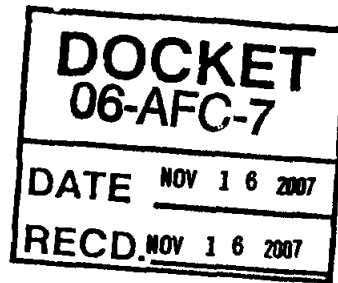




**CH2MHILL**



**CH2M HILL**  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA  
Tel 916-920-0300  
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November 16, 2007

Mr. John Kessler  
Project Manager  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**Re: Applicant's Responses to CEC Staff Data Request 103  
Humboldt Bay Repowering Project (06-AFC-07)**

Dear Mr. Kessler:

Attached are an original and 12 copies of Pacific Gas and Electric Company's responses to California Energy Commission Staff Data Request 103 for the Application for Certification for the Humboldt Bay Repowering Project (06-AFC-07). This data request response addresses the potential effects of the project on the 115 kV transmission tower associated with Humboldt Bay Power Plant Unit 3.

If you have any questions about this matter, please contact me at (916) 286-0278 or Susan Strachan at (530) 757-7038.

Sincerely,

Douglas M. Davy, Ph.D.  
AFC Project Manager

Attachment

cc: G. Lamberg  
S. Strachan  
S. Galati

**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE  
STATE OF CALIFORNIA**

**APPLICATION FOR CERTIFICATION FOR THE  
HUMBOLDT BAY REPOWERING PROJECT  
BY PACIFIC GAS AND ELECTRIC COMPANY**

**Docket No. 06-AFC-7  
PROOF OF SERVICE  
(Revised 10/25/07)**

**INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:**

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 06-AFC-07  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

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**INTERVENORS**

**ENERGY COMMISSION**

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Gary Fay  
Hearing Officer

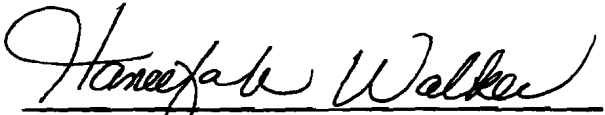
**DECLARATION OF SERVICE**

I, Haneefah Walker, declare that on November 15, 2007, I deposited the required copies of the attached Responses to CEC Staff Data Request 103 filed in support of the Application for Certification for the Humboldt Bay Repowering Project (06-AFC-07) in the United States mail at Sacramento, California with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. I declare under penalty of perjury that the foregoing is true and correct.

**OR**

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Haneefah Walker

# Cultural Resources (103)

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## 115 kV Transmission Tower

103. *For the proposed alterations to the Humboldt Bay/Humboldt #1 115-kV transmission line, please provide the following.*
- a. *The results of research by a qualified historian as to the age of the Humboldt Bay/Humboldt #1 115 kV transmission line and its association, if any, with the installation or operation of Unit 3.*
  - b. *If the Humboldt Bay/Humboldt #1 115 kV transmission line is 45 years of age or older, or if it was associated with the installation or operation of Unit 3, an evaluation by a qualified architectural historian as to whether the proposed HBRP interconnection to this line would be a significant impact; and*
  - c. *The resume of the evaluator.*

### Response:

- (a) As indicated in the response to Data Request 102, the Humboldt Bay to Humboldt #1 115 kV transmission line is associated with the operation of Humboldt Bay Power Plant Unit 3. The 115 kV transmission tower that is located on the Humboldt Bay Re-Powering Project (HBRP) site was built about the same time as Unit 3 (1961-1963) to carry power generated by the Unit 3 turbine to a substation located in Eureka. Unit 3 was shut down in 1976 for seismic retrofitting. The plan to retrofit was later determined to be economically unfeasible, and the reactor was placed under the Nuclear Regulatory Commission's safe storage license program (SAFSTOR) and has not operated since that time. The 115 kV transmission tower stopped conveying power produced by Unit 3 in 1976 and has been used intermittently to convey power from the Mobile Emergency Power Plants (MEPPs). Accordingly, it was disconnected from Unit 3.
- (b) Unit 3 was found eligible for National Register listing under criterion consideration G "exceptional significance" (for properties less than 50 years old) in a 2003 evaluation by Mary Maniery of PAR Environmental Resources for the Independent Spent Fuel Installation (ISFSI) project (see AFC Appendix 8.3B). As part of the analysis prepared for the HBRP Application for Certification (AFC), a DPR 523b "Building, Structure, and Object Record" (BSOR) form was prepared for the 115 kV transmission tower as part of the DPR 523a Primary Form for the HBPP. That DPR form indicated that the transmission tower had not been evaluated, although it was stated that it was part of the HBPP and was built as part of Unit 3.

The 115 kV transmission tower does not contribute in an important way to the significance of Unit 3 either as an innovative example of engineering or as a landmark in the history of commercial nuclear power. The 115 kV transmission tower is a standard steel-lattice tower. This structure lacks distinguishing features and does not have characteristics that tie it particularly or exclusively to

Humboldt Bay Power Plant Unit 3. The HBRP would not diminish the significance of Unit 3 by removing the 115 kV transmission tower.

The 115 kV transmission tower at the HBPP is associated with Unit 3, but it lacks distinguishing features and/or characteristics; therefore the 115 kV Transmission Tower is not a contributor to the significance of Unit 3. Consequently, removal of the tower, would not be considered a substantial adverse change in the significance of Unit 3.

- (c) Jessica Feldman is the qualified Architectural Historian who conducted the analysis and evaluation. Her resume is included in the AFC, Appendix 8.3C