PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

January 19, 2016

Ms Jeanne Armstrong
Goodin, Macbride, Squeri & Day LLP
505 Sansome Street, Suite 900
San Francisco, California 94111

Subject: PacifiCorp (U 901 E) Lassen Substation Project (Application No. A.15-11-005) – Data Request 2.0

Dear Ms. Armstrong,

Following the site visit on December 16, 2015, the California Public Utilities Commission (CPUC), with technical assistance from Dudek, requests additional information in support of the review for PacfiCorp's Permit to Construct (PTC) application. The additional questions are provided in Attachment A, please provide your response to Michael Rosauer (CPUC Energy Division) and Iain Fisher (Dudek) no later than February 21, 2016.

If you have any questions regarding this letter or need additional information, please contact me at 415.703.2579 or Michael.Rosauer@cpuc.ca.gov.

Sincerely,

Michael Rosauer
CPUC Project Manager

cc: Ms. Cathie Allen, Mr. Dustin Till, and the Data Request Response Center
Attachment A: Data Request 2.0

ATTACHMENT A
Permit to Construct
PacifiCorp Lassen Substation Project
Proponent's Environmental Assessment (PEA) Completeness Review Data Request 2.0

The California Public Utilities Commission, their environmental consultant, Dudek, and PacifiCorp (project applicant) conducted a field visit to the proposed Lassen Substation Project site, including the existing and proposed substation sites on December 16, 2015. During the field visit questions arose that require additional clarification by PacifiCorp. Data Request 2.0 consists of the questions that arose during the field visit and the follow-up applicant/agency/consultant team call held on January 11, 2016.

2.0 PROJECT PURPOSE AND NEED

a. To assist in establishing the utility of the proposed substation please provide a summary of the increased maintenance activity, which has led to the conclusion that the existing substation is nearing the end of its useful life. How does this differ from the expected standard frequency of maintenance activity?

3.0 PROJECT DESCRIPTION

a. Provide the expected support pole and conductor line heights that would cross Interstate 5 (I-5).

b. Please acquire the as-built plans for the existing conduit (under I-5) to determine the suitability for use by the proposed project in-lieu of overhead lines. Provide as-built plans for review. If infeasible, please provide a written justification of why the proposed lines cannot be routed through this existing subsurface facility.

c. Provide a detailed inventory of trees that would remain on the new substation property, specifically identify those that would serve to screen the substation from the adjacent South Old Stage Road.

d. During the field visit it was indicated by PacifiCorp that decommissioning activities include leaving the existing foundation and substation pad in place. Please indicate whether the existing substation site will remain in control of PacifiCorp following decommissioning activities.

e. Provide a full list of which substation features (for example concrete and gravel pads, fencing, non-electric components, etc.) will remain onsite following decommissioning activities and which features will be permanently removed.

f. As stated in discussions with the applicant, standard practice when decommissioning a substation is to remove all surface and subsurface features, and regrade the site to match adjacent grades. Please provide an explanation as to why this project would not remove subsurface features and regrade the site per decommissioning standards. Further, please provide the method by which PacifiCorp would ensure that any toxic contamination of the site resulting from the long term use as a substation, would be identified and remediated if subsurface components are to be left *in situ* and no grading will be undertaken.

4.0 ENVIRONMENTAL IMPACT ASSESSMENT SUMMARY

4.1 Aesthetics

a. In addition to View Point 3, please provide a new visual simulation from southbound Old Stage Road that depicts the pre- and post-project condition from a location adjacent to the northwest corner of the substation pad looking east to show the old and new substations in the same view. The old substation should be simulated to accurately show the final proposed condition after decommissioning and the new substation beyond (and should be consistent with features described in Question 3.0(e) above).

b. Figure 3-6 in the PEA project description shows cross arms that are side by side for the future condition, similar to the existing condition. However, in Viewpoint 6 (the simulation running adjacent to I-5), shows the cross arms for the 69kV transmission staggered down the pole, depicting more lines than in Figure 3-6. Please clarify which view is correct. If Figure 3-6 is correct, please provide an updated Viewpoint 6 visual simulation that reflects the configuration described in the project description.

c. In Viewpoint 10, please provide any records of discussions with Caltrans regarding the proposed overhead line traversing I-5, which crosses the Volcanic Legacy Scenic Byway, a federally designated scenic highway. Further, please provide contact details of any Caltrans personnel that have been contacted concerning this project.

4.5 Biological Resources

During the field visit it was observed that the wetland areas immediately adjacent to the north and east of the existing substation could potentially be characterized as ACOE jurisdictional wetlands.

a. Please provide a map depicting the extent of the wetlands surrounding the existing substation.

b. Provide a detailed description of likely impacts to wetlands immediately adjacent to the existing substation including determination if adjacent wetlands are jurisdictional pursuant to ACOE criteria.

c. Demonstrate that construction and decommission activities would avoid and minimize impacts to existing wetlands.

4.9 Hydrology and Water Quality

a. During the field visit, an on-site groundwater well was observed in addition to evidence of shallow groundwater, confirming conditions as described in the geotechnical report. The preliminary geotechnical study gives several methods by which the site may be dewatered (PEA Appendix E, Section 7.9.1.2 [pg. 25-26]), without determining which would be most suitable for the site and project. The geotechnical report suggests a predrainage or cutoff system may be necessary for the project, but only describes the sump and pump methodology. Please clarify which method or combination of methods would be used, describe the implications on the construction scenario, and the anticipated discharge location for dewatered groundwater.

ATTACHMENT A
PEA Completeness Review

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