

October 12, 2015

Christopher Calfee, Senior Counsel  
Holly Roberson, Land Use Counsel  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

RE: Preliminary Discussion Draft of Amendments to the CEQA Guidelines dated August 11, 2015

Dear Mr. Calfee and Ms. Roberson:

Pacific Gas and Electric (PG&E) appreciates the opportunity to submit comments on the Office of Planning and Research's (OPR) August 11, 2015 Preliminary Discussion Draft of Amendments to the CEQA Guidelines (Discussion Draft), and recognizes OPR's tremendous effort in updating the CEQA Guidelines (Guidelines). These comments address additions to the Appendix G checklist that are consistent with OPR's goal of improving the guidelines for a more efficient environmental review process.

**I. Including Gas and Electric Checklist Items in Section XVII of Appendix G Will Help Ensure that Lead Agencies Consider the "Whole of the Action" as required by Existing Law and Streamline the Overall Environmental Review Process.**

Section XVII of Appendix G provides a series of questions concerning potential impacts related to utilities and service systems. We believe it is important to ensure that lead agencies consider whether a project would require natural gas, telecommunications, and electric infrastructure improvements that could cause significant environmental effects as the Appendix already suggests for water, wastewater, and drainage facilities. For example, a lead agency reviewing the environmental effects of a new power plant should take into account the potential impacts associated with electric interconnection facilities that must be constructed in order to interconnect the new power plant to the electric grid, assuming those related projects are sufficiently developed to permit meaningful environmental review. The same is true for lead agencies reviewing highway widening and other projects that may require the relocation of existing utility facilities.

We propose the following addition to Appendix G, Section XVII (existing language in bold, recommended language in italics):

**“Would the project:**

*h) Require or result in the construction of new natural gas, telecommunications, or electric power facilities, or the relocation or expansion of existing natural gas, telecommunications, or electric power facilities, the construction, relocation, or expansion of which could cause significant environmental effects?”*

This addition is consistent with CEQA’s requirement that lead agencies consider the whole of an action, not merely its constituent parts (see CEQA Guidelines sections 15003(h), 15378). The proposed addition would also help streamline permitting and environmental review of related utility projects, consistent with existing authority encouraging tiering from, and reference to, earlier environmental documents where appropriate (see Pub. Res. Code sections 210685, 21093, 21156; CEQA Guidelines section 15152). Incorporating the suggested checklist item will enhance the efficiency of the CEQA process by promoting the full disclosure of potential environmental impacts associated with a project, and by allowing agencies approving related utility projects to avoid unnecessary and duplicative review efforts and the associated costs thereof.

PG&E supports OPR’s effort to fashion a more efficient and effective environmental review process. We appreciate OPR’s commitment to incorporating stakeholder feedback throughout this update of the CEQA Guidelines, and hope you will consider the comments above as you continue this important work.

Sincerely,

/s/

Mark Krausse