

May 10, 2016  
(Rev. 3)

Michael Rosauer  
California Public Utilities Commission  
San Francisco Office (Headquarters)  
505 Van Ness Avenue  
San Francisco, CA 94102

**RE: Notice to Proceed Requests #3 and #4 (NTP#3, NTP#4)  
Liberty Utilities 625/650 Line Upgrade Project, Phase 1B**

Dear Mr. Rosauer,

Having reviewed and certified in February 2015 that the Final Environmental Impact Study/Environmental Impact Report (EIS/EIS/EIR) for the Liberty Utilities 625 and 650 Line Upgrade Project (Project) is in accordance with California State CEQA Guidelines, the California Public Utilities Commission (CPUC) subsequently issued a decision on March 26, 2015 (Decision 15-03-020) granting Liberty Utilities (Liberty) a Permit to Construct (PTC) for the Proposed Project, Alternative 4. The Project consists of three phases, as follows:

- Phase 1: Rebuild/reconductor the 650 Line (from Truckee to Northstar to Kings Beach) and the 132/650 Line double circuit to permit eventual operation at 120kV and construct other infrastructure improvements to address existing low voltage conditions at the Northstar substation. (A segment of this work, from Truckee Substation to the existing riser pole just south of Brockway Road in Truckee, had previously been authorized by Commission Resolution E-4671, dated August 28, 2014, approving Advice Letter (AL) 35-E, and was completed by mid-October 2014.)
- Phase 2: Once system demand approaches 89 megawatts (MWs), upgrade the three existing 650 Line substations (North Truckee, Northstar, and Kings Beach), and decommission existing Brockway substation, re-routing the existing 14.4 kV distribution feeders to the upgraded Kings Beach substation.
- Phase 3: Once system demand approaches 100 MWs, rebuild/relocate to straighten the 625 Line (from Tahoe City to the intersection with the 650 Line at Brockway Summit), thereby

removing angle points (which have a higher probability of failure), and construct other improvements to permit operation of the entire loop at 120 kV, including the already 120 kV-rated 629 Line (Tahoe City to Squaw Valley), which at present can only be operated at 60 kV.

CPUC's decision authorized Liberty to begin construction on Phase 1 of Project Alternative 4 in 2015, and stated that a Tier 2 advice letter must be filed, documenting updated verification of projected load growth (in the form of a new network study), prior to approval to proceed with Phases 2 and 3 is given.

As a result of constricted windows of time within which construction activities may occur in the Project area (typically May 1 through October 15), and realizing that all necessary agency approvals wouldn't be received until approximately August 2015, Liberty opted to subsequently divide Phase 1 into two sub-phases, Phase 1A and Phase 1B. Phase 1A, for which CPUC Notices to Proceed (NTPs) were issued in 2015, was completed as of October 31, 2015. The Phase 1A NTPs (NTP#1 and NTP#2) allowed for weed pre-treatment and vegetation management activities from the Martis Tap pole in Martis Valley (Pole #291034) to Brockway Summit (Pole #291170), including the Northstar Fold (Pole #291105 to Northstar substation); for line construction activities, including setting new steel poles, some with poured-in-place concrete foundations, removing old wood poles, reconductoring or transferring existing, associated transmission, distribution, communication and fiber circuits, and installing and maintaining all temporary construction BMPs from Martis Valley to Northstar substation (from Pole #291034 to #291105, and from Pole #291105 to Northstar substation); and for upgrades within Northstar substation that included the installation of a new vault, twelve (12) new disconnect switches, six (6) new lightning arrestors, five (5) CCVTs, and associated new steel structures with concrete foundations, structure grounding, conduits, grounding mats, and primary jumpers from the newly installed equipment to the existing 60 kV bus.

*Due to inclement weather beginning to occur in October 2015, the vegetation management/timber harvest activities approved under NTP#2 were halted and not completed up to Brockway Summit. They were completed up to approximately Pole #291129, and the remainder, from Pole #291129 to #291170, is planned to be completed in this 2016 season, beginning on approximately May 16, 2016.*

Notices to Proceed, NTP#3 and NTP#4, are now being sought for the 2016 season to allow for completion of the 650 Line Upgrade work; i.e. Phase 1B, from the Northstar tap to Kings Beach substation, including continuing upgrade work within Northstar substation. Details of the scope of work, and how it relates to each NTP request is further described in the following sections.

### **REQUEST FOR NOTICE TO PROCEED #3 (NTP#3)**

Under NTP#3, Liberty Utilities requests approval to proceed with the following project activities:

- **Vegetation management** for the portion of the outside-of-Lake-Tahoe-basin area that was approved under the 2015 NTP 2, but that wasn't completed in 2015; i.e. from Pole #291129 to #291170. The updated 2016 tree removal inventory mapping discussed directly below includes this area.
- **Vegetation management** on US Forest Service - Lake Tahoe Basin Management Unit (LTBMU) owned parcels – 1) from Brockway Summit to the LTBMU-NTPUD (North Tahoe PUD) property boundary (Pole #291170 to just SE of Pole #291204); and 2) from Pole #291226 to LTBMU-CalPeco property boundary, just south of Pole #291236. This work will be completed under the Timber Sale Contract between Liberty and LTBMU, executed as of April 13, 2016, and the LRWQCB Timber Waiver, WDID 6AT63116140, dated April 14, 2016. A copy of the Timber Sale Contract and the Timber Waiver are provided as attachments to this letter, along with updated 2016 tree removal inventory mapping for 2016 Phase 1B-related vegetation management areas. An Excel spreadsheet of this updated inventory is intended to accompany the mapping. It's a sizable file and will therefore be emailed.
- **Line construction work**, from the Northstar tap to Brockway Summit (Pole #291105 to #291170). These activities will consist of installing new steel transmission line poles, seven (7) of which are self-supporting requiring poured-in-place concrete foundations; stringing new 397.5 AA (Canna) conductor for both existing transmission and distribution underbuild circuits; transferring existing distribution overhead tap locations and reframing dip transition structures; restringing new distribution tap extensions; installing a new dip transition structure; reframing existing transformer structures; and coordinating with communications entities to complete the transfer of existing communications lines from the existing pole line to the new.

The line construction scope of work under this NTP#3 request also includes the improvement of existing and/or development of new access roads; the installation and continual maintenance of all temporary construction BMPs; the demarcation of project boundaries/work areas; installation of all necessary signage to be in place during construction; and stabilization, restoration and revegetation of the project area at completion of construction. These elements of work are identified within the *650-1B Rebuild Project Map Book*, Revision 9.0, dated April 7, 2016 that is included as an attachment to this letter.

- **Removal of existing 650 Line structures and equipment**, from the Northstar tap to Brockway Summit (Pole #291105 to #291170). As the line construction crews proceed down the alignment installing new structures and equipment, transferring communications lines, stringing new conductor and removing old, they will also be cutting (to 6 inches below adjacent ground surface) and removing from the project site the existing wood poles, including all existing attachments (i.e. cross arms, insulators, guy wire, hardware, etc.). Prior to final

energization of the new line, all associated equipment used for construction along the project route will be removed.

We believe that all requirements for this NTP#3 request have been met, through the 2015 submittals that still apply and/or that have been updated on the project CPUC FTP site, specific to Phase 1B.

All necessary permits associated with 650 Line Upgrade work and related vegetation management, from Martis Valley to Brockway Summit, were obtained in 2015. As previously noted, vegetation management work, approved to be done per CPUC NTP#2, was not completed all the way to Brockway Summit in 2015. The remainder of the work, [as previously approved under NTP#2, and as requested by the CPUC to be included within the request for NTP#3](#), is planned to be completed this spring of 2016.

The vegetation management activities to occur within the Lake Tahoe basin closer to Brockway Summit, described above, are being separated out to be done early in the season due to the need to perform aerial tree removals (i.e. via helicopter). This form of tree removal for this segment of the project is a TRPA requirement, due to the underlying TRPA Land Capability District of the parcels and lack of existing roads that can be used for logging for this project; reference TRPA Ordinance 61.1.6.E, including Table 61.1.5-4 – Tree Removal Methods, and attached Liberty-LTBMU Timber Sale Contract. This segment of vegetation management occurring in the Lake Tahoe Basin on LTBMU property intersects the Tahoe Rim Trail, and it is Liberty's desire and intent to therefore be done with this work prior to the peak usage period for the trail, typically beginning in late May/early June. Additionally, the helicopter companies with which Liberty has contracts for this type of work have indicated that they will likely be unavailable after June 30, 2016, at which time they need to be available to Cal Fire for fire season.

Work under this NTP#3 request is planned to begin as early as possible in May 2016. To support this, Liberty requests this NTP#3 by May 9, 2016, specifically to accommodate the need for helicopter-assisted vegetation management from Brockway Summit into the Lake Tahoe basin to begin by no later than May 23, 2016. We understand this is an expedited request. However, we are confident that all necessary submittals are already complete and have been reviewed and approved as part of NTP#2.

#### **REQUEST FOR NOTICE TO PROCEED #4 (NTP#4)**

Under NTP#4, Liberty Utilities requests approval to proceed with the following project activities:

- **Vegetation management** on privately owned parcels – 1) from Pole #291204 to #291226; and 2) from just south of Pole #291236 to Kings Beach substation. This work will be completed under the Timber Harvesting Plan, No. 2-16-001-PLA, 5 MEG, submitted to the California Department of Forestry and Fire Protection (Cal Fire) on January 5, 2016, and filed on January 15, 2016. A pre-harvest inspection (PHI) was conducted in the field on April 15, 2016. Per the

attached letter from Cal Fire to Thomas Amesbury, Foresters Co-op (forestry contractor to Liberty), on January 16, 2016, final decision on the THP is expected to be received from the Cal Fire Director by the week of May 16, 2016. Once received, a copy of the decision letter/memo and final THP will be provided to the CPUC.

- **Line construction work**, from Brockway Summit to the termination at Kings Beach substation (Pole #291170 to the termination at Kings Beach substation). These activities will consist of installing new steel transmission line poles, fourteen (14) of which are self-supporting requiring poured-in-place concrete foundations; stringing new 397.5 AA (Canna) conductor for both existing transmission and distribution underbuild circuits; transferring existing distribution overhead tap locations and reframing dip transition structures; restringing new distribution tap extensions; installing a new dip transition structure; reframing existing transformer structures; and coordinating with communications entities to complete the transfer of existing communications lines from the existing pole line to the new – where it is planned to occur.

For the segment from Pole #291164 to #291214, the rebuilt line is being ‘set back’ from the existing alignment (as required by the NEPA/CEQA permitting agencies and as detailed within discussion of Proposed Project, Alternative 4 in the Final ESI/EIS/EIR) and will be constructed within an entirely new easement. The communications underbuild entity that currently exists along this segment, AT&T, has declined to move their facilities into the setback alignment. They will therefore remain on the existing pole line, on existing wood poles that will be topped to just above communication level as a part of this scope of work.

The line construction scope of work under this NTP#4 request also includes the improvement of existing and/or development of new access roads; the installation and continual maintenance of all temporary construction BMPs; the demarcation of project boundaries/work areas; installation of all necessary signage to be in place during construction; installation of USFS-approved gates across indicated access points, to prevent public vehicular access and use; and stabilization, restoration and revegetation of the project area at completion of construction. These elements of work are identified within the *650-1B Rebuild Project Map Book*, Revision 9.0, dated April 7, 2016 that is included as an attachment to this letter.

- **Northstar substation upgrade activities**, to include the installation of two new breakers and associated wiring and relay settings. No earth disturbing activities are planned within the substation. All work will occur within the existing substation fence line.
- **Kings Beach substation activities** will be limited to the attachment of the new line terminations to the existing substation box structure. No earth disturbing activities are planned within the substation.

Work under this NTP#4 request is planned to begin by May 30, 2016. Permitting, approvals and/or certifications that are pending as of the date of this letter include 401 Water Quality Certification (WQC), and a Lake Tahoe Basin Construction General Permit (Order No. R6T-2011-0019) with the Lahontan Regional Water Quality Control Board (LRWQCB), for line construction-related work from Brockway Summit to King Beach substation; final LTBMU approval for engineered access road design on their parcels within the Lake Tahoe basin; Cal Fire approval for the in-basin Timber Harvesting Plan; and final approval from TRPA that all permit conditions have been satisfied.. The Liberty team is working diligently to secure all outstanding items. As each is completed, it will be uploaded to the FTP submittal site and CPUC will be notified.

### **Distribution Service Taps**

There are approximately eleven (11) distribution taps/transformers/services along the alignment that will be fed by the newly rebuilt distribution circuit. These locations will possibly require generation during construction; however, the contractor is still working through phasing and outage logistics with Liberty in an effort to minimize the number of generators needed. These distribution services are located on the following structures: #291155, #291159, #291168, #291170, #291182, #291208, #291214, #291220, #291223, #133456, and #291234. Of these 11 distribution taps, three of them will be re-strung from the new 650 Line across SR 267 to their respective existing distribution service poles.

### **Project Permitting**

Several federal, state and local jurisdictional permits are required for the work to be completed for this project. Many of these permits were obtained prior to work in 2015, and were established to cover the full extent of the 650 Line Upgrade, Phases 1A and 1B. A few permits that are specific to Phase 1B work to be completed within the Lake Tahoe basin in 2016 have been recently acquired or are under process with the anticipation that they'll be issued by the end of May 2016. A summary of the project permits, to which project phases and CPUC NTPs they are associated, and their current status is provided in the attached *Project Schedule by Phase of Construction*. Also included within the attachments are copies of permits and/or approvals that have been newly received for 2016 Phase 1B work. Documentation for all permits and approvals received in 2015 are located on the Project FTP site for CPUC.

### **Project Area and Right-of-Way Description**

The location for performance of work under these NTP requests #3 and #4 is within Placer County, CA between Northstar and Kings Beach, generally along State Route (SR) 267. All line construction work will occur within new or existing easement boundaries and/or within approved project wire

stringing/work areas, in the case of wire pulling/stringing activities, installation of guy anchors, etc. All project construction areas, including storage and staging sites, will occur within the boundaries of the project study area established within the Project's FINAL EIS/EIS/EIR.

The permanent 650 Line right-of-way (ROW) width is 40' for single-circuit transmission (Pole #291105 to #291164), with an additional 12.5' of temporary construction easement allowed on both sides of the 40' easement. For the majority of double-circuit transmission line construction (Pole #291164 to #291214, and Pole #291226 to midway between Pole #s 291236 and 291237), the permanent ROW width ('permitted easement' width across LTBMU) is 65' feet, with no additional allowance made for temporary easement width for construction. The exceptions for double-circuit ROW exist 1) in Kingswood Estates, where there exists a 50' wide permanent easement that will be maintained as is; and 2) on the CalPeco-owned parcel at the end of the 650 Rebuild, where Kings Beach substation is located, within which there are no specific line easements. No segments within this Phase 1B scope of work require reduced working areas, as was the case for culturally sensitive areas for Phase 1A. Details for all 650 Line, Phase 1B easements/ROWs and associated parcel ownership are provided as an appendix to the attached *650-1B Rebuild Project Map Book*.

All newly established access roads will exist within permanent easement/ROW boundaries. Where a few exceptions exist, they are covered by language within the property owner-specific easement agreements (permit, in the case of LTBMU). The various types of access roads (existing, existing to be improved, new, etc.) intended to be used for both construction of and long-term maintenance of the rebuilt 650 Line are identified in the attached *650-1B Rebuild Project Map Book*.

Vegetation management activities will be contained within boundaries established per the respective THPs and LTBMU Timber Sale Contract. These boundaries exist within the boundaries of the project study area established within the Project's FINAL EIS/EIS/EIR. The attached updated 2016 tree removal mapping for Phase 1B-related vegetation management areas illustrates the THP and Timber Sale Contract boundaries.

### **Weed Pre-Treatment**

Weed pre-treatment was completed for the 2015 season, from Martis Valley to Brockway Summit. A Weed Pre-Treatment Plan for work between Brockway Summit and Kings Beach has been completed to support APM BIO-04. This is found on the project FTP site. Necessary property owner notifications have been completed, and, as necessary, weed treatments will occur prior to vegetation management activities. It is noted that, due to the early start of work, a sizable amount of vegetation management may occur prior to the weed blooms. In these cases, no treatment will occur. This will be monitored and field verified throughout vegetation management activities by the Insignia Biologists.

### **Environmental Compliance**

Several Applicant Proposed Measures (APMs) and agency required Mitigation Measures (MMs) have been established in accordance with the Final EIS/EIS/EIR permitting process. These APMs and MMs must be adhered to at all times by Liberty, their Contractor and all subcontractors. Within compliance of these environmental constraints, several construction plans have been developed by Liberty. Throughout these plans, reference is made to APMs and MMs. The Contractor will be required to comply with all conditions in each permit, all APMs and MMs that are applicable to the 650 line construction, and all plans developed by Liberty. All construction specific plans have been updated and uploaded to the FTP site. A printed copy will be mailed to you, for your use. Note that Liberty has the highest expectation of the Contractor to meet all environmental compliance. All personnel working on site will be required to attend mandatory Worker Environmental Awareness Program (WEAP) training. Training will be required prior to entering the project ROWs. Training will be provided by Liberty's Environmental Monitoring Team.

### **Environmental Monitoring and Quality Control**

Liberty Utilities will have environmental biological monitors, and construction quality assurance monitors on site for monitoring of work within compliance with all construction documents and project permits. Liberty has retained Insignia Environmental to verify compliance with the APMs, as set forth in the Final EIS/EIS/EIR and the MMCRP.

### **CPUC NTP Submittals & FTP Site Procedures**

As for the 650, Phase 1A project in 2015, Tri Sage Consulting, on behalf of Liberty Utilities, has set up an FTP site to accommodate the documentation request/submittal process associated with issuance of requested NTPs, and in compliance with the project MMCRP. The logins and passcodes for accessing this project-specific FTP site for CPUC are the same as was originally issued to the CPUC-Dudek team last year.

Many of the submittals required for Phase 1A last year are applicable to Phase 1B this year. Where the same information is applicable to both phases, "Applicable for 1A & 1B" has been added to the the APM/MM folder name on the FTP site. This is intended to make the reviewer aware that the information contained in the folder that was reviewed and accepted for Phase 1A remains applicable for 1B and has therefore not been revised or changed. Where new information is required for 1B, "Updated for 1B" has been added to the folder name. If certain information is still pending to satisfy a certain APM/MM, this has also been indicated in the folder name. As previously noted, when the pending items are complete, an email will be sent to CPUC and Dudek to notify that updated information/documentation has been uploaded to the FTP site.



Please accept this request for NTP#3 and NTP#4 as our formal request to initiate the compliance review for 650 Line Upgrade, Phase 1B work in 2016. As required, relevant measures from the Project's Mitigation Monitoring, Compliance and Reporting Program (MMCRP) will be implemented. The attached APM/MM table identifies the measures that have been and will be met to comply with the issuance of NTP#3 and NTP#4, as well as measures that are not relevant to the issuance of NTP#3 and NTP#4; i.e. they're relevant to another Phase of the Project. Subsequent future phases of the larger Project, for which subsequent future NTP requests will be made when the time is appropriate, include:

- Phase 2 (TBD – projected for 2017 and or 2018 dependent upon the demand study results): Upgrade of the Kings Beach Substation to operate at 120kV; conversion of overhead distribution lines to underground into Kings Beach substation; and decommissioning of the Brockway Substation. Work will also include upgrades at the Squaw Valley and Truckee substations. This phase will allow for operation of the 650 Line at 120kV.
- Phase 3 (TBD – projected out past 2018 depending upon demand study results): Rebuild the 625 line with segments of new route alignments, and remove the existing 625 Line. Work will also include upgrades to the Tahoe City substation and full termination of upgraded 625 and 650 Lines into the Kings Beach substation.

Activities relevant to these future Project phases are included in the attached Project Schedule by Phase, along with 650 Upgrade, Phase 1A and Phase 1B, activities.

Please don't hesitate to contact me with any questions you may have regarding this revised NTP request. Liberty sincerely appreciates the efforts completed to date by the CPUC and we look forward to another successful construction season.

Sincerely,



Alissa K. Turner, PE  
Tri Sage Consulting  
Contract Project Manager for Liberty Utilities

Attachments:

- 625/650 Line Rebuild - Project Schedule by Phase of Construction
- 625/650 Line Rebuild – Applicant Proposed and Mitigation Measures Table
- 650-1B Rebuild Project Map Book, Northstar to Kings Beach, Revision 9.0, dated 04/07/2016
- Liberty-LTBMU Timber Sale Contract, signed and dated 04/13/2016, and Map

- LRWQCB Timber Waiver Approval (for work within Lake Tahoe Basin), dated 04/14/2106
- 2016 Liberty Tree Removal Inventory Mapping, dated 03/21/2016
- Cal Fire Letter Re: Status of Liberty Timber Harvesting Plan No. 2-16-001-PLA 5 MEG, dated 01/15/2016