

February 2, 2012

Philip Isenberg, Chair
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA, 95814

RE: Comment on Fifth Staff Plan for the Delta Plan EIR

Dear Chair Isenberg and Council Members:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Delta Stewardship Council's (Council) 5th Staff Draft of the Delta Plan Environmental Impact Report (EIR). In general, we support the significant efforts of the Council and the many stakeholders involved to help craft a Delta Plan that meets the co-equal goals of improved water reliability for California and the protection, restoration, and enhancement of the Delta ecosystem. As the owner and operator of gas and electric transmission and distribution facilities within the Delta, as well as many hydroelectric facilities in the upstream tributaries, we have an interest in what occurs in the Delta.

As with any far-reaching new policy affecting multiple stakeholders with historical interest, we respectfully highlight the need for caution in not creating unintended consequences in adopting the Delta Plan. One example of this scenario that has recently come to our attention are potentially significant impacts to the state's energy system and clean energy goals from new flow criteria proposed by the State Water Resources Control Board, which are to be included as part of the final Delta Plan. We urge the Council to further analyze the interrelationships between the state's water and energy systems, and to work closely with agencies involved in forwarding California's ambitious clean energy initiatives while finalizing the Delta Plan and achieving the objectives of the Delta Reform Act.

We appreciate your consideration of our remarks and look forward to continued participation in this important planning process. Please feel free to contact Ian Caliendo at 415-973-0192 or ixc8@pge.com if you have any questions.

Respectfully submitted,



Randy Livingston,
Vice President, Power Generation,
Pacific Gas and Electric Company

CC:

Terry Macaulay, Interim Chief Deputy Executive Officer, Delta Stewardship Council