

July 10, 2020

#### ADVICE LETTER 5-E Horizon West Transmission, LLC (U222-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

SUBJECT: GENERAL ORDER 131-D NOTICE OF CONSTRUCTION OF

CONVERSION OF 230 KV TRANSMISSION LINE AT SUNCREST

DYNAMIC REACTIVE POWER SUPPORT FACILITY TO

UNDERGROUND PURSUANT TO WILDFIRE MITIGATION PLAN

#### **PURPOSE**

Pursuant to Section XI.B.4 of General Order ("GO") 131-D of the California Public Utilities Commission ("Commission"), Horizon West Transmission, LLC (U222-E) ("Horizon West") hereby provides notice of construction of a 230 kV transmission line that will be converted from an existing 230 kV overhead transmission line. The 230 kV underground conversion is a wildfire risk mitigation measure at Horizon West's Suncrest Dynamic Reactive Power Support Facility ("Suncrest Facility") located near the town of Alpine in San Diego County, California. The 230 kV underground conversion will be performed pursuant to Horizon West's 2020 Wildfire Mitigation Plan ("2020 WMP"). The Commission's Wildfire Safety Division ("WSD") approved Horizon West's 2020 WMP, and the Commission ratified the WSD's approval in Resolution WSD-009, issued June 19, 2020.

#### DESCRIPTION OF UNDERGROUND CONVERSION

The Commission granted Horizon West a certificate of public convenience and necessity ("CPCN") for the Suncrest Facility in Decision (D.) 18-09-030, issued October 2, 2018. Horizon West started construction of the Suncrest Facility on February 25, 2019 and placed the Suncrest Facility in service on February 29, 2020. The Suncrest Facility is comprised of a static var compensator ("SVC") facility and an approximately one-mile 230 kV transmission line that connects the SVC facility to the Suncrest Substation owned by San Diego Gas and Electric Company ("SDG&E"). Most of the approximately one-mile 230 kV connecting transmission line was installed underground in accordance with the Suncrest Facility's planned design. Only an approximately 115-foot segment of the Horizon Westowned 230 kV transmission line was installed overhead. That short overhead segment interconnects directly with SDG&E's facilities at the Suncrest Substation.

Upon issuance of the CPCN, Horizon West became an electrical corporation and a public utility (as defined in the California Public Utilities Code ("PU Code")) and is required to prepare and obtain Commission approval for its WMPs pursuant to PU Code Section 8386. Horizon West submitted WMPs for Commission approval in 2019 and 2020 to fulfill the applicable mandates from PU Code Section 8386 and the Commission's implementation decisions and rulings. The Commission approved Horizon West's 2019 WMP in D.19-05-041 issued June 3, 2019, and also issued a guidance decision that applies to all utilities, including Horizon West, in D.19-05-036. In accordance with D.19-05-036, associated guidance and Resolution WSD-001, Horizon West's 2020 WMP identified

additional wildfire risk reduction measures for the Suncrest Facility, including grid hardening measures to reduce or mitigate risks and enhance resiliency. One of the fire hardening and risk mitigation measures in Horizon West's 2020 WMP provides for Horizon West to convert the one short overhead transmission line segment at the Suncrest Facility to underground. Horizon West's wildfire risk assessment determined that converting the overhead segment to underground would mitigate the risk of ignitions and protect Horizon West's and SDG&E's facilities, which are located in a Tier 3 Extreme Fire Threat District in San Diego County. The underground conversion is designed to increase resiliency and minimize risk year round but especially during high fire hazard conditions. As stated above, the WSD approved Horizon West's 2020 WMP and the Commission ratified the WSD's approval in Resolution WSD-009, issued June 19, 2020.

Horizon West's approximately one-mile 230 kV connecting transmission line, including the short overhead segment that will be converted to underground, was built on SDG&E's land pursuant to an easement agreement between SDG&E and Horizon West that was executed on August 26, 2019 and recorded on October 24, 2019 ("Easement Agreement"). Construction occurred under a temporary construction easement that was executed as of August 27, 2019 and recorded on October 24, 2019 ("Construction Easement Agreement"). SDG&E filed Advice Letter 3405-E on July 19, 2019 requesting Commission approval under PU Code Section 851 and General Order 173 to grant Horizon West the easements conveyed in the Easement Agreement and Construction Easement Agreement. The Commission's Deputy Executive Director for Energy and Climate Policy/Director, Energy Division sent a letter to SDG&E confirming that Advice Letter 3405-E was effective as of August 19, 2019.

The converted underground transmission line segment will be built on a same legal parcel as the existing overhead transmission line segment. Horizon West and SDG&E have agreed to amend their Easement Agreement to adjust the easement boundaries so that they encompass the area where the underground line will be installed. The amendment also provides for Horizon West to relinquish a portion of the easement area where the overhead transmission line was built once the conversion is complete. The net result of these boundary adjustments is that the amendment will reduce Horizon West's total easement area by 0.078 acres. The total approximate new disturbance associated with the conversion of the last approximately 115 feet of overhead transmission line to underground is 0.85 acres, comprised of 0.9 acres of temporary disturbance and 0.01 acres of permanent disturbance. These are worst-case estimates that Horizon West is working to reduce as much as practicable.

#### **REGULATORY COMPLIANCE**

Neither a CPCN nor a permit to construct ("PTC") is required pursuant to GO 131-D for Horizon West to convert the existing overhead transmission line segment to an underground transmission line segment. The conversion does not require approval under GO 131-D, Section III.A, which specifies that a CPCN is required for "major" transmission line facilities of 200 kV or more "except for the replacement of existing power line facilities or supporting structures with equivalent facilities or structures, the minor relocation of existing power line facilities, the conversion of existing overhead lines to underground, or the placing of supporting structures already built" (emphasis added). The italicized exception applies because this is a conversion of an existing overhead line to underground. Even if newly built, the underground segment will be approximately 275 feet long and does not constitute a "major" transmission line facility that would require a CPCN. See e.g., D.11-07-020 at 1-2 (in A.10-11-012); Assigned Commissioner's Scoping Memo and Ruling in A.10-11-012 (Feb. 25, 2011) at 4 (addressing

two 500 kV transmission line segments of 2,500 feet to 3,500 feet and determining that "in view of the relatively short length of the new transmission line segments and in the context of the overall project, the transmission loop-in lines are not 'major' facilities that require a CPCN").

The conversion also does not require approval under GO 131-D, Section III.B, which specifies that a PTC is required for power line facilities or substations between 50 kV or 200 kV, or new or upgraded substations with a high side voltage exceeding 50 kV. Because the underground transmission line segment has a voltage above 200 kV, a PTC is not required.

As explained above, the converted underground transmission line segment will be installed on the same legal parcel as the existing overhead transmission line segment pursuant to an amended version of the Easement Agreement that the Commission approved via SDG&E's Advice Letter 3405-E. The Commission approved the Easement Agreement and the resulting encumbrance of SDG&E's land for use by Horizon West to build, operate, and maintain the 230 kV transmission line that interconnects Horizon West's SVC facility with SDG&E's Suncrest Substation. Converting the overhead transmission line segment to underground does not require a new encumbrance or conveyance of utility property. The amendment to the Easement Agreement merely adjusts the boundaries of the easement previously granted by SDG&E and approved by the Commission, but does not involve any new or different legal parcels, and results in a net decrease in the total acreage encompassed by Horizon West's easement. No further approval should be required under PU Code Section 851.

#### CALIFORNIA ENVIRONMENTAL QUALITY ACT EXEMPTIONS

The underground conversion does not require review under the California Environmental Quality Act ("CEQA"). CEQA applies to discretionary projects proposed to be carried out or approved by public agencies, including the Commission (Pub. Res. Code § 21080(a)). As explained above, the underground conversion at the Suncrest Facility does not require discretionary approval under GO 131-D or PU Code Section 851. CEQA review therefore is not required.

Even if discretionary Commission approval were required, the underground conversion is exempt from CEQA under two CEQA exemptions. First, the underground conversion is exempt under Section 21080(b)(4) of CEQA (Pub. Res. Code § 21080(b)(4)) because it constitutes a specific action necessary to prevent or mitigate an emergency. Section 15269 of the CEQA Guidelines specifies that this statutory exemption applies where "fire or catastrophic risk mitigation or modifications to improve facility integrity . . . are proposed for existing facilities in response to an emergency at a similar existing facility." The underground conversion is a fire risk mitigation measure and modification to improve facility integrity and is proposed for an existing facility in response to emergencies that have occurred at similar facilities in the state (*i.e.*, wildfires in California that ignited at utility-owned transmission and distribution facilities). The underground conversion is part of Horizon West's 2020 WMP and is implemented as fire and catastrophic risk mitigation and to improve facility integrity.

Second, the underground conversion also falls within the Class 2 categorical exemptions in Section 15300 of the CEQA Guidelines because the underground conversion is (A) a replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site and have substantially the same purpose and capacity, (B) a replacement or reconstruction of existing utility systems that involves no expansion of capacity, and (C) a conversion of overhead facilities to underground where the surface will be restored to its prior condition. Notably, none of

the circumstances set forth in Section 15300.2 of the CEQA Guidelines, which identify exceptions to the categorical exemptions, apply here. The underground conversion will not result in a significant cumulative impact, will not have a significant effect on the environment due to "unusual circumstances," will not result in damage to scenic resources, will not be located on a hazardous waste site, and will not cause a substantial adverse change in the significance of a historical resource. The location where the underground conversion will occur was thoroughly surveyed prior to and during construction of the Suncrest Facility. The environmental analyses conducted by Horizon West's consultants, which are attached hereto as **Attachment 4**, demonstrate that there is no substantial evidence that the underground conversion will have a significant effect on the environment.

Horizon West also will follow environmental compliance guidelines similar to those that were established for the Suncrest Facility, including the following:

- Preparation of a Biological Resource Report summarizing the multiple rounds of surveys conducted as part of the Suncrest Facility, the results of those surveys, and any applicable recommendations for resource avoidance.
- Preparation of a Cultural Resource Report summarizing the multiple rounds of surveys conducted as part of the Suncrest Facility, the results of those surveys, and any applicable recommendations for resource avoidance.
- Botanical surveys conducted in late April-early May 2020 to capture appropriate blooming periods. A focused plant survey report will be prepared to document the findings and serve as compliance documentation.
- Obtain coverage under the State General Permit for Discharges of Storm Water Associated with Construction Activity ("CGP") as the proposed activities exceed one acre of ground disturbance in aggregate.
- Development and implementation of a Stormwater Pollution Prevention Plan in compliance with the CGP.
- Preparation and implementation of an Erosion Control Plan to outline best management practices to utilize during and post construction
- Development of a training module and administer a worker environmental awareness training to personnel prior to construction
- Preconstruction biological surveys 14 days prior to construction
- Biological monitoring during ground disturbing activities during construction
- Cultural and Native American monitoring during initial ground-disturbing activities during construction
- Preparation and implementation of a restoration plan to restore temporary disturbance areas of the mitigation work following construction

In sum, the underground conversion is not subject to CEQA, and implementation of the above-summarized environmental compliance guidelines ensures that the conversion will not have a significant effect on the environment.

#### **PROTEST**

Anyone wishing to protest this advice letter may do so by filing a protest with the Commission and Horizon West not later than July 30, 2020, which is 20 days after the date of this filing. Protests should be mailed to the following address:

CPUC Energy Division ED Tariff Unit 505 Van Ness Avenue, 4<sup>th</sup> Floor San Francisco, California 94102 Facsimile: (415) 703-2200

E-Mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address show above.

The protest also should be sent electronically and via U.S. mail to Horizon West at the addresses shown below on the same date it is mailed or delivered to the Commission:

Alona Sias Director, Strategy & Business Development One California Street, Suite 1600 San Francisco, California 94111 Email: alona.sias@nexteraenergy.com

Tracy C. Davis
Senior Attorney
5920 W. William Cannon Dr., Bldg. 2
Austin, Texas 78749
Email: tracy.c.davis@nexteraenergy.com

Persons or groups may protest the proposed construction if they believe that Horizon West has incorrectly applied an exemption under GO 131-D, Section III.A.

#### **PUBLIC COMMENT**

Individuals or groups who do not file an official protest may still submit a comment on this request to the Energy Division at the address noted above, referencing Horizon West Advice Letter 5-E.

#### **EFFECTIVE DATE**

Horizon West requests that this advice letter become effective on August 12, 2020, which is 30 days after the date of filing. In accordance with GO 131-D, construction will not begin until 45 days after notice is first published.

#### **NOTICE**

A copy of this advice letter is being sent electronically and via U.S. Mail to parties shown on the "Notice Distribution List" in <u>Attachment 2</u>, and is being sent electronically to the individuals shown on the "Advice Letter Service List" in <u>Attachment 3</u>. A copy of the Notice included in <u>Attachment 1</u> also will be posted on site in accordance with G.O. 131-D, Section XI.B.3.

Sincerely,

/s/ Tracy C. Davis

Tracy C. Davis Senior Attorney

Attorney for Horizon West Transmission, LLC

#### **Attachments 1-4**

#### cc: Via electronic mail only:

Robert Peterson (Robert.Peterson@cpuc.ca.gov)
Jack Mulligan (Jack.Mulligan@cpuc.ca.gov)
Wildfire Safety Division (wildfiresafetydivision@cpuc.ca.gov)
CALFIREUtilityFireMitigationUnit@fire.ca.gov





# California Public Utilities Commission

# ADVICE LETTER



ENERGY UILLIY	OF CALL		
MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)			
Company name/CPUC Utility No.: Horizon West Transmission, LLC (U222-E)			
Utility type:    ELC	Contact Person: Tracy C. Davis Phone #: 512.236.3141 E-mail: tracv.c.davis@nee.com E-mail Disposition Notice to: tracv.c.davis@nee.com		
EXPLANATION OF UTILITY TYPE  ELC = Electric GAS = Gas WATER = Water  PLC = Pipeline HEAT = Heat WATER = Water	(Date Submitted / Received Stamp by CPUC)		
Advice Letter (AL) #: 5-E	Tier Designation: 2		
Subject of AL: Horizon West provides notice of construction of a 230 kV transmission line that will be converted from an existing 230 kV overhead transmission line, at Horizon West's Suncrest Dynamic Reactive Power Support Facility in San Diego County, CA, consistent with Horizon West's approved 2020 Wildfire Mitigation Plan.			
Keywords (choose from CPUC listing): Transmission Lines, Undergrounding, GO 131-D  AL Type: Monthly Quarterly Annual ✓ One-Time Other:			
If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: General Order 131-D, Resolution WSD-009			
Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: $_{ m No}$			
Summarize differences between the AL and the prior withdrawn or rejected AL: Not applicable			
Confidential treatment requested? Yes ✓ No			
If yes, specification of confidential information:  Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:			
Resolution required? Yes ✓ No			
Requested effective date:	No. of tariff sheets: $_{ m None}$		
Estimated system annual revenue effect (%): Not applicable			
Estimated system average rate effect (%): Not applicable			
When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).			
Tariff schedules affected: Not applicable			
Service affected and changes proposed <sup>1:</sup> Not applicable			
Pending advice letters that revise the same tariff sheets: $_{ m None}$			

## Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this submittal, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division Attention: Tariff Unit 505 Van Ness Avenue San Francisco, CA 94102

Email: EDTariffUnit@cpuc.ca.gov

Name: Lisa Cottle

Title: Winston & Strawn LLP

Utility Name: Horizon West Transmission, LLC Address: 101 California Street, 35th Floor

City: San Francisco

State: California Zip: 94111

Telephone (xxx) xxx-xxxx: (415) 591-1579 Facsimile (xxx) xxx-xxxx: (415) 591-1400

Email: lcottle@winston.com

Name: Tracy C. Davis Title: Senior Attorney

Utility Name: Horizon West Transmission, LLC Address: One California Street, Suite 1600

City: San Francisco

State: California Zip: 94111

Telephone (xxx) xxx-xxxx: (512) 236-3141 Facsimile (xxx) xxx-xxxx: (512) 236-3148

Email: tracy.c.davis@nee.com

#### **ENERGY Advice Letter Keywords**

Affiliate	Direct Access	Preliminary Statement
Agreements	Disconnect Service	Procurement
Agriculture	ECAC / Energy Cost Adjustment	Qualifying Facility
Avoided Cost	EOR / Enhanced Oil Recovery	Rebates
Balancing Account	Energy Charge	Refunds
Baseline	Energy Efficiency	Reliability
Bilingual	Establish Service	Re-MAT/Bio-MAT
Billings	Expand Service Area	Revenue Allocation
Bioenergy	Forms	Rule 21
Brokerage Fees	Franchise Fee / User Tax	Rules
CARE	G.O. 131-D	Section 851
CPUC Reimbursement Fee	GRC / General Rate Case	Self Generation
Capacity	Hazardous Waste	Service Area Map
Cogeneration	Increase Rates	Service Outage
Compliance	Interruptible Service	Solar
Conditions of Service	Interutility Transportation	Standby Service
Connection	LIEE / Low-Income Energy Efficiency	Storage
Conservation	LIRA / Low-Income Ratepayer Assistance	Street Lights
Consolidate Tariffs	Late Payment Charge	Surcharges
Contracts	Line Extensions	Tariffs
Core	Memorandum Account	Taxes
Credit	Metered Energy Efficiency	Text Changes
Curtailable Service	Metering	Transformer
Customer Charge	Mobile Home Parks	Transition Cost
Customer Owned Generation	Name Change	Transmission Lines
Decrease Rates	Non-Core	Transportation Electrification
Demand Charge	Non-firm Service Contracts	Transportation Rates
Demand Side Fund	Nuclear	Undergrounding
Demand Side Management	Oil Pipelines	Voltage Discount
Demand Side Response	PBR / Performance Based Ratemaking	Wind Power
Deposits	Portfolio	Withdrawal of Service
Depreciation	Power Lines	

#### NOTICE OF CONSTRUCTION

### CONVERSION OF 230 KV TRANSMISSION LINE AT SUNCREST DYNAMIC REACTIVE POWER SUPPORT FACILITY TO UNDERGROUND PURSUANT TO WILDFIRE MITIGATION PLAN

#### Horizon West Transmission, LLC Advice Letter 5-E

Project Description: Pursuant to Section XI.B.4 of General Order ("GO") 131-D of the California Public Utilities Commission ("CPUC"), Horizon West Transmission, LLC (U222-E) ("Horizon West") hereby provides notice of construction of a 230 kV transmission line that will be converted from an existing 230 kV overhead transmission line. The 230 kV underground conversion is a wildfire risk mitigation measure at Horizon West's Suncrest Dynamic Reactive Power Support Facility ("Suncrest Facility") located near the town of Alpine in San Diego County, California. Horizon West will convert one approximately 115-foot 230 kV overhead transmission line to underground. That short overhead segment interconnects directly with the Suncrest Substation. Horizon West will place the SVC into outage to take the overhead line out of service. Horizon West will remove the existing riser pole and intermediate pole, and install a new riser pole downslope at the former location of the intermediate pole/point of change of ownership. Horizon West will create safe working access through implementing its grading plan design to allow excavation of a trench on the hill. After intercepting the existing underground conduit on Upper Bell Bluff Truck Trail, a new segment of underground cable (identical to the existing) will be installed in the underground duct bank alignment ending at the new riser pole. The underground cable will transition to overhead at the riser pole; the point of change of ownership will not change. After testing and commissioning, another outage would be taken to place the entire 230 kV underground line and SVC Facility back in-service. The proposed point of interconnection work area is 1.03 acres. However, ground disturbance (grading and excavation) within that work area is estimated at 0.85 acres and will be restored following Project implementation. Construction is scheduled to begin as soon as practicable, or as soon as 45-days after publication of notice of construction in a newspaper of general circulation in San Diego County. Construction will be completed in the first half of 2021, or as soon as possible after construction begins.

Electric and Magnetic Fields ("EMF"): Horizon West will comply with its Magnetic Field Management Plan for the Suncrest Facility, as approved by the CPUC in Decision ("D.") 18-09-030 (at 36-37), which provides for the implementation of no-cost and low-cost EMF mitigation measures in accordance with D.06-01-042. This includes the "[a]rrangement of the 230 kV transmission line in a triangular configuration, and installation of the transmission line at a minimum of 36 inches below grade where practicable..." (*See* D.18-09-030 at 37.)

Additional Project Information: For additional information, please call Horizon West at (888) 512-2446, or please visit www.horizonwesttransmission.com/regulatory.html.

<u>Public Review Process</u>: Individuals or groups may protest the underground conversion if they believe that Horizon West has incorrectly applied the exemption in GO 131-D, Section III.A. Protests should include the following:

- 1. Your name, mailing address, and daytime telephone number;
- 2. Reference to the Advice Letter Number and Horizon West's proposed undergrounding;
- 3. A clear description of the reason for the protest; and
- 4. Whether you believe that evidentiary hearings are necessary to resolve factual disputes.

#### Protests must be filed by August 12, 2020 at the following address:

Director, Energy Division ED Tariff Unit California Public Utilities Commission 505 Van Ness Avenue, 4<sup>th</sup> Floor San Francisco, California 94102 Facsimile: (415) 703-2200

E-Mail: EDTariffUnit@cpuc.ca.gov

#### With a copy to:

Tracy C. Davis, Senior Attorney 5920 W. William Cannon Dr., Bldg. 2 Austin, Texas 78749

Email: tracv.c.davis@nexteraenergy.com

Horizon West must respond within five business days of receipt and serve its response on each protestant and the Energy Division. Within 30 days after Horizon West has submitted its response, the CPUC Executive Director will send you a copy of an Executive Resolution granting or denying Horizon West's request and stating the reasons for the decision.

Assistance in Filing a Protest: If you need assistance in filing a protest, contact the CPUC Public Advisor: email: public.advisor@cpuc.ca.gov or call: 1-866-849-8390 (toll-free), or (415) 703-2074, or TTY (415) 703-5258.

<u>Public Comment</u>: Even if you do not want to file an official protest, you may still comment on the request. To do so, send your comments to the Energy Division at the address noted above. Please reference Horizon West Advice Letter 5-E.

#### NOTICE DISTRIBUTION LIST

# CONVERSION OF 230 KV TRANSMISSION LINE AT SUNCREST DYNAMIC REACTIVE POWER SUPPORT FACILITY TO UNDERGROUND PURSUANT TO WILDFIRE MITIGATION PLAN

#### Horizon West Transmission, LLC Advice Letter 5-E

#### **Energy Commission**

Mr. Drew Bohan, Executive Director California Energy Commission 1516 Ninth Street, Mail Stop 39 Sacramento, California 95814 Drew.Bohan@energy.ca.gov

Ms. Courtney Smith, Executive Deputy Director California Energy Commission 1516 Ninth Street, Mail Stop 39 Sacramento, California 95814 Courtney.Smith@energy.ca.gov

#### Other Agencies

San Diego County Department of Planning and Land Use Mark Wardlaw, Director 5510 Overland Avenue, Suite 100 San Diego, CA 92123 mark.wardlaw@sdcounty.ca.gov

Alpine Community Planning Group Travis Lyon, Chairman Alpine Community Center 1830 Alpine Blvd. Alpine, CA 91901 travislyonacpg@gmail.com

#### Newspaper

East County Herald

Alpine Sun

#### ADVICE LETTER SERVICE LIST

Service list in A.15-08-027 (Suncrest CPCN Proceeding)



#### CALIFORNIA PUBLIC UTILITIES COMMISSION Service Lists

PROCEEDING: A1508027 - NEXTERA ENERGY TRANS FILER: NEXTERA ENERGY TRANSMISSION WEST, LLC

**LIST NAME: LIST** 

LAST CHANGED: SEPTEMBER 4, 2019

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#### **Back to Service Lists Index**

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TOP OF PAGE
BACK TO INDEX OF SERVICE LISTS

#### ENVIRONMENTAL ANALYSES AND REPORTS

Available via the Attached Notice of Availability

#### **NOTICE OF AVAILABILITY OF:**

#### ATTACHMENT 4 TO HORIZON WEST TRANSMISSION, LLC (U 222-E) ADVICE LETTER 5-E

On July 10, 2020, Horizon West Transmission, LLC ("Horizon West") served its Advice Letter 5-E. Attachment 4 thereto exceeds 50 pages and exceeds 3.5 megabytes in file size. Accordingly, pursuant to Rule 1.9(d) of the Commission's Rules of Practice and Procedure, Horizon West hereby serves a Notice of Availability of Attachment 4 to its Advice Letter 5-E, and has made Attachment 4 available at the following publicly available internet site:

http://content.winston.com/sitefiles/files/Attachment 4 to Horizon West Transmission LLC %28U222E%29 Advice Letter 5-E-Notice of Construction.pdf

Please contact the representative below with any questions or to request a hard copy of the Attachment 4 to the Horizon West Transmission, LLC (U 222-E) Advice Letter 5-E:

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Date: July 10, 2020 Respectfully submitted,

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