

We Advocate Thorough Environmental Review (W.A.T.E.R.)
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November 27, 2015

California Public Utilities Commission
Docket Office
505 Van Ness Avenue, Room 2001
San Francisco, CA 94102
public.advisor@cpuc.ca.gov

Re: Comments/objections on the Pacific Power Proposed Construction (A.15-11-005)

Dear Sir or Madam:

We Advocate Thorough Environmental Review (W.A.T.E.R.) is a California 501c3 non-profit corporation incorporated to promote quality local and regional planning, land use and development, as well as to preserve a healthy human and natural environment within the Siskiyou County area.

W.A.T.E.R. is responding to a request for comments or objections to the Pacific Power Proposed Construction project (A.15-11-005).

Controversy

In the “Lassen_EA.pdf” on page 16 Pacific Power states: “There are no known areas of controversy, and no major issues that must be resolved related to the Project.”

W.A.T.E.R. contends that Crystal Geyser Water Company’s (CGWC) new beverage plant planned in Mt. Shasta is a direct beneficiary of this project, a major reason for the substation power upgrade and this project has been the source of major controversy in Siskiyou County for the past 2+ years. The necessity to consider the “whole of the project” requires that the environmental effects of this plant be considered in any environmental review. CPUC staff emails in 2014 note the need to consider Crystal Geyser to avoid “piecemealing” in CEQA standards. (See **PUC emails_11-06-2014.pdf**)

Upgrade and Project is for one main beneficiary

Crystal Geyser Water Company, (CGWC), owned by Otsuka Pharmaceuticals of Japan is NOT specifically named as a direct beneficiary in the “Application of PacificCorp” for the “Lassen Substation” replacement. A footnote on the second page of the application reveals only that:

“An industrial customer has requested connection of new load requiring significantly more transformer capacity than is available at Mt. Shasta Substation”

On page 25 of the application Pacific Power simply states:

“In addition, there will be changes to local 12.47 kV distribution lines in the area of the City of Mt. Shasta; one circuit will be reconducted north of the Lassen Substation to a light industrial facility, a new overhead circuit will be installed over Interstate I-5 north of the Lassen Substation (near Hatchery Lane), and a circuit will be removed north of the Lassen Substation.”

And again reference to the new connection for CGWC’s beverage plant is mentioned on page 30 of the same document:

“Once the power is converted to 12.47 kV for distribution, it would be routed through lower voltage buswork to three underground distribution feeder circuits (two of the distribution circuits are existing and one circuit is new).”

Finally on page 31 they name CGWC.

“There are additional changes being made to the local 12.47 kV distribution system:

- The 12.47 kV circuit to the new Crystal Geyer Water Co. facility will be reconducted and a new section of underground will be installed near Interstate I-5.”

On page 5 of the “Application of PacifiCorp” it states:

“The distribution lines in the area will be upgraded from 4.16 kV lines to 12.47 kV lines. “

On page 18 of the Lassen_EA.PDF document it states:

“A light industrial bottling facility closed in December 2010, and seasonal loading peaks afterward reflect the loss of that load. However, a similar facility plans to begin operation in 2016 to bring summer and winter load peaks to 100 percent of the seasonal loading capabilities of the transformer, with the connection of 3 megawatts (MW) of additional load in 2018.”

However in an email from William Dietrich of the CPUC (**PacifiCorp-CPUC_email-04-04-2013.pdf**) it is stated that;

“According to the ESSA questionnaire we received yesterday, from Crystal Geyser, they will require 2.6mW’s this year. Load will increase to 6 megawatts in 2014 and 12 megawatts in 2017.”

If this is still an accurate description of the power needs of the Crystal Geyser plant, it has become apparent that this is the major reason for the substation’s power upgrade. This is a large increase from the power requirements of the former CocaCola Dannon water bottling plant at that site 2001-2010, and as such the need for a large power increase should be reviewed under CEQA for the Crystal Geyser Water Company.

Upgrade needed?

The Lassen EA.PDF document, page 18 of 805 states:

“Meet Electrical Service Demand

A light industrial bottling facility scheduled to begin operation in 2016 has requested delivery of new load beyond the capability of Mt. Shasta Substation transformer T-3521. An increase in transformer capacity is required in order to supply the new load. In addition, load growth in the Mt. Shasta area has historically been approximately 2.0 percent for summer peak loads prior to 2008. Loads since 2008 have declined in the region.”

The current power levels are sufficient due to population loss in the area and the conservation efforts of the Mt. Shasta Area. The power increases planned for this substation replacement are primarily for the needs of Crystal Geyser (which is zoned heavy industrial).

We object to the fact that PacifiCorp is expanding the capacity to serve Crystal Geyser Water Company’s needs without including the environmental effects of the operations of such a plant.

Piecemealing of Environmental Review under CEQA

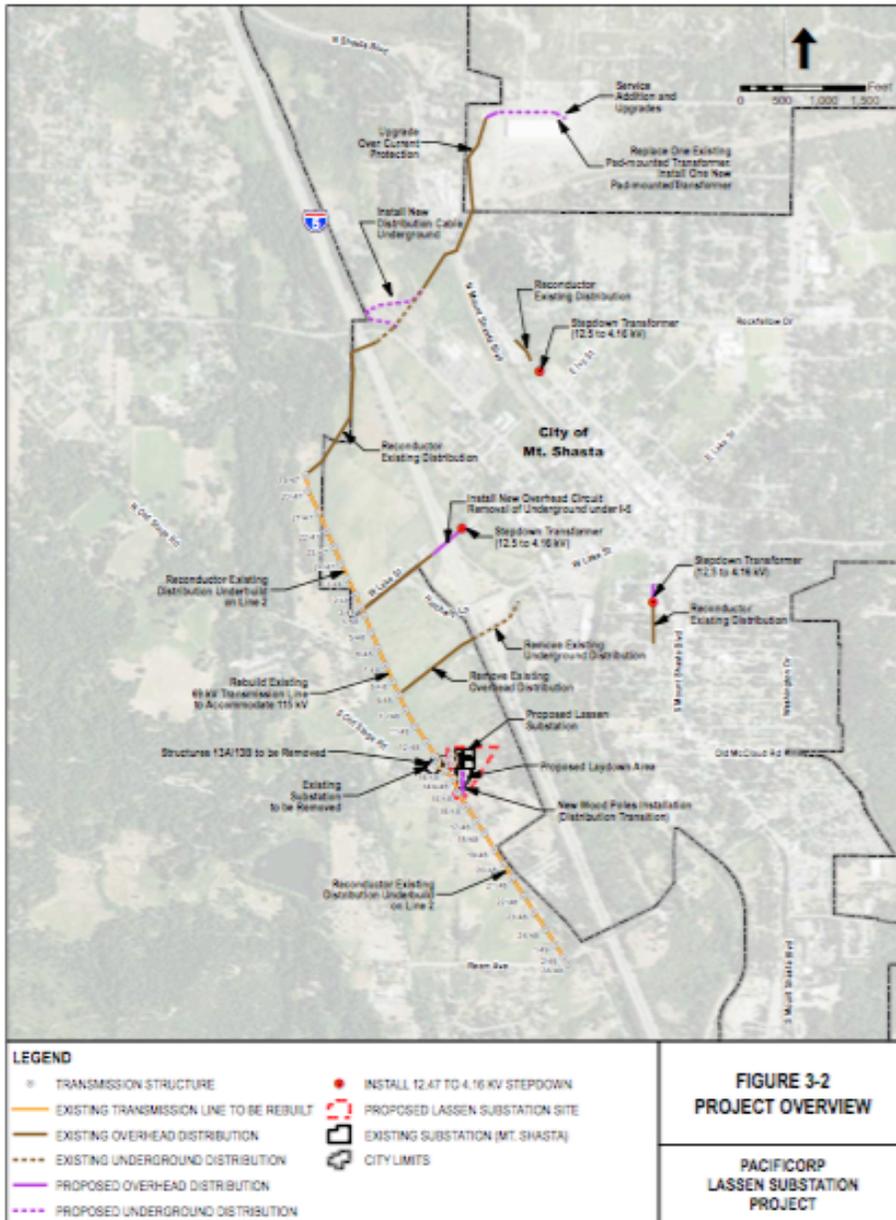
PacifiCorp is attempting to avoid naming Crystal Geyser Water Company as a primary beneficiary for this project and as such this constitutes ‘piecemealing’ of environmental review as defined by CEQA.

Page 18 of the “the Lassen_EA.PDF” never identifies Crystal Geyser Water Company directly, only referring to them as a “light industrial bottling facility” stating:

“Meet Electrical Service Demand

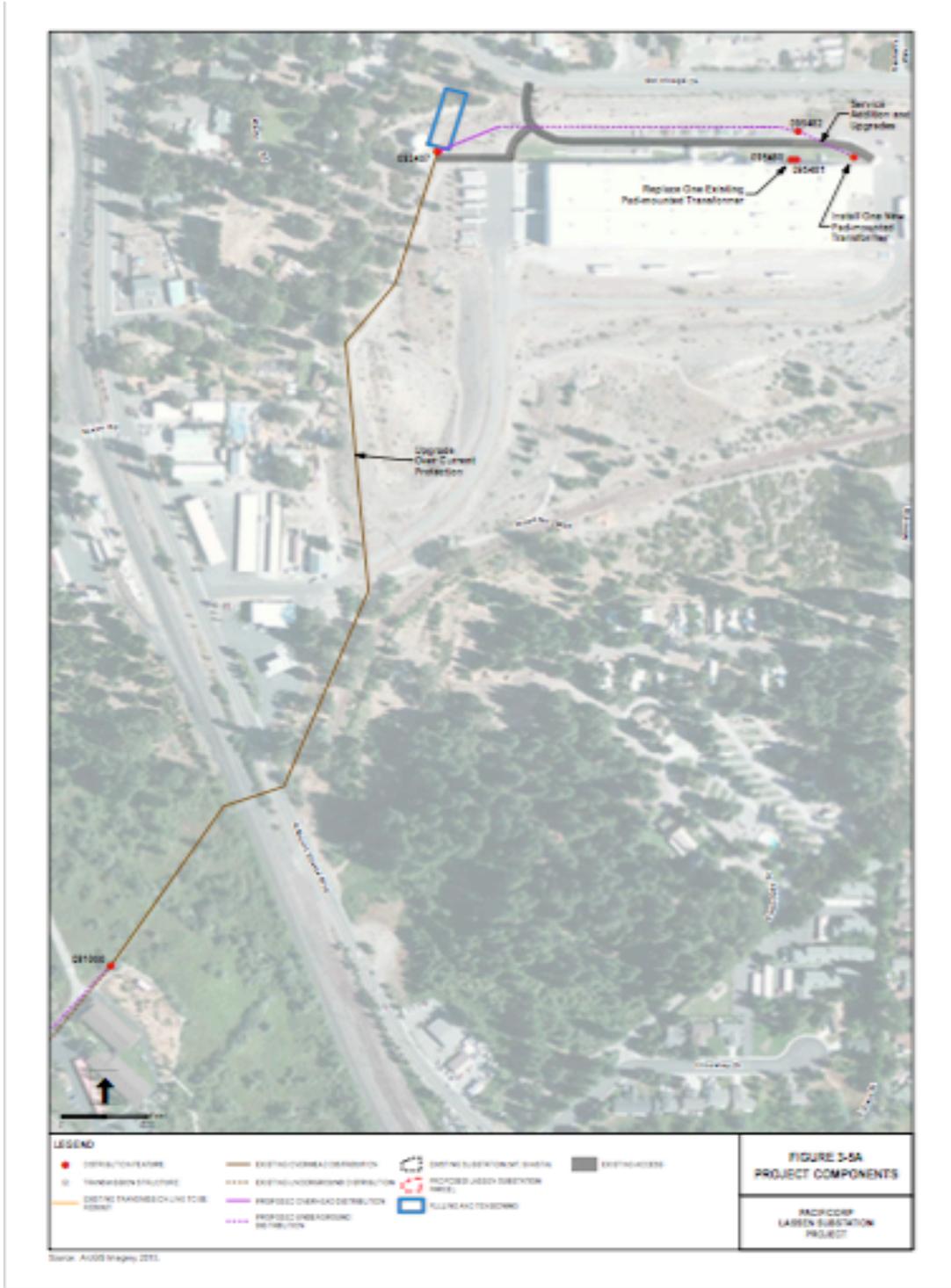
A light industrial bottling facility scheduled to begin operation in 2016 has requested delivery of new load beyond the capability of Mt. Shasta Substation transformer T-3521. An increase in transformer capacity is required in order to supply the new load.“

On page 25, figure 3-2 of the Lassen_EA.PDF identifies “service addition and upgrades” on the map in a dotted purple line without naming Crystal Geysers Water Company.



Source: ArcGIS Imagery, 2010.

And in figure 3-5A the new upgrade goes directly to Crystal Geyser Water Company, again without directly naming them in the 805 page document.



The map clearly identifies Crystal Geysers as the direct beneficiary of this power upgrade without actually being named. We contend that they are the ONLY real beneficiaries of the power upgrade as the area has less power needs due to conservation and loss of population. "Future power needs" is Crystal Geysers Water Company; the main beneficiary of this project.

Additional Comments:

1) While we applaud "part of the distribution line upgrade," will contain "1,200 feet of underground cable" a large section of connections will be through installation of overhead lines. ALL proposed 'above ground' power distribution and other lines should be put underground due to preserving/improving the aesthetics and viewshed and to save costs for power line repair due to heavy/wet snow that is associated with the climate change we are now experiencing. With new lines going in, it is shortsighted to put them above ground.

2) Why rename the Mt. Shasta Substation the Lassen Substation? This makes it very difficult for agencies and the public to know what area the project is being undertaken. What is the purpose of this change, other than to obfuscate where the project is truly located or who the real beneficiary might be?

3) Request camouflage or Evergreen trees be placed between the substation and old stage Road to improve visual appeal of that area on Old Stage Road.

Request of the CPUC

W.A.T.E.R. respectfully requests that the CPUC engage the Office of Planning and Research to locate the appropriate lead agency and request that a full and impartial Environmental Impact Report be prepared regarding the Crystal Geysers Water Company bottling plant. Once a lead agency is assigned and the EIR is underway, W.A.T.E.R. would have no concerns regarding the piecemealing of this Lassen Substation upgrade project.

Roslyn McCoy

Treasurer

We Advocate Thorough Environmental Review