

May 23, 2025

VIA EMAIL

Ms. Connie Chen
California Environmental Quality Act Project Manager
California Public Utilities Commission Energy Division
505 Van Ness Avenue
San Francisco, California 94201

RE: LSPGC Response to CPUC Data Request #4 for LS Power Grid California, LLC's Collinsville 500/230 Kilovolt Substation Project (A.24-07-018)

Dear Ms. Chen,

As requested by the California Public Utilities Commission (CPUC), LS Power Grid California, LLC (LSPGC) has collected and provided the additional information that is needed to continue the environmental review of the Collinsville 500/230 kilovolt (kV) Substation Project (Application 24-07-018). This letter includes the following enclosures:

- A Response to Data Request Table providing the additional information requested in the Data Request #4, received May 9, 2025.
 - Attachment A: Submarine Cable Installation Using Vertical Injector Technology
 - Attachment B: Substation Alternatives GIS
 - Attachment C: Alternative 230 kV Submarine Segment Alignment
 - Attachment D: Alternative 230 kV Overhead Segment Alignment
 - Attachment E: Horizontal Directional Drilling
 - Attachment F: Kirby Hills Fault Research Paper
 - Attachment G: Nearby Infrastructure

The attachments listed above can be accessed via the following link:

[LSPGC Response to CPUC DR-4](#)

Please contact me at (925) 808-0291 or djoseph@lspower.com with any questions regarding this information. If needed, we are also available to meet with you to discuss the information contained in this response.

Sincerely,

A handwritten signature in cursive script that reads "Dustin Joseph".

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Jason Niven (LSPGC)
Doug Mulvey (LSPGC)

Lauren Kehlenbrink (LSPGC)
Clayton Eversen (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Aaron Lui (Panorama)
Peter Mye (Panorama)
Susanne Heim (Panorama)

LSPGC RESPONSE TO DATA REQUEST #4

Project Description

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n/a	<p>DR-1: Potential for the Concrete Mattresses and other Covering Methods along the Submarine Segment</p> <p>Based on the CPUC's coordination with USACE regarding the proposed 230 kV submarine segment, USACE's minimum target depths, and uncertainty that the depths could be achieved in all areas, the CPUC requests that LSPGC provide additional Project Description information to account for contingencies that may be required to protect the submarine segment cables and meet USACE requirements. Specifically, we understand such contingencies may include installing concrete mattresses or covering the submarine cables using other methods and materials, if required by USACE, in any areas where the minimum target depths cannot be achieved for any reason.</p>	A	<p>Please provide a detailed description of the possible use of concrete mattresses along the submarine segment, if required to address depth concerns or to otherwise protect the submarine cables. Include information on the construction process and dimensions, whether the materials would be constructed on-site or prefabricated, estimates regarding the potential locations and quantities, and timing.</p>	<p>If the minimum burial depth cannot be met using the jet plow, the use of diver-assisted water jet lances may be utilized to achieve the required depth. In the event that the required burial depth cannot be met using these methods, then alternate cable protection measures would be implemented as necessary (e.g., placement of concrete mattresses on the riverbed). Cable protection measures, such as concrete mattresses or rock over, may be necessary if burial depths are unable to be met, due to physical constraints. If the need for cable protection measures arises, LSPGC would apply for the necessary permits to authorize placement of any fill material on the riverbed. LSPGC and the Army Corps of Engineers (USACE) have discussed that protective coverings would not be installed within maintained channels.</p> <p>In the unlikely event of needing concrete mattresses an approximate 8-foot wide by 20-foot-long articulating concrete mattress (per cable) would be place over areas where the cable may not meet depth. The concrete mattresses are prefabricated and contain hooks which allow for placement.</p> <p>Although LSPGC does not anticipate the use of concrete mattresses or rocking; if a protective covering is required, the USACE would identify the areas and process for installing protective coverings. Typically, a barge and crane would be used to install the protective cover. LSPGC does not anticipate using more than a total of 540 linear feet (LF) or 4,320 square feet (SqF).</p> <p>Installation of concrete mattresses would take approximately two weeks of in-river work, depending on the extent needed to be covered, and weather conditions.</p>
		B	<p>Please provide a detailed description of any other submarine cable covering methods that could be used in addition to or in lieu of concrete mattresses, such as rocks or boulders, etc. Include information on the construction process and dimensions, estimates regarding the potential locations and quantities, and timing.</p>	<p>Protective rock and/or concrete mattresses are the only viable submarine cable covering methods available. If rocking over the submerged cable would be required to protect the submerged cables, a width of approximately 8 feet would be placed over each cable, to the length of cable that the target depth was not met, and a protective cover was deemed necessary by the USACE. The size of the rocks/boulders and process for installation would be determined in coordination with the USACE in the event that rocking would be required. LSPGC and the USACE have discussed that protective coverings would not be installed within maintained channels.</p>

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				<p>Although LSPGC does not anticipate the use of concrete mattresses or rocking; if a protective covering is required the USACE would identify the area and process for installing the protective coverings. Typically, a barge and crane would be used to install the protective cover. LSPGC does not anticipate using more than a total of 540 linear feet LF or 4,320 square feet SqF.</p> <p>Installation of rocking would take approximately one month of in-river work, depending on the extent needed to be covered, and weather conditions.</p> <p>LSPGC does not anticipate the need of rocking and expects to meet target burial depths across the river.</p>
n/a	DR-2: Submarine Cable Installation using Vertical Injector Technology Based on the information LSPGC provided about available submarine cable installation methods and USACE's minimum depths, two installation methods are capable of meeting the depth requirements, which include (a) jet-sled/hydroplow (proposed method) and (2) vertical injector. The proposed hydroplow has depth limitations that are close to the USACE required depths, whereas the vertical injector method is capable of greater depths. LSPGC has indicated that vertical injector equipment may be difficult to obtain or unavailable due to high demand and limited global access; however, the CPUC recommends including it as an optional construction method in the Project Description that could be used if necessary to achieve the minimum depth requirements.	A	Please provide a detailed description of the option to install the submarine segment using vertical injector technology. Provide a narrative similar to the proposed hydroplow method, and highlight any key differences from the hydroplow installation process, including timing and materials, etc.	A detailed description of the option to install the submarine segment using vertical injector technology is attached as Attachment A: Submarine Cable Installation using Vertical Injector Technology .
		B	Please explain if the sediment dispersion assumptions with vertical injector installation would be similar or greater than that analyzed for the hydroplow method. If greater, please provide estimated values compared to the proposed method.	Based on LSPGC's experience with installations within riverways, LSPGC believes that the sediment dispersion for a vertical injector would be larger than that of a hydroplow. LSPGC's previous project, which analyzed the use of a vertical injector to install single core transmission lines beneath riverbed, modeled suspended sediment concentrations ranging from 25 to 200 mg/L above ambient conditions. However, LSPGC understands that sediment dispersion modeling should not be used as a direct comparison, as sediment in one project is different from another. Nevertheless, LSPGC believes that the sediment dispersion volume would be larger with a vertical injector; however, without completing a full analysis, LSPGC recommends using a conservative estimate of 200 mg/L above ambient conditions for the basis of the environmental review.
n/a	DR-3: Refined Project Objectives LSPGC informed the CPUC that the project objectives would be refined to address CAISO's updated project information once CAISO's latest transmission plan is published. The project objectives must be finalized to complete the alternatives screening process.	A	Please provide updated project objectives to support the alternatives development and screening process.	<p>In addition to the items in the 2021-2022 Transmission plan, the Draft 2023-2024 transmission plan bolsters the necessity of the Collinsville Substation project, as described below.</p> <ul style="list-style-type: none">• Meet the California Independent System Operators' (CAISO) policy-driven need established for the project in their 2023-2024 Transmission Plan:<ul style="list-style-type: none">– Provide stronger support for the East Bay and Alleviate Stress on the 230kV lines, particularly in the Contra Costa region.– Serve as a termination point for future energy projects; however, is not dependent on future projects– Reinforce and support increased supply demands in the Bay Area– Relieve congestion on the 230kV system.

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				<p>– Meet the forecasted long-term demand reliably and economically</p> <p>This language is pending the Final 2023-2024 Transmission Plan from CAISO, expected to be released in May 2025.</p>
Data Request #2, DR-8 Data Request #3, DR-2	DR-4: Proposed Substation Property In response to Data Request #3, DR-2, LSPGC provided clarification regarding the proposed substation property size and boundary and stated the following: “The GIS data for the proposed substation property is included as Attachment A, Proposed Substation Property Size. The area includes workspaces and permanent substation features which cover 28.3 acres of the 44 acres south located of Stratton Lane on the proposed parcel (Parcel ID: 0090-12-0300).”	A	Please clarify what would be done with the unused portion of the existing parcel, and if the property would be subdivided and if existing ownership would be maintained in the unused areas.	LSPGC would restore any temporary impacts to the property following construction, following a CPUC approved restoration plan. Any unused portion of the property would remain unused and vacant. LSPGC anticipates purchasing the entire 64.05-acre parcel.
n/a	DR-5: Additional PG&E Construction Measures On March 26, 2025, PG&E informed the CPUC team that they would be submitted additional Construction Measures (CMs), but no additional CMs have been submitted to date. The Project Description including the proposed CMs need to be finalized to effectively evaluate impacts.	A	If PG&E intends to submit additional CMs, please ensure they are submitted no later than May 16, 2025.	PG&E plans to submit a response separately to address the addition of new CMs.

Alternatives

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n/a	DR-6: Core Project Objectives for Alternatives Screening Simplified core project objectives are required to support the CPUC’s alternative screening process. The CPUC has drafted the following simplified descriptions of the core project objectives based on the detailed project objectives included in the PEA: <ul style="list-style-type: none">• Meet the California Independent System Operators' (CAISO) policy-driven need established for the project in their 2021-2022 Transmission Plan:<ul style="list-style-type: none">– Address identified transmission constraints on the 230 kV system– Provide additional supply from the 500 kV system• Improve and maintain the reliability of the transmission grid by addressing overloads• Facilitate deliverability of load from existing and proposed renewable energy projects, and progress California’s renewable energy goals• Achieve commercial operation by June 2028	A	Please verify the core project objectives or provide requested revisions.	<ul style="list-style-type: none">• Meet the California Independent System Operators' (CAISO) policy-driven need established for the project in their 2021-2022 Transmission Plan:<ul style="list-style-type: none">– Address identified transmission constraints on the 230 kV system– Provide additional supply from the 500 kV system• Improve and maintain the reliability of the transmission grid by addressing overloads• Facilitate deliverability of load from existing and proposed renewable energy projects, and progress California’s renewable energy goals• Achieve commercial operation by June 2028• Meet the California Independent System Operators' (CAISO) policy-driven need established for the project in their 2023-2024 Transmission Plan:<ul style="list-style-type: none">– Provide stronger support for the East Bay and Alleviate Stress on the 230kV lines, particularly in the Contra Costa region.– Serve as a termination point for future energy projects; however, is not dependent on future projects– Reinforce and support increased supply demands in the Bay Area– Relieve congestion on the 230kV system.

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				This language is pending the Final 2023-2024 Transmission Plan from CAISO, expected to be released in May 2025.
n/a	DR-7: Alternative Collinsville Substation Sites More information is needed regarding impact areas and other project feature details associated with the alternative substation sites.	A	Please identify and provide GIS for proposed staging areas to support construction of the Collinsville Substation for Alternative A (adjacent to existing wind energy substations) and the PEA Alternative (also referred to as Applicant 2).	The GIS for proposed staging areas to support construction of the Collinsville Substation for Alternative A and the PEA Alternative are attached as Attachment B-1: Staging Areas .
		B	Please identify and provide GIS for proposed Collinsville Substation property (beyond the minimum footprint) for Alternative A (adjacent to existing wind energy substations) and the PEA Alternative (also referred to as Applicant 2).	The GIS for proposed Collinsville Substation property for Alternative A and the PEA Alternative are attached as Attachment B-2: Substation Property .
n/a	DR-8: Alternative 230 kV Submarine Segment Alignment LSPGC informed the CPUC that an alternative route for the 230 kV submarine segment would be developed in coordination with Suisun Associates to minimize impacts associated with the sand and mining lease.	A	Please provide GIS data for the alternative 230 kV submarine segment alignment.	These minor route alternatives are attached as Attachment C: Alternative 230 kV Submarine Segment Alignment .
n/a	DR-9: Alternative 230 kV Overhead Segment Alignment LSPGC provided data showing the alignment and structure locations for an alternative 230 kV overhead segment going south of the proposed substation site through PG&E property and west of the proposed overhead segment route. More design information is needed for this alternative, including the locations of temporary work areas and access routes consistent with the design for the Proposed Project.	A	Please provide GIS data for the alternative 230 kV overhead segment design details consistent with the Proposed Project, including the associated work areas and access roads.	LSPGC has evaluated an alternative for the 230 kV overhead segment. The GIS for this alternative is provided as Attachment D: Alternative 230 kV Overhead Segment Alignment . Implementing the 230 kV overhead segment in the specified area would necessitate an alternative landing location, which is illustrated in the aforementioned attachment.
Data Request #2, DR-19	DR-10: Alternative 230 kV Submarine Segment – Partial HDD Installation Method In response to Data Request #2, DR-19, LSPGC stated: “LSPGC reviewed the feasibility of Horizontal Directional Drilling (HDD) during the design of the proposed submarine cable routing. HDD is not feasible to install the submarine cables across the sand mining lease, as the cables are not spliced together, rather one continuous cable. If an HDD was used in these locations, an HDD would be required across the entire 4.5-mile route through the river, which is not feasible. HDD is feasible at the end points of the cable (i.e., shorelines); however, due to engineering constraints of the cables, the required depth of the HDD would introduce additional cables required in order to meet specified cable ratings resulting in additional impacts and time constraints in-river. Due to this, and the potential for frac-out in the river in critical habitat, HDD was not proposed.” A number of stakeholders have requested the EIR consider HDD methods to install the submarine cables, and more information is needed to understand a potential hybrid approach where both a hydroplow and HDD methods are used.	A	Please identify the maximum distances from the shores that partial HDD installation could achieve.	Based on previous review, LSPGC anticipates that the submarine cables could be used for distances up to approximately 1,500 feet waterward of the shoreline.
		B	Please explain the construction process for a partial HDD installation method, including the process for splicing cables and continuing installation using other methods where HDD is not feasible.	Please see Attachment E-1: Horizontal Drilling Description .
		C	Please explain factors related to the construction schedule/duration with a hybrid installation approach using HDD and hydroplow, and how it would be different that using the proposed hydroplow method alone.	Please see Attachment E-1: Horizontal Drilling Description .
		D	Please identify the additional work areas that would be required if partial HDD methods were used and provide associated GIS data.	Please see Attachment E-2: HDD Work Areas .
n/a	DR-11: Biological and Cultural Surveys and Data for Project Alternative Study Areas Several of the project alternative study areas are outside of previously evaluated biological and cultural study areas for the Proposed Project, such as two alternative substation sites, including “Scenario A” (near existing wind energy	A	Please conduct biological surveys and provide data coverage consistent with the BRTR for all project alternative study areas, including for vegetation communities, aquatic resources, and species/habitat presence. Please provide a BRTR Addendum focused on the project alternative study areas and associated GIS data.	Due to landownership constraints, LSPGC is unable to survey all project alternative study areas. LSPGC understands that the presence of potential threatened and endangered species will have to be assumed in lieu of survey data.

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	substations) and “PEA 2/Applicant 2” (north of Tabert Lane), as well as the overhead 230 kV segment on PG&E property. Additional data is needed for the project alternative areas to evaluate and compare impacts, including along all alignments, temporary and permanent work areas, and buffers consistent with the BRTR.	B	Please complete a cultural resources record search surrounding the project alternative study areas consistent with the record search performed for the Proposed Project.	LSPGC has initiated a Cultural Resources records search for the project alternative study areas and will submit the results to the CPUC when received.
		C	Please conduct cultural resource surveys and provide data coverage consistent with the CRTR and associated technical reports for all project alternative study areas. Please provide a CRTR Addendum focused on the project alternative study areas and associated GIS data.	Due to landownership constraints, LSPGC is unable to survey all project alternative study areas. LSPGC understands that the presence of cultural resources sites will have to be assumed in lieu of survey data.
Data Request #2, DR-18	DR-12: PG&E 500 kV Interconnection – TSP Structures Alternative Based on SMUD comments and information provided by PG&E in response to Data Request #2, DR-18, a potential alternative has been identified that involves using entirely tubular steel poles (TSPs) for the 500 kV interconnection lines instead of primarily lattice steel towers (LSTs) with a few three-pole TSPs near the proposed Collinsville Substation. Specifically, the alternative would involve using TSP monopole structures where LSTs are identified for the Proposed Project.	A	Please provide preliminary design information and GIS data for an alternative that involves the use of TSPs (monopoles) along the proposed 500 kV interconnection lines. The design information and GIS should include structure dimensions (heights, diameters, depths, use of retaining walls, etc.), structure locations, work areas, access roads, and overhead alignments.	PG&E plans to submit a response separately to address this item.
		B	Please explain any differences in construction procedures and schedules that would be different with the TSP alternative vs. the proposed use of LSTs. Please explain how helicopters and cranes may be used differently to install the TSPs vs. LSTs, and provide equipment details if different than proposed.	PG&E plans to submit a response separately to address this item.
		C	Please provide diagrams of typical TSP structures that would be used under this alternative.	PG&E plans to submit a response separately to address this item.

Biological Resources

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BRTR Addendum	DR-13: Survey Areas and Data for Vegetation Communities and Aquatic Resources at PG&E Transposition Sites As discussed with LSPGC and PG&E, there are gaps in the survey areas and data coverage in the BRTR Addendum at the PG&E transposition sites (i.e., Transposition Sites C and D, etc.). Complete data coverage is needed for vegetation communities and aquatic resources to complete the impact analysis.	A	Please ensure they areas are adequately surveyed for biological resources and data coverage is provided for the entire biological study area identified, particularly where project work areas and access routes are identified.	The BRTR Addendum has been revised to reflect vegetation within areas that were not available for survey and was submitted to the CPUC via E-mail on 5/14/25.
BRTR Addendum	DR-14: Wetlands at PG&E Transposition Sites The BRTR Addendum doesn’t provide conclusive information about where wetlands are located and if they would be avoided or impacted. There are several mapped water features located along proposed access routes and within structure work areas that may be wetlands.	A	Please describe how wetland impacts would be avoided or permitted at the PG&E transposition sites. Where avoidance is possible, provide revised GIS data for the proposed access routes and work areas at the transposition sites that demonstrates avoidance.	PG&E plans to submit a response separately to address this item.
BRTR Addendum	DR-15: Possible Vernal Pools at PG&E Transposition Sites The BRTR Addendum identified features that may be vernal pools (based on photos), but the report is vague about the presence of vernal pools. <i>PG&E CM BIO-1: Vernal Pool and Waters Avoidance</i> indicates vernal pools may be present; however, the presence of vernal pools has not been verified, and it's unclear if the water features identified in the BRTR Addendum (or where survey gaps have been identified) that may be vernal pools could be avoided.	A	Please explain if the presence of vernal pools is known and identify where they occur, as well as if and how they would be avoided.	As discussed, PG&E plans to submit a response separately to address this item.
		B	If impacts on vernal pools cannot be ruled out, explain what additional measures would be implemented to address vernal pools, such as from PG&E's HCP.	PG&E plans to submit a response separately to address this item.

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	More information is needed about possible vernal pools that may be present at the transposition sites.			
BRTR Addendum	DR-16: Focused Botanical Surveys The BRTR Addendum did not include recommendations for focused botanical surveys.	A	Please explain if focused botanical surveys were conducted or are in progress.	PG&E plans to submit a response separately to address this item.
n/a	DR-17: Crotch’s Bumble Bee Habitat Assessment PG&E informed the CPUC that they were working on a habitat assessment for Crotch’s bumble bee.	A	Please provide a schedule for when the habitat assessment will be completed and provided to the CPUC.	PG&E plans to submit a response separately to address this item.

Geology

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n/a	DR-18: Submarine Segment Fault Crossing The submarine segment geotechnical report describes the Kirby Hills fault (also referred to as the Rio Vista fault) as being 2.3 km west of the submarine segment alignment; however, our records indicate that the Kirby Hills fault would be crossed by the submarine segment.	A	Please describe how the submarine segment would cross faults, the fault activity, and design considerations that address potential risks associated with faults along the submarine segment.	LSPGC agrees that the submarine cable would likely cross the Kirby-Hills (Rio Vista) fault line. As shown in the PEA GEO section, the Proposed Project accounted for the crossing of the fault. As described in the geotechnical report, a middle line length approach was used when referring to the submarine cabling, which is why the report states the cabling is 2.3 km west of the fault lines. Installation across this fault would be the same as the rest of the river installation. Please see Attachment F: Kirby Hills Fault Research Paper for a recent research paper on the fault, which describes the activity. LSPGC’s engineering and design follows standard industry standard for designing earthquake conditions.

Utilities

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Deficiency Report #1, DEF-3	DR-19: Utility Crossings along the Submarine Segment In response to Deficiency Report #1, DEF-3, LSPGC stated: “One of LSPGC’s underground 230kV circuits will cross under the existing underground Trans Bay Cable near the Pittsburg Substation. LSPGC will coordinate with Trans Bay Cable LLC/NextEra Energy Transmission, LLC to facilitate this crossing and any requirements that the utility may require. LSPGC will establish a crossing agreement with Trans Bay Cable LLC/NextEra Energy Transmission, LLC to ensure all requirements are documented.” A review of available GIS data for California Transmission Lines indicates that the submarine segment would cross the Trans Bay Cable within the Delta at two locations for a total of approximately eight crossings. It appears the Trans Bay Cable would be crossed within and immediately adjacent to a federal navigation channel where USACE is requiring a minimum depth of 15 feet below the riverbed; however, according to LSPGC this public dataset is inaccurate, and the submarine segment would not cross the Trans Bay Cable within the Delta.	A	Please identify all utilities within a minimum of 1,000 feet of the submarine segment by feature type, feature name, operator name, and number of individual lines for each feature. Please provide associated GIS data identifying the routes as well as the source of reference data.	The only utility LSPGC is aware of, within 1,000 feet of the submarine segment, is the Transbay Cable. Transbay Cable LLC (subsidiary of NextEra Energy Transmission, LLC) operates the 53-mile direct current electrical transmission cable which operates at 200 kV. https://www.transbaycable.com/home.html
		B	Please identify which utilities would be crossed by the submarine cables, the number of and location of each cable/line crossing, provide the known or expected depth of the existing utility at the crossing locations (i.e., surface of the riverbed or depth below the riverbed), and describe the submarine crossing position (i.e., above, below, etc.).	According to LSPGC’s research, LSPGC is not aware of any crossing that would be required by the submarine cabling. Please see Attachment G: Nearby Infrastructure for a visual of the existing infrastructure. LSPGC would cross the Transbay Cable, onshore, as described in the PEA Project Description.
		C	Please describe the process for installing submarine cables where utility crossings would occur. Explain the process for how precise locations and depths of existing utilities would be identified, how any incidental damage would be avoided, and any separation and clearance distances/procedures.	According to LSPGC’s research, the proposed submarine cable would not cross any existing utility.

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	Furthermore, the State Lands Commission informed the CPUC that there may be other pipelines or utility lines in the Delta that should be addressed if they would be crossed by the submarine segment. More information is needed about existing utilities in the vicinity of the proposed submarine segment, including but not limited to the Trans Bay Cable.	D	Please explain if the USACE's minimum depth requirements would be maintained at utility crossing locations, and if existing utilities could constrain the installation depths of the proposed submarine cables, such as if the submarine cables would be installed over the existing cables and the depth of the existing utilities is less than the USACE's 10 to 15 foot minimum.	According to LSPGC's research, the proposed submarine cable would not cross any existing utility.
		E	Please describe any contingencies or construction process options that may be necessary to protect the submarine cables if the minimum depths cannot be achieved at utility crossings, such as but not limited to the use of concrete mattresses (refer to DR-1).	According to LSPGC's research, the proposed submarine cable would not cross any existing utility.
		F	Please provide any available data for any utility lines within the San Francisco Bay or Delta region that may be located within mining lease areas, including where existing utility crossings have occurred and where the mining areas have been affected.	According to LSPGC's research, the proposed submarine cable would not cross any existing utility.
n/a	DR-20: Montezuma Gas Line Based on the location of the underground Motezuma gas line in the vicinity of 500 kV interconnection lines, there are temporary work areas and access routes that would be positioned on top of the gas line.	A	Please review the locations of proposed work areas and access roads that intersect the existing gas line features, explain if the proposed construction activities at the locations could affect the gas line, describe how the gas line would be identified and protected, and or refine the boundaries of proposed work areas to avoid the gas line.	PG&E plans to submit a response separately to address this item.