

**From:** [Hill, Shannon](#)  
**To:** [Hillary Gitelman](#); [Karl Heisler](#); [Linda S. Peters](#)  
**Cc:** [Downtown West Project](#); [Keyon, David](#)  
**Subject:** FW: Downtown West (Google) Draft EIR Comments  
**Date:** Tuesday, December 8, 2020 5:20:01 PM  
**Attachments:** [PGE Comments DEIR for Downtown West \(Google\) Proj\\_Final\\_signed.pdf](#)

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Please refer to the attached comment letter on the DEIR from PG&E.

Thank you,

Shannon Hill, Planner

Planning, Building & Code Enforcement | Environmental Review Section

City of San José | 200 East Santa Clara Street

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**From:** Collette, Nicole <NACa@pge.com>  
**Sent:** Tuesday, December 8, 2020 11:37 AM  
**To:** Hill, Shannon <Shannon.Hill@sanjoseca.gov>  
**Cc:** Lambert, Jo Lynn <JLLm@pge.com>; Schexnayder, Mark <MTS2@pge.com>  
**Subject:** Downtown West (Google) Draft EIR Comments

[External Email]

Hello Ms. Hill,

Enclosed are PG&E's comments to the DEIR for the Downtown West (Google) Project.

Sincerely,

***Nicole Collette***

Expert Program Manager

State Infrastructure Projects

Pacific Gas & Electric Company

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December 08, 2020

Cindy Muller  
Director, District Systems & Energy  
1212 Bordeaux Drive  
Sunnyvale, CA 94089

**Re: Pacific Gas and Electric Company (PG&E) Review of the Draft  
Environmental Impact Report for the Downtown West (Google) Project**

Dear Ms. Muller,

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to review the Google Draft Environmental Impact Report (DEIR) for the Downtown West (Google) Project. PG&E provides additional details and comments regarding the PG&E work that will be needed to interconnect and serve electricity to Google's project. The Downtown West (Google) Project is expected to require new transmission-level or distribution-level electric service and upgrades to existing electrical utility facilities. Two options for service are presented in the DEIR.

Since PG&E's facilities are under the jurisdiction of the California Public Utilities Commission's (CPUC), PG&E will need to seek separate authorization from the CPUC in order to construct the necessary upgrades. Permitting for the construction of transmission facilities under CPUC jurisdiction can take a considerable amount of time; however, the CPUC's General Order 131-D provides utilities an exemption from CPUC permit requirements for certain projects that have undergone environmental review by another agency as part of a larger project, such as the Downtown West (Google) Project, and have found less-than-significant impacts from construction of PG&E's facilities. For projects that qualify for the exemption, a much shorter noticing process is required.

To avoid delays and added costs in the CPUC permitting process, PG&E recommends adding the following information to the Google project's environmental analysis in an effort to qualify the interconnection work for an exemption from CPUC permitting. Because the CPUC has control over its own permitting practices, however, PG&E makes no representations as to the adequacy of this information for purposes of CPUC permitting or exemptions.

## **A. Expected Electric Service**

As noted above, two options for service are presented in the DEIR. While both options are discussed in most sections of the DEIR, only the first option is mentioned at page 3.4-20 in the DEIR's Energy chapter. The second option should be added to the analysis in this chapter.

The following paragraphs provide additional detail concerning the two options:

### **Option 1: New 115 kV switching station dedicated to Google**

- **Switching Station:** PG&E would construct a new switching station, dedicated to Google's project, with a 115 kV bus and control room. The 115 kV bus and control room would be housed in a new building located on property within the Google development with adequate land and access rights. The new building is proposed to be approximately 80 feet x 100 feet x 35 feet tall with a basement. It is anticipated to be located next to the Google substation.
- **PG&E 115 kV Transmission Lines:** The switching station would receive 115 kV power from PG&E's El Patio-SJ Station A 115 kV Transmission Line, which would be extended and looped into and out of the proposed switching station building through a new 115 kV bus. The existing overhead transmission line from El Patio Substation would transition from overhead to underground near West San Carlos Street and enter the basement of the PG&E building. The existing overhead transmission line from San Jose Station A would transition underground at or near the southern property line of Station A and also enter the basement of the PG&E building. It is anticipated that the underground routing of the circuits would follow the existing overhead routes until both turn eastward towards the PG&E switching station. PG&E will require equivalent land rights for the underground circuits.

At Google's request, PG&E would place approximately 1,500<sup>1</sup> feet of the existing SJ Station A – SJ Station B Transmission Line underground starting just north of Station A and transitioning back overhead at the northern Project Area boundary. PG&E will require equivalent land rights for the underground circuits.

At the locations where the existing overhead transmission lines transition to underground, a steel monopole transition structure will be required for each circuit. During the final design phase, PG&E will determine if communication and system protection equipment will be required at any or all transition structures.

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<sup>1</sup> Please note that the DEIR indicates "approximately 1,300 feet" (see, e.g., DEIR at 2-57), but PG&E has determined that 1,500 feet is more likely.

The heights of the transition structures will vary as necessary to maintain required ground to conductor clearances. The heights of the two existing towers at West San Carlos Street and at the southern property line of SJ Station A are 135 feet and 90 feet respectively. The heights of the two existing power poles on the SJ A-SJ B lines are 51 feet and 82 feet. The new transition poles will likely have roughly similar heights to the existing structures they replace. The transition structures will require reinforced concrete pier-type foundations approximately six to eight feet in diameter. If communication and system protection equipment are required, a fenced area of approximately 50 feet by 50 feet may be required at any or all the transition structures.

- **115 kV Transmission Lines to New Development:** Two new 115 kV circuits would be constructed from the switching station to provide electrical power to the adjacent Google-owned substation. At the Google substation, transmission-level voltage would be reduced to distribution level to serve the new development. The proposed design is to route these circuits from the basement of the PG&E building underground into the adjacent Google substation.

Minor modifications within the existing El Patio and San Jose Station A substations would be required to support the project.

### **Option 2: Equipment replacement at PG&E's San Jose Station A**

- **Station A:** PG&E would replace the 115 kV, 12 kV and 4 kV buses, three existing transformers, and the existing control room within the existing substation property. The new 115 kV bus and control room would be housed in a new building, and the new 12 kV and 4 kV buses would be housed in metal-clad switchgear buildings. The transformers would be located on outdoor concrete pads. No new property would be required.
- **PG&E 115 kV Transmission Lines:** Station A would continue to be fed from both the El Patio and San Jose Station B 115 kV lines. Substation modifications would be required to align the circuits with the new equipment, and temporary transmission line reroutes would be needed for PG&E to complete construction while continuing to supply electric service to customers in the area.

As described under Option 1, the existing SJ Station A-SJ Station B line would be placed underground between Station A and the northern Project Area boundary, a distance of approximately 1500 feet. New transition structures, related equipment, and equivalent land rights for the underground circuits would be required. (See Option 1 for additional details.)

- **12 kV Distribution Lines to New Development:** Up to four 12 kV circuits would be constructed underground from PG&E's existing substation to

provide electrical power to the Downtown West (Google) Project. PG&E would provide either 12kV service (primary service) that Google could step down in voltage behind the meter at the Google substation, or 120/240/480-volt service (secondary service).

Minor modifications within the existing El Patio and San Jose Station B substations would be required to support the project.

Option 2 has the advantage of not only serving the Downtown West (Google) Project's needs at 12 kV distribution voltage, but also increasing Station A's capacity to serve the area's forecasted increased electrical demand. In contrast, installing a new switching station dedicated to the Google project under Option 1 would serve the Google project's demand but would not increase area electrical capacity to serve other loads. As a result, Option 1 would require PG&E to construct additional facilities at Station A or elsewhere in the area to serve other area demand.

## **B. Comments Applicable to Either Option**

### **1. Large-truck access to PG&E's existing substation**

For either of the options presented, access for large trucks to PG&E's existing San Jose Station A substation would need to be retained in the City's plans. Figures 2.3 and 2.8 indicate that Otterson Street, which is the only vehicular access route into Station A, will be removed and become a pedestrian path. In order to operate and maintain the substation, PG&E requires access to Station A by trucks hauling trailers that may be 50 feet long and require a large turning radius. Adequate access to Station A for large trucks must be accommodated in any plan to remove Otterson Street.

### **2. Spacing Requirements Between Underground Transmission Circuits**

During the engineering phase, the routing of the underground transmission circuits will be determined. PG&E's standard utility practice requires a minimum of 15 feet between parallel circuits to prevent reliability issues due to mutual circuit heating that could impact the ratings of the cables or potential dig-ins hitting both circuits. This standard could most likely impact space and land rights requirements in two locations under Option 1: (1) the extension of the El Patio-San Jose A circuit into and out of the PG&E switching station and (2) the two underground 115kV circuits extending from the proposed switching station to the Google substation.

PG&E looks forward to partnering with Google on this project and appreciates the opportunity to provide comments on the DEIR for the Downtown West (Google) Project.

Sincerely,

*Madeline R. Silva Khan*

Madeline Silva Khan  
Director  
State Infrastructure Projects