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Ms. Julia Souder
Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Re: West-wide Energy Corridor Programmatic EIS

Dear Ms. Souder,

Pacific Gas and Electric Company (PG&E) appreciates the continuing opportunity to contribute to the West-wide Energy Corridor Programmatic EIS process. Previous comments were provided for the record on November 28, 2005 regarding corridors within the State of California. This letter will supplement those and previous comments provided to the federal project team by PG&E.

PG&E indicated in our previous comments that there was a need for the federal project team to engage in more interaction with stakeholders and respectfully request that you provide opportunities to work more closely with project team members to discuss in detail stakeholder issues and future plans. The last public forum was in November 2005, and it would be an opportune time to get stakeholders together again to discuss the preliminary corridor maps.

Though PG&E has attempted to identify the appropriate corridors in this proceeding, PG&E's comments are based upon the understanding that the future development or upgrades of energy pipelines and transmission and distribution facilities will be fairly considered for federal permits and environmental reviews, whether or not the locations for such facilities are situated within a designated corridor. It is impossible to determine the needs and most appropriate locations for all potential energy facilities. Siting such facilities is a fluid process, dependent upon external factors including the location of generation, geography, climate, environmental, and historical concerns. For example, California, like many areas of the country, is seeking to enhance its use of renewable generation resources to meet environmental objectives and diversify its resource portfolio. The sites for such renewable resources are potentially remote from load centers and would require expansion of the electric transmission system in order to develop. However, since in many cases such sites have yet to develop, the transmission need does not appear in congestion studies. As other generation sites and transmission needs evolve, the process for the designation of such energy corridors and/or permitting of such transmission lines needs to be flexible so that it can be updated as system needs change.

Congress enacted Section 368 of the Energy Policy Act of 2005 in order to facilitate the necessary expansion of the energy transmission system in order to maximize reliability and efficiency. Refusal or undue delay in considering requests for permits for future projects merely because they would be located outside of a designated corridor would violate the intent of Section 368 and restrict the potentially critical expansion of such transmission. Moreover, as the Notice of Intent for the current process indicated, new proposed project activities, though situated in designated corridors, will be analyzed in separate environmental analyses (70 Fed. Reg. 56647, 56648 (Sept. 28, 2005)). PG&E therefore urges the agencies to maintain and supplement as necessary the procedures by which utilities may expeditiously seek and obtain permits for future projects, whether such projects are located within, partially within, or outside of a designated corridor.

PG&E also requests that the federal project team communicate the process, criteria and decision matrix used to develop the preliminary corridor locations. Several of the corridors proposed by PG&E are either not referenced on the map and/or shown at locations which are not consistent with our future needs. Of specific concern to PG&E is the corridor identified between Topock, AZ and Bakersfield, CA. PG&E had proposed an expanded gas pipeline corridor, parallel to the existing gas transmission pipeline (L-300A&B) system between Topock and Bakersfield. The corridor shown on the draft map parallels Interstate Highway I-40 from the Arizona border towards Barstow near the intersection of I-15, and then heads southwest paralleling I-15 towards Victorville and San Bernardino. PG&E reiterates its request that a corridor be extended westward from Topock to Barstow along the existing pipeline corridor, and then on towards Bakersfield roughly paralleling Highway 58 and the existing pipeline route. PG&E anticipates that possible future expansion of gas supplies from the Rocky Mountains and LNG terminals within SW CA and NW Mexico may create a need to expand the gas pipeline capacity within this utility corridor.

It is unclear why the current corridor width of 3500 feet was selected. Based on our experiences in routing and siting for linear facilities of this nature, we believe that this could be increased to a minimum one mile width to allow adequate room for avoidance of sensitive resources and to maintain sufficient separation of facilities within the corridor so as not to compromise safety, reliability and national security concerns. PG&E would support the use of this standard until such time that a more effective width is identified. The scale of the draft maps makes it difficult to confirm absence of federal lands. Perhaps future maps could be published at a larger scale to compensate for this issue.

In addition, whether proposed corridors are intended for oil, gas, or hydrogen pipeline or electricity transmission or distribution facilities, or some combination thereof will have a significant impact upon the environmental effects of the designation of such corridors and the incorporation into land use plans. To maximize efficient use of resources in studying the proposed corridors and the accuracy and relevance of the environmental reviews, the federal project team should determine which use (or uses) is intended for each proposed corridor. Studies can then be appropriately tailored to the intended use and will most effectively reflect the corresponding environmental impacts.

We recognize that the intent of this action is to designate energy corridors across federal lands. Since any future corridor will ultimately impact private and public lands, including federal lands, PG&E recommends that final mapping be coordinated with the California Public Utilities Commission and the California Energy Commission efforts to establish energy corridors within California. Where possible, locations of these federal corridors across private and public lands should be identified on future maps to provide continuity on the transition between federal land ownership and privately held lands. This

would serve to identify possible points of constraint with local land use policies that may conflict with future utility facilities.

Finally, we would like to reiterate some of the key considerations for these federal corridors, including:

- Provide corridors suitable in terrain and free from physical constraints that prevent cost effective construction and management of utility facilities. Be mindful that underground pipelines have different corridor constraints than overhead electric power lines;
- Provide a mechanism to allow a utility to reserve corridor space;
- Allow perpetual entitlements within future corridors once approved;
- Streamline or simplify environmental and public review; and
- Incorporate existing utility corridors crossing federal lands into this designation process.

Attached for your use is an updated map for PG&E's service area that depicts recommended corridors in their approximate location, with the addition of the following specific new corridor: a 500kV electric transmission corridor from Midway Substation in Kern County to Gregg Substation in Fresno County necessary for future generation sources and bulk system transfers from the Western Electric Coordinating Council.

Sincerely,

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Cc:
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Jim Bartridge – California Energy Commission
Pamela Lacey - American Gas Association
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