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Fountain
WIND PROJECT

June 21, 2021

Shasta County Department of Resource Management
Attn: Paul Hellman, Director
300 Park Marina Circle
1855 Placer Street, Suite 103
Redding, California 96001

Dear Mr. Hellman,

In response to comments regarding PG&E's management of their electrical system and assertions that the interconnection of the Fountain Wind Project ("Project") would exacerbate fire dangers associated with the electrical grid, we provide the following to explain how the Project would in fact improve the fire safety of PG&E's system in the Project region.

Background

The cause of wildfires associated with PG&E's system has been well documented and can be attributed to two primary causes; contact from fuel sources and equipment failures along PG&E's transmission and distribution lines. Contact from fuel sources primarily results from inadequately trimmed hazardous fuels within the PG&E rights-of-way, whereas equipment failures include failures of aging conductors, insulators and other components on transmission and distribution lines or the failure of power poles themselves. These two primary causes have contributed to several recent major fire events in northern California, including the Camp fire in Butte County, Kincade fire in Sonoma County, as well as the Zogg fire that occurred last year in Shasta County. According to the California Department of Forestry and Fire Protection ("CAL FIRE"), the Zogg fire was caused by a pine tree hitting electrical distribution lines owned and operated by PG&E.

Notably absent from these fire events are fuel-source contact or equipment failure associated with substations or interconnection switchyards, such as the new substation proposed as part of the Fountain Wind Project. Although ConnectGen and PG&E are entirely separate operations and ConnectGen has no direct control over PG&E's fire management practices throughout the larger electrical grid, ConnectGen has direct control over fire management adjacent to the substation and the related collection facilities. ConnectGen's infrastructure improvements and fire management practices would minimize fire risk related to the new substation, already a low fire risk, and further improve the connection facilities needed to connect the Project to the larger grid.

Project Improvements

The Project's electrical equipment, including the Project substation and collection lines, will be owned, operated and maintained by ConnectGen, not PG&E. ConnectGen will build a new substation to

interconnect the Project to the grid. Fuel management adjacent to the substation, and within the cleared collection line corridors, will be monitored and maintained by ConnectGen's full time site operations team. The full-time operations presence associated with the Project would also assist in monitoring all electrical infrastructure in the area, including the PG&E high voltage lines and associated rights-of-ways that bisect the Project Site. Operation and maintenance staff located on site full-time will bring a new source of monitoring to all rights-of-way and electrical equipment in the Project area that does not exist today. This additional monitoring will allow for immediate communication and coordination to PG&E to address fire and safety risks.

Though the County does not control PG&E's maintenance of its equipment or transmission lines, PG&E is subject to regulation by various state agencies, such as the CPUC. As disclosed in Draft EIR Section 3.16.1.3 (at page 3.16-10 et seq.), PG&E has adopted and implements both a Fire Prevention Plan and an Emergency Response Plan. PG&E's Wildfire Operations Center also operates 24-hours per day during fire season. These measures have been designed to reduce fire risk to maximum extent feasible. Combined with the Project's upgraded facilities, full-time monitoring, increased vegetation management and improved fire prevention practices, the Project would have a positive impact on PG&E's overall fire safety management in the vicinity of the Fountain Wind Project.

Interconnection

The California Independent System Operator ("CAISO") conducts extensive interconnection studies to determine transmission line capacity before allowing interconnection of new sources of electricity generation. As was explained in the 'Interconnection Overview' letter dated June 16, the Project has completed all necessary studies pursuant to requirements set forth by the CAISO. The Project would not overload existing PG&E transmission facilities.

The Project will have a power plant controller ("PPC") that regulates and controls the wind turbine generators and automatically responds to CAISO and/or PG&E operating instructions. The PPC ensures that the Fountain Wind project maintains its required voltage schedule at its point of interconnection and does not exceed its interconnection capacity limit. The Project is also required to implement a Special Protection Scheme ("SPS") that will automatically disconnect the Project from the transmission grid in the event of potential thermal overloads on the 230 kV transmission line used for Project interconnection (the Pit #1 to Cottonwood transmission line). In addition to SPS implementation, the Fountain Wind Project will fund upgrades to two older 230kV circuit breakers at the existing Cottonwood substation, where energy generated by the Project would be distributed to the larger grid. The SPS and circuit breaker upgrades are required to be in place prior to the Fountain Wind Project being allowed to fully interconnect to the PG&E system.

Conclusion

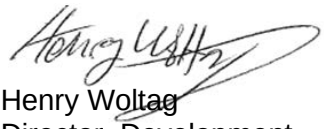
The Project will improve the fire safety of PG&E's system in the Project region by constructing upgraded interconnection facilities, implementing improved fire prevention and

management practices, and adding full time fire monitoring to the area. The Project will result in:

- Upgraded PG&E infrastructure at the Cottonwood Substation
- Controlled electricity generation to prevent thermal overload
- Reduced greenhouse gas emissions that may be contributing to climate change
- Full-time, on-site monitoring of all electrical infrastructure and associated rights-of-ways
- Improved vegetation and fuel supply management
- State of the art wind turbine fire suppression technology
- Community benefits to further reduce local fire risks, including the proposed fuel reduction project in coordination with the Fall River RCD.

Please feel free to contact me if there are any further questions about how Fountain Wind will improve local fire safety.

Sincerely,



Henry Woltag
Director, Development
ConnectGen