



Land Services, 111 Almaden Blvd., Rm. 814, San Jose, CA 95115

July 27, 2011

City of San Jose
Department of Planning, Building and Code Enforcement
200 E Santa Clara St., 1st Floor
San Jose, CA 95113
Attn: John Davidson



RE: Review of Notice of Availability (NOA) of Draft Program Environmental Impact Report (PEIR)
Project: Envision San Jose 2040 General Plan
Citywide- San Jose

Dear Mr. Davidson,

Thank you for the opportunity to comment on the Notice of Availability (NOA) of Draft Program Environmental Impact Report (PEIR) for the above project. PG&E has the following comments to offer:

PG&E owns and operates gas and electric facilities located within the project area. To promote the safe and reliable maintenance and operation of these utility facilities, the CPUC has mandated specific clearance requirements between utility facilities and surrounding objects or construction activities. To ensure compliance with these standards, planners and project proponents should coordinate with PG&E early in the development of their project. Any proposed development plans should provide for unrestricted utility access and prevent easement encroachments that might impair the safe and reliable maintenance and operation of PG&E's facilities.

Developers will be responsible for the costs associated with the relocation of existing PG&E facilities to accommodate their proposed development. Because facilities relocations require long lead times and are not always feasible, developers should be encouraged to consult with PG&E as early in their planning stages as possible.

We would like to note that expansion of utility facilities is a necessary consequence of growth and development. As development occurs, the cumulative impacts of new energy load growth use up available capacity in the utility system. In addition to adding new distribution feeders, the range of electric system improvements needed to accommodate growth may include upgrading existing substations and building new substations and interconnecting transmission line. Comparable upgrades or additions would be required for our gas system as well.

We recommend that environmental documents for proposed development projects include adequate evaluation of cumulative impacts to utility systems, the utility facilities needed to serve those developments, and any potential environmental issues associated with extending utility service to the proposed project. This will assure the project's compliance with CEQA and reduce potential delays to the project schedule.

Please note that continued development consistent with your General Plan will have a cumulative impact on PG&E's gas and electric systems and may require on-site and off-site additions to the facilities that supply these services. Because utility facilities are operated as an integrated system, the presence of an existing gas or electric transmission or distribution facility does not necessarily mean the facility has capacity to connect new loads.

We would like to recommend that environmental documents for proposed project include adequate evaluation of cumulative impacts to utility systems, the utility facilities needed to serve the future developments and any potential environmental issues associated with extending utility service to the proposed project. This will assure the project's compliance with the California Environmental Quality Act (CEQA) and reduce potential delays to the project schedule.

The California Constitution vests in the California Public Utilities Commission (CPUC) exclusive power and sole authority with respect to the regulation of privately owned or investor owned public utilities such as PG&E. This exclusive power extends to all aspects of the location, design, construction, maintenance and operation of public utility facilities. Nevertheless, the CPUC has provisions for regulated utilities to work closely with local governments and give due consideration to their concerns. PG&E must balance our commitment to provide due consideration to local concerns with our obligation to provide the public with a safe, reliable, cost-effective energy supply in compliance with the rules and tariffs of the CPUC.

We would also request that we be copied on future correspondence regarding this subject as this project develops and that we be placed on the list to review the Final Environmental Impacts Report (FEIR).

Should you require any additional information or have any questions, please call me at (408) 282-7544.

Sincerely,



Alfred Poon
Land Rights Services
South Coast Area