

April 15, 2021

VIA EMAIL

Ms. Patricia Kelly
California Public Utilities Commission
300 Capitol Mall, 4th Floor
Sacramento, California 95814

RE: Response to Data Request #1 for the Gates 500 kV Dynamic Reactive Support Project

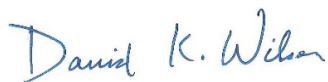
Dear Ms. Kelly:

As requested by the California Public Utilities Commission (CPUC), LS Power Grid California, LLC (LSPGC) has collected and provided the additional information required to adequately conduct California Environmental Quality Act (CEQA) review of the Gates 500 kV Dynamic Reactive Support Project (Proposed Project). This letter includes the following enclosures:

- A Response to Comments Table providing the additional information requested in Data Request #1, received March 25, 2021
- Take-off Tower Exhibit with dimensions (Request No. 2)
- Revised Figure 3-3, STATCOM Substation Diagram (Request No. 9)
- Updated 1,000-foot mailing list (Request No. 18)

Please contact me at (636) 534-3221 or Dustin Joseph at (510) 590-8503 with any questions regarding this information.

Sincerely,



David Wilson
Director of Environmental Permitting

Enclosures

cc: Mark Milburn (LSPGC)
Eric Hayes (LSPGC)
Nicolas Moser (LSPGC)
Aaron Wilson (LSPGC)
Dustin Joseph (KPE/Heritage)
Kenda Pollio (KPE/Heritage)
Patrick Golden (KPE/Heritage)



**LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018)
 Energy Division Data Request #1 Date March 25, 2021
 LSPGC Response #1 Date April 15, 2021**

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1

REPORT OVERVIEW

On March 25, 2021 the CPUC deemed the application and PEA for the Gates Dynamic Reactive Support Project (A. 21-02-018) complete. The Energy Division has requested additional data to prepare a complete and adequate analysis of the potential environmental effects of the Project, in accordance with the requirements of CEQA.

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1

Request No.	DATA REQUEST	LSPGC RESPONSE																																				
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).	<p>The table below provides the dimensions for the STATCOM Substation equipment concrete foundations:</p> <table border="1"> <thead> <tr> <th>Substation Equipment</th> <th>Foundation Type</th> <th>Width (ft)</th> <th>Length (ft)</th> <th>Diameter (ft)</th> <th>Depth (ft)</th> </tr> </thead> <tbody> <tr> <td>STATCOM IGBT Valve/Control Enclosures</td> <td align="center">Slab</td> <td align="center">80</td> <td align="center">90</td> <td align="center">N/A</td> <td align="center">2</td> </tr> <tr> <td>Three-Phase 500 kV Main Power Transformers</td> <td align="center">Slab</td> <td align="center">45</td> <td align="center">55</td> <td align="center">N/A</td> <td align="center">4.5</td> </tr> <tr> <td>Outdoor Core Reactors</td> <td align="center">Slab</td> <td align="center">15</td> <td align="center">15</td> <td align="center">N/A</td> <td align="center">2.5</td> </tr> <tr> <td>500 kV Bus Support</td> <td align="center">Drilled Pier</td> <td align="center">N/A</td> <td align="center">N/A</td> <td align="center">4</td> <td align="center">20</td> </tr> <tr> <td>500 kV Take-Off Towers</td> <td align="center">Drilled Pier</td> <td align="center">N/A</td> <td align="center">N/A</td> <td align="center">7</td> <td align="center">30</td> </tr> </tbody> </table>	Substation Equipment	Foundation Type	Width (ft)	Length (ft)	Diameter (ft)	Depth (ft)	STATCOM IGBT Valve/Control Enclosures	Slab	80	90	N/A	2	Three-Phase 500 kV Main Power Transformers	Slab	45	55	N/A	4.5	Outdoor Core Reactors	Slab	15	15	N/A	2.5	500 kV Bus Support	Drilled Pier	N/A	N/A	4	20	500 kV Take-Off Towers	Drilled Pier	N/A	N/A	7	30
	Substation Equipment	Foundation Type	Width (ft)	Length (ft)	Diameter (ft)	Depth (ft)																																
	STATCOM IGBT Valve/Control Enclosures	Slab	80	90	N/A	2																																
	Three-Phase 500 kV Main Power Transformers	Slab	45	55	N/A	4.5																																
	Outdoor Core Reactors	Slab	15	15	N/A	2.5																																
	500 kV Bus Support	Drilled Pier	N/A	N/A	4	20																																
500 kV Take-Off Towers	Drilled Pier	N/A	N/A	7	30																																	

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018)
Energy Division Data Request #1 Date March 25, 2021
LSPGC Response #1 Date April 15, 2021

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1							
Request No.	DATA REQUEST	LSPGC RESPONSE					
		500 kV Circuit Breakers	Slab	15	9	N/A	2.5
		Spare Parts and Maintenance Tool Storage Pads	Slab	25	25	N/A	2.5
		Cooling Equipment	Slab	25	80	N/A	2.5
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.	See attached Take-off Tower Exhibit . The lightning shielding masts are the tall structures shown adjacent to the converter and control building in PEA Figure 3-6, STATCOM Substation Profile and will be approximately 75 feet in height.					
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.	The take-off towers will be set on concrete pier foundations, 20 to 25 feet below ground-level.					
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.	Correct, the take-off towers will be approximately 135 to 199 feet tall, as measured 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.	No landscaping is proposed. Following construction, temporarily disturbed areas will be returned as near as possible to original contours and allowed to revegetate naturally. Areas within the Proposed Project parcel located adjacent to the agricultural field but outside of permanently disturbed areas will be allowed to return to agricultural use.					

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1

Request No.	DATA REQUEST	LSPGC RESPONSE
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.	<p>At the end of the useful life of the Proposed Project, the site will be decommissioned in accordance with a CPUC-approved removal and restoration plan (the “Plan”) that will be provided to the CPUC prior to implementation. The types of activities expected to be included within the Plan include the following:</p> <ul style="list-style-type: none"> • Evaluating the expected future use of the site, whether for agricultural use or continued utility use. • Defining the extents of surface disturbance for decommissioning and restoration, which could range up to the approximately 20 acres of construction disturbance area reflected in Figure 3-8, Project Disturbance Areas of the PEA. • Decommissioning steps, including the following, with erosion and sediment controls implemented and dust control provided by water spray trucks: <ol style="list-style-type: none"> 1) Removing fluids and gases, including dielectric fluid and sulfur hexafluoride (SF6) gas, for recycling or reuse. 2) Dismantling and removing the STATCOM substation equipment and distribution poles and wires detailed in Section 3.3.4.1, STATCOM Substation of the PEA; all materials would be recycled or reused to the maximum extent practicable. 3) Removing the converter and control structure and reusing or recycling its components to the maximum extent practicable. 4) Removing concrete pads and foundations below grade as necessary to enable future agricultural or utility uses of the site as applicable and reusing the removed foundation materials (e.g., as fill in other approved locations) to the maximum extent practicable. 5) Removing gravel and fencing at the site and recycling or reusing fencing materials to the maximum extent practicable. • Restoration steps, including the following, with erosion and sediment controls implemented and dust control provided by water spray trucks:

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1		
Request No.	DATA REQUEST	LSPGC RESPONSE
		<ol style="list-style-type: none"> 1) Removing the access roads within the site boundaries by removing and recycling or reusing road gravel to the maximum extent practicable. 2) Recontouring the site surface to original contours, including the stormwater detention basin shown in Figure 3-5, STATCOM Substation General Arrangement of the PEA. 3) Spreading topsoil throughout the disturbed areas of the site. 4) Allowing the area to return to agricultural use or seeding with an approved seed mix to stabilize the surface in preparation for its future use.
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.	<p><u>Williamson Act Cancellation</u></p> <p>The Williamson Act allows landowners to petition the county for cancellation of any contract as to all or any part of the contracted property. Once a petition is filed, the cancellation process proceeds in two phases. First, the county considers whether to approve a tentative cancellation of the contract, subject to conditions of approval. Second, the county must approve final cancellation once all applicable conditions of approval have been satisfied. The contract remains in effect until final cancellation occurs.</p> <p>To commence the tentative cancellation process here, the landowner must submit a petition for tentative cancellation to the Fresno County Agricultural Land Conservation Committee along with application fees and a proposal describing the desired alternative use of the property that is triggering cancellation. Once the application is complete, the County Assessor conducts a land valuation, and the Board of Supervisors (BOS) holds a noticed public hearing to consider comments on the tentative cancellation. Following the public hearing, the BOS may grant tentative approval for cancellation of the contract if it makes at least one of the following two primary findings: (i) that cancellation is consistent with the purposes of the Williamson Act, or (ii) that cancellation is in the public interest. The BOS may impose additional conditions to cancellation. After the BOS approves tentative cancellation based on either or both findings, it must record a Certificate of Tentative Cancellation and publish notice of its decision.</p> <p>The Williamson Act provides two conditions of approval that must be satisfied to obtain final cancellation of the contract: (i) the landowner must first pay the applicable cancellation fee (at least</p>

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018)
Energy Division Data Request #1 Date March 25, 2021
LSPGC Response #1 Date April 15, 2021

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1		
Request No.	DATA REQUEST	LSPGC RESPONSE
		<p>12.5 percent of the assessed value of the property), and (ii) the landowner must first obtain all permits necessary to commence construction of the alternative land use described in the proposal. The landowner must notify the BOS when all conditions of approval described in the Certificate of Tentative Cancellation have been satisfied. Within 30 days following such notice, and upon the County’s determination that the conditions of approval have been satisfied, the BOS must execute and record a Certificate of Cancellation stating that the contract cancellation is final.</p> <p><u>Eminent Domain</u></p> <p>As an alternative to cancellation, the exercise of eminent domain or conveyance in lieu of eminent domain will nullify a Williamson Act contract with respect to the land actually condemned or acquired. LS Power may exercise eminent domain after it is granted public utility status by the CPUC. See Pub. Util. Code § 610. Once granted such status, LS Power may exercise eminent domain to take title to private property by paying just compensation to the landowner.</p> <p>Alternatively, LS Power may purchase the property in lieu of eminent domain, which will also nullify the Williamson Act contract over the lands acquired. Here, LS Power has entered into an option contract with the owner of the contracted land acknowledging that the option was negotiated in lieu of LS Power pursuing eminent domain, as required for LS Power to nullify the Williamson Act contract by means of purchase in lieu of eminent domain. In either case, Fresno County will have no role in the Williamson Act cancellation by eminent domain or eminent domain in lieu.</p>
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?	LSPGC is still in negotiations with PG&E in regard to the proposed north-south access road. At this time, PG&E has not approved the access road on their property, and therefore, the Section 851 application has not been submitted to the CPUC. When and if PG&E approves the access road, the Section 851 application will be submitted.

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1

Request No.	DATA REQUEST	LSPGC RESPONSE
9	<p>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.</p>	<p>See attached revised Figure 3-3, STATCOM Substation Diagram that illustrates the electrical integration of the proposed STATCOM Substation facility and the existing PG&E Gates Substation. The main components of the electrical functionality of facilities, including the transformers, STATCOM reactors, disconnect switches and circuit breakers are labeled accordingly. The red arrows on the diagram illustrate the newly stabilized 500 kV power being directed back to the PG&E Gates Substation. The following is a description of the major substation equipment and their proposed functions:</p> <ul style="list-style-type: none"> • Transformers – Electrical equipment that transforms electric current from one voltage to another. • STATCOM Reactors – Electrical equipment that removes harmonics from the electric current and smooths the current waveform. Provides for system stability. • Disconnect Switches - Electrical equipment that provides a means of isolating one piece of equipment from another. Primarily used for equipment maintenance. For the Proposed Project, the disconnect switches will be used to isolate the STATCOM Substation from the PG&E Gates Substation. • Circuit Breakers - Electrical protection device that is used to isolate equipment in the event of a system fault. Provides both safety and equipment protection.
10	<p>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.</p>	<p>The “deadend” structures depicted in Figure 3-6, STATCOM Substation Profile are in fact the proposed STATCOM Substation take-off structures. Section 3.3.5, <i>Other Potentially Required Facilities</i> details the PG&E component of the Proposed Project, including their dead-end structures that will be located on the Gates Substation property.</p>
Biology		
11	<p>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.</p>	<p>Following construction, temporarily disturbed areas will be returned as near as possible to original contours and allowed to revegetate naturally. Areas within the Proposed Project site located adjacent to the agricultural field but outside of permanently disturbed areas will be allowed to return to agricultural use. The potential for invasive weeds will be minimized by allowing adjacent areas within</p>

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1																																																											
Request No.	DATA REQUEST	LSPGC RESPONSE																																																									
		the Proposed site to be returned to agricultural use. These conditions are expected to be established within one to two growing seasons following completion of construction.																																																									
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.	The approximately 20 distribution poles will remain in service during the lifespan of the STATCOM Substation. During decommissioning, the wooden poles will be removed completely and transported off-site by flatbed truck for disposal at an approved facility. The wood poles will not be treated with penta oil, creosote, chemonite, and/or chromated copper. The base of the poles will be abandoned in place if they cannot be removed. If the base of the pole can be removed, the void will be backfilled with soils from the pole replacement, or with native soil where excess soil is not available. If additional backfill material is required, clean gravel (or other suitable backfill material) will be used to backfill the old pole holes. Excess soil from the new holes will be placed on top of the backfill material.																																																									
	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 dispose, reused, or recycled.	<table border="1"> <thead> <tr> <th></th> <th colspan="3">Construction</th> <th colspan="3">O&M</th> <th colspan="3">Decommissioning</th> </tr> <tr> <th>Waste Type</th> <th>Wood</th> <th>Metal</th> <th>Plastic</th> <th>Wood</th> <th>Metal</th> <th>Plastic</th> <th>Wood</th> <th>Metal</th> <th>Plastic</th> </tr> </thead> <tbody> <tr> <td>Waste Composition</td> <td>60%</td> <td>10%</td> <td>30%</td> <td>20%</td> <td>20%</td> <td>60%</td> <td>15%</td> <td>50%</td> <td>35%</td> </tr> <tr> <td>Reuse/Recycling Rate</td> <td>90%</td> <td>80%</td> <td>50%</td> <td>90%</td> <td>80%</td> <td>50%</td> <td>90%</td> <td>80%</td> <td>50%</td> </tr> <tr> <td>Total Waste Volume (CY)</td> <td colspan="3">300</td> <td colspan="3">10</td> <td colspan="3">50</td> </tr> </tbody> </table>										Construction			O&M			Decommissioning			Waste Type	Wood	Metal	Plastic	Wood	Metal	Plastic	Wood	Metal	Plastic	Waste Composition	60%	10%	30%	20%	20%	60%	15%	50%	35%	Reuse/Recycling Rate	90%	80%	50%	90%	80%	50%	90%	80%	50%	Total Waste Volume (CY)	300			10			50	
	Construction			O&M			Decommissioning																																																				
Waste Type	Wood	Metal	Plastic	Wood	Metal	Plastic	Wood	Metal	Plastic																																																		
Waste Composition	60%	10%	30%	20%	20%	60%	15%	50%	35%																																																		
Reuse/Recycling Rate	90%	80%	50%	90%	80%	50%	90%	80%	50%																																																		
Total Waste Volume (CY)	300			10			50																																																				
Wildfire																																																											
13	Provide a Fire Prevention Plan for the Project.	A Construction Fire Prevention Plan will be prepared for the Proposed Project and will be submitted to the CPUC for approval prior to the issuance of the Notice to Proceed.																																																									

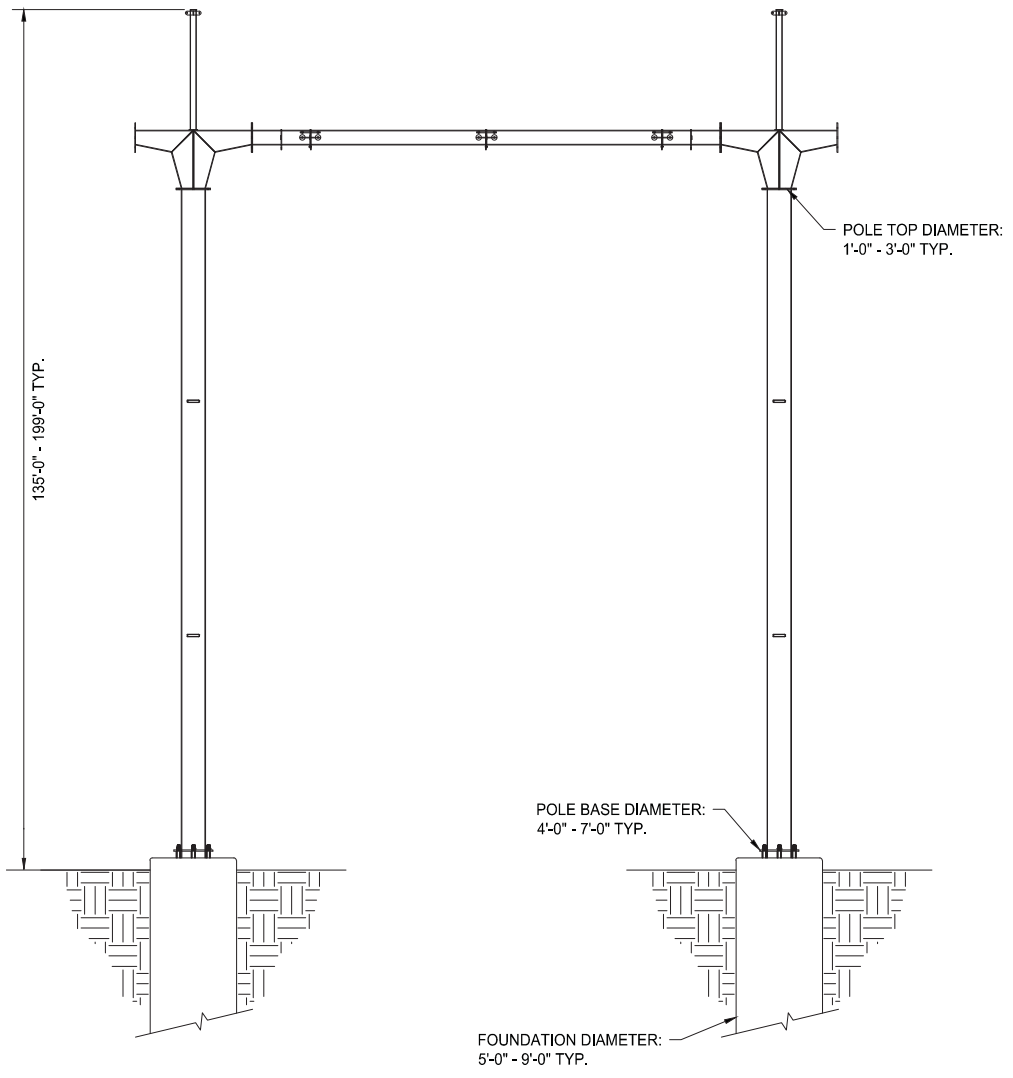
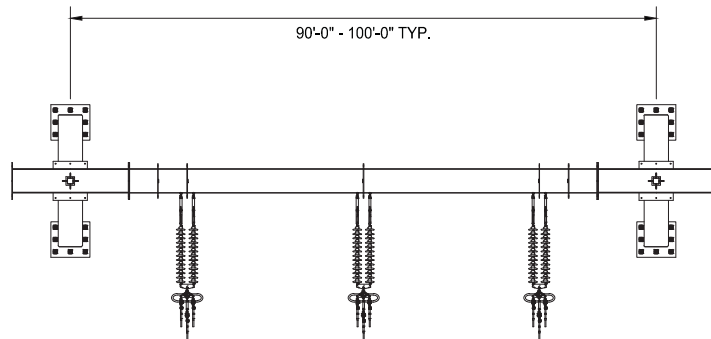
LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018)
Energy Division Data Request #1 Date March 25, 2021
LSPGC Response #1 Date April 15, 2021

LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1		
Request No.	DATA REQUEST	LSPGC RESPONSE
Additional Requests		
14	Provide all GIS data that have been developed for the Project.	A ShareFile link to the Proposed Project’s GIS data was submitted to the CPUC on April 6 th , 2021: https://kpenvironmental.sharefile.com/i/i59d663c1a864775a
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.	A ShareFile link to the Confidential Cultural Resources Report was provided to the CPUC on April 6 th , 2021. Given the confidential nature of this information, please have the CPUC's cultural resource specialist contact Megan Good (mgood@kpenvironmental.com or 760-583-9211), who will then coordinate the direct transfer of information between the two cultural resource specialists through a confidential folder.
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.	LSPGC is developing an alternative access road option in conjunction with its ongoing negotiations with PG&E on the primary access road that was included in the PEA. The alternative access road will be located completely on private property, west of the PG&E Gates Substation and solar arrays. LSPGC is still developing the plans for the access road. When those plans are more developed, the requested information (text descriptions, revised figures, GIS data, and any associated revisions to construction information, such as disturbance areas, gravel volumes, etc.) will be provided to the CPUC for its inclusion in the Proposed Project’s CEQA document.
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 which ever north-south access road option is	If PG&E objects to the north-south access road as currently proposed, LSPGC will revise its telecommunication lines to follow the path of the alternative access road described in the previous response. Updated telecommunication information will be provided to the CPUC when the road plans are more fully developed for inclusion in the Proposed Project’s CEQA document. Distribution lines are expected to follow the same routing described in the PEA.



LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018)
Energy Division Data Request #1 Date March 25, 2021
LSPGC Response #1 Date April 15, 2021

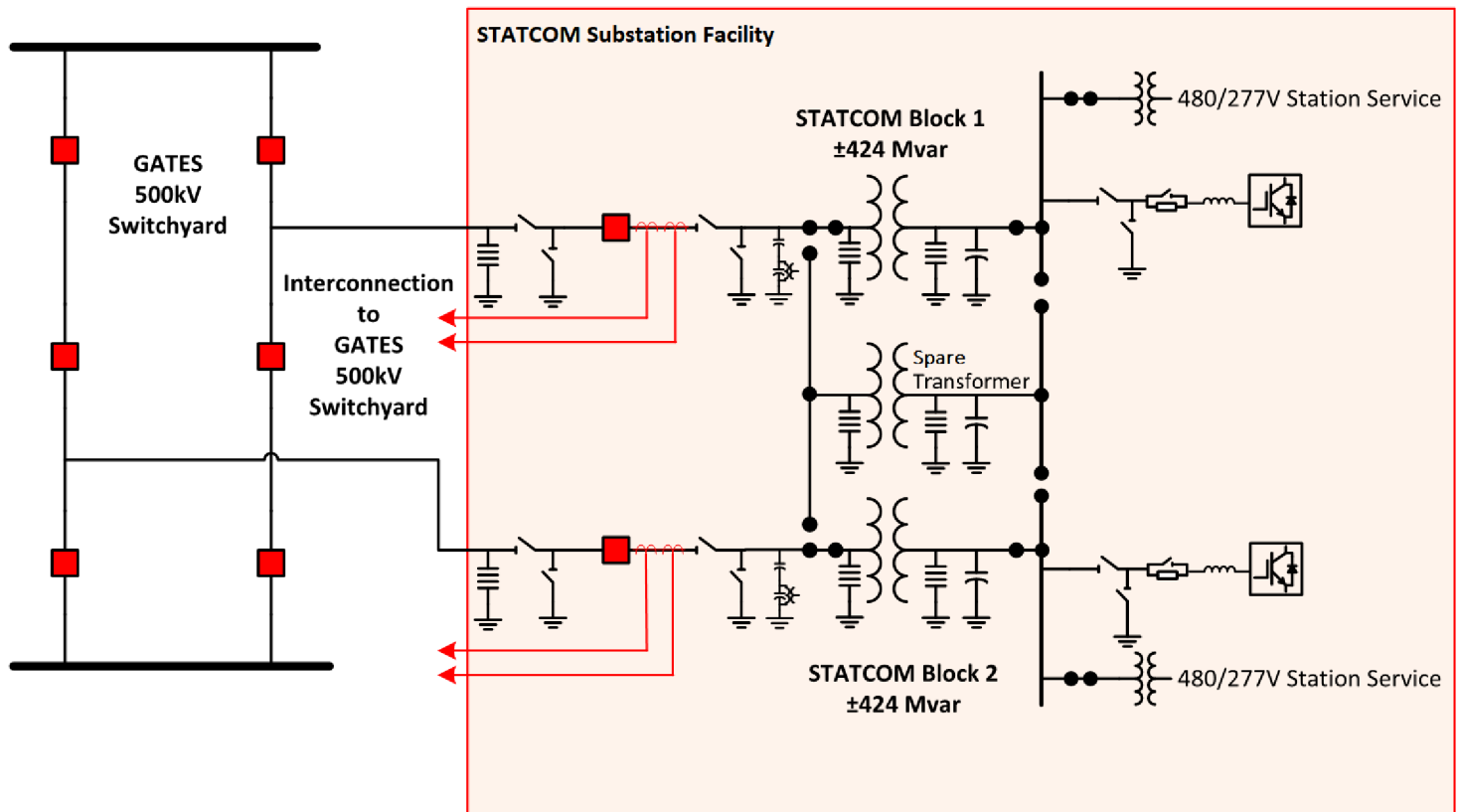
LSPGC Gates Dynamic Reactive Support Project (A. 21-02-018) Data Request #1		
Request No.	DATA REQUEST	LSPGC RESPONSE
	selected for the Project.	
18	<p>After filing the Application and PEA, LSPGC filed amendments to its Application (March 5, and March 15, 2021) indicating changes have been made to the 1,000-foot mailing list prepared for the Project. Provide the updated spreadsheet for the 1,000-foot mailing list.</p>	<p>An updated 1,000-foot mailing list was submitted to the CPUC on April 6th, 2021, and a copy is also included as an attachment to this response letter. The original notice that was sent to the PG&E local address (within 1,000 feet of the of the Proposed Project) was returned due to “insufficient address – unable to forward.” As a good faith effort to notice the appropriate people at PG&E, LSPGC sent following additional notifications:</p> <p>Jo Lynn Lambert PG&E Attorney Lambert Law 300 E State Street, Suite 600 Redlands, CA 92373</p> <p>Stephen Ruiz Senior Land Planner 1455 E Shaw Avenue Fresno, CA 92710</p>



**LSPGC - Gates 500 kV
Dynamic Reactive Support Project**

**Figure 3-3
STATCOM Substation Diagram**

Fresno County, CA



Legend:

- | | | | |
|--|-----------------------|--|---------------------------------------|
| | 500kV Bus | | Pre-charge resistor and bypass switch |
| | Power Transformer | | Circuit Breaker |
| | Disconnect Switch | | Current Transformers |
| | Surge Arrester | | STATCOM IGBT Valves |
| | STATCOM Phase Reactor | | Capacitive Voltage Transformer |
| | Surge Capacitor | | Removeable Link Open |
| | | | Removeable Link Closed |