



# California Public Utilities Commission



May 1, 2026

Elizabeth Pritchard, Senior Land Planner  
Pacific Gas and Electric Company

## Re: CPUC Concurrence with PG&E Minor Project Refinement 4 for the Manning 500/230 kV Substation Project

Ms. Pritchard,

On May 1, 2026, Pacific Gas and Electric Company (PG&E) requested California Public Utilities Commission (CPUC) concurrence with PG&E's Minor Project Refinement 4 (MPR-4) for the Manning 500/230 kV Substation Project (Project). In MPR-4 (see Attachment 1), PG&E proposes the following minor project refinements:

1. Update the project maps to show the specific location of the paved access road within the PG&E telecommunications yard planned to be constructed as part of the LS Power Grid California (LSPGC) Manning Substation;
2. Clarify that the PG&E telecommunications yard, which will be constructed outside the Manning Substation security wall, will be enclosed by a prefabricated interlocking security wall approximately 12 feet in height, with 1 foot of barbed wire at the top, fabricated in a neutral, nonreflective finish consistent with the substation wall; and
3. Adjust the planned lighting for the PG&E telecommunications yard to have 24-hour illumination.

Although these activities would have the potential to impact Aesthetics, 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-4 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](mailto: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-4 Form

Protecting California since 1911

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-4 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: May 1, 2026

<b>Date Requested: May 1, 2026</b>				
<b>Report No.:</b> 4		<b>Approval Agency:</b> California Public Utilities Commission (CPUC)		
<b>Property Owner(s):</b> LS Power Grid California, LLC		<b>Location/Milepost:</b> PG&E Telecommunication Yard outside Manning Substation		
<b>Land Use/Vegetative Cover:</b> Disturbed		<b>Sensitive Resources:</b> Aesthetics Biological Resources Cultural and Tribal Cultural Resources Geology and Soils Hydrology and Water Quality Noise and Vibration		
<b>Modification From:</b>	<input type="checkbox"/> Permit	<input type="checkbox"/> Plan/Procedure	<input type="checkbox"/> Specification	<input type="checkbox"/> Drawing
	<input type="checkbox"/> Mitigation Measure	<input checked="" type="checkbox"/> Other: PG&E Telecommunications Yard Design		

**Proposed Action(s):**

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

Original Condition:

**Item 1: Paved Roads**

The following are relevant excerpts from the Manning Final IS/MND:

*Section 2.6.1*

*Proposed LSPGC Facilities, Manning Substation*

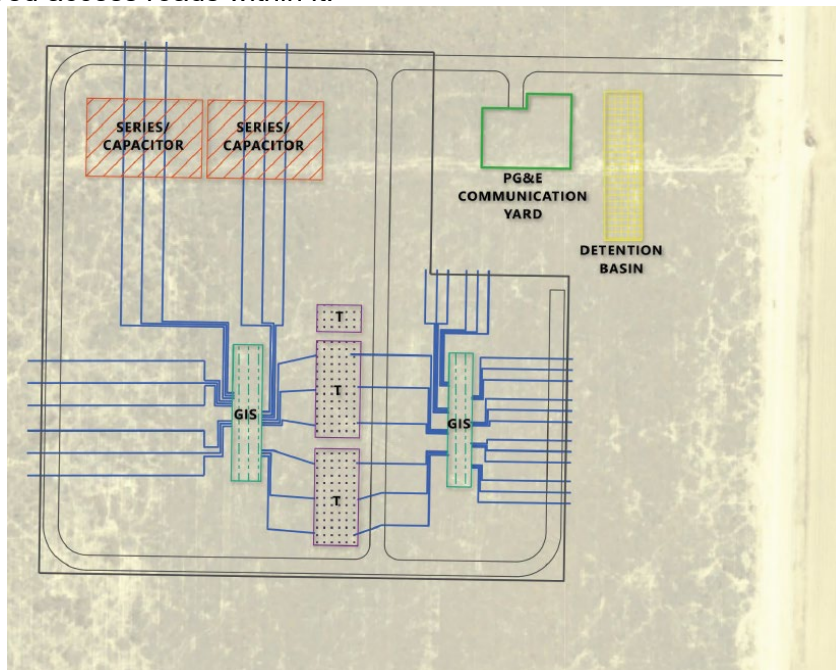
“All major terminal equipment (e.g., power transformers, series capacitors, and gas-insulated switchgear enclosures) will be installed on concrete foundations...The proposed layout of the substation site is shown in Figure 2-4 and the proposed equipment profiles are shown in Figure 2-5.”

*Section 3.10.4 (b)*

*Hydrology and Water Quality*

“Most of the substation site will be covered by gravel, which will allow percolation of water into the ground. Only the foundations, buildings, and paved driveways and access roadways will reduce the surface area for groundwater recharge. These areas will total approximately 14 acres.”

Figure 2-4, referenced in the above excerpt, shows the PG&E Communication Yard located just outside the security wall of Manning Substation but does not show any paved access roads within it.



**Item 2: Non-Reflective Paint and Height of Enclosures**

Section 2.6.1 of the Final IS/MND states:

“The substation site will be surrounded by a prefabricated interlocking security wall that will be 10 feet tall with 1 foot of barbed wire on top. The access gate will have an opening of 24 feet in width. All substation control enclosures will be painted a non-reflective, American National Standards Institute (ANSI) 70 light gray or similar neutral tone. All other substation components will have a non-reflective finish.”

### Item 3: Telecommunications Yard Lighting

Section 2.6.1 of the Final IS/MND states:

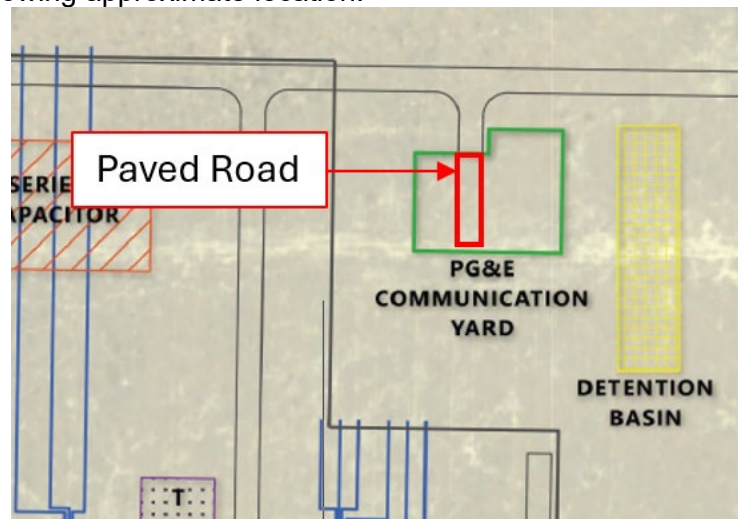
“Lighting will be installed and will conform to the National Electric Safety Code requirements and other applicable outdoor lighting codes. The facility will not require 24-hour illumination.”

#### Proposed Condition:

### Item 1: Paved Roads

PG&E will be paving an access road within the PG&E Telecommunications Yard. This access road will be approximately 20 feet by 74 feet in area (1480 square feet, 0.03 acres).

PG&E’s paved access road within the PG&E Communication Yard will be in the following approximate location:



### Item 2: Non-Reflective Paint and Height of Enclosures

The PG&E Telecommunications Yard will be constructed outside of, and adjacent to, the LS Power Manning Substation security wall. The Telecommunications Yard will be enclosed by a prefabricated interlocking security wall approximately 12 feet in height with 1 foot of barbed wire at the top. The wall will be fabricated in a “Light Stone” color, which is a neutral, nonreflective finish similar in appearance to ANSI 70 light gray.

### Item 3: Telecommunications Yard Lighting

PG&E’s Telecommunications Yard will have 24-hour illumination to ensure a safe working environment for crews, particularly at access control points, and in front of panel doors and equipment cabinets.

Lighting within the telecommunications yard will be designed to comply with PG&E safety and access requirements (PG&E Electric & Gas Service Requirements) and the

applicable industry standards established by the Illuminating Engineering Society (IES) Lighting Handbook, IES Recommended Practice-7 (Lighting for Industrial Facilities), and IES Recommended Practice-33 (Lighting for Exterior Environments).

Consistent with the IES recommendations for exterior utility and industrial facilities, lighting will provide a minimum illumination level of approximately 0.2 footcandle across general site areas and approximately 2.0 footcandles at access points and areas where personnel are required to operate or service equipment, such as equipment cabinets. 0.2 footcandle looks like a dimly lit outdoor area at night, similar to a neighborhood street far from a direct streetlamp or a parking lot in its darkest corners. Two footcandles is enough light to see general shapes and avoid obstacles but still too dark to read writing and fine detail is difficult to distinguish.

Site lighting will be limited to the minimum necessary to ensure safe access and operations and will be directed downward and shielded as appropriate to minimize glare and light spill beyond the facility. This level of illumination is sufficient for wayfinding and safety while avoiding excessive brightness, glare, or over-illumination.

#### Justification for Change:

PG&E's design of the Telecommunications Yard has progressed since the writing of the Final IS/MND, allowing for more specific details to be provided.

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 embedded images and excerpts included above.

#### Environmental Impact Summary

##### **Item 1: Paved Roads**

While Figure 2-4 from the Final IS/MND does not identify this road within the PG&E Telecommunications Yard, the description of paved roadways from Section 3.10.4(b) accurately reflects the general scope. The inclusion of 0.03 acres of paved road within the PG&E Telecommunications Yard will not substantially alter the estimated paved area of 14 acres as described in the CEQA document.

The PG&E Telecommunications Yard is incorporated into PG&E's SWPPP and Dust Control Plan. PG&E's standard environmental protection measures and BMPs will sufficiently address any potential impacts.

##### **Item 2: Non-Reflective Paint and Height of Enclosures**

The proposed PG&E Telecommunications Yard wall will be visually consistent with the materials, finishes, and overall design characteristics described for the Manning Substation and will not introduce additional glare, contrast, or visual effects beyond those evaluated in the Final IS/MND. The wall height falls within a reasonable range of variation contemplated in the CEQA analysis. As such, the minor design distinctions identified will not result in new or more severe environmental impacts beyond those previously analyzed.

**Item 3: Telecommunications Yard Lighting**

Lighting at the PG&E Telecommunications Yard would be limited to the minimum necessary to ensure safe access and operational requirements. All lighting would be directed downward and shielded, as appropriate, to minimize glare and light spill beyond the facility boundaries. Lighting levels would be low and would not substantially alter the surrounding visual environment beyond what was evaluated in the CEQA analysis. Accordingly, the proposed lighting will not result in new or more severe environmental impacts than those previously analyzed.

The following table summarizes potential environmental impacts from MPR-4 to categories identified in the CEQA Appendix G Checklist Sections addressed in the final IS/MND.

MPR-4 will not have the potential to impact the following environmental resource areas and therefore they are not included in the table below: Agriculture and Forestry Resources, Air Quality, 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.

<b>Applicable CEQA Section</b>	<b>Discussion</b>
Aesthetics	<p>The pavement of a road within the PG&amp;E Telecommunications Yard will not be visible outside of the yard.</p> <p>The height of the PG&amp;E Telecommunications Yard wall falls within a reasonable range of variation contemplated in the CEQA analysis and will visually match the dull-gray, non-reflective finish of the Manning Substation wall.</p> <p>Lighting at the PG&amp;E Telecommunications Yard would be limited to the minimum necessary to ensure safe access and operational requirements. All lighting would be directed downward and shielded, as appropriate, to minimize glare and light spill beyond the facility boundaries. Lighting levels would be low and would not substantially alter the surrounding visual environment beyond what was evaluated in the CEQA analysis.</p> <p>Accordingly, this MPR-4 will not result in new or more severe environmental impacts than those previously analyzed.</p>
Biological Resources	<p>The items described in this MPR-4 are occurring entirely within disturbed landcover and will not result in new or more severe environmental impacts than those previously analyzed. PG&amp;E's standard environmental protection measures and BMPs will sufficiently address any potential impacts.</p>
Cultural and Tribal Cultural Resources	<p>The items included in this MPR-4 are located entirely within the existing surveyed areas for cultural resources. Specifically, these areas were surveyed in 2023 by Paleo West. PG&amp;E's standard</p>

<b>Applicable CEQA Section</b>	<b>Discussion</b>
	environmental protection measures and BMPs will sufficiently address any potential impacts.
Geology and Soils	All areas associated with this MPR-4 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-4 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-4 occurs within areas already analyzed under the final IS/MND and will not result in any significant change in that analysis. The analysis included within the final IS/MND adequately assesses all potential impacts.