

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 25, 2021

VIA MAIL AND EMAIL

David Wilson
LS Power Grid California
5000 Hopyard Road, Suite 480
Pleasanton, CA 94588

SUBJECT: Data Request #1 for the Gates 500 kV Dynamic Reactive Substation Project

Dear Mr. Wilson:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review for the Gates 500 kV Dynamic Reactive Substation Project (Project), we have identified additional information required to adequately conduct the CEQA review. Please provide the information requested below (Data Request #1) by April 8, 2021. Please submit your response in electronic format to me and also directly to our environmental consultant, Environmental Science Associates (ESA), at the physical and e-mail addresses noted below. If you have any questions, please direct them to me as soon as possible.

Sincerely,

A handwritten signature in blue ink that reads "Patricia A. Kelly".

Patricia Kelly
Infrastructure Planning and CEQA, Energy Division
California Public Utilities Commission
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ESA
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Data Request #1

Gates 500 kV Dynamic Reactive Substation Project

Project Description

Provide the requested Project information described below:

1. Section 3.3.4.1, first paragraph on page 3.0-5: Provide the dimensions, including depth, for the proposed concrete foundation(s).
2. Section 3.3.4.1, first paragraph on page 3.0-5: Provide an illustration/drawing of the take-off towers and lighting shielding masts, including heights and other dimensions.
3. Section 3.3.4.1, first paragraph on page 3.0-5: “The take-off towers would be set approximately 20 to 25 feet below ground level.” Clarify that the take-off towers would not be directly embedded into the soil. PEA Section 3.3.5.1 indicates that the towers would be installed on pier foundations.
4. Section 3.3.4.1, first paragraph on page 3.0-5: Confirm that take-off towers or lightning shielding masts would be approximately 135 to 199 feet tall measured as above the ground surface.
5. Section 3.5.4.5, page 3.0-13: “The SWPPP BMPs would remain in place and would be maintained until new vegetation is established.” Clarify what vegetation is referred to here. Section 3.7.2 indicates no landscaping is proposed.
6. Section 3.9.1, pages 3.0-29 and 3.0-30: Provide additional detail about the types of decommissioning (i.e., removal and restoration) activities that would be undertaken.
7. Section 3.10.1, Table 3-8, Anticipated Permits and Approvals, page 3.0-30: Describe Fresno County’s role related to the Williamson Act cancellation and the eminent domain process.
8. Section 3.10.2, first paragraph, page 3.0-34: “LSPGC, in conjunction with PG&E, would file a Section 851 application concurrently with the Proposed Project’s PTC application.” Did LSPGC file its Section 851 application concurrently with the PTC application for the Project? If not, when will that application be filed?
9. PEA Figure 3-3. Provide narrative that walks the reader through the system shown in PEA Figure 3-3. E.g., what do the red boxes, red arrows, etc., represent and what functions do they serve, and what process occurs at each facility in the STATCOM block. Also, revise the figure to point out some of the main ancillary components identified in the bullet lists on PEA pages 3.0-4 and 3.0-5.
10. PEA Figure 3-6. Confirm that the “deadend” structure represents the “take-off towers” described in the PEA text. Note there is no mention of “deadend” structures in the PEA Project Description text.

Biology

11. Section 4.4.4, Impact Analysis, page 4.4-29: In addition to the restoration approach, provide details to include species to be planted, procedures to reduce invasive weeds, and timeframe.

Utilities

12. Section 4.19.4, Impact Analysis, pages 4.19-8 and 4.19-9: Include estimation of waste generated during decommissioning.
 - a. It is stated that the *installation of 20 new poles may be required* but is stated later in the analysis that *existing poles* would not need to be removed or disposed (related to waste). Please provide clarification on disposal of proposed wood poles during decommissioning and whether the poles would be treated.
 - b. Provide a breakdown of waste volumes by waste type (wood, metal, plastic) generated during all phases; construction, O&M, and decommissioning, including how much of it would be disposed, reused, or recycled.

Wildfire

13. Provide a Fire Prevention Plan for the Project.

Additional Requests

14. Provide all GIS data that have been developed for the Project.
15. Provide any confidential cultural resource location data or reports prepared for the Project, not provided previously, under a separate confidential cover in order to protect sensitive resource information.
16. It has come to our attention that PG&E has expressed concern regarding granting LSPGC an easement for the north-south access road east of Gates Substation, and LSPGC is considering new access road options to the west of Gates Substation. Provide details for all possible access road options to the Project site, including text descriptions, revised figures, GIS data, and any associated revisions to construction information, such as disturbance areas, gravel volumes, etc.
17. The Project includes installation of proposed utilities within or along PG&E's north-south access road east of Gates Substation (e.g., distribution, telecommunication). As discussed under item No. 16, above, PG&E may not grant LSPGC an easement for that road. Confirm that the proposed distribution and telecommunication lines would be installed within or along whichever north-south access road option is selected for the Project.
18. After filing the Application and PEA, LSPGC filed amendments to its Application (March 5, and March 15, 2021) indicating changes have been made to the 1,000-foot mailing list prepared for the Project. Provide the updated spreadsheet for the 1,000-foot mailing list.