

**Record of Categorical Exclusion
for
Pacific Gas and Electric's (PG&E's)
North Dublin-Cayetano Reconductoring Project**

Description of Categorically Excluded Action

The United States Department of Energy (DOE) Title XVII Energy Infrastructure Reinvestment (EIR 1706) Program was established pursuant to the Inflation Reduction Act of 2022, which amended Title XVII of the Energy Policy Act of 2005 to include the EIR Program. The EIR Program provides loan guarantees for projects that either: (1) retool, repower, repurpose, or replace energy infrastructure that has ceased operations; provided that if the project involves electricity generation through the use of fossil fuels, it is required to have controls or technologies to avoid, reduce, utilize, or sequester air pollutants and anthropogenic emissions of greenhouse gases; or (2) projects that enable operating energy infrastructure to avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases.

The DOE Loan Programs Office (LPO) is considering whether to issue a loan guarantee of a funding facility to Pacific Gas and Electric Company (PG&E) pursuant to its authority under the EIR 1706 Program. In its application, PG&E has identified the North Dublin-Cayetano Reconductoring Project (Project) in Alameda County, California, for inclusion in the funding facility that is the subject of DOE's loan guarantee (the Proposed Action). PG&E may request inclusion of multiple individual projects with independent utility in the funding facility that is the subject of the DOE loan guarantee; accordingly, DOE will complete an environmental review pursuant to the National Environmental Policy Act (NEPA) for these projects prior to their inclusion in the funding facility that is the subject of DOE's loan guarantee.

Project Description

The Project involves reconductoring the underground portion of the North Dublin-Cayetano 230 kilovolt (kV) transmission line to achieve the required capacity requested by an Interconnection Customer. The Project spans approximately 2.8 miles, including eight underground vaults accessed via manholes, from PG&E's Cayetano substation to PG&E's North Transmission Station. The Project is located within a rural, non-incorporated area within Alameda County, north of the City of Livermore, California.

The existing transmission line cables will be accessed via the vaults and pulled from the existing conduit (a protective casing that encapsulates the transmission line) and the new transmission line cables will be installed in the existing conduit lines. The eight vaults located along the 2.8-mile transmission line may require dewatering during work activities. Each work area around the vaults will require a temporary 50-foot by 50-foot space for equipment staging and may require mowing and minor leveling. Minor blading and graveling improvements to existing roadways may be required to access two of the eight vaults. The equipment laydown and trailer area is located on previously disturbed/developed PG&E property outside of the Cayetano Substation, and measures approximately 300 feet by 120 feet. Reel storage will be located in an existing graveled area, and measures approximately 250 feet by 70 feet.

LPO's review of the Project in accordance with the Endangered Species Act determined that the Project complies with the 2017 United States Fish and Wildlife Service *Pacific Gas and Electric Company Bay Area Operations and Maintenance Habitat Conservation Plan* (HCP) and accompanying Incidental Take Permit (ITP). The Project is entirely within the HCP boundaries and line reconductoring is an HCP covered activity. Further, the Project will comply with the standard measures from the HCP and ITP. Accordingly, LPO is using the HCP and ITP in support of its Section 7 obligations. An official species list dated June 21,

2024, was evaluated by LPO to determine if additional species that may occur in the vicinity of the Project have been listed since completion of the HCP and issuance of the ITP. LPO determined the Project would have no effect on listed species not addressed in the HCP due to the lack of suitable habitat. Therefore, the Project is not likely to jeopardize the continued existence of federally listed species or destroy or adversely modify designated critical habitat.

In accordance with the National Historic Preservation Act, LPO consulted with the California State Historic Preservation Office (SHPO). The California SHPO concurred with LPO's finding of no historic properties affected for this Project on May 9, 2024. DOE identified federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area. DOE notified the following four (4) federally recognized Tribes to see if they have an interest in the Project: California Valley Miwok Tribe, California; Guidiville Rancheria of California; Tule River Indian Tribe; and Wilton Rancheria. On May 23, 2024, the California Valley Miwok Tribe, California responded that they have no comments or concerns with the Project. In the event of a post-review unanticipated discovery of cultural resources and/or human remains during construction, DOE LPO will determine actions to resolve adverse effects and notify the SHPO, any Tribe that might attach religious and cultural significance to the affected property, and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery, pursuant to 36 CFR 800.13(b)(3).

Number and Title of Categorical Exclusion(s)

The Project is consistent with and covered by DOE categorical exclusions in 10 Code of Federal Regulations (CFR) Part 1021, Appendix B1, Categorical Exclusions Applicable to Facility Operation and Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission. The Project is covered by DOE Categorical Exclusions B1.3 and B4.13.

B1.3 Routine Maintenance

Routine maintenance activities and custodial services for buildings, structures, rights-of-way, infrastructures (including, but not limited to, pathways, roads, and railroads), vehicles and equipment, and localized vegetation and pest control, during which operations may be suspended and resumed, provided that the activities would be conducted in a manner in accordance with applicable requirements. Custodial services are activities to preserve facility appearance, working conditions, and sanitation (such as cleaning, window washing, lawn mowing, trash collection, painting, and snow removal). Routine maintenance activities, corrective (that is, repair), preventive, and predictive, are required to maintain and preserve buildings, structures, infrastructures, and equipment in a condition suitable for a facility to be used for its designated purpose. Such maintenance may occur as a result of severe weather (such as hurricanes, floods, and tornadoes), wildfires, and other such events. Routine maintenance may result in replacement to extent that replacement is in-kind and is not a substantial upgrade or improvement. In-kind replacement includes installation of new components to replace outmoded components, provided that the replacement does not result in a significant change in the expected useful life, design capacity, or function of the facility. Routine maintenance does not include replacement of a major component that significantly extends the originally intended useful life of the facility (for example, it does not include the replacement of a reactor vessel near the end of its useful life). Routine maintenance activities include, but are not limited to:

- (a) Repair or replacement of facility equipment, such as lathes, mills, pumps, and presses;*
- (b) Door and window repair or replacement;*
- (c) Wall, ceiling, or floor repair or replacement;*
- (d) Reroofing;*

- (e) Plumbing, electrical utility, lighting, and telephone service repair or replacement;*
- (f) Routine replacement of high-efficiency particulate air filters;*
- (g) Inspection and/or treatment of currently installed utility poles;*
- (h) Repair of road embankments;*
- (i) Repair or replacement of fire protection sprinkler systems;*
- (j) Road and parking area resurfacing, including construction of temporary access to facilitate resurfacing, and scraping and grading of unpaved surfaces;*
- (k) Erosion control and soil stabilization measures (such as reseeding, gabions, grading, and revegetation);*
- (l) Surveillance and maintenance of surplus facilities in accordance with DOE Order 435.1, "Radioactive Waste Management," or its successor;*
- (m) Repair and maintenance of transmission facilities, such as replacement of conductors of the same nominal voltage, poles, circuit breakers, transformers, capacitors, crossarms, insulators, and downed powerlines, in accordance, where appropriate, with 40 CFR part 761 (Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions) or its successor;*
- (n) Routine testing and calibration of facility components, subsystems, or portable equipment (such as control valves, in-core monitoring devices, transformers, capacitors, monitoring wells, lysimeters, weather stations, and flumes);*
- (o) Routine decontamination of the surfaces of equipment, rooms, hot cells, or other interior surfaces of buildings (by such activities as wiping with rags, using strippable latex, and minor vacuuming), and removal of contaminated intact equipment and other material (not including spent nuclear fuel or special nuclear material in nuclear reactors); and*
- (p) Removal of debris.*

B4.13 Upgrading and Rebuilding Existing Powerlines

Upgrading or rebuilding existing electric powerlines, which may involve relocations of small segments of the powerlines within an existing powerline right-of-way or within otherwise previously disturbed or developed lands (as discussed at 10 CFR 1021.410(g)(1)). Upgrading or rebuilding existing electric powerlines also may involve widening an existing powerline right-of-way to meet current electrical standards if the widening remains within previously disturbed or developed lands and only extends into a small area beyond such as lands as needed to comply with applicable electrical standards. Covered actions would be in accordance with applicable requirements, including the integral elements listed at the start of appendix B of this part; and would incorporate appropriate design and construction standards, control technologies, and best management practices. This exclusion does not apply to underwater powerlines. As used in this categorical exclusion, "small" has the meaning discussed at 10 CFR 1021.410(g)(2).

Per 10 CFR §1021.410 Application of categorical exclusions (classes of actions that normally do not require EAs or EISs), the following clarifications are provided to assist in the appropriate application of categorical exclusions that employ the terms or phrases "previously disturbed or developed" and "small" or "small-scale":

- (1) "Previously disturbed or developed" refers to land that has been changed such that its functioning ecological processes have been and remain altered by human activity. The phrase encompasses areas that have been transformed from natural cover to nonnative species or a managed state, including, but not limited to, utility and electric power transmission corridors*

and rights-of-way, and other areas where active utilities and currently used roads are readily available.

(2) DOE considers terms such as “small” and “small-scale” in the context of the particular proposal, including its proposed location. In assessing whether a proposed action is small, in addition to the actual magnitude of the proposal, DOE considers factors such as industry norms, the relationship of the proposed action to similar types of development in the vicinity of the proposed action, and expected outputs of emissions or waste. When considering the physical size of a proposed facility, for example, DOE would review the surrounding land uses, the scale of the proposed facility relative to existing development, and the capacity of existing roads and other infrastructure to support the proposed action.

Regulatory Requirements defined in 10 CFR § 1021.410(b)

The Proposed Action and related Project activities described above were subjected to an environmental due diligence review by DOE LPO staff to ensure they are consistent with the specific category of actions (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure the requirements of Appendix B were met, LPO staff reviewed numerous project-related documents obtained between March 2024 and July 2024 and participated in several conference calls with PG&E staff to ensure a complete understanding of the activities associated with the Project.

The environmental due diligence review determined that there is no controversy regarding the potential environmental impacts of the Project, and that the actions associated with the loan guarantee would not adversely affect any physical, biological, or socio-cultural resources associated with the deployment of the project. The environmental due diligence review determined the Proposed Action has not been segmented to meet the definition of a categorical exclusion.

The Comment section below is provided for any necessary clarifications concerning the findings listed above. Signature by PG&E’s designated representative in the Corporate Validation section is an indication of PG&E’s concurrence with the findings and determinations presented above.

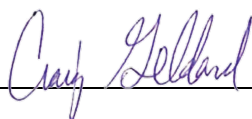
Comment(s)

Corporate Validation

Name and Title (Print):

Craig Geldard, Sr. Manager, Environmental Management

Signature and Date:



9/27/24

Determination

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed EIR Program (EIR 1706) loan guarantee described above, as NEPA Compliance Officer (as prescribed in DOE Policy Directive 451.1), I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR Part 1021 described above, and are hereby categorically excluded from further review under NEPA (42 United States Code 4321, as amended).

DOE will complete a review of any future projects in accordance with NEPA prior to their inclusion in the funding facility that is the subject of the DOE loan guarantee.

Signature and Date

Anna Eskridge, Ph.D.
NEPA Compliance Officer
Loan Programs Office