



Submitted Comment on Transmission Development Forum

City and County of San Francisco comments on the July 2026 Transmission Development Forum.

The City and County of San Francisco (City) appreciates the opportunity to comment on the materials presented by Pacific Gas & Electric Company (PG&E) at the Transmission Development Forum (TDF) on July 29, 2026.

Martin 230 kV Bus Extension *aka* Egbert 230kV Switching Station

The In-Service Date (ISD) for this project (1415-R-03), approved in the 2014-2015 Transmission Plan with an original in-service date of December 2021, has now moved from the last reported in-service date of October 2028 to December 2029. During the July 29, 2026 TDF meeting, PG&E reported that this additional 13-month slip was attributed to an updated Siemens GIS commissioning duration. This latest change brings the cumulative slip to approximately eight years beyond the project's original in-service date. The City is very concerned about this delay.

Following are CCSF questions regarding the status of this critical project:

1. Delay of 13 months due to a vendor update in commissioning duration suggests that the duration of commissioning exceeds 13 months. Please provide the specifics behind the vendor input—including the prior and revised commissioning durations, the date PG&E received the updated schedule, and whether this is a Martin-specific constraint or a fleet-wide Siemens GIS issue affecting other projects.
2. Also, the TDF note indicated "scope development" as a cause for delay. Please elaborate on this scope development.
3. The July 2026 TDF workbook categorizes the Reason for ISD Change as "Financing" (Delay Resolver: Utility), while the accompanying note and PG&E's verbal explanation cite scope development and a vendor commissioning update. Please reconcile the standardized "Reason for ISD Change from Original Committed Date" categorization with the note and verbal explanation.
4. CAISO determined that this project is needed to meet NERC reliability and CAISO planning requirements, in addition to mitigating critical infrastructure vulnerability. Please describe the actions PG&E has taken, and any interim mitigation measures in place, to assure the reliability of the supply to the City until this critical project is completed.



5. During the July 30, 2026 Transmission Project Review (TPR) stakeholder meeting, PG&E indicated that Egbert will now be used as a supply for a large load increase.
 - a. Please provide scope information for the new large load increase, including timing, amount of load, proximity to the Egbert Switching Station site, special supply requirements, etc.
 - b. Please explain whether, and to what extent, accommodating this new large load connection requires any change to the design or scope of the Egbert 230kV switching station as approved by CAISO.
 - c. Will the new large load customer be charged for the design changes and associated construction required at Egbert to serve this load?
 - d. Could serving this new large load require accelerating construction of the Egbert Switching Station, and if so, how will PG&E accommodate this?
 - e. Please explain how the service to this new large load will impact the project's enhancement of reliability of service to San Francisco. Will the potential new design still enhance the reliability to the City, consistent with the benefits that CAISO identified for the original project?
6. Will additional CPUC permitting approval or environmental review be needed for Egbert as a result of any design or scope changes associated with it? If so, what impact would that have on the project schedule?