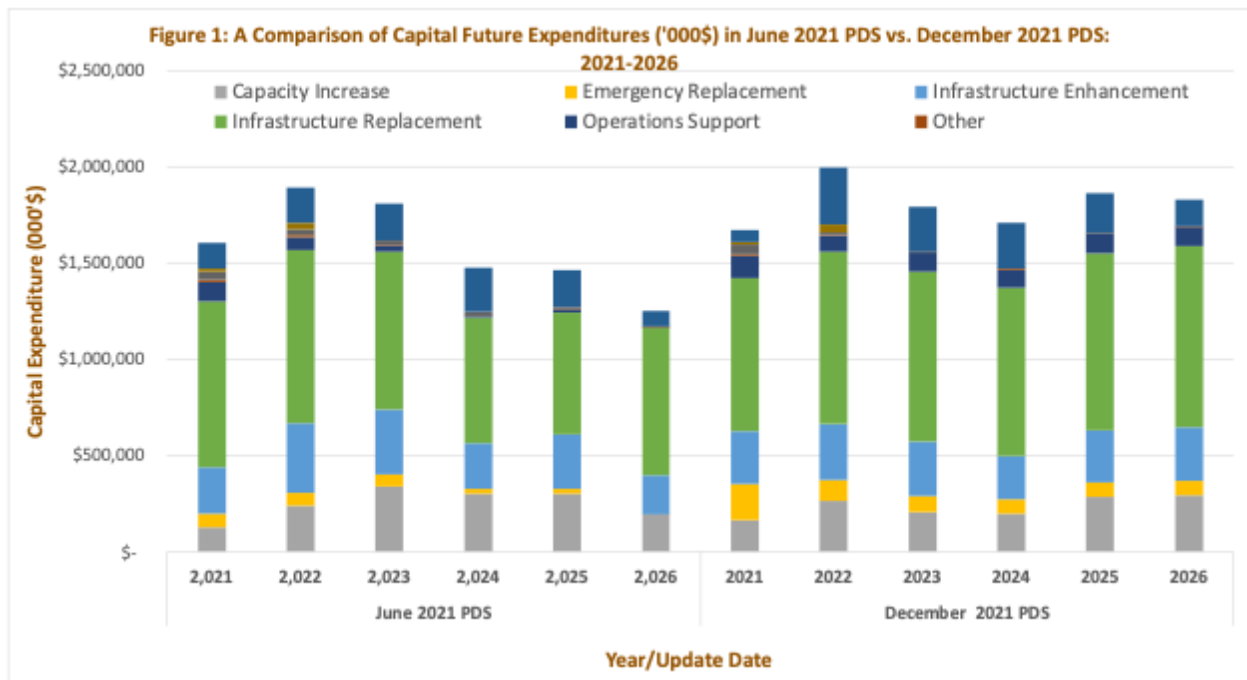


## **BAMx Comments on PG&E’s Submission of Section 3.1 Material**

The Bay Area Municipal Transmission group (BAMx)<sup>1</sup> appreciates the opportunity to comment on Pacific Gas and Electric Company’s (PG&E) December 1, 2021 submission of Section 3.1 Material for the Stakeholder Transmission Asset Review (STAR) Process on PG&E’s FERC-jurisdictional electric transmission projects, involving capital expenditures incurred over the past four years and/or anticipated to be incurred through the next five years.

### **Increase in Certain Categories of Future Capital Expenditure**

In Figure 1 below, BAMx has summarized PG&E’s future expenditure in its latest December 2021 Project Data Spreadsheet (PDS) versus those that PG&E included in its June 2021 PDS.



It appears most of the increase is driven under the “primary Purpose” category of **Infrastructure Replacement** for 2024-2026. A closer inspection indicates that most of the increases in **Infrastructure Replacement** are driven by the “secondary purpose” categories of

- **Age/Condition - T-Line Preventative Maintenance:** A part of it is wildfire-related (Bucket placeholder for HFTD T-line Tag Work), and part of it is not (Bucket placeholder for Non-HFTD T-line Tag Work);
- **Safety - Line Right of Way Access** is wildfire-related.

### **Question 1:**

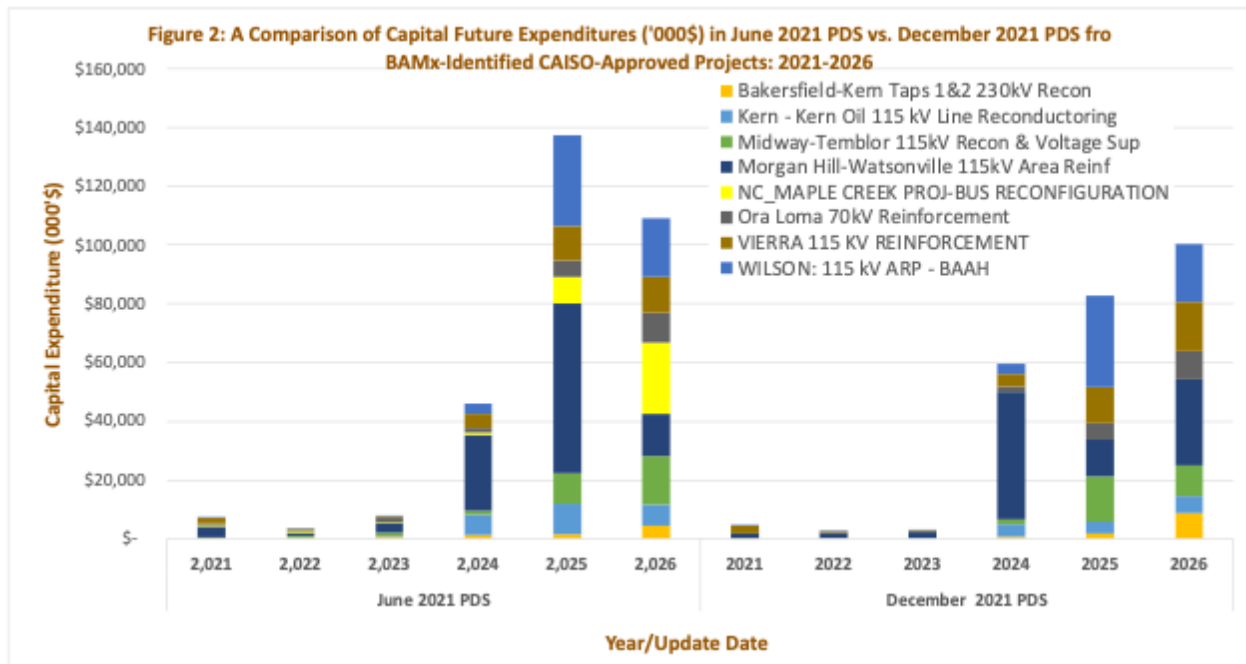
- a. Please provide a background on the maintenance tags.

<sup>1</sup> BAMx consists of the City of Palo Alto Utilities and the City of Santa Clara, Silicon Valley Power.

- b. Please provide the actual quantity and financial expenditures of the maintenance tags for the years 2016 to 2020.
- c. Please describe PG&E’s process of forecasting the quantity and the budgeted amounts under these categories.
- d. Also, please spell out the underlying assumptions and primary drivers for the significant increase in the above two secondary purpose categories.

**Continued Need for the Previously CAISO-Approved Projects**

Figure 2 below summarizes the capital expenditures for the eight (8) CAISO-approved projects that BAMx had questioned the need for in BAMx’s comments in July 2021, which PG&E had subsequently discussed at the August 3, 2021 STAR process stakeholder meeting – and that are also separated by what information was in the June 2021 PDS versus in the December 2021 PDS. Figure 2 shows that one of the projects, MAPLE CREEK: Reconfigure Bus and MAPLE CREEK: Inst Static VAR Compensator (T.0000554) (yellow bar), is no longer part of the December 1, 2021 PDS.



**Question 2:**

- a. Please confirm whether PG&E has canceled the two MAPLE CREEK projects and that PG&E is no longer pursuing them? The June 1, 2021 PDS had indicated that \$5.871 million was spent on the two MAPLE CREEK projects through June 2021. Please identify if there were any additional capital expenses incurred on these two projects through December 1, 2021.

- b. If the MAPLE CREEK projects are now identified under other project names/categories, please specify.
- c. Although the Estimates at Completion (EAC) have not changed significantly for the remaining projects (as shown in Figure 2), the projected capital expenditures for the remaining seven (7) projects are lower comparing the December 1, 2021 PDS relative with the June 1, 2021 PDS, as can be seen in Figure 2. Does this mean that the capital expenditures for these projects are pushed out further into the future (2027 onwards)?

**Capital Expenditures for “On Hold” Projects**

**Question 3:** Table 1 below shows the list of projects in the December 1, 2021 PDS with the project status as “On Hold.” Why are the four projects highlighted in yellow showing capital expenditures for the years 2022-2026, whereas the remaining seventeen (17) are showing none?

**Table 1: “On Hold” Projects**

| Project Name                             |
|--|
| W R -WEEDPATCH (9/119 - WR)              |
| RECONDUCTOR STOCKDALE_MAGUNDEN 115KV     |
| WRJ NONCOMPETITIVE_CPUC LIC/PER          |
| VOLTAGE UPGRADE WHEELER RIDGE_LAMONT 115 |
| RECONDUCTOR KERN PP_STOCKDALE 230KV      |
| VOLTAGE UPGRADE STOCKDALE_LAMONT 115KV   |
| New Midway to Andrew 230kV T-Line        |
| MIDWAY ANDREW_CPUC LIC/PER               |
| Kingsburg-Lemoore 70 kV Line Reconduct   |
| Wheeler Ridge 230kV Station - New BAAH   |
| WRJ COMPETITIVE_CPUC LIC/PER             |
| Magunden 115kV Substation - New BAAH     |
| Stockdale 230kV Substn Ampacity & Relay  |
| CASA LOMA JUNCTION SUBSTATION            |
| CASA LOMA JCT SUBST_COMPETITIVE          |
| New 230/115kV Andrew Substation          |
| VACA DIXON: Install 230 KV Smart Wires   |
| TABLE M - SYCAMORE: Inst SPS             |
| MORRO BAY: Install 230 KV MPAC           |
| Coburn 60kv bus reliability improvement  |
| MORRO BAY: Upgrade 230 KV Bus            |

**Conclusion**

BAMx appreciates the opportunity to comment on the STAR process. BAMx would also like to acknowledge PG&E's willingness to work with the stakeholders in these efforts.

If you have any questions concerning these comments, please contact Paulo Apolinario ([papolinario@svpower.com](mailto:papolinario@svpower.com) or (408) 615-6630).