



Dustin Joseph
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LS Power Grid California, LLC
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September 11th, 2023

Boris Sanchez
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th floor
San Francisco, CA 94102

Re: Minor Project Refinement No. 3 for the Gates 500 kV Dynamic Reactive Support Project

Mr. Sanchez:

LS Power Grid California, LLC (LSPGC) is hereby requesting approval of Minor Project Refinement No. 3 (MPR-3) from the California Public Utilities Commission (CPUC) for the Gates 500 kilovolt (kV) Dynamic Reactive Support Project (Orchard Substation or Project). Approval of MPR-3 will authorize the use of equipment components containing a reflective finish that are not commercially available in a neutral gray color as described herein.

Equipment parts such as the voltage transformer corona rings and the existing transformer covers were noted as having a reflective finish by the CPUC Compliance Monitor onsite. At the CPUC's request, this MPR is being submitted to clarify the intent of APM AES-2 for the Project record. Approval of MPR-3 would remain consistent with the intent of the APM AES-2 measure in that the majority of the Orchard Substation equipment surface area would be comprised of non-reflective, neutral gray components. No additional temporary nor permanent disturbance is proposed as a result of MPR-3. Please refer to **Attachment B, MPR-3 Site Photographs** to view the Project components discussed within MPR-3.

Attachment A: MPR-3 Form

Attachment B: MPR-3 Site Photographs

Preconstruction Requirements and Permit/Approvals

Approval of MPR-3 will not change the conditions set forth in the IS/MND, nor will it change the scope of the Project, number of construction personnel, or the status of any MMCRP pre-construction requirements. No new permits are required for MPR-3.

MPR-3 Request for Approval

LSPGC respectfully requests approval of MPR-3 to allow the use of equipment components that contain a reflective finish where they are not commercially available in a neutral gray color as described within this request by September 18, 2023. Should you have any questions or need additional information, please do not hesitate to contact me at djoseph@lspower.com.

Sincerely,

Dustin Joseph
Director of Environmental Permitting

cc: Michael Manka, ESA
Matt Fagundes, ESA
David Wilson, LSPGC
Mark Milburn, LSPGC
Emily Critchfield, KPE

ATTACHMENT A
MPR-3 Form



Gates 500 kilovolt (kV) Dynamic Reactive Support Orchard Substation Project CPUC Minor Project Refinement 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, 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.

Date Requested: September 11, 2023

Report No.: 3

Date Approved: TBD

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Gates 500 kilovolt (kV) Dynamic Reactive Support Project (Orchard Substation or Project) is located on LS Power Grid California, LLC (LSPGC)-owned property.

Location/Milepost: The Orchard Substation is located north of West Jayne Avenue in Fresno County, California.

Land Use/Vegetative Cover: N/A

Sensitive Resources: None. See resource discussions below.

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:		

LSPGC is requesting approval of MPR-3 to authorize the use of equipment components that contain a reflective finish that are not commercially available in a neutral gray color for construction of the Orchard Substation as described herein. APM AES-2 states that “*structures and equipment at the proposed Orchard Substation would be a non-reflective finish and neutral gray color.*” Implicit in the creation of this APM was LSPGC’s understanding that the reflectivity and color specifications would apply to the extent that equipment meeting these specifications is commercially available, and that the result would be the new Orchard Substation where structures and equipment would be substantially non-reflective and neutral gray in color.

It is LSPGC’s understanding that the Project is in compliance with APM AES-2 as LSPGC has selected non-reflective neutral gray colored structures and equipment in cases where such components are available. For some minor equipment components, such as the voltage transformer

corona rings and the current transformer covers (See **Attachment B, MPR-3 Site Photographs**), the component surfaces must be round and smooth/polished to reduce or eliminate corona discharges, thus enabling safe, efficient, and quiet operation of the equipment. As such, these and similar components are not available for purchase in a non-reflective finish. Moreover, these equipment components comprise only a very small fraction of the overall surface area of the equipment installed at Orchard Substation, meaning that the overwhelming majority of the equipment surfaces at the substation will be non-reflective and neutral gray in color.

Therefore, LSPGC is submitting this MPR to allow the use of select components with a reflective finish with the understanding that the Project remains consistent with the specifications in APM AES-2 under a reasonable interpretation of the measure.

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

Original Condition: There is no change to the original condition of the Project site, however, MPR-3 is being proposed for the reasons described below.

Justification for Change: The surfaces of the components identified during the August 21, 2023, compliance visit, such as corona rings and transformer covers, are required to be smooth and polished to reduce or eliminate discharges, enabling safe and efficient operation of the equipment. These components are not commercially available in a neutral gray, non-reflective finish, therefore LSPGC is submitting this MPR to authorize the use of those components with a reflective finish. These pieces of equipment represent the industry standard for substation construction throughout California, and comprise only a small fraction of the total surface area of equipment being installed at the Orchard Substation. The majority of equipment at the Orchard Substation will be significantly non-reflective and neutral gray in color, which is the intent of APM AES-2.

Maps & Figures: Refer to **Attachment B, MPR-3 Site Photographs**, for pictures of the current conditions of the Orchard Substation equipment discussed in MPR-3.

Environmental Impact: The use of equipment components with a reflective finish discussed in MPR-3 would not change the nature or increase the severity of any impacts disclosed within the IS/MND; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the MPR-3 components are located within the Project site boundary and are therefore within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	<input type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input checked="" type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference: Biological resources within the Project site boundary were studied, reviewed, and documented as part of LSPGC's application for a Permit to Construct (PTC) for the Project and Proponent's Environmental Assessment (PEA). Biological resources were also discussed within the CPUC-conducted CEQA review process. No additional biological surveys or monitoring are proposed as a result of MPR-3.			

Cultural	<input type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input checked="" type="checkbox"/> N/A, changes would not affect resources
Previous Cultural Survey Report Reference: Cultural resources within the Project's study area were studied, reviewed, and documented as part of LSPGC's application for a PTC for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's IS/MND, Sections 3.5 and 3.18). No additional cultural surveys or monitoring are proposed as a result of MPR-3.			
Disturbance Acreage Changes: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
MPR-3 does not propose additional temporary nor permanent disturbance.			

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the IS/MND as it relates to MPR-3. MPR-3 would have no potential to impact the following environmental resource areas, and therefore are not included in the table below: Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Energy, Hazardous Materials, Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise and Vibration, Population and Housing, Public Services, Recreation, Traffic and Transportation, Utilities and Service Systems, and Wildfire.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Aesthetics	<input type="checkbox"/> Y	The components of the Orchard Substation that are discussed herein are not located in the vicinity of any sensitive receptors or public views. These components were included in the original design of the Orchard Substation and represent the industry standard of substations throughout California and beyond. The reflective finish of the components, such as the corona rings and transformer covers, are required to eliminate potential discharges and to ensure safe operation. The majority of equipment utilized throughout the Orchard Substation will remain significantly non-reflective and neutral gray in color. Therefore, impacts would remain consistent to those addressed in the Project's IS/MND, Section 3.1, and the MPR-3 interpretation adheres to the intent of APM AES-2, which is to minimize conditions of glare to the maximum extent practicable. No new or altered APMs or MMs would be required.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	MPR-3 would not require agency consultation relating to aesthetics or visual resources.
	<input checked="" type="checkbox"/> N	

ATTACHMENT B
MPR-3 Site Photographs

Gates 500 kilovolt Dynamic Reactive Support Project

MPR-3 PHOTO LOG

	<p>Photograph 1:</p> <p>View containing the reflective surfaces of transformer covers and corona rings noted during the compliance visit on August 21, 2023. The surfaces of these components are required to be reflective to eliminate discharges and enable safe operation of equipment, and thus are not commercially available in neutral gray colors. MPR-3 clarifies the intent of APM AES-2 in which components that are commercially available as non-reflective will be subject to the measure.</p>
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	<p>Photograph 2:</p> <p>View containing the equipment components with reflective surfaces. The majority of the equipment is neutral gray in color, and only a minor portion that is required to have a polished finish is reflective. The reflective components are representative of an industry standard for substation construction throughout California, with other substations in the county containing the same equipment.</p>
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