



We Advocate Thorough Environmental Review

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December 21, 2020

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Submitted via email

Re: The Undergrounding of Power Lines from the Lassen Substation

We note that the County is currently in negotiations with Pacific Power to renew its franchise for electrical distribution and transmission lines. We urge you to use your leverage in this matter to get Pacific Power to put UNDERGROUND the power lines associated with the Lassen Substation Project. At a recent Mt. Shasta City Council meeting, Todd Andrus, Pacific Power's new corporate PR rep for this area, stated that the project is still "under development". So there is still an opportunity for the County and Mt. Shasta City to work with Pacific

Frank Toriello
President
Bruce Hillman
Treasurer
Geneva M. Omann
Secretary
Raven Stevens
Board Member
Dan Axelrod
Board Member
Diane Lowe
Board Member

Power in developing a plan that includes undergrounding the power lines associated with the Lassen substation upgrade. The burden of the wildfire risks associated with the proposed overhead power infrastructure will be shared by the City and County. Thus we call on you to work with the City of Mt. Shasta and Pacific Power to ensure the maximum safety from wildfire in the south county area.

Undergrounding is more expensive, although not nearly as expensive as burning down a whole town and its beautiful surroundings (e.g., Paradise, CA 2018). Nonetheless, how could the cost for undergrounding the 1.5 miles of transmission/distribution lines be covered?

1. As you know, the CPUC requires the utility companies to maintain a pot of money to support undergrounding of power lines (Rule 20A). Todd Andrus said at the October 12, 2020, Mt. Shasta City Council meeting there is enough money in Mt. Shasta's allocation to underground 1 mile of lines—enough to cover about 2/3 of the cost. Siskiyou County receives a Rule 20A allocation, and given that most of the area where the power lines will be upgraded are within the County's boundaries, the County also has a responsibility to contribute Rule 20A credits to the project. In addition, communities can borrow forward up to five years of additional allocations.
2. Pacific Power's budget for the current plan (replacing the existing lines with new, higher towers and new cables), if rededicated, would likely cover the cost of an additional quarter of a mile of underground line.
3. If that isn't enough, the primary corporate beneficiaries of this project, Pacific Power / Berkshire Hathaway and Crystal Geyser/Otsuka could provide the remaining costs as an investment in the safety of our region. It is hard to believe that such giant corporations do not have the money; rather, it is a question of will, and the County could exert some pressure in the current negotiations to increase that corporate "will".

Here are three reasons to use the CPUC's Rule 20A funds for the Lassen substation undergrounding:

First, **fire hazard**: By the CPUC's own designation the area is at the very highest risk of fire, what they call Tier 3, signifying that the risk is high because of the electrical infrastructure. Putting the power lines underground will significantly reduce the wildfire risk.

Second, **aesthetics**: The CPUC website says, "Undergrounding electric distribution and transmission lines can beautify major thoroughfares, civic areas, scenic highways, and residential and commercial areas, elevate property value in communities, reduce urban and industrial blight, enhance electric reliability and make wildfire prone areas safer." The route of the proposed power line upgrade certainly qualifies for those purposes, given that those over-ground poles and lines would clearly impact the view seen by tourists as they drive to Castle Lake, Box Canyon, the Sacramento River Canyon, and Lake Siskiyou. In addition, approximately 1/3 of the new larger power poles and lines will be less than 1000 feet from a designated scenic highway (I-5), a designation that by itself mandates undergrounding of the lines.

Third, the CPUC can require the electric utilities to reallocate work credits from communities that have been inactive in the program—in other words, "use it or lose it".

According to CPUC rules, communities are to work with the utility company to identify projects for Rule 20A funding. Please contact the appropriate decision makers at Pacific Power and work with the City of Mt. Shasta to use your collective influence to get Pacific Power to put those lines underground.

For the safety of the residents of Siskiyou County, please act on this matter while the Franchise negotiations are in progress, the County has some leverage, and before the next fire season.

Sincerely,

A handwritten signature in black ink that reads "Frank S Toriello". The signature is written in a cursive, flowing style.

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