proposed by the utility to reduce the potential exposure to EMF generated by a 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. D.06-01-042 determined that only no-cost EMF mitigation measures are required for projects located in agricultural or undeveloped areas except for permanently occupied residences, schools or hospitals located on those lands.[103]

PG&E asserts that the record demonstrates that the Project is designed in compliance with the Commission's policies governing the mitigation of electromagnetic field effects using low-cost and no-cost measures. It indicates that it evaluated no-cost and low-cost EMF mitigation measures because the Project is located in agricultural areas, but is near some residences. The measures PG&E will implement include: (1) raising the height of the poles or towers that support the conductor by ten feet in residential areas and (2) phasing circuits to reduce the level of magnetic field.[104] PG&E maintains that its

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[102] D.06-01-042 at 19.

[103] *Id.* at 20.

[104] PG&E Opening Brief at 47 to 49.

measures are designed in compliance with the Commission's EMF guidelines because "the low-cost measures are within the four percent benchmark, and the low-cost and no-cost measures will achieve incremental magnetic field reductions greater than fifteen percent at the edge of the utility right-of-way."[105] It also states that the no-cost measures are already incorporated into the Project's design.

We find that PG&E has complied with the Commission's policies governing the mitigation of EMF effects. The Northern San Joaquin Project is in an agricultural area, so PG&E's inclusion of no-cost and low-cost measures is consistent with Commission requirements. We find the measures included in the Field Management Plan satisfy the Commission's requirements.

4. 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 Northern San Joaquin Project, so long as such minor project refinements are located within the geographic boundary of the study area of the Final EIR and do not: (1) result, without mitigation, in a new significant impact based on the criteria used in the Final EIR; (2) substantively 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

[105] *Ibid.*

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 today's 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 mitigation measures or APMs, 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.

5. 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. Six comments were submitted addressing concerns about the cost and safety implications of the Project as well as the CEQA process and the siting of the Project.

6. 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. We also grant judicial notice to the SJVHCP Final EIS/EIR.

7. Comments on Proposed Decision

The proposed decision of ALJ Marcelo Lins Poirier in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on July 6, 2026 by CFBF and PG&E. No reply comments were filed. We have considered the comments and made modifications as appropriate.

8. Assignment of Proceeding

Karen Douglas is the assigned Commissioner and Marcelo Lins Poirier is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Northern San Joaquin Project was approved in the CAISO's 2017-2018 Transmission Plan and is needed to address reliability and capacity issues identified by CAISO on the existing PG&E 230 kV and 60 kV systems serving northern San Joaquin County in the vicinity of PG&E's Lockeford Substation and PG&E's Lodi Substation.

2. The need for the Northern San Joaquin Project continues to exist.

3. The Northern San Joaquin Project meets the identified system needs by resolving the current low voltage problems and increasing the loading capability of the 230 kV and 60 kV transmission system during normal and peak load conditions.

4. The Northern San Joaquin Project will help accommodate future load growth in the project's area.

5. The Northern San Joaquin Project serves a present and future public convenience and necessity as a reliability-driven upgrade to the transmission system operated by the CAISO.

6. The Northern San Joaquin Project will not result in any significant adverse environmental impacts with implementation of the Final EIR's mitigation measures.

7. The environmentally superior alternative is the No Project alternative.

8. Among the other project alternatives, the Northern San Joaquin Project is the environmentally superior alternative.

9. The mitigation measures in the MMRP are required, with the edits identified for Mitigation Measures BIO-2a, 2b, 2c, 2d, 2f, 2g and 3.

10. The mitigation measures, with the edits identified for Mitigation Measures BIO-2a, 2b, 2c, 2d, 2f, 2g and 3 are feasible.

11. The Commission has reviewed and considered the information contained in the Final EIR.

12. The Final EIR complies with CEQA.

13. The Commission is the lead agency for compliance with the provisions of CEQA. As the lead agency under CEQA, the Commission is required to monitor the implementation of mitigation measures adopted for the Northern San Joaquin Project to ensure full compliance.

14. PG&E proposes a maximum prudent and reasonable cost of $198,815,305, which includes a 14 percent contingency, for the Northern San Joaquin Project.

15. In accordance with Public Utilities Code Section 1002(a), the Commission considered, as a basis for granting the CPCN, community values, recreational

and park areas, historical and aesthetic values, and influence on the environment, and confirms that the Northern San Joaquin Project will not have any significant adverse effects in these areas after mitigation.

16. The Northern San Joaquin Project will not have any significant impacts on ESJ communities and will not impact the achievement of any goals in the Commission's ESJ Action Plan.

17. The Northern San Joaquin Project is in an agricultural area, but there are some residences near the project right-of-way.

18. The Northern San Joaquin Project is designed in compliance with the Commission's policies governing the mitigation of EMF effects.

19. No party currently opposes the Northern San Joaquin Project.

Conclusions of Law

1. The Northern San Joaquin Project serves a present and future public convenience and necessity in accordance with Public Utilities Code Section 1001.

2. A finding of overriding considerations is not required for approval of the Northern San Joaquin Project because it will not result in any significant adverse environmental impacts with implementation of mitigation measures.

3. The Final EIR, with revisions to the MMRP, was completed in compliance with CEQA requirements, and it reflects the Commission's independent judgment and analysis on all material matters.

4. The Commission should adopt the Final EIR in this decision.

5. PG&E should be granted a CPCN to construct the Northern San Joaquin Project in conformance with the MMRP, which is Attachment A to this decision.

6. The Commission's Energy Division should be authorized to 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 boundary of the study area of the Final EIR and do not: (1) result, without mitigation, in a new significant impact based on the criteria used in the Final EIR; (2) substantively conflict with any mitigation measure or applicable law or policy; or (3) trigger an additional discretionary permit requirement.

7. Pursuant to Public Utilities Code Section 1005.5(a), the Commission should adopt a maximum prudent and reasonable cost of $198,815,305, which includes a 14 percent contingency.

8. This maximum reasonable and prudent cost should not be increased absent significant changes to the Northern San Joaquin Project or to project costs that cannot be anticipated at this time.

9. Pursuant to Public Utilities Code Section 1005.5(b), after the issuance of the CPCN but prior to any expenditures in excess of the maximum reasonable and prudent cost, PG&E should be authorized to file a formal Petition for Modification with the Commission for an increase in the reasonable and prudent maximum cost specified in this decision and show that: (a) the cost has in fact increased; and (b) the present or future public convenience and necessity require construction of the Project at the increased cost.

10. The Commission should find that Northern San Joaquin Project will not have significant adverse effects on community values, recreational and park

areas, historical and aesthetic values, and influence on the environment after implementation of mitigation measures.

11. The Commission should find that the Northern San Joaquin Project will not have any significant impacts on ESJ communities and will not impact the achievement of any goals in the Commission's ESJ Action Plan.

12. The Commission should find that the Northern San Joaquin Project is designed in compliance with the Commission's policies governing the mitigation of EMF effects

13. The Commission should grant judicial notice to the SJVHCP Final EIS/EIR.

14. Any pending motions that are not expressly ruled upon by the assigned Commissioner or ALJ to date should be denied.

15. This proceeding should be closed.

O R D E R

IT IS ORDERED that:

1. The Final Environmental Impact Report for the Northern San Joaquin 230 Kilovolt Transmission Project (Project) is adopted as having been completed in compliance with the California Environmental Quality Act, reviewed and considered by the California Public Utilities Commission (Commission) prior to approving the Project. The Final Environmental Impact Report is reflective of the Commission's independent judgment.

2. The mitigation measures and applicant proposed measures included as part of the Final Environmental Impact Report and the revised Mitigation Monitoring and Reporting Program attached to this order as Attachment A are adopted.

3. The application of Pacific Gas and Electric Company (PG&E) for a certificate of public convenience and necessity to construct Northern San Joaquin 230 Kilovolt Transmission Project is granted. PG&E shall comply with the Mitigation, Monitoring and Reporting Program, which is attached to this decision as Attachment A.

4. Pacific Gas and Electric Company shall implement an Agricultural Community Communication Plan developed in consultation with the California Farm Bureau Federation.

5. The maximum reasonable and prudent cost for the Northern San Joaquin 230 Kilovolt Transmission Project is $198,815,305, which includes a 14 percent contingency. This cost shall not be increased, absent significant changes to the project or project costs, that cannot be anticipated at this time.

6. After the issuance of the certificate of public convenience and necessity but prior to any expenditures in excess of the maximum reasonable and prudent cost, Pacific Gas and Electric Company may file a formal Petition for Modification with the California Public Utilities Commission for an increase in the reasonable and prudent maximum cost specified in this decision and show that: (a) the cost has in fact increased; and (b) the present or future public convenience and necessity require construction of the project at the increased cost.

7. Pacific Gas and Electric Company shall submit quarterly project status reports, including cost information, to both the California Environmental Quality Act and Federal Energy Regulatory Commission Electric Costs sections of the California Public Utilities Commission's Energy Division.

8. All outstanding motions filed in this proceeding that have not yet been ruled on are denied.

9. Application 23-09-001 is closed.

This order is effective today.

Dated July 16, 2026, at San Francisco, California.

JOHN REYNOLDS
President
DARCIE L. HOUCK
KAREN DOUGLAS
MATTHEW BAKER
CHRISTINE HARADA
Commissioners

ATTACHMENT A

(Mitigation Monitoring and Reporting Program)

(END OF ATTAHCMENT A)

ATTACHMENT B

(Project Area Map)

(END OF ATTACHMENT B)