



California Public Utilities Commission



December 19, 2025

Elizabeth Pritchard, Senior Land Planner
Pacific Gas and Electric Company

Re: CPUC Concurrence with PG&E Minor Project Refinement 2 for the Manning 500/230 kV Substation Project

Ms. Pritchard,

On December 3, 2025, Pacific Gas and Electric Company (PG&E) requested California Public Utilities Commission (CPUC) concurrence with PG&E's Minor Project Refinement 2 (MPR-2) for the Manning 500/230 kV Substation Project (Project). PG&E submitted a revised request on December 19, 2025. As outlined in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted for the Project, the CPUC may approve or concur with minor changes to the Project if these variances 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-2 (see Attachment 1), PG&E proposes to correct and revise the number, type, and location of structures on the 500 kV interconnection lines; revise the number and location of structures being replaced, and use specified additional parking and staging areas for substation construction. 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 Final IS/MND, and would be sufficiently addressed by existing measures in the MMCRP. **Therefore, I concur with PG&E's assessment that the activities described in MPR-2 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-2 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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California Public Utilities Commission



Attachment 1

Manning 500/230 kV Substation Project PG&E MPR-2 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, 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: December 19, 2025

Date Requested: December 3, 2025 (revised December 19, 2025)				
Report No.: 2		Agency: California Public Utilities Commission (CPUC)		
Property Owner(s): Various, see Column D of attached spreadsheet		Location/Milepost: See attached KMZ.		
Land Use/Vegetative Cover: Various, see Column E of attached spreadsheet.		Sensitive Resources: Various, see Column J of attached spreadsheet		
Modification From:	<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: Engineering Design, Landcover Classifications, Staging and Parking Areas		

Proposed Action(s):

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

Original Condition:

This MPR-2 is being submitted for:

- Corrections and revisions to the number, type, and location of structures on the 500 kV interconnection lines; and
- Revisions to the number and location of structures being replaced, as described in Section 2.6.2 of the final IS/MND related to "230 kV Interconnections", "230 kV Reconductoring", and "230 kV and 115 kV Structure Raises"; and
- Additional parking and staging areas necessary for substation construction.

Please see Column F of the attached spreadsheet for more details.

The additional staging and parking areas necessary for the Tranquillity Switching Station scope of work are identified in this MPR-2 because the broader substation scope of work was incorporated into the Project Description of the final IS/MND and the additional areas are outside of the existing PG&E parcel. However, the substation scopes of work and associated work areas will not be subject to MMCRP compliance monitoring (per email communication between Liz Pritchard and Tommy Alexander on 9/16/25). Nevertheless, PG&E will ensure these areas are incorporated into the larger project SWPPP and Dust Control Plan, as appropriate, and will implement PG&E's standard environmental protection measures and BMPs.

Proposed Condition:

Please see Column G of the attached spreadsheet.

Justification for Change:

Please see Column H of the attached spreadsheet.

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 item included in this MPR-2.

Please see photos below of pertinent locations.



Photo 1: Photo taken August 8, 2025, standing at approximately 36.592739°, -120.433794° and looking west. This field was mapped as *Brassica nigra* landcover in the final IS/MND but has since been disced by the landowner.



Photo 2: Photo taken August 8, 2025, standing at approximately 36.592739°, -120.433794° and looking east. This field was mapped as *Brassica nigra* landcover in the final IS/MND but has since been disced by the landowner.



Photo 3: Photo taken November 20, 2025, standing at approximately 36.590955°, - 120.403667°, looking eastward at the proposed parking area located along the southern perimeter of Tranquillity Switching Station. This proposed parking area is Disturbed and is largely used as a parking area already for maintenance and operations in this area.



Photo 4: Photo taken November 20, 2025, standing at approximately 36.590996°, -120.401993°, looking northeastward at the proposed staging area located between the eastern perimeter of Tranquillity Switching Station and an existing solar field.

Environmental Impact Summary

The following table summarizes the change in impact areas as a result of this MPR-2. In total, this MPR-2 would result in a 1.76-acre reduction of temporary impacts and a 0.064-acre increase in permanent impacts.

Project Component	Summary	Change in Temporary Impacts	Change in Permanent Impacts
500 kV Interconnection	Interconnection Line Structure Count and Type	-1.83 acres	+ 0.05 acres
230 kV Interconnection	Structure Location	0	0
230 kV Reconductoring	Structure Types and Locations	0	0

230 kV and 115 kV Structure Raises	Structure Replacements and New Intersect Structures	- 1.711 acres	+ 0.014 acres
230 kV Reconductoring	Landcover Types	0	0
Substation Modifications	Staging and Parking Areas	+ 1.78 acres	0
TOTAL		- 1.76 acres	+0.064 acres

The following table summarizes potential environmental impacts from MPR-2 to categories identified in the CEQA Appendix G Checklist Sections addressed in the final IS/MND.

MPR-2 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-2 would add an additional 0.064 acre of permanent impacts to Williamson Contract land. When rounded, this would increase the total project impact from 1.6 acres to 1.7 acres. The impact would remain less than significant for the reasons described in the IS/MND, including that electric facilities are considered compatible uses for agriculture, and that the potential land conversion on any individual parcel would be less than a tenth of an acre. 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	<p>There is no change in the release of criteria pollutants by MPR-2.</p> <p>While the permanent disturbance areas of the project will slightly increase as a result of MPR-2, the impacted areas are within the same landcover types and general areas as analyzed in the final IS/MND. For the transmission line scopes of work subject to MMCRP compliance monitoring, the existing MMCRP measures would sufficiently address any potential impacts.</p> <p>For the substation scopes of work, including parking and staging areas, which are not subject to MMCRP compliance monitoring, PG&E's standard environmental protection measures and BMPs would sufficiently address any potential impacts. Placement of staging and parking areas next to Tranquillity Switching Station will decrease vehicle traffic, and therefore, also decrease air quality emissions, as construction vehicles will not have to drive to and from other existing staging areas located further away from the construction site.</p>

Applicable CEQA Section	Discussion
Biological Resources	<p>The minor shifts and modifications to transmission line structures described in MPR-2 occur almost entirely within landcover types and general locations already evaluated under the final IS/MND, with the exception of the western end of the new pull site for 38/162 which does extend slightly beyond the area previously mapped as part of the vegetation cover exercise. This area will be surveyed according to the pre-construction survey requirements of the biological Construction Measures. For the transmission line scopes of work subject to MMCRP compliance monitoring, the existing MMCRP measures would sufficiently address any potential impacts.</p> <p>For the substation scopes of work, including parking and staging areas, which are not subject to MMCRP compliance monitoring, PG&E's standard environmental protection measures and BMPs would sufficiently address any potential impacts. These areas are disturbed and are largely used as a parking area already for maintenance and operations in this area.</p>
Cultural and Tribal Cultural Resources	<p>The minor shifts and modifications to transmission line structures described in MPR-2 are occurring within the buffered survey areas for archaeological and built environment resources. There are not any known resources in these areas. For the transmission line scopes of work subject to MMCRP compliance monitoring, the existing MMCRP measures would sufficiently address any potential impacts.</p> <p>For the substation scopes of work, the additional staging and parking areas are occurring in highly disturbed areas without any known resources. . The use of these areas for parking and staging does not involve subsurface ground disturbance. PG&E's standard inadvertent discovery protocol would sufficiently address any potential impacts.</p>
Geology and Soils	<p>All permanent disturbance areas, temporary disturbance areas, staging areas, and parking areas will be subject to the project SWPPP and Dust Control Plan, as appropriate, which will avoid or minimize erosion during construction and ensure the site is stabilized post-construction.</p>
Hydrology and Water Quality	<p>All permanent disturbance areas, temporary disturbance areas, staging areas, and parking areas will be subject to the project SWPPP which will avoid or minimize erosion during construction and ensure the site is stabilized post-construction.</p>
Noise and Vibration	<p>The minor shifts and modifications to transmission line structures described in MPR-2 occur within areas already analyzed under the final IS/MND and would not result in any significant change in that analysis.</p> <p>There is one residence located approximately 1,650 feet southeast of the existing Tranquillity Switching Station. The additional parking</p>

Applicable CEQA Section	Discussion
	<p>and staging areas identified in this MPR-2 around Tranquillity Switching Station could result in increased construction noise levels. 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. Furthermore, construction noise at the Tranquillity Switching Station was already evaluated because the approved project includes work at this location.</p> <p>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. The analysis included within the final IS/MND adequately assesses all potential impacts for these additional areas. For the substation parking and staging areas, which are not subject to MMCRP compliance monitoring, PG&E's standard environmental protection measures and BMPs would sufficiently address any potential impacts.</p>
Transportation	<p>MPR-2 will not change the coordination necessary between surrounding agricultural land use, farm equipment use, and project construction. Placement of staging and parking areas next to Tranquillity Switching Station will decrease vehicle traffic, as construction vehicles will not have to drive to and from other existing staging areas located further away from the construction site. Existing MMCRP measures would sufficiently address any potential impacts.</p>