



California Public Utilities Commission



January 16, 2026

Clayton Eversen
LS Power Grid California, LLC
Via email: CEversen@lspower.com

Re: Notice to Proceed #1 (NTP-1) for the Manning 500/230 kV Substation Project (A.24-06-017)

Mr. Eversen:

This letter, Notice to Proceed #1 (NTP-1) for the Manning 500/230 Kilovolt (kV) Substation Project (Project), authorizes LS Power Grid California, LLC (LSPGC) to proceed with construction of the Manning Substation, contingent upon compliance with the adopted Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) and the additional conditions specified in this letter, including the documentation of completion of all pending preconstruction requirements (see Attachment 1).

Background

On September 18, 2025, in Decision 25-09-013, the California Public Utilities Commission (CPUC) adopted the Final Initial Study and Mitigated Negative Declaration (IS/MND) for the Project and granted LSPGC a certificate of public convenience and necessity (CPCN) to construct and operate the Project pursuant to Application (A.) 24-06-017. In this decision, the Commission directed LSPGC to comply with the MMCRP, including the applicant-proposed measures and mitigation measures set forth therein. To implement the Project, LSPGC will construct and operate the new Manning Substation as well as the new Manning 230 kV Transmission Line connecting the Manning Substation to the existing Pacific Gas & Electric Company (PG&E) Tranquillity Switching Station. On December 19, 2025, LSPGC submitted a request to the CPUC seeking authorization to proceed with construction of the new Manning Substation (NTP-1). The CPUC understands that LSPGC intends to submit a subsequent request for the activities required to construct and operate the Manning 230 Kilovolt Transmission Line (NTP-2).

The activities authorized by NTP-1 are as follows:

- Construction of the new Manning Substation, including seven 500/230 kV transformer units, two series capacitors, gas-insulated switchgear, access roads, below ground conductor/cable, above-grade structures (e.g., electrical enclosures, poles), telecommunication lines, stormwater detention basin, and ancillary components. Activities include access road construction, site development, below grade construction, above grade construction, testing, and commissioning.
- Use of the Manning Substation property (approximately 40 acres) as a temporary construction staging area for activities including refueling vehicles and construction equipment; equipment assemblage and storage; worker parking and meeting; spreading spoils; and borrow excavation.

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As described in the adopted IS/MND, the Project also includes interconnection facilities and associated work that would be completed by PG&E to interconnect the new LSPGC facilities to the electrical grid. However, PG&E was not an applicant in the A.24-06-017 proceeding. The construction and operation of the PG&E interconnection facilities, though analyzed in the IS/MND as part of the whole of the Project, were not part of the CPUC's application decision and are not subject to this NTP.

This NTP-1 letter documents the CPUC's evaluation of all activities covered in LSPGC's NTP-1 request, including compliance with applicable preconstruction requirements (see the table enclosed as Attachment 1, Status of LSPGC Compliance with MMCRP Measures and Preconstruction Conditions). The evaluation process ensures that all applicant-proposed measures and mitigation measures applicable to the location and activities covered in the NTP are implemented as required by Decision 25-09-013. Upon receipt of this letter, LSPGC is authorized to initiate material deliveries to the Project site, and site preparation and construction activities may begin.

Minor Project Refinements

The Project components described above are consistent with the Final IS/MND and Decision 25-09-013, except for minor design and engineering details that were not available at the time the Final IS/MND was adopted. As part of its NTP-1 request, LSPGC is also requesting minor Project refinements consisting of:

1. The slight reduction of the height of the interlocking substation fence from 10 feet to 8 feet, based on final security requirements; and
2. The use of Westlands Water District agricultural irrigation equipment at the southwestern corner of the substation property's 160-acre parent tract as a nearby source of water for dust control, to be accessed via an existing road along the edge of the larger 160-acre parent tract.

As defined in the MMCRP, modifications approved via the minor project refinement process should be strictly limited to minor Project changes that do not trigger other permit requirements, do not increase the severity of an impact or create a new impact, and clearly and strictly comply with the intent of the mitigation measures. The changes proposed in LSPGC's NTP-1 request comply with the intent of the IS/MND mitigation measures and would not trigger other permit requirements, increase the severity of an impact, or create a new impact. Therefore, the requested modifications to the Project are approved.

Conclusion

LSPGC is hereby authorized to proceed with the construction activities described in its NTP-1 request, provided that all activities are carried out in accordance with the methods and conditions described in the NTP request and this NTP-1, and subject to completion of the following implementing actions by LSPGC prior to the start of construction:

- LSPGC will implement the MMCRP to ensure compliance with all applicable APMs and mitigation measures, compliance plans, and permit conditions during construction activities. Some measures are ongoing and/or have time-sensitive requirements, and LSPGC shall implement



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these measures prior to and during construction as applicable (see Attachment 1). LSPGC will keep copies of the MMCRP, applicable permits, and this NTP at the construction site.

- LSPGC will provide copies of all outstanding State and local permits—e.g., from Fresno County, the San Joaquin Valley Air Pollution Control District (SJVAPD), and the State Water Resource Control Board (SWRCB)—to the CPUC as they are obtained.
- Prior to the start of construction, LSPGC will provide the following outstanding items, listed as “pending” in Attachment 1, to the CPUC:
 - Special-status reptile survey results (Mitigation Measure BIO-3)
 - Special-status and other nesting bird survey results (Mitigation Measure BIO-5)
 - American badger survey results (Mitigation Measure BIO-8)
 - San Joaquin kit fox survey results (Mitigation Measure BIO-9)
- Prior to the start of construction, LSPGC will notify law enforcement and fire protection agencies regarding the timing, location, and duration of construction activities.
- Prior to the start of construction, LSPGC will notify all utilities located within or crossing the Manning Substation facilities to mark and locate existing underground utilities.
- Prior to conducting construction activities under this NTP, LSPGC will conduct a Worker Environmental Awareness Program (WEAP) training for all Project personnel. LSPGC will maintain training logs at the construction site and will make them available upon request.

Please feel free to call me at (213) 266-4748 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Tommy Alexander".

Tommy Alexander

CEQA Project Manager
CPUC Energy Division

cc:

Michelle Wilson, CPUC Energy Division
George Dix, Ascent
Dustin Joseph, LSPGC

Attachment 1: Status of LSPGC Compliance with MMCRP Measures and Preconstruction Conditions

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Attachment 1 – Status of LSPGC Compliance with MMCRP Measures and Preconstruction Conditions

Measure or Condition	Deliverable and/or Required Action	Mitigation Timing	Status of Preconstruction Requirements
Mitigation Measure BIO-3	Special-status reptile survey results	Prior to construction (within 14 days) and, as applicable, during construction	Pending. LSPGC must complete special-status reptile surveys within 14 days prior to construction and provide the results to the CPUC prior to construction.
Mitigation Measure BIO-5 and APM BIO-18	Special-status and other nesting bird survey results and avoidance	Prior to construction and, as applicable, during construction	Pending. LSPGC must complete preconstruction nesting bird surveys and Swainson’s Hawk surveys and provide the results to the CPUC prior to construction.
Mitigation Measure BIO-8	American badger survey results	Prior to construction (within 14 days)	Pending. LSPGC must complete American badger surveys within 14 days prior to construction and provide the results to the CPUC prior to construction.
Mitigation Measure BIO-9	San Joaquin kit fox survey results	Prior to construction (14 to 30 days prior)	Pending. LSPGC must provide the CPUC with the results of its San Joaquin kit fox surveys prior to construction.
APM BIO-5	Vehicle Cleaning	Prior to construction	Pending. LSPGC must implement this measure prior to construction activities.
Mitigation Measure BIO-6	Burrowing owl survey results	Prior to construction	Ongoing. LSPGC provided the survey report on December 18, 2025. However, LSPGC must also submit the results of the take avoidance survey for burrowing owl, which must be conducted no more than 14 days prior to the start of construction.
Mitigation Measure BIO-11	Avian Protection Plan	Prior to construction	Ongoing. LSPGC has provided the CPUC with a copy of the Avian Protection Plan and documentation that LSPGC submitted the plan to the California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS) for approval on November 7, 2025. The CDFW and USFWS did not provide comments by the deadline requested by LSPGC. The CPUC is reviewing the plan for consistency with Mitigation Measure BIO-11.



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APM AES-1	Landowner coordination log	Prior to and during construction	Complete. LSPGC provided the notice to the CPUC on December 19, 2025. Preconstruction requirements are complete, but compliance will continue during construction.
APM AIR-2	Fugitive Dust Control Plan	Prior to construction	Complete. LSPGC provided the plan, and documentation of its approval by the San Joaquin Valley Air Pollution Control District, on January 14, 2026.
Mitigation Measure BIO-1	Special-Status Plant Survey	Prior to construction	Complete. LSPGC provided the survey report to the CPUC on October 9, 2025.
APM BIO-1	Biological Surveys	Prior to construction	Complete. LSPGC provided survey results in the Biological Resources Technical Report (BRTR) submitted with the PEA on June 28, 2024, and in the BRTR Addendum submitted May 29, 2025.
APM BIO-2	Restoration Plan	Prior to construction	Complete. LSPGC provided the plan to the CPUC on October 10, 2025, and the CPUC approved the final version on October 22, 2025.
APM BIO-3; APM CUL-1	Workers Environmental Awareness Program (WEAP)	Prior to and during construction	Complete. LSPGC provided the WEAP on November 11, 2025, and the CPUC approved the final version on November 21, 2025. Preconstruction requirements are complete, but compliance will continue during construction.
APM BIO-4	Pre-construction Plant Surveys	Prior to construction and, if appropriate, during construction	Complete. LSPGC provided the CPUC with documentation of the surveys on October 9, 2025.
APM BIO-7	Giant kangaroo rat survey results	Prior to construction	Complete. LSPGC provided the survey report to the CPUC on December 12, 2025.
APM BIO-9	San Joaquin antelope squirrel survey results	Prior to construction	Complete. LSPGC provided the survey report to the CPUC on December 12, 2025.
Mitigation Measure AQ-1	Construction Equipment Memorandum	Prior to and during construction	Complete. LSPGC provided the memo to the CPUC on November 7, 2025.
Mitigation Measure CR-1	Historical/Built Environment Survey	Prior to construction	Complete. LSPGC provided the survey report on December 18, 2025 And a revised version of the report on January 14, 2026
Mitigation Measure CR-3	Archaeological resource surveys;	Prior to construction	Complete. LSPGC provided the CPUC with documentation of surveys covering the

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	avoid archaeological resources		substation site in the Cultural Resources Technical Report (CRTR) submitted as part of the PEA on June 28, 2024.
APM FIRE-1	Construction Fire Prevention Plan	Prior to construction	Complete. LSPGC provided the plan to the CPUC on November 7, 2025, and the CPUC approved the final version on November 10, 2025.
Regulatory Requirement	Stormwater Pollution Prevention Plan (including dewatering plan)	As required by encroachment permits	Complete. LSPGC provided the CPUC with a copy of its SWPPP application on December 18, 2025, and provided the issued WDID number (5F10C410978) on January 7, 2026.
Regulatory Requirement	Hazardous Materials Management Plan	Prior to construction	Complete. LSPGC provided the plan to the CPUC on November 20, 2025.
APM BIO-10 (superseded by Mitigation Measure BIO-6 for burrowing owl)	Burrow and Den Avoidance	Prior to and during construction	N/A – During construction. If occupied burrows or dens are identified during preconstruction surveys, LSPGC will identify and implement buffers to protect the burrows/dens.
APM BIO-11	Vehicle travel restrictions	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM BIO-12	Trapped animal prevention measures	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM BIO-13	Delineation of work areas	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM BIO-14	Project lighting restrictions	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM BIO-19	Vegetation removal limitations	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM BIO-20	Raptor nest avoidance	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM CUL-3	Inadvertent discovery protocol	During construction	N/A – During construction. LSPGC will implement this measure during construction.

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APM GEO-1	Minimize geological hazards and soil disturbance	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM GHG-1	Minimize greenhouse gas emissions	During construction	N/A – During construction. LSPGC will implement this measure during construction.
APM HAZ-1	Helicopter use protocol	During construction	N/A – During construction. LSPGC will implement this measure during construction.
Mitigation Measure N-1	Noise reduction measures	During construction	N/A – During construction. LSPGC will implement this measure during construction.
Mitigation Measure BIO-2	Blunt-noised leopard lizard survey results	Prior to construction	N/A - Not applicable to NTP-1. LSPGC provided the survey results on December 5, 2025. However, no areas of potential habitat (i.e., annual grasslands) occur within the substation work area.
Mitigation Measure BIO-2	Western spadefoot toad survey results	Prior to construction (within 48 hours) and during, if applicable	N/A - Not applicable to NTP-1. Not required for substation construction since there is no suitable habitat for the species within the planned work area.
Mitigation Measure BIO-7	Crotch’s bumble bee survey results	Prior to construction	N/A - Not applicable to NTP-1. Initial ground-disturbing activities for substation construction will be occurring within the August 15-March 15 timeframe, so a habitat assessment and focused survey for Crotch’s bumblebee is not required. Additionally, the substation construction activities do not contain grassland habitat, grasses, or forbs.
Mitigation Measure BIO-10	Wetland survey/delineation results	Prior to and during construction	N/A – Not applicable to NTP-1. There are no state or federal wetlands in the NTP-1 work area per LSPGC’s NTP-1 request.
APM UTIL-1	Induction Study	Prior to construction	N/A - Not applicable to NTP-1. The induction study is not applicable to the substation components of the project, as no pipelines would be parallel to LSPGC overhead lines within this area, and overhead lines outside of the substation are not subject to this NTP.

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