



California Public Utilities Commission



April 10, 2025

Dustin Joseph
LS Power Grid California
6701 Kroll Center Parkway, Suite 250
Pleasanton, CA 94566

Re: Minor Project Refinement No. 5 for the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project – (A.24-01-011)

Dear Mr. Joseph:

On March 27, 2025, LS Power Grid California, LLC. (LS Power) requested approval from the California Public Utilities Commission (CPUC), for Minor Project Refinement No. 5 (MPR-5) for the Round Mountain 500 kV Dynamic Reactive Support Project (Fern Road Substation or Project). The minor project refinement or variance process, as described in the approved Mitigation Monitoring Compliance and Reporting Program (MMCRP) for the Project, allows for minor Project changes provided those changes do not trigger new permit requirements, create a new impact, or increase the severity of an impact identified in the approved Initial Study/Mitigated Negative Declaration (IS/MND).

LS Power has not requested any new substation components, expansion of substation footprint, or infrastructure beyond what was anticipated in the approved IS/MND. As described in the MPR-5 request, approval of MPR-5 authorizes the installation of an approximately 1,900-foot-long underground 12 kilovolt (kV) distribution line along the eastern edge of Fern Road and northern edge of the existing Fern Road Substation access road. This portion of the scope of work requested under MPR-5 is related to the PG&E Facilities component of the approved project, which is not under CPUC jurisdiction but is included for informational purposes. This underground distribution line is being proposed as an alternative to avoid the need for an overhead distribution line (on approximately 35 wood poles) which was described in the Project's Final Initial Study/Mitigated Negative Declaration (IS/MND). In lieu of an overhead line, MPR-5 includes the installation of an approximately 1,650-foot-long underground fiber optic telecommunications line along the southern edge of the existing Fern Road Substation access road to provide service to both the LSPGC and Pacific Gas and Electric (PG&E) transmission facilities. In addition, one existing PG&E distribution pole on the east side of Fern Road would be reframed to transition down to the proposed 12 kV underground distribution line. The MPR-5 work would temporarily impact approximately 0.28 acres of previously disturbed developed land (mostly within the eastern Fern Road corridor) that does not contain

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California Public Utilities Commission



Dustin Joseph
April 10, 2025
Page 2

any sensitive resources. An encroachment permit will be obtained by LS Power for the underground work within the Fern Road public right-of-way. The request notes that the PG&E communications monitoring building was anticipated in the Final IS/MND; however the precise locations (within the substation footprint) depended on final engineering, which was not complete at the time of the environmental review. MPR-5 depicts these components in the context of their current engineering and design plan.

LS Power has documented in their MPR-5 request the resource areas with potential to be impacted by the MPR-5 activities along with the applicability of measures [including applicant proposed measures (APMs) and mitigation measures (MMs)] to be implemented to reduce potential impacts. Biological surveys were conducted for the Project site (including the MPR-5 areas) as part of the permit to construct application and subsequent environmental review. There are no special status plants or wildlife species in the MPR-5 work areas based on botanical surveys conducted for the Biological Resources Technical Report. Preconstruction bird and bat surveys show no active nests or roosting bats. An additional preconstruction survey will occur prior to construction in the MPR-5 pole replacement areas to confirm current conditions, consistent with APM BIO-4. Streams and wetlands have been flagged for protection and do not intersect the MPR-5 areas. As documented in the request, the potential for the presence of unrecorded archaeological resources in the proposed MPR-5 area is low; (APMs) CUL-1 and CUL-3 would be implemented during MPR-5 activities, as described for the project in the IS/MND. MPR-5 would not result in new construction activities or methods that have not been previously analyzed and disclosed within the Project's Final IS/MND. There is no change to the overall construction schedule or new equipment used that will result from the installation of the proposed underground lines. MPR-5 activities would comply with the Project's Hazardous Materials Management Plan and would provide worker awareness training for the MPR-5 activities as described for the Project in the IS/MND. All MPR-5 activities would adhere to requirements within the stormwater pollution prevention plan (SWPPP). Although impacts on hydrology and water quality are not anticipated, any indirect impacts that might occur would be reduced in accordance with the implementation of APM WQ-1, APM WQ-2, and the Project SWPPP, which contains measures to reduce or eliminate pollutants in storm water discharges from the site during construction that may otherwise violate water quality standards. MPR-5 would not create any new noise and vibration impacts beyond what was analyzed in the IS/MND. No blasting would occur under MPR-5, so no new impacts or mitigation would apply. LS Power and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention Plan (CFPP), APMs FIRE-1 through FIRE-5, and APM HAZ-4. The 12kV distribution line was anticipated in the IS/MND to be an overhead line; under MPR-5 this line would be underground which improves fire hardening and associated wildfire safety for the Project once operational.



California Public Utilities Commission



Dustin Joseph
April 10, 2025
Page 3

Thus, the Project impacts would remain consistent with those analyzed in the Final IS/MND and additional mitigation measures are not warranted. In addition, this MPR-5 approval does not result in alteration to APMs or existing Mitigation Measures, would not require new mitigation measures, and would not require new permits or new regulatory approval.

MPR-5 includes PG&E Infrastructure that is not under the jurisdiction of this proceeding; however these activities are considered as part of the overall project and are therefore included for informational purposes.

LSPGC is authorized to proceed with the activities as described in the March 27, 2025, MPR-5 request to CPUC upon condition that all proposed actions and construction are carried out in accordance with the methods and conditions herein and as described in the IS/MND and the Notice to Proceed issued by CPUC.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Sanchez", is placed over a light gray rectangular background.

Boris Sanchez, CPUC Project Manager

cc: Michelle Wilson, CPUC
Maria Hensel, ESA
Matt Fagundes, ESA