April 15, 2026

Elizabeth Pritchard, Senior Land Planner
Pacific Gas and Electric Company

Re: CPUC Concurrence with PG&E Minor Project Refinement 3 for the Manning 500/230 kV Substation Project

Ms. Pritchard,

On April 7, 2026, Pacific Gas and Electric Company (PG&E) requested California Public Utilities Commission (CPUC) concurrence with PG&E's Minor Project Refinement 3 (MPR-3) for the Manning 500/230 kV Substation Project (Project). In MPR-3 (see Attachment 1), PG&E proposes the following minor project refinements:

1. Update the project maps to be consistent with the project description as written in Sections 2.6.2 and 2.8.6 of the Final IS/MND, specifically for the temporary work areas around four existing 500 kV towers to be removed;
2. Modify the design of the underbuild crossing of ADSS fiber between Panoche-Manning Tower 4/26 and Manning-Tranquillity Tower 4/22 to underground an approximately 100-foot segment of ADSS fiber optic cable; and
3. Update the project maps to identify the specific location of two underground conduits on the west side of the Tranquillity Switching Station.

Although these activities would have the potential to impact Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Hydrology and Water Quality, Noise and Vibration, and Transportation, these impacts would be consistent with those analyzed in the CPUC's Final Initial Study/Mitigated Negative Declaration (IS/MND), and would be sufficiently addressed by existing measures in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted for the Project. **Therefore, I concur with PG&E's assessment that the activities described in MPR-3 are consistent with the IS/MND measures and would not trigger an additional permit requirement, create a new significant impact, substantially increase the severity of a previously identified significant impact, or conflict with applicable laws or policies, provided that these activities are carried out in accordance with the applicable methods and measures set forth in the Final IS/MND and MMCRP.**

Please feel free to contact me at tommy.alexander@cpuc.ca.gov with any questions or concerns regarding this letter.

Thank you,

Tommy Alexander, Project Manager
California Public Utilities Commission

Attachment 1: Manning 500/230 kV Substation Project PG&E MPR-3 Form

Attachment 1

Manning 500/230 kV Substation Project PG&E MPR-3 Form

Manning 500/230 Kilovolt Substation Project
CPUC Minor Project Refinement (MPR) Form

Minor project refinements *are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact, do not create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.*

CPUC Concurrence

The CPUC ☒ concurs / ☐ does not concur that this Minor Project Refinement will not trigger an additional permit requirement, does not substantially increase the severity of a previously identified significant impact, does not create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and doesn't conflict with any applicable law or policy.

Date of CPUC Concurrence: April 15, 2026

<table>
<tr><td colspan="5">Date Requested: April 6, 2026</td></tr>
<tr><td colspan="3">Report No.: 3</td><td colspan="2">Approval Agency: California Public Utilities Commission (CPUC)</td></tr>
<tr><td colspan="3">Property Owner(s):
Item 1: Cottonwood Farms Inc and Solstice Energy Center LLC
Item 2: Joseph Procacci
Item 3: RE Tranquillity LandCo, LLC</td><td colspan="2">Location/Milepost:
See attached KMZ.</td></tr>
<tr><td colspan="3">Land Use/Vegetative Cover:
Item 1: Avena spp. – Bromus spp. And Amsinckia
Item 2: Agriculture
Item 3: Disturbed</td><td colspan="2">Sensitive Resources:
Agriculture and Forestry Resources
Air Quality
Biological Resources
Cultural and Tribal Cultural Resources
Geology and Soils
Hydrology and Water Quality
Noise and Vibration
Transportation</td></tr>
<tr><td>Modification From:</td><td>☐ Permit</td><td>☐ Plan/Procedure</td><td>☐ Specification</td><td>☐ Drawing</td></tr>
<tr><td></td><td>☐ Mitigation Measure</td><td colspan="3">☒ Other:
Item 1: Construction Plan and Mapping Update
Item 2: Engineering Design
Item 3: Engineering Design</td></tr>
</table>

Proposed Action(s):

Describe how project refinement deviates from current project. Include photos:

Original Condition:

Item 1:

Section 2.6.2 (500 kV Interconnections) of the Final IS/MND includes the following project description:

> *As part of the PG&E 500 kV Interconnections, an approximately 2,500-foot-long segment of two existing PG&E 500 kV transmission lines and approximately four existing transmission line structures would be removed between the interconnection points.*

Section 2.8.6 of the Final IS/MND describes Transmission Structure Removal, including the removal of existing 500 kV lattice steel towers using cranes and helicopters.

Appendix A (Project Element Map) identifies the removal of four existing 500 kV lattice steel towers on Map 4, to the west of the new Manning Substation site. However, the Project Element Map does not identify any Structure Work Areas around these tower removal locations.

Item 2:

Section 2.8.6 (Telecommunications) of the Final IS/MND includes the following project description:

> *Optical ground wire would be installed along the proposed LSPGC 230 kV transmission line and PG&E 230 kV Interconnections. The proposed PG&E 230 kV Reconductoring would reuse the existing optical ground wire.*

The original project scope included the placement of Optical Ground Wire (OPGW) fiber optic cable on the peaks of the Manning-Tranquillity #1 and #2 230 kV line and Panoche-Manning #1 and #2 230 kV line. This OPGW fiber optic cable will interconnect the Manning Telecommunications Yard with PG&E's other surrounding facilities.

At Panoche Junction, the OPGW was designed to transition from the Panoche-Manning 230 kV line (Tower 4/26) to the Manning-Tranquillity 230 kV line (Tower 4/22). Crossing between two transmission lines necessitates lowering this OPGW fiber optic cable from the peak position into an underbuild position and converting the fiber to All Dielectric Self-Supporting (ADSS) fiber optic cable.

Per CPUC General Order 95 clearance tables and PG&E's internal vertical separation rules for transmission and telecommunications circuits, PG&E must account for pollution severity when designing these circuits. Contaminants on ADSS jackets increase electric field stress, corona risk, and tracking/erosion, which in turn affects minimum installation height and separation requirements from energized conductors. Pollution increases the required separation margin because contaminated surfaces lower the 'withstand capability' which is a measure of the ability of equipment to endure high-stress events, such as short circuits or voltage surges, without sustaining damage. PG&E's original design assumed a *medium* level of pollution, due to dust associated with surrounding agricultural land uses.

Item 3:

Section 2.6.2 (Below Grade Conductor/Cable Installations) of the Final IS/MND includes the following project description:

> *Modifications within or directly adjacent to existing switching stations and substations, such as fiber communication, may include underground facilities.*

The specific locations of these underground facilities within or directly adjacent to existing switching stations and substations were in the design and development phase during the writing of this project description. Therefore, Appendix A (Project Element Map) does not identify the locations of these underground facilities.

Proposed Condition:

Item 1:

The project description as written in Sections 2.6.2 and 2.8.6 of the Final IS/MND is accurate. Appendix A (Map 4 of Project Element Map) needs to be updated. This MPR-3 proposes updating the maps to be consistent with the project description related to the necessary temporary Structure Work Areas around four existing 500 kV lattice steel towers to be removed. These Structure Work Areas would be 200' x 200' in size, consistent with Table 2-7 of the Final IS/MND.

Item 2:

During final design reviews, it was determined that this underbuild crossing of ADSS fiber between Panoche-Manning Tower 4/26 and Manning-Tranquillity Tower 4/22 needed to be reevaluated. PG&E engineers applied lessons learned from similar surrounding projects during the final design review and determined that a *heavy* level of pollution should be utilized in the design models, due to increased salts and fertilizers observed in the soil and dust in this region. This increase in pollution category increased the required separation between the ADSS underbuild fiber optic cable and the overhead electric transmission circuits, which would necessitate placing the ADSS fiber optic cable approximately 10 feet above ground level. Since this would not meet safety standards, PG&E proposes to underground this segment of ADSS fiber optic cable.

Specifically, two 4-inch diameter, 100-feet long conduits will be installed side by side between Panoche-Manning Tower 4/26 and Manning-Tranquillity Tower 4/22. One conduit will carry the ADSS fiber optic cable and one conduit will remain empty and serve as a back-up conduit for future maintenance or emergencies. The conduits will be buried to a depth of approximately 36-48 inches, using either direct burial trenching or horizontal directional drilling (HDD). If completed using direct burial trenching, an excavator and backhoe would be utilized to excavate and backfill the trench. If completed using HDD, an HDD rig would be utilized such as a Vermeer D40x55 S3 or Ditch Witch JT32. A backhoe may also be utilized to support the HDD method in order to prepare entry and exit pits. The conduits will be installed in the summer of 2027.

Item 3:

The project description as written in Section 2.6.2 of the Final IS/MND is accurate. Appendix A (Map 4 of Project Element Map) needs to be updated. This MPR-3 proposes identifying the specific location of two segments of underground conduits on the west side of Tranquillity Switching Station.

Specifically, two 4-inch diameter, 34-feet long conduits will be installed side by side between an existing pull box located at 36.592413°, -120.406562° and a new pull box to be installed at the base of the new Manning-Tranquillity tubular steel pole 11/61.

Additionally, two 4-inch diameter, 605-feet long conduits will be installed side by side between the new Manning-Tranquillity tubular steel pole POCO 3 and an existing pull box located just south of Tranquillity Switching Station. This scope will necessitate the installation of two pull boxes.

One conduit will carry the ADSS fiber optic cable and one conduit will remain empty and serve as a back-up conduit for future maintenance or emergencies. The conduits will be buried to a depth of approximately 36-48 inches, using either direct burial trenching or horizontal directional drilling (HDD). If completed using direct burial trenching, an excavator and backhoe would be utilized to excavate and backfill the trench. If completed using HDD, an HDD rig would be utilized such as a Vermeer D40x55 S3 or Ditch Witch JT32. A backhoe may also be utilized to support the HDD method in order to prepare entry and exit pits and install pull boxes. The conduits would be installed in the fall of 2026.

Justification for Change:

Item 1:

This was a simple mapping oversight as the project description in the Final IS/MND is accurate. PG&E seeks to update the mapping to support clear coordination with the field monitoring teams.

Item 2:

In order to meet PG&E's *Overhead Transmission Line Design Criteria* and its ADSS electric field stress analysis requirements, PG&E's design of the ADSS fiber must be revised. It is unsafe to place the fiber optic cable at the height required to mitigate electric field stress, corona risk, and tracking/erosion. Therefore, PG&E proposes to underground the fiber-optic cable.

Item 3:

PG&E's telecommunications scope has progressed since the writing of the Final IS/MND, allowing for more specific mapping to be provided. PG&E seeks to update the mapping to support clear coordination with the field monitoring teams.

This minor project refinement does not result in a new significant impact based on the criteria used in the Final IS/MND; does not conflict with any mitigation measure or applicable law or policy; and does not trigger an additional discretionary permit requirement.

Maps & Figures:

Please see the attached KMZ which shows the Original Condition (Final IS/MND) and the Proposed Modified Condition for each of the items listed above.

Also attached are updated shapefiles of all of PG&E's work areas for ease of coordination with the field monitoring team.

Environmental Impact Summary

Item 1:

This item would make the mapping consistent with the project description analyzed in the Final IS/MND.

All applicable MMCRP measures would be implemented. These additional Structure Work Areas will be incorporated into the necessary pre-construction biological surveys. The existing MMCRP measures would sufficiently address any potential impacts associated with other resource categories.

Item 2:

This item would require up to 0.05-acre of ground disturbance within other existing temporary work areas already accounted for in the Final IS/MND (Structure Work Areas for Manning-Tranquillity Switching Station #1 and #2 230 kV Structure 4/22, Panoche-Manning #1 and #2 230 kV Structure 4/26, and two Pull Sites). Therefore, there is no increase in temporary impacts associated with this item.

Item 3:

This item would require up to 0.29-acre of ground disturbance. However, much of this ground disturbance overlaps with other existing temporary work areas already accounted for in the Final IS/MND (Structure Work Area for Manning-Tranquillity Switching Station #1 and #2 230 kV Structure 11/61 and a Pull Site; Structure Work Area for Manning-Tranquillity tubular steel pole POCO 3 and Tranquillity Switching Station Parking Area). Therefore, there is only a 0.12-acre increase in temporary impacts associated with this item relative to the Final IS/MND.

The following table summarizes potential environmental impacts from MPR-3 to categories identified in the CEQA Appendix G Checklist Sections addressed in the final IS/MND.

MPR-3 would not have the potential to impact the following environmental resource areas and therefore they are not included in the table below: Aesthetics, Energy, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Recreation, Utilities and Service Systems, and Wildfire.

Applicable CEQA Section	Discussion
Agriculture and Forestry Resources	This MPR-3 would not require the conversion of any existing land use on Williamson Contract land. The minimum acreage requirement for Williamson Act would be maintained on all subject parcels. Therefore, the existing MMCRP measures would sufficiently address any potential impacts.
Air Quality	Item 1: There is no change in the release of criteria pollutants by MPR-3. The existing MMCRP measures would sufficiently address any potential impacts. Items 2 and 3:

Applicable CEQA Section	Discussion
	The conduits will be buried using either direct burial trenching or horizontal directional drilling (HDD). If completed using direct burial trenching, an excavator and backhoe would be utilized to excavate and backfill the trench. If completed using HDD, an HDD rig would be utilized such as a Vermeer D40x55 S3 or Ditch Witch JT32. A backhoe may also be utilized to support the HDD method in order to prepare entry and exit pits and install pull boxes. The excavator, HDD rig, and backhoe have been added to the Air Quality Plan required as part of Construction Measure AQ-A documenting the use of EPA Tier 4 requirement. The updated Air Quality Plan is attached to this MPR-3 submittal. PG&E remains in compliance with the requirements of Construction Measure AQ-A, including the requirement that at least 75 percent of off-road diesel-powered construction equipment with a rating between 100 and 750 horsepower will be EPA Tier Level 4.
Biological Resources	Item 1: The removal of four 500 kV towers was included in the Final IS/MND analysis. This proposed map revision will ensure that the applicable MMCRP measures are implemented in these areas. Item 2: This work is occurring within other existing temporary work areas already accounted for in the Final IS/MND. The existing MMCRP measures would sufficiently address any potential impacts. Item 3: Much of this work is occurring within other existing temporary work areas already accounted for in the Final IS/MND The additional 0.12-acre of temporary impacts are within the same landcover type (Disturbed) and area as analyzed in the final IS/MND. The existing MMCRP measures would sufficiently address any potential impacts.
Cultural and Tribal Cultural Resources	The scope items included in this MPR-3 are located entirely within the existing surveyed areas for archaeological and built environment resources. Specifically, these areas were surveyed in 2023 by Paleo West (archaeological), in 2025 by Applied EarthWorks (archaeological), and in November 2025 by JRP Historical Consulting, LLC (built environment). The existing MMCRP measures would sufficiently address any potential impacts.
Geology and Soils	All areas associated with this MPR-3 will be subject to the project SWPPP and Dust Control Plan, which will avoid or minimize erosion during construction and ensure the site is stabilized post-construction.

Applicable CEQA Section	Discussion
	The existing MMCRP measures would sufficiently address any potential impacts to paleontological resources including CM CUL-1, CM CUL-2, and CM PALEO-1.
Hydrology and Water Quality	All areas associated with this MPR-3 will be subject to the project SWPPP which will avoid or minimize erosion during construction and ensure the site is stabilized post-construction.
Noise and Vibration	The work described in this MPR-3 occurs within areas already analyzed under the final IS/MND and would not result in any significant change in that analysis. The analysis included within the final IS/MND adequately assesses all potential impacts.
Transportation	MPR-3 will not change the coordination necessary between surrounding agricultural land use, farm equipment use, and project construction. Existing MMCRP measures would sufficiently address any potential impacts.