



California Public Utilities Commission



November 7, 2025

Elizabeth Pritchard, Senior Land Planner
Pacific Gas and Electric Company

Re: CPUC Approval of PG&E Minor Project Refinement 1 for the Manning 500/230 kV Substation Project

Ms. Pritchard,

On October 28, 2025, Pacific Gas and Electric Company (PG&E) requested California Public Utilities Commission (CPUC) approval of PG&E's Minor Project Refinement 1 (MPR-1) for the Manning 500/230 kV Substation Project (Project). PG&E subsequently submitted a revised request on November 5, 2025. As outlined in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted for the Project, the CPUC may approve minor changes to the Project (i.e., variances) if these changes do not trigger new permit requirements, contradict the intent of the adopted measures, create a new impact, or increase the severity of an impact identified in the CPUC's Final Initial Study/Mitigated Negative Declaration (IS/MND).

In MPR-1 (see Attachment 1), PG&E requests to relocate one staging area from the southeast corner of the intersection of Manning Avenue and Interstate 5 (I-5) to the northwest corner of that intersection to avoid potential impacts to blunt-nosed leopard lizard and other special-status species. Although the use of the northwest staging area would have the potential to impact 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 the impacts analyzed in the Final IS/MND, and would be sufficiently addressed by existing construction measures in the MMCRP. This minor project change would not result in any new significant impacts, conflict with any mitigation measures or applicable laws or policies, necessitate any new mitigation measures, or trigger any new permit requirements. **Therefore, PG&E is authorized to relocate the Manning Avenue staging area to the proposed new site described in MPR-1, provided that these activities are carried out in accordance with the 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-1 Form

Protecting California since 1911

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



@CaliforniaPUC



California Public Utilities Commission



Attachment 1

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

Protecting California since 1911

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



@CaliforniaPUC



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: November 7, 2025

Date Requested: October 28, 2025 (resubmitted on November 5, 2025)				
Report No.: 1		Approval Agency: California Public Utilities Commission (CPUC)		
Property Owner(s): Private Landowner, Donald Gragnani		Location/Milepost: PG&E Manning Avenue Staging Area		
Land Use/Vegetative Cover: Agricultural (see discussion below)		Sensitive Resources: Special-status species habitat (see discussion below)		
Modification From:	☐ Permit	☐ Plan/Procedure	☐ Specification	☐ Drawing
	☐ Mitigation Measure	☒ Other: Construction Plan Staging Area		

Proposed Action(s):

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

Original Condition:

Section 2.8.2 and Table 2-6 of the final IS/MND describes the required staging areas, including the Manning Avenue staging area. Page 3 of the Map Book identifies the location of the Manning Avenue staging area at the south-east corner of the intersection of Manning Avenue and Interstate-5.

Proposed Condition:

PG&E proposes to relocate the Manning Avenue staging area to the north-west corner of the intersection of Manning Avenue and Interstate-5. This area was originally identified and analyzed in the draft IS/MND. No changes are necessary to Section 2.8.2 and Table 2-6 of the final IS/MND.

Map 2 of 15 of the Vegetation Communities, Drainages and Land Cover Types mapping incorrectly identifies this parcel as largely *Amsinckia*, with a small section of Disturbed land cover. Based on field verifications in August 2025, this entire parcel should be mapped as Agricultural. Please see the photos below.

Justification for Change:

The staging area location on the south-east corner of Manning Avenue and Interstate-5 contained *Amsinckia* landcover (as of August 2025) which could potentially be habitat for listed species, including the blunt-nosed leopard lizard. Relocating the staging area to an area of existing agricultural disturbance avoids the potential for impacts to blunt-nosed leopard lizard habitat.

As noted above, the proposed location at the north-west corner of the intersection of Manning Avenue and Interstate-5 was included in the draft IS/MND. During review, PG&E requested a revision to have it moved to the south-east corner as it had slightly better access and both locations appeared to have similar habitat constraints. Neither site had been disced at that time. A recent site visit confirmed that the north-west corner parcel has since been disced and is the preferred location for PG&E to avoid potential impacts to special-status species.

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:

Map 1: Map of the existing and proposed staging area locations, with the photo point identified.

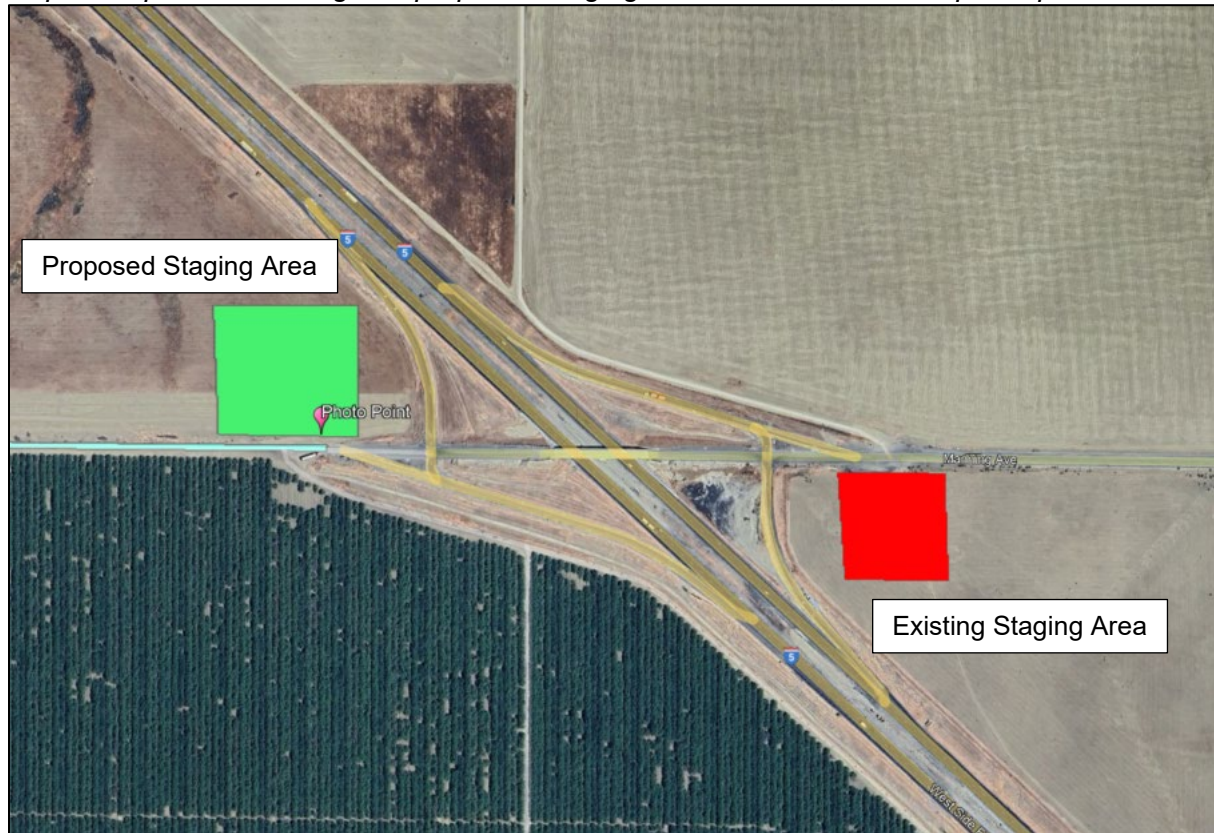


Photo 1: Photo taken on August 8, 2025 of disced agricultural land at the proposed staging area.



Environmental Impact Summary

This modification would avoid potential impacts to special-status species habitat and would not result in a net change to the overall impact acreage. The staging area is moving from an area of potential sensitive-species habitat to an area without such habitat.

This modification would not change the impact analysis for any other CEQA category.

The following table summarizes potential environmental impacts from MPR-1 to categories identified in the CEQA Appendix G Checklist Sections addressed in the Final IS/MND.

MPR-1 would not have the potential to impact the following environmental resource areas and therefore they are not included in the table below: Aesthetics, Agriculture and Forestry Resources, 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
Air Quality	There is no net change in disturbance area or the release of criteria pollutants by MPR-1. Existing MMCRP measures would sufficiently address any potential impacts.
Biological Resources	MPR-1 would avoid impacts to special-status species habitat and would not result in a net change to impact acreage. The staging area is moving from an area of potential sensitive-species habitat to an area without such habitat. Existing MMCRP measures would sufficiently address any potential impacts.
Cultural and Tribal Cultural Resources	The revised location was already surveyed for cultural and tribal cultural resources with negative results. Existing MMCRP measures would sufficiently address any potential impacts.
Geology and Soils	All staging areas 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. Existing MMCRP measures would sufficiently address any potential impacts.
Hydrology and Water Quality	All staging areas will be subject to the project SWPPP which will avoid or minimize erosion during construction and ensure the site is stabilized post-construction. Existing MMCRP measures would sufficiently address any potential impacts.
Noise and Vibration	The IS/MND evaluated noise from construction of Manning Substation at a residence identified as R1 in the IS/MND. The Manning Substation would be approximately 3,400 feet from R1. MPR-1 would place the staging area approximately 1,620 feet from R1, which could result in increased construction noise levels compared to construction at Manning Substation. However, construction activity at the staging area is brief and generally occurs only several times per day, as crews pick up equipment to start the work day and return it at the end of the day or shift. Additionally, existing MMCRP measures prohibit unnecessary noise during construction, such as idling of equipment at the staging area. Therefore, there would be no change in the severity of noise impacts identified in the IS/MND and no additional mitigation requirements beyond the existing MMCRP.
Transportation	MPR-1 will have no net change in the coordination necessary between surrounding agricultural land use and farm equipment use and project construction. Existing MMCRP measures would sufficiently address any potential impacts.