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**CITY COUNCIL**

Anthony Cannella, Mayor  
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June 7, 2010

California Energy Commission  
ATTN: Felicia Miller  
1516 Ninth Street "Mail Stop 15"  
Sacramento, CA 95814-5112

**DOCKET**

**09-AFC-2**

DATE JUN 07 2010

RECD. JUN 07 2010

RE: Staff Assessment for the Almond 2 Power Plant Project, Application for Certification (09-AFC-2)

Dear Ms. Miller:

The City of Ceres appreciates the opportunity to comment on the Staff Assessment (SA) for the Almond 2 Power Plant project. Previously, the City of Ceres provided comment on the A2PP project in a letter dated September 17, 2009, from Michael Riddell, Wastewater System Supervisor. The Staff Assessment addresses all but one of the comments made regarding the proposed project.

Corridor 2 runs from the A2PP site down to a proposed substation along Grayson Road and a portion of this corridor runs adjacent to Crows Landing Road. The City of Ceres previously responded recommending that the segment adjacent to Crows Landing Road be placed 55' from center line to ensure these new facilities would not be placed within future right-of-way. Furthermore, we suggested that the line be placed 70' from centerline to ensure there would be no future impact when Crows Landing Road is developed to its ultimate width.

The SA does address the City's concern by suggesting that the transmission lines along Crows Landing Road be placed 55' from center line. However, the SA then makes the statement: "Although Stanislaus County and the City of Ceres plan to widen Crows Landing Road between Service Road and State Route 33, implementation of roadway improvements has been delayed indefinitely because no funding sources have been identified for the proposed improvements (TID 2010)". Essentially, the SA suggests that because funding for roadway improvement has been "delayed indefinitely" there won't be any conflict with placing Corridor 2 in a 10' area adjacent to existing pavement along Crows Landing Road. The City of Ceres disagrees. In fact, the City's Public Facility Fee program collects fees for future improvements to Crows Landing Road. While we agree there is not an immediate time line for the construction of those improvements, placing a new and expensive transmission line in a location that must ultimately be moved does not serve the Crows Landing Road corridor, the City of Ceres, Stanislaus County or Turlock Irrigation District.

The City understands that the California Energy Commission (CEC) will approve the A2PP project, while Turlock Irrigation District will approve the Hughson-Grayson 115 kV Transmission Line and Substation project. These projects are connected as transmission lines from the A2PP project and will be routed to a new substation along Grayson Road. While the City of Ceres recognizes that these are two independent projects that will be approved separately, they are connected and the approval of one may potentially impact the other.

The City of Ceres is aware that an alternative substation location is being explored by TID that may relocate the Grayson Road site to a new location just south of TID Lateral #2 and south of the A2PP project. If this alternative, which the City of Ceres supports, were selected by the TID Board of Directors, it may potentially eliminate the need to develop transmission lines along Crows Landing Road. Through conversations with TID's Hughson-Grayson consultant, it appears that the re-circulated EIR is being prepared and may become available by July 2010 but the City can not formally comment on an alternative substation location until the document is released.

While the City is aware that the CEC may approve the A2PP project this summer, that does not hinder TID's ability to approve a new substation location south of Lateral #2 and adjacent to the A2PP project, when that project is submitted to the Board of Directors. The City of Ceres' understanding is that if the CEC has approved the A2PP project and TID selects a new substation site, then TID must submit a major amendment to the A2PP for approval, which should not take longer than six months to approve. Further, TID would not be restricted from beginning construction on the power plant portion of the A2PP project while processing the major amendment through the CEC for a new substation location. This is an important point for the City of Ceres as the approval of the Hughson-Grayson 115 kV Transmission Line and Substation project is likely to happen after the CEC has considered the A2PP project.

To summarize, the City of Ceres stands by its earlier comments that the portion of Corridor 2 along Crows Landing Road should be placed a minimum of 55' from center line. Additionally, the City of Ceres understands that regardless of which project is approved first, the A2PP by the CEC or the Hughson-Grayson 115 kV Transmission Line and Substation project by TID Board of Directors, nothing prohibits TID from submitting a major amendment if the new substation location is approved by TID. The City of Ceres supports a proposal that eliminates Corridor 2 from being placed adjacent to Crows Landing Road or any other roadway within the City's current or future circulation system.

If you have any questions or comments regarding this letter, please free to contact me at your convenience.

Sincerely,



Tom Westbrook  
Interim City Planner

xc: Ceres City Council  
Brad Kilger, City Manager  
TID Board of Directors  
Larry W. Weis, General Manager, TID  
Susan Strachan, Strachan Consulting