



California Public Utilities Commission



July 29, 2026

Elizabeth Pritchard, Senior Land Planner
Pacific Gas and Electric Company

Re: CPUC Concurrence with PG&E Minor Project Refinement 5 for the Manning 500/230 kV Substation Project

Ms. Pritchard,

On July 17, 2026, Pacific Gas and Electric Company (PG&E) requested California Public Utilities Commission (CPUC) concurrence with PG&E's Minor Project Refinement 5 (MPR-5) for the Manning 500/230 kV Substation Project (Project). In MPR-5 (see Attachment 1), PG&E proposes the following minor project refinements:

1. Adjusting the mapped locations of 13 transmission structures and associated work areas, pull sites, and permanent disturbance areas for PG&E's 230 kV interconnection transmission line and 230 kV reconductoring work;
2. Removing the triangular staging area and associated access road west of the Tranquillity Switching Station; and
3. Adjusting the mapped locations of certain structure work areas, pull sites, temporary access roads, and a staging/landing zone for PG&E's 500 kV interconnection transmission line.

In total, these activities would result in a 5.418-acre increase in temporary impacts and a 0.014-acre increase in permanent impacts associated with the project. Although these activities would have the potential to impact Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Noise and Vibration, 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-5 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,

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

Tommy Alexander, Project Manager
California Public Utilities Commission

Attachment 1: Manning 500/230 kV Substation Project PG&E MPR-5 Form

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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



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Attachment 1

Manning 500/230 kV Substation Project PG&E MPR-5 Form

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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, will 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, will 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: July 29, 2026

Date Requested: July 17, 2026				
Report No.: 5		Approval Agency: California Public Utilities Commission (CPUC)		
Property Owner(s): Various		Location/Milepost: See attached KMZ		
Land Use/Vegetative Cover: Various		Sensitive Resources: Aesthetics Agriculture and Forestry Resources Air Quality Biological Resources Cultural and Tribal Cultural Resources Geology and Soils Hydrology and Water Quality Noise and Vibration		
Modification From:	☐ Permit	☐ Plan/Procedure	☐ Specification	☐ Drawing
	☐ Mitigation Measure	☒ Other: PG&E Transmission Line Design and Construction Work Plan		

Proposed Action(s):

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

Original Condition:

Item 1: 230 kV Structure Location Shifts

The project mapping included in the final IS/MND included Structure Permanent Disturbance areas, Structure Work Areas, and Pull Sites based on the 60% designs for the “230 kV Interconnections” and “230 kV Reconductoring”, as described in Section 2.6.2 of the final IS/MND.

Item 2: Staging Area Removal

The project mapping included in the final IS/MND included a triangular staging area to the west of Tranquillity Switching Station.

Item 3: 500 kV Interconnections Work Area Shifts

The project mapping included in the final IS/MND included Structure Work Areas, Pull Sites, Landing Zones, and Temporary Access Roads based on the 60% designs for the “500 kV Interconnections”, as described in Section 2.6.2 of the final IS/MND.

Proposed Condition:

Item 1: 230 kV Structure Location Shifts

The IFC designs for the “230 kV Interconnections” and “230 kV Reconductoring”, as described in Section 2.6.2 of the final IS/MND, included minor shifts in 13 structure locations, necessitating shifts in the mapped Structure Permanent Disturbance areas. In some cases, these shifts also necessitated modifying the location of the Structure Work Areas and Pull Sites.

Please see the attached KMZ titled, “Manning_Mapping Revisions_MPR-5_20260716” for a detailed map of “Existing” compared to “Proposed” conditions for the towers and pull sites which changed locations. Existing locations are mapped in shades of pink and red; proposed locations are mapped in shades of green.

The table below summarizes these revisions:

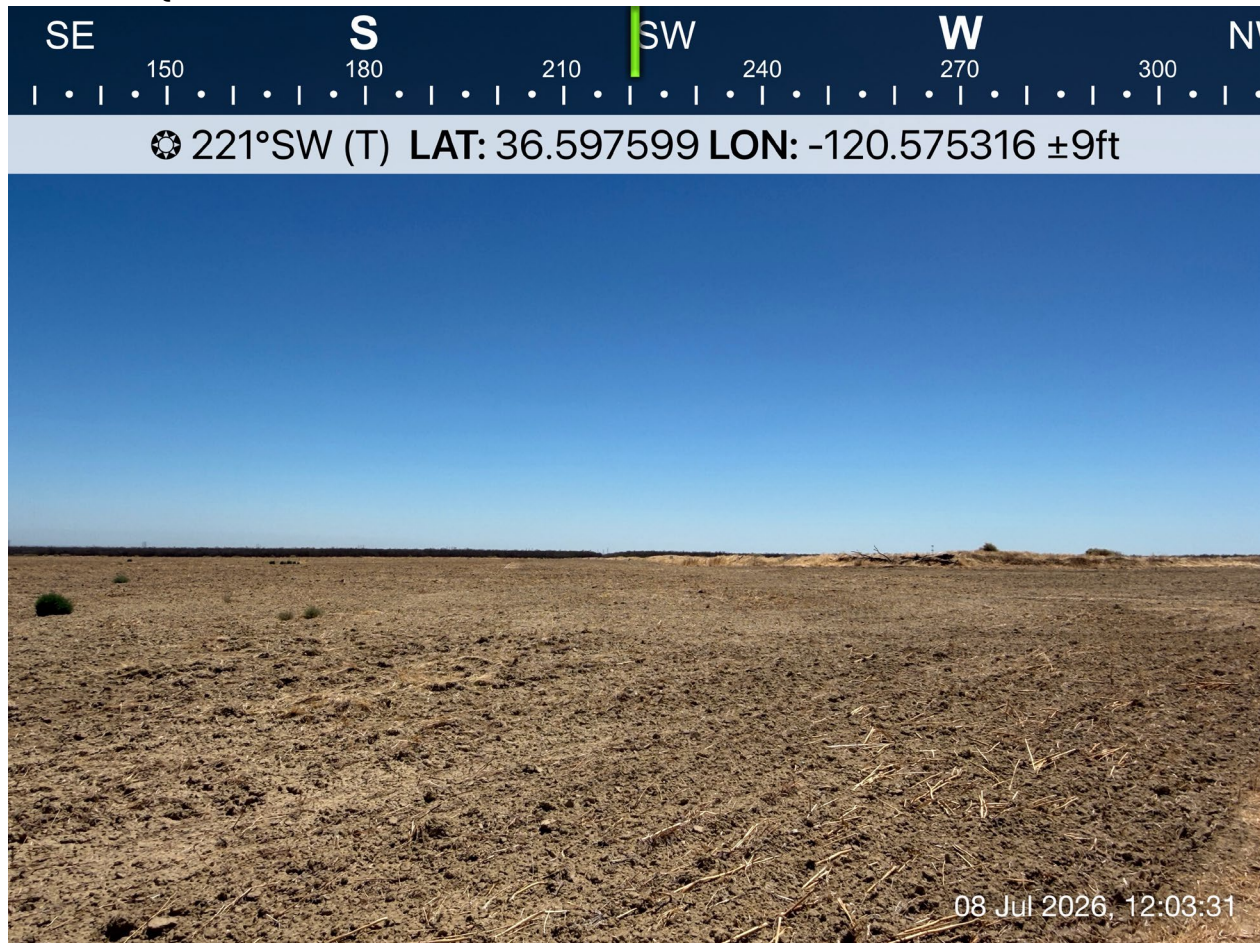
Structure/Pull Site Number	Revision	Landcover	Change in Temporary Impacts (acres)	Change in Permanent Impacts (acres)
230 kV Reconductoring				
5/31 (5/29)	2-pole TSP structure changed to single TSP structure	Agriculture	0	-0.007211 acres
6/38 (7/36)	TSP shifting ~65' to the west	Agriculture	0	0
7/44 (8/42)	TSP shifting ~60' to the west	Agriculture	0	0

10/56 (10/54)	TSP shifting ~55' to the east	Agriculture	0	0
230 kV Interconnections				
5/28	Single TSP structure changed to 2-pole TSP structure	Agriculture	0	+0.007211 acres
7/38	TSPs shifted ~40' to the west	Bromus rubens	0	0
7/39	TSPs shifted ~130' east	Agriculture*	0	0
1/10	TSPs shifted ~80' to the east	Agriculture*	0	0
Pull Site 7/39 NW	Shifted ~130' to the east	Agriculture*	0	0
Pull Site 7/39 NE	Shifted ~30' to the north-west	Agriculture*	0	0
Pull Site 1/10 NW	Shifted ~110' to the east	Agriculture*	0	0
Pull Site 1/10 NE	Shifted ~120' to the north-east	Agriculture*	0	0
Structure Work Area for 7/39	Shifted ~230' to the north-east and reshaped to accommodate new location	Agriculture*	+0.010861	0
Structure Work Area for 1/10	Shifted ~70' to the north-east and reshaped to accommodate new location	Agriculture*	+0.076074	0
0/2	Shifted ~20' to the east	Agriculture	0	0
Structure Work Area for 0/2	Shifted ~35' to the east	Agriculture	0	0
8/47	Shifted ~150' to the north-west	Agriculture	0	0
Structure Work Area for 8/47	Shifted ~150' to the north-west	Agriculture	0	0
8/48	Shifted ~130' to the north-east	Disturbed	0	0
Structure Work Area for 8/48	Shifted ~130' to the north-east	Disturbed and Agriculture	0	0
0/1A	Shifted ~145' to the north and split from one TSP to a two-pole H-frame structure	Disturbed	0	+0.007211 acres
Structure Work Area for 0/1A	Shifted ~145' to the north	Disturbed and Agriculture	0	0

0/1B	Shifted ~200' to the north and split from one TSP to a two-pole H-frame structure	Disturbed	0	+0.007211 acres
Structure Work Area for 0/1B	Shifted ~200' to the north	Disturbed and Agriculture	0	0
Pull Site 8/48 SE	Shifted from NW side of pole to SE side of pole.	Disturbed and Agriculture	0	0
Pull Site 8/48 E	Shifted ~150' to the north	Disturbed and Agriculture	0	0
Pull Site 0/1A SE	Shifted ~160' to the north	Disturbed and Agriculture	0	0
Pull Site 0/1A E	Shifted ~180' to the north	Disturbed and Agriculture	0	0
Pull Site 0/1B SE	Shifted ~220' to the north	Disturbed and Agriculture	0	0
Pull Site 0/1B E	Added, it was an oversight had this pull site was missing in prior map iterations. Part of the pull site overlaps other project temporary work areas.	Disturbed and Agriculture	+1.167418	0
TOTAL			+1.254 acres	+0.014 acres

*This area is mapped as *Amsinckia* and *Atriplex lentiformis* in the final IS/MND. However, the landowner disced this field in May 2026, converting this landcover to Agriculture. Please see Photo 1 below.

Photo 1: Image from July 2026 of disced agricultural field to the east of Interstate 5, which was originally mapped as Amsinckia and Atriplex lentiformis in the final IS/MND.



Item 2: Staging Area Removal

PG&E will no longer use the triangular staging area and associated access road to the west of Tranquillity Switching Station. This results in a 1.426-acre reduction in temporary impacts. Please see the attached KMZ titled, "Manning_Mapping Revisions_MPR-5_20260716" for the location of this staging area.

Item 3: 500 kV Interconnections Work Area Shifts

PG&E reevaluated the construction plan for the 500 kV Interconnection scope of work, given our recent findings of giant kangaroo rat (GKR) within this area. This resulted in modifying the location of the Structure Work Areas, Pull Sites, Temporary Access Roads, and a Staging/Landing Zone. Many of these mapping revisions were simply resizing the mapping to ensure the impact areas were precisely mapped according to the dimensions identified in Table 2-7 of the final IS/MND.

Please see the attached KMZ titled, "Manning_Mapping Revisions_MPR-5_20260716" for a detailed map of "Existing" compared to "Proposed" conditions for the work areas which changed locations. Existing locations are mapped in shades of pink and red; proposed locations are mapped in shades of green.

The table below summarizes these revisions:

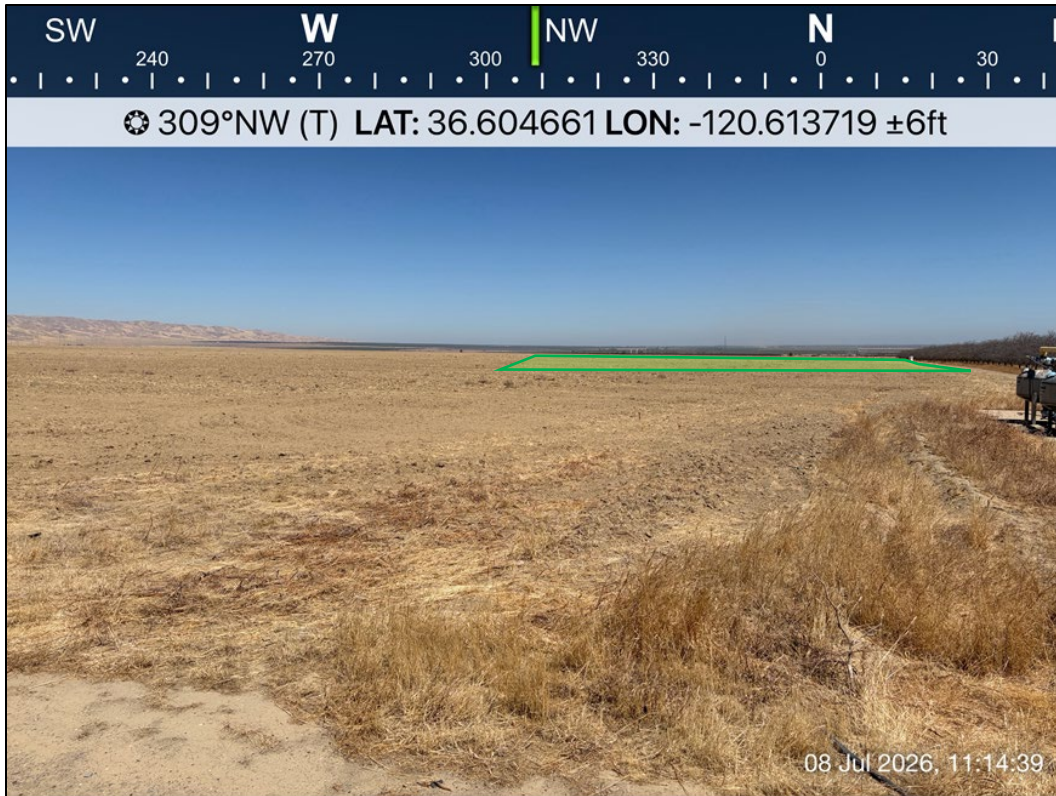
Work Area	Revision	Landcover	Change in Temporary Impacts (acres)
Staging/LZ 38/160	Relocated 0.45-mile to the north east to be outside of GKR habitat. Please see Photo 2 below.	Agriculture	0
PS 38/160A	Shifted 60' south to be centered on alignment.	<i>Avena spp.</i> – <i>Bromus spp.</i>	0
PS 38/160B	Shifted 50' north to be centered on alignment.	<i>Amsinckia</i> – <i>Phacella spp.</i>	0
PS 38/160E-2 N	Shifted 50' north-east to be centered on alignment and resized.	Disturbed	-0.09 (reduced mapped impact area to align with dimensions of Table 2-7)
PS 38/160E-1 N	Added pull site.	Disturbed	3.21 total 1.51 separate disturbance (accounting for overlap with adjacent pull site and structure work area)
PS 38/160E-2 E	Shifted 50' north-east to be centered on alignment and resized.	Disturbed	0.47 (updated mapped impact area to align with dimensions of Table 2-7)
PS 38/160E-1 E	Added pull site.	Disturbed	3.21 total 1.86 separate disturbance (accounting for overlap with adjacent pull site and structure work area)
PS 38/161A-1	Shifted 70' north to be centered on alignment and “squared up”.	Disturbed	-1.6 (reduced mapped impact area to align with dimensions of Table 2-7)
PS 38/161A-2	Added pull site.	Disturbed	3.21 total 1.98 separate disturbance (accounting for overlap with adjacent pull site)
PS 38/161C-1 NE	Shifted 230' southwest to be centered on alignment and resized.	<i>Amsinckia</i> – <i>Phacella spp.</i>	-1.67

			(reduced mapped impact area to align with dimensions of Table 2-7)
PS 38/161C-2 NE	Added pull site.	<i>Amsinckia</i> – <i>Phacella</i> spp.	3.21 total 2.22 separate disturbance (accounting for overlap with adjacent pull site and structure work area)
PS 38/161C-1 W	Shifted 140' north to be centered on alignment and resized.	<i>Amsinckia</i> – <i>Phacella</i> spp.	-1.55 (reduced mapped impact area to align with dimensions of Table 2-7)
PS 38/161C-2 W	Added pull site.	<i>Amsinckia</i> – <i>Phacella</i> spp.	3.21 total 1.9 separate disturbance (accounting for overlap with adjacent pull site and structure work area)
PS 38/162-2	Added pull site.	<i>Amsinckia</i> – <i>Phacella</i> spp.	3.21
PS 38/162-1	Shifted 200' east to be centered on alignment and resized.	<i>Amsinckia</i> – <i>Phacella</i> spp.	-1.9 (reduced mapped impact area to align with dimensions of Table 2-7)
37/158 Structure Work Area	Removed from scope.	<i>Avena</i> spp. – <i>Bromus</i> spp.	-0.32
38/159 Structure Work Area	Removed from scope.	<i>Avena</i> spp. – <i>Bromus</i> spp.	-0.32
38/160A-2 Structure Work Area	Recentered on structures and resized.	<i>Avena</i> spp. – <i>Bromus</i> spp.	0.218
38/160A-1 Structure Work Area	Recentered on structures and resized.	<i>Avena</i> spp. – <i>Bromus</i> spp.	0.32 (accounting for overlap with adjacent pull site and structure work area)
38/160B-2 Structure Work Area	Recentered on structures. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/160B-1 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/160C-2 Structure Work Area	Recentered on structures. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/160C-1 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0

38/160D-2 Structure Work Area	Recentered on structures. Squared up edges of impact area.	Disturbed	0
38/160D-1 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	Disturbed	0
38/160E-2 Structure Work Area	Recentered on structures. Squared up edges of impact area.	Disturbed	0
38/160E-1 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	Disturbed	0
38/161-1 Structure Work Area	Recentered on structures. Squared up edges of impact area.	Disturbed	0
38/161-2 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	Disturbed	0
38/161-A1 Structure Work Area	Recentered on structures. Squared up edges of impact area.	Disturbed	0
38/161-A2 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	Disturbed	0
38/161-B1 Structure Work Area	Recentered on structures. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/161-B2 Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/160A-2 Structure Work Area	Recentered on structures and resized.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0.04 (accounting for overlap with adjacent pull site and structure work area)
38/160A-1 Structure Work Area	Recentered on structures and resized.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0 (changes in temporary disturbance area shape did not create new temporary impacts due to overlap with other pull sites and work area)
38/161 (east, LB-M) Structure Work Area	Recentered on structures. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/161 (west, LB-M) Structure Work Area	Recentered on structures and resized. Squared up edges of impact area.	<i>Amsinckia</i> – <i>Phacella</i> spp.	0
38/162-1 Structure Work Area	Recentered on structures and resized.	<i>Amsinckia</i> – <i>Phacella</i> spp.	-0.642

38/162-2 Structure Work Area	Recentered on structures and resized.	<i>Amsinckia – Phacella spp.</i>	-0.512
39/164 Structure Work Area	Removed from scope.	<i>Amsinckia – Phacella spp.</i>	-0.32
Temporary Access Road to 37/158	Removed from scope.	<i>Avena spp. – Bromus spp.</i>	-0.140295
Temporary Access Road to 38/159	Removed from scope.	<i>Avena spp. – Bromus spp.</i>	-0.284959
Temporary Access Road (A)	Shortened length to account for other mapped work areas. Widened mapped width from 12' to 15' (still within range of Table 2-7 from final IS/MND)	<i>Avena spp. – Bromus spp.</i>	-0.064765
Temporary Access Road (B)	Shifted 60' north to align with center of towers as originally intended. Widened mapped width from 12' to 15' (still within range of Table 2-7 from final IS/MND)	<i>Avena spp. – Bromus spp.</i> <i>Amsinckia – Phacella spp.</i> Disturbed	0.120 (This increase is from the increased 3' of width, accounting for overlap with other work areas.)
Temporary Access Road (C)	Added road, inadvertently left out of prior mapping.	<i>Amsinckia – Phacella spp.</i>	0.521
Temporary Access Road (D)	Adjusted alignment to avoid overlap with certain work areas. Widened mapped width from 12' to 15' (still within range of Table 2-7 from final IS/MND)	<i>Amsinckia – Phacella spp.</i> Disturbed	0.637 (This increase is from the increased 3' of width and revised alignment, accounting for overlap with other work areas.)
TOTAL			+5.59 acres of temporary impact

Photo 2: Image of disced agricultural field to the north of the 500 kV Interconnection scope where the revised Staging/LZ 38/160 (green polygon) will be located.



Justification for Change:

PG&E's design of the transmission line has progressed to IFC status, resulting in final minor shifts in the 230 kV structure locations since the writing of the final IS/MND, allowing for more specific details to be provided. Additionally, PG&E sought to refine and reevaluate the construction plan within areas of sensitive biological habitat around the 500 kV Interconnection scope.

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 titled, "Manning_Mapping Revisions_MPR-5_20260716" for a detailed map of "Existing" compared to "Proposed" conditions. Existing locations are mapped in shades of pink and red; proposed locations are mapped in shades of green.

A revised overall project shapefile, inclusive of these revisions, is provided with this MPR-5 for field monitoring purposes.

Environmental Impact Summary

In total, this MPR-5 would result in a 5.418-acre increase in temporary impacts and a 0.014-acre increase in permanent impacts.

MPR-5 Item	Change in Temporary Impacts (acres)	Change in Permanent Impacts (acres)
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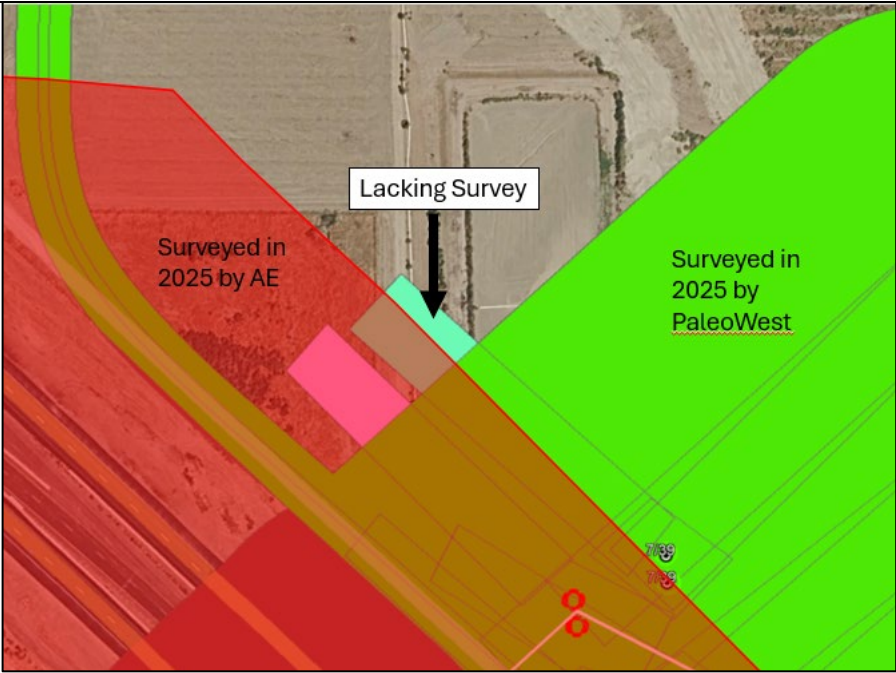
Item 1	+1.254	+0.014
Item 2	-1.426	0
Item 3	+5.59	0
Total	+5.418 acres	+0.014 acres

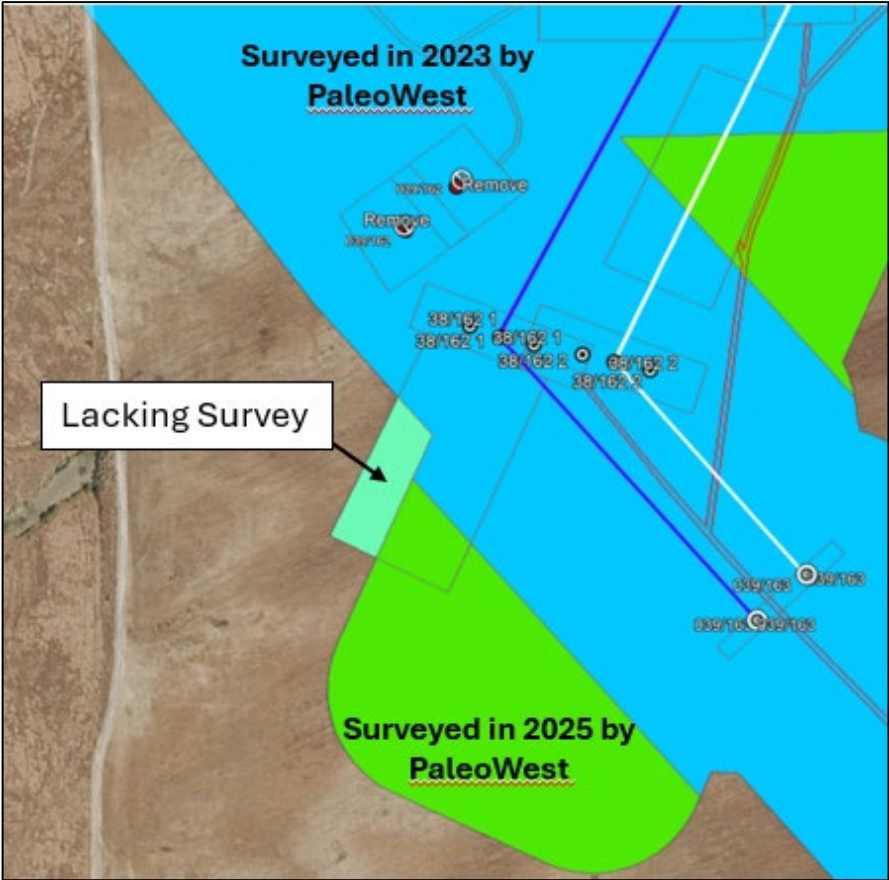
The following table summarizes potential environmental impacts from MPR-5 to categories identified in the CEQA Appendix G Checklist Sections addressed in the final IS/MND.

MPR-5 will not have the potential to impact the following environmental resource areas and therefore they are not included in the table below: 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, Transportation, and Wildfire.

Applicable CEQA Section	Discussion
Aesthetics	The shifting of 13 structures approximately 20 – 200' will not significantly change the analysis for visual impacts as described in the final IS/MND. This scope revision does not move any permanent structures or temporary disturbance areas significantly closer to sensitive visual receptors. Similarly, the shifting of temporary work areas for the 500 kV interconnection scope does not move work areas significantly closer to sensitive visual receptors. Therefore, the existing MMCRP measures would sufficiently address any potential impacts.
Agriculture and Forestry Resources	This MPR-5 would result in a net zero change in permanent impacts to Williamson Contract land. The minimum acreage requirements for Williamson Act contracts would be maintained on individual parcels. Therefore, the existing MMCRP measures would sufficiently address any potential impacts.
Air Quality	There is no change in the release of criteria pollutants by MPR-5. The existing MMCRP measures would sufficiently address any potential impacts.
Biological Resources	Items 1 and 2 are occurring entirely within disturbed or agricultural landcover and will not result in new or more severe environmental impacts than those previously analyzed. The existing MMCRP measures would sufficiently address any potential impacts. Item 3 occurs within a combination of natural landcover types, including grassland habitats, as well as disturbed and agricultural areas. The natural landcover in this portion of the project area provides suitable habitat for the state- and federally listed giant kangaroo rat (GKR). In response to recent GKR findings and to minimize impacts to suitable habitat, PG&E intentionally relocated Staging/LZ 38/160 out of natural landcover and into an existing disced agricultural field. In addition, PG&E eliminated three structure work areas on the existing 500 kV towers north and south of the

Applicable CEQA Section	Discussion
	interconnection lines, further reducing the overall extent of work proposed within suitable habitat. The remaining map revisions are primarily associated with refining the construction plan, aligning work areas with final construction needs, and ensuring that temporary disturbance areas are accurately represented for implementation and field monitoring. Although these revisions result in a net increase in temporary impacts, they are necessary to confirm that the construction plan is feasible, accurately mapped, and consistent with the work methods anticipated in the final IS/MND. All temporary and permanent impacts within GKR habitat would be mitigated either through PG&E's existing San Joaquin Valley Habitat Conservation Plan or through a project-specific Incidental Take Permit. This approach is consistent with Construction Measure BIO-H and would ensure that impacts to GKR habitat are addressed through the appropriate approved mitigation mechanism. Therefore, the revisions would not result in a new or substantially more severe biological resources impact than previously analyzed, and the existing MMCRP measures would sufficiently address any potential impacts.
Cultural and Tribal Cultural Resources	The majority of items included in this MPR-5 are located within existing surveyed areas for cultural resources with three exceptions, listed below. 1. An approximately 115' x 20' portion of the relocated PS 7/39 NW falls outside of the previous archaeological survey coverage (see diagram below). This area was surveyed on July 15, 2026 with negative findings. Results will be provided to the CPUC in a letter report shortly.

Applicable CEQA Section	Discussion
	 2. The relocated Staging/LZ 38/160 falls outside of the previous archaeological survey coverage. This area was surveyed on July 15, 2026 with negative findings. Results will be provided to the CPUC in a letter report shortly. 3. An approximately 120' x 340' portion of the relocated PS 38/162-1 falls outside of the previous archaeological survey coverage (see diagram below). This area was surveyed on July 15, 2026 with negative findings. Results will be provided to the CPUC in a letter report shortly.

Applicable CEQA Section	Discussion
	
Geology and Soils	All areas associated with this MPR-5 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.
Hydrology and Water Quality	All areas associated with this MPR-5 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-5 occurs within general areas already analyzed under the final IS/MND and will not result in any significant change in that analysis. The relocation of Staging/LZ 38/160 shifted the helicopter landing zone from approximately 1.4 miles to approximately 1 mile from a house structure of unknown occupancy status located at 36.605027°, -120.596009°. Although this change would place helicopter landing and takeoff activity approximately 0.4 mile closer to the structure, the receptor would remain approximately 1 mile from the revised landing zone. At this distance, temporary and intermittent helicopter-related noise would continue to attenuate substantially before reaching the

Applicable CEQA Section	Discussion
	receptor and would not be expected to result in a meaningful increase in perceived noise levels compared with the condition analyzed in the final IS/MND. The relocation would not introduce a new type of noise-generating activity, increase the duration or intensity of helicopter use beyond what was previously evaluated, or place staging activities in proximity to a concentration of sensitive receptors. Therefore, the reduced distance to this isolated structure would not substantially increase the severity of a previously identified noise impact or create a new significant noise impact. The analysis included in the final IS/MND adequately evaluates the potential noise and vibration impacts associated with project construction activities, including helicopter use, and the existing MMCRP measures would sufficiently address any potential impacts.