

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 7, 2015

**Advice Letter 4525-E**

Meredith Allen  
Senior Director, Regulatory Relations,  
Pacific Gas and Electric Company  
Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: Notice of Construction under General Order (GO) 131-D, for the Construction of Mustang Switching Station and Solar Project Interconnection in the County of Kings.**

Dear Ms. Allen:

Summary: Energy Division approves PG&E's request to construct facilities pursuant to GO 131-D for the Mustang Switching Station and Interconnection for the Mustang Solar Project in the County of Kings.

Background: The Commission's General Order (GO) 131-D governs the planning and construction of electric generation, transmission/power/distribution line facilities and substations.

To interconnect Recurrent Energy's planned Mustang Solar Project to the electric transmission system, Recurrent energy is proposing to construct a new approximately 5-acre 230kV switching station in Kings County and transfer its ownership to Pacific Gas and Electric Company (PG&E). The proposed solar facility is located southwest of the intersection of State Route 198 and 25<sup>th</sup> Avenue, approximately one mile southwest of the unincorporated community of Lemoore Station. To interconnect the new switching station, located within the solar project boundaries and on the north side of PG&E's existing tower line, PG&E will relocate and loop approximately 1,000 and approximately 1,200 feet of the existing Gates-Gregg 230kV and Gates-McCall 230kV transmission lines, respectively, into and out of the switching station (minor relocation). To relocate the transmission lines, PG&E will install approximately 8 tubular steel poles, 4 poles in-line with the existing transmission lines and 4 poles north of the existing lines adjacent to the switching station. The new poles will be approximately 100- to 135- feet tall, which is approximately the same height or shorter than the existing towers. Construction is tentatively scheduled to begin in January 2015, or as soon as project plans and approvals are in place. Construction is scheduled to be completed in January 2016, or as soon as possible after construction begins.

PG&E believes this project qualifies for the following exemption(s) under GO131D Section III.A and III.B.1:

III.A: "the minor relocation of existing power line facilities"

III.B.f: “power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, for which the final CEQA finds no significant unavoidable environmental impacts caused by the proposed line or substation.”

The county of Kings adopted a Mitigated Negative Declaration for the RE Mustang, RE Kent South, and RE Orion Solar Generation Facilities Project on August 6, 2012 and Addendum dated January 6, 2014, finding no significant unavoidable environmental impacts resulting from PG&E’s proposed facilities. (State clearinghouse No. 2012061038).

This project will not increase rates or charges, cause the withdrawal of service, or conflict with any other rate schedule or rule.

PG&E’s Advice Letter AL 4525-E was timely responded to by the Office of Ratepayer Advocates (ORA) for clarification of the following issues:

1. Does General Order 131-D Section I define “transmission line” as a line designed to operate above 200kV.
2. Do the Exemptions listed under General Order 131-D Section III.A for the “minor relocation of existing power line facilities” and under Section B.1.f is for “power lines or substations to be relocated or constructed” apply to Advice Letter 4525-E.
3. If PG&E incorrectly applied for these Exemptions under General Order 131-D, should PG&E apply for a Certificate of Public Convenience and Necessity (CPCN).

PG&E responded to the issues raised by the Office of Ratepayer Advocates on November 25, 2014.

Commission staff has reviewed the Advice Letter, ORA’s Response to the Advice Letter, and PG&E’s Response to the issues that ORA raised.

In PG&E response to the issues raised, PG&E states that it is a logical interpretation of the use of the term “power lines” that the term “power lines” and “transmission lines” were used interchangeably in Section III.A of General Order 131-D. and these exemptions largely track those found in Section III.B. While Section III.A requires utilities to obtain a CPCN for construction of “major electric transmission line facilities which are designed for immediate or eventual operation at 200kV or more”, it also provides exemptions from a CPCN for minor relocation of existing power line facilities. Due to longstanding utility practice and the guidance from the CPUC Energy Division, this exemption from the CPCN requirement for transmission line applies to minor transmission line work required to interconnect the new switching station for the Mustang Solar Project.

This project falls within and qualifies for the exemptions cited by PG&E in their Advice Letter 4525-E. None of the concerns raised by the Office of Ratepayer Advocates fits within the specific exceptions to the exemptions of General Order 131-D, nor does ORA’s claim support a misapplication of an exemption by PG&E. The Energy Division appreciates the opportunity to offer clarification to the language of General Order 131-D.

Meredith Allen  
January 7, 2015  
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Hence, PG&E's request to construct the facilities for the Mustang Switching Station and Solar Project Interconnection in the County of Kings is approved, effective January 5, 2015.

Sincerely,

  
Edward Randolph  
Director, Energy Division

Cc: Kingsley Cheng, PG&E  
Joseph Como, Director of Office of Ratepayer Advocates



**Meredith Allen**  
Senior Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-7226

October 29, 2014

**Advice 4525-E**  
(Pacific Gas and Electric Company ID U39 E)

Public Utilities Commission of the State of California

**Subject: Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Mustang Switching Station and Solar Project Interconnection in the County of Kings**

Pacific Gas and Electric Company ("PG&E" or "the Company") hereby submits notice pursuant to General Order (G.O.) 131-D, Section XI, Subsection B.4, of the construction of facilities that are exempt from a Permit to Construct or Certificate of Public Convenience and Necessity.

**Purpose**

This advice letter provides a copy of the Notice of Proposed Construction (Attachment I) and the Notice Distribution List, which comply with the noticing requirements found in G.O. 131-D, Section XI.

**Background**

To interconnect Recurrent Energy's planned Mustang Solar Project to the electric transmission system, Recurrent Energy is proposing to construct a new approximately 5-acre 230 kilovolt (kV) switching station in Kings County (larger project CEQA) and transfer its ownership to Pacific Gas and Electric Company (PG&E). The proposed solar facility is located southwest of the intersection of State Route 198 and 25th Avenue, approximately one mile southwest of the unincorporated community of Lemoore Station. To interconnect the new switching station, located within the solar project boundaries and on the north side of PG&E's existing tower line, PG&E will relocate and loop approximately 1,000 and approximately 1,200 feet of the existing Gates-Gregg 230 kV and Gates-McCall 230 kV transmission lines, respectively, into and out of the switching station (minor relocation). To relocate the transmission lines, PG&E will install approximately 8 tubular steel poles, 4 poles in-line with the existing transmission lines and 4 poles north of the existing lines adjacent to the switching station. The new poles will be approximately 100- to 135 feet tall, which is approximately the same height or shorter than the existing towers. Construction

is tentatively scheduled to begin in January 2015, or as soon as project plans and approvals are in place. Construction is scheduled to be completed in January 2016, or as soon as possible after construction begins.

CPUC General Order 131-D, Section III.A (transmission line relocations) and III.B.1 (switching station) exempts projects meeting specific conditions from the CPUC's requirement to file an application requesting authority to construct. The Company believes this project qualifies for the following exemption(s),

III.A: "the minor relocation of existing power line facilities"

III.B.f: "power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (Environmental Impact Report (EIR) or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation."

The County of Kings adopted a Mitigated Negative Declaration for the RE Mustang, RE Kent South, and RE Orion Solar Generation Facilities Project on August 6, 2012 and Addendum dated January 6, 2014, finding no significant unavoidable environmental impacts resulting from PG&E's proposed facilities. (State Clearinghouse # 2012061038).

This filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other rate schedule or rule.

### **Protests**

Anyone wishing to protest this filing may do so by filing a protest with the CPUC and the Company by November 18, 2014, which is 20 days after the date of this filing. Protests should be mailed to the following address:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-Mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address show above.

The protest also should be sent via U.S. mail (and by facsimile and electronically, if possible) to PG&E at the address shown below on the same date it is mailed or delivered to the Commission:

David T. Kraska  
Attorney, Law Department  
Pacific Gas and Electric Company  
P.O. Box 7442  
San Francisco, California 94120

Facsimile: (415) 973-0516

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
P.O. Box 770000, Mail Code B10C  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-Mail: PGETariffs@pge.com

Persons or groups may protest the proposed construction if they believe that the Company has incorrectly applied for an exemption or that the conditions set out in Section III.B.2 of G.O. 131-D exist.

### **Public Comment**

Individuals or groups who do not file an official protest may still submit a comment on the request to the Energy Division at the address noted above, referencing Advice Letter 4525-E.

### **Effective Date**

The Company requests that this advice filing become effective on **November 28, 2014**, which is 30 days after the date of filing. (In accordance with G.O. 131-D, construction will not begin until 45 days after notice is first published.)

### **Notice**

A copy of this advice letter is being sent electronically and via U.S. Mail to parties shown on the attached list, including the parties listed in G.O. 131-D, Section XI, Paragraphs B.1 and B.2. These parties are identified in the "Notice Distribution List" included in Attachment I. All electronic approvals should be sent to e-mail PGETariffs@pge.com. Advice letter filings can also be accessed electronically at <http://www.pge.com/tariffs/>.



# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 E)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: **Kingsley Cheng**

Phone #: **(415) 973-5265**

E-mail: **k2c0@pge.com and PGETariffs@pge.com**

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas        
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4525-E**

Tier: **N/A**

Subject of AL: **Submits Notice of Construction, Pursuant to General Order 131-D, for the Construction of Mustang Switching Station and Solar Project Interconnection in the County of Kings**

Keywords (choose from CPUC listing): **Power Lines**

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: **N/A**

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: **No**

Summarize differences between the AL and the prior withdrawn or rejected AL:

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: **No**

Confidential information will be made available to those who have executed a nondisclosure agreement: **N/A**

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: **November 28, 2014**

No. of tariff sheets: **N/A**

Estimated system annual revenue effect (%): **N/A**

Estimated system average rate effect (%): **N/A**

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected:

Service affected and changes proposed:

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**  
**Director, Energy Division**  
**505 Van Ness Ave., 4th Floor**  
**San Francisco, CA 94102**  
**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**  
**Attn: Meredith Allen, Senior Director, Regulatory Relations**  
**77 Beale Street, Mail Code B10C**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: PGETariffs@pge.com**

**PROJECT NAME: Mustang Switching Station and Solar Project Interconnection –  
(Kings County, P. No. 07916)  
ADVICE LETTER NUMBER: 4525-E**

**Proposed Project:** To interconnect Recurrent Energy's planned Mustang Solar Project to the electric transmission system, Recurrent Energy is proposing to construct a new approximately 5-acre 230 kilovolt (kV) switching station in Kings County (larger project CEQA) and transfer its ownership to Pacific Gas and Electric Company (PG&E). The proposed solar facility is located southwest of the intersection of State Route 198 and 25<sup>th</sup> Avenue, approximately one mile southwest of the unincorporated community of Lemoore Station. To interconnect the new switching station, located within the solar project boundaries and on the north side of PG&E's existing tower line, PG&E will relocate and loop approximately 1,000 and approximately 1,200 feet of the existing Gates-Gregg 230 kV and Gates-McCall 230 kV transmission lines, respectively, into and out of the switching station (minor relocation). To relocate the transmission lines, PG&E will install approximately 8 tubular steel poles, 4 poles in-line with the existing transmission lines and 4 poles north of the existing lines adjacent to the switching station. The new poles will be approximately 100- to 135 feet tall, which is approximately the same height or shorter than the existing towers. Construction is tentatively scheduled to begin in January 2015, or as soon as project plans and approvals are in place. Construction is scheduled to be completed in January 2016, or as soon as possible after construction begins.

**Exemption from CPUC Permit Requirement:** CPUC General Order 131-D, Section III.A (transmission line relocations) and III.B.1 (switching station) exempt projects meeting specific conditions from the CPUC's requirement to file an application requesting authority to construct. Pacific Gas and Electric Company believes this project qualifies for the following exemption(s):

III.A: "the minor relocation of existing power line facilities"

III.B.f: "power lines or substations to be relocated or constructed which have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (Environmental Impact Report (EIR) or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation."

The County of Kings adopted a Mitigated Negative Declaration for the RE Mustang, RE Kent South, and RE Orion Solar Generation Facilities Project on August 6, 2012 and Addendum dated January 6, 2014, finding no significant unavoidable environmental impacts resulting from PG&E's proposed facilities. (State Clearinghouse # 2012061038)

**Additional Project Information:** To obtain further information on the proposed project, please call PG&E's Project Information Line at (415) 973-5530.

**Public Review Process:** Individuals or groups may protest the proposed construction if they believe that PG&E has incorrectly applied for an exemption or that the conditions set out in Section III.B.2 of General Order 131-D exist;

- a. There is reasonable possibility that the activity may have an impact on an environmental resource of hazardous or critical concern where designated, precisely mapped and officially adopted pursuant to law by federal, state, or local agencies; or
- b. The cumulative impact of successive projects of the same type in the same place, over time, is significant; or
- c. There is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

Protests should include the following:

1. Your name, mailing address and daytime telephone number.
2. Reference to the CPUC Advice Letter Number and Project Name.
3. A clear description of the reason for the protest.
4. Whether you believe that evidentiary hearings are necessary to resolve factual disputes.

**Protests for this project must be filed by November 18, 2014 at the following address:**

Director, Energy Division  
ED Tariff Unit  
California Public Utilities Commission  
505 Van Ness Avenue, Fourth Floor  
San Francisco, California 94102

With a copy mailed to:  
David Kraska, Law Department  
Pacific Gas and Electric Company  
P.O. Box 7442  
San Francisco, California 94120

PG&E must respond within five business days of receipt and serve its response on each protestant and the Energy Division. Within 30 days after PG&E has submitted its response, the CPUC Executive Director will send you a copy of an Executive Resolution granting or denying PG&E's request and stating the reasons for the decision.

**Assistance in Filing a Protest:** If you need assistance in filing a protest, contact the CPUC Public Advisor: email: [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov) or call: 1-866-849-8390 (toll-free), or (415) 703-2074, or TTY (415) 703-5258

**Public Comment:** Even if you do not want to file an official protest, you may still comment on the request. To do so, send your comments to the Energy Division at the address noted above. Please reference Advice Letter 4525-E.

## **Notice Distribution List**

### **Mustang Switching Station and Solar Project Interconnection (Kings County, P. No. 07916)**

Advice 4525-E

#### **Energy Commission**

Mr. Robert Oglesby, Executive Director  
California Energy Commission  
1516 Ninth Street, Mail Stop 39  
Sacramento, California 95814

Mr. Roger Johnson, Deputy Director  
California Energy Commission  
1516 Ninth Street, Mail Stop 39  
Sacramento, California 95814

#### **California Department of Fish and Wildlife**

Ms. Sarah Bahm  
California Department of Fish and Wildlife, Central Region  
1234 E. Shaw Avenue  
Fresno, CA 93710

#### **County of Kings**

Mr. Gregory Gatzka  
Director of Community Development  
Kings County Planning Department  
1400 West Lacey Boulevard  
Hanford, CA 93230

#### **Newspaper**

The Hanford Sentinel

**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

AT&T	Douglass & Liddell	Occidental Energy Marketing, Inc.
Alcantar & Kahl LLP	Downey & Brand	OnGrid Solar
Anderson & Poole	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
BART	G. A. Krause & Assoc.	Praxair
Barkovich & Yap, Inc.	GenOn Energy Inc.	Regulatory & Cogeneration Service, Inc.
Bartle Wells Associates	GenOn Energy, Inc.	SCD Energy Solutions
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
CENERGY POWER	Green Power Institute	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Hanna & Morton	SPURR
California Energy Commission	In House Energy	San Francisco Public Utilities Commission
California Public Utilities Commission	International Power Technology	Seattle City Light
California State Association of Counties	Intestate Gas Services, Inc.	Sempra Utilities
Calpine	K&L Gates LLP	SoCalGas
Casner, Steve	Kelly Group	Southern California Edison Company
Center for Biological Diversity	Linde	Spark Energy
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of San Jose	Los Angeles Dept of Water & Power	Sunshine Design
Clean Power	MRW & Associates	Tecogen, Inc.
Coast Economic Consulting	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Commercial Energy	Marin Energy Authority	TransCanada
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Cost Management
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
Davis Wright Tremaine LLP	Morgan Stanley	Verizon
Day Carter Murphy	NLine Energy, Inc.	Water and Energy Consulting
Defense Energy Support Center	NRG Solar	Wellhead Electric Company
Dept of General Services	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Division of Ratepayer Advocates	North America Power Partners	