

October 13, 2025

VIA EMAIL

Mr. Tommy Alexander
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

RE: Response to Data Request No. 8 for LS Power Grid California, LLC's Power the South Bay Project
(Application 24-05-014)

Dear Mr. Alexander:

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 complete the California Environmental Quality Act (CEQA) review for the Power the South Bay Project (Proposed Project). Responses to the specific requests are included within the table below, along with one LSPGC request.

LS Power – Power the South Bay Project Data Request No. 8, Response 1		
No.	Data Request	Response
1	Pursuant to our conversation on October 8, 2025, please provide an updated version of Applicant-Proposed Measure (APM) BIO-19: Wetlands and Aquatic Resources Delineations clarifying that wetland and aquatic resources delineation will be conducted for all portions of the proposed Newark to NRS 230 kV AC transmission line containing potentially State or Federal jurisdictional waters which have not already been delineated, regardless of whether the potentially jurisdictional waters are within Caltrans right-of-way.	See revised APM BIO-19 below: Pursuant to property owner approval, a wetland and aquatic resources delineation will be conducted for the on all portions of the Proposed Project Newark to NRS 230 kV AC transmission line within Caltrans ROW containing potentially State or Federal jurisdictional waters. Accurate acreages of vernal pools and RWQCB, CDFW, and USACE jurisdictional waters will be defined from these delineations. Vernal pools and jurisdictional waters shall be marked as a sensitive area and shall be avoided to the extent practicable. If these areas cannot be avoided, applicable permits shall be obtained.
2	Pursuant to our conversation on October 8, 2025, please provide an updated version of APM UTIL-1: Coordination with Utilities adjusting the requirement to mark existing underground utilities (currently “at least 14 days prior to construction”) to better align with the Underground Service Alert (USA) 811 utility location and marking process (e.g., by changing to “at least 72 hours prior to construction”, noting that LSPGC would call	See revised APM UTIL-1 below: LS Power shall notify all utility companies with utilities located within or crossing the Proposed Project ROW to locate and mark existing underground utilities along the entire length of the Proposed Project. Due to the linear nature of transmission line construction, utilities shall be marked in short segments at least 14 days <u>72 hours</u> prior to construction within said segments. No subsurface work shall be conducted that

	811, and/or otherwise revising the APM to be more aligned with the 811 process).	would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, areas of subsurface excavation shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering, or relocation of the existing utility shall be coordinated with each utility owner/operator. LS Power shall coordinate with third-party utilities and shall submit the intended construction methodology to the owner of the third-party utility for review and coordination. Construction methods shall be adjusted as necessary to ensure that the integrity of existing utility lines is not compromised.
3	Please provide a summary of LSPGC's contact with the City of Fremont and the Alameda County Water District regarding utility coordination for the Project, including the dates of contact.	LSPGC has been coordinating with the City of Fremont since May of 2023. Since May of 2023, LSPGC has held monthly meetings with the City of Fremont to discuss the Project including details regarding the Project route, development timelines, construction schedule, etc. LSPGC officially submitted encroachment permits to the City of Fremont on June 27, 2025. LSPGC's geotechnical survey contractor reached out to the Alameda County Water District (ACWD) in 2024 to obtain the required Well Drilling Permit for the borings in Alameda County. LSPGC reached out to ACWD to begin coordination for the Project alignment on September 12, 2025 and held a kickoff meeting on September 18, 2025. LSPGC provided ACWD with their plans following that meeting to begin their review. LSPGC will continue to coordinate with ACWD regarding their utility infrastructure through the City of Fremont encroachment permit process and will apply for a Drilling Permit for all required Horizontal Directional Drills and structures in Alameda County.
4	N/A	LSPGC is requesting the following change to Draft Environmental Impact Report, Section 2.8.10.2 Dewatering: Dewatering would be conducted using a pump or well points. Groundwater encountered during underground construction would be pumped into water trucks for haul-off or directly into containment tanks (e.g., Baker tanks) that would allow acceptable de-sedimentation before

		discharge; the groundwater would be tested for <u>sedimentation, turbidity</u> and pH, among other required parameters. The groundwater would be discharged into the storm sewer system when the water meets quality standards established by applicable regulations and acquired permits, or it would be hauled off for disposal if parameters are detected in concentrations that prohibit discharge. Discharge may also be applied to flat, vegetated, upland areas, may be used for dust control, or may be used in other suitable construction operations if testing determines that the water is suitable for such use....
--	--	--

Please contact me at (925) 808-0291 or djoseph@lspower.com with any questions regarding this information.

Sincerely,



Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Lucy Marton (LS Power)
Casey Carroll (LS Power)
Jacob Diermann (LS Power)
David Wilson (LS Power)
Michelle Wilson (CPUC)
Vince Molina (ESA)
Dave Davis (ESA)