

September 16, 2025

VIA EMAIL

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

RE: Response No. 1 to Data Request No. 7 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 (LS Power) 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). This letter includes the following enclosures:

- Data Request Response Table providing the additional information requested in the Power the South Bay Project Data Request No. 7, received August 28, 2025.
 - Avian Powerline Interaction Committee (APLIC), Suggested Practices for Avian Protection on Power Lines, 2006.
 - APLIC, Eagle Rise Framework, 2018.

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

Sincerely,

A handwritten signature in black ink that reads "Dustin Joseph".

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)



LS Power - Power the South Bay Project (A. 24-05-014)
Energy Division Data Request No. 7 Date August 28, 2025
LS Power Response No. 7 Date September 16, 2025

LS Power - Power the South Bay Project (A. 24-05-14) CPCN and PEA Data Request 7

RESPONSE OVERVIEW

Review of the Certificate of Public Convenience and Necessity (CPCN) Application and Proponent’s Environmental Assessment (PEA) for the Power the South Bay Project (Application 24-05-014) was based on the California Public Utilities Commission’s (CPUC) Guidelines for Energy Project Applications Requiring California Environmental Quality Act (CEQA) Compliance: Pre-filing and Proponent’s Environmental Assessments (November 2019). Based on these criteria, the Energy Division found that the PEA contains sufficient information to satisfy the requirements of the Commission’s Information and Criteria List, and therefore deemed Application 24-05-014 complete. The CPUC published the Draft Environmental Impact Report (DEIR) for public review on June 9, 2025. Following completion of public review period, CPUC identified additional information required to advance and complete the CEQA review or the Project. The following additional information is provided in response to the Power the South Bay Project Data Request No. 7.

LS Power – Power the South Bay Project (A. 24-05-014) Data Request No. 7, Response No. 1		
Comment No.	DATA REQUEST	RESPONSE
Project Description		
1	The Project would use fluidized thermal backfill over the buried electric transmission line to discharge heat to the surface. How would this affect existing utilities, especially those located along Los Esteros Road? Are there feasible construction alternatives to the use of fluidized thermal backfill?	Fluidized thermal backfill (FTB) is a controlled low strength material that is designed and tested to transfer heat efficiently so the transmission line can meet its required electrical rating. FTB is a mixture of fine aggregates (e.g., sand), cement, water, and sometimes additives to improve properties like flowability. The project’s design separation from existing utilities and the use of FTB above the duct bank help to minimize the accumulation of heat into surrounding soils and existing utilities, instead directing heat from the cables directly to the ground surface. The soil temperatures expected would not be anticipated to adversely impact existing utilities. Studies may be performed with owners of certain nearby electric lines to ensure that neither circuit experiences a derating. A common alternative to FTB for backfilling the duct bank trench is the soil originally excavated. While this may be used for the project in certain circumstances, this approach is generally less preferred for several reasons. One, the native soil must be properly compacted to avoid excess settlement that would be especially detrimental within city streets. Compacting backfilled soil properly within the trench lengthens the construction schedule compared to placing self-compacting materials, can increase construction noise from vibratory compaction equipment, and requires careful attention to moisture content – meaning the soil may be too wet during some

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		periods to properly compact or consume additional water if conditions are too dry. Another significant disadvantage with using native soil for backfill for this project is that the CAISO identified need requires a substantial electrical rating that the variable thermal properties of native soil may not reliably achieve in all project segments. For these reasons, FTB is planned for the project for duct bank trench backfill instead of native soils.
2	What are the minimum horizontal and vertical clearances between the proposed transmission line and other existing clearances in the underground portion of the Project alignment?	Minimum crossing and paralleling clearances are dictated by GO-128. Generally given as 12-inches when paralleling and 6-inches when crossing. (GO128, Rule 41.4.A(1)).
3	For the segment where the proposed overhead transmission line would cross the drying beds in the San José-Santa Clara Regional Wastewater Facility, confirm if the work pads (i.e., structure foundations) would be installed within the drying beds or adjacent to the drying beds (e.g., along the access roads).	The majority of the structures would be installed adjacent the access roads along, outside of the drying beds. Structure NN-8 is the one structure that would be installed inside the drying bed. This structure was relocated to a drying bed in coordination with the Regional Wastewater Facility (RWF) to avoid impacting a U.S. Army Corps of Engineers’ Levee that is located on the road to the north of the structure. The location of all of the structures have been and will continue to be coordinated with the RWF.
4	In the event that the Project requires dewatering, please list facilities into which the Project would dispose of the discharge. Have the owners of these facilities been contacted? If not, when will they be contacted?	The exact locations for any water encountered that needs to be disposed of during dewatering has not yet been determined. LS Power and their Contractor will work with the Cities to allow discharge into the storm sewers if possible. If that is not possible, LS Power and their Contractor will work with the local wastewater facilities such as Union Sanitary District and the San Jose-Santa Clara Regional Wastewater Facility to permit discharges to those facilities.
5	Provide copies of the Avian Power Line Interaction Committee (APLIC) guidelines: a. Suggested Practices For Avian Protection on Power Lines: State of the Art in 2024 (2024) b. Eagle Risk Framework (2025)	LS Power has provided 2006 Suggested Practices for Avian Protection on Power Lines referenced in the DEIR and the 2018 Eagle Risk Framework (see attached).

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6	Provide records of consultation with the Don Edwards National Wildlife Refuge and U.S. Fish and Wildlife Service to date.	LSPGC meet with the staff at Don Edwards National Wildlife Refuge and the U.S. Fish and Wildlife on a few different occasions. Below is a summary of those meetings: - July 30, 2024: USFWS representative Ivette Loreda shared historical survey data for vernal pool branchiopods in the Don Edwards National Wildlife Refuge immediately adjacent to Cushing Parkway (Warm Springs Unit). - August 21, 2024: LS Power met with USFWS representatives Joseph Terry, Ivette Loreda, and Ryan Olah to discuss the potential for listed branchiopods to occur in the Don Edwards National Wildlife Refuge adjacent to Cushing Parkway, as well as in the Pacific Gas and Electric Company (PG&E) Newark Substation parcel. USFWS shared details of their ongoing studies of vernal pools at Cushing Parkway. - October 23, 2024: LS Power met with USFWS representative Joseph Terry to update USFWS on the PG&E Bay Area Habitat Conservation Plan data for the Newark Substation parcel, and to notify USFWS that LS Power would proceed with conducting protocol vernal pool branchiopod surveys. - May 19, 2025: LS Power submitted a request for information to USFWS Don Edwards National Wildlife Refuge staff regarding the blooming status of Contra Costa goldfields (<i>Lasthenia conjungens</i>) for the 2025 blooming period, and known occurrence information in the Warm Springs Unit adjacent to Cushing Parkway. USFWS San Francisco Bay National Wildlife Refuge Complex Botanist, Aidona Kakouros, responded to the request on May 21, 2025, sharing results of the USFWS surveys for Contra Costa goldfields in the Warm Springs Unit.
7	Confirm the approximate temporary disturbance area at the Silicon Valley Power (SVP) Northern Receiving Station (NRS) 230 kV Substation.	The temporary disturbance area at SVP’s NRS 230 kV substation associated with the Power the South Bay Project is approximately 0.3 acres.

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8	Confirm whether the following characterization of the scope of work at the SVP NRS 230 kV Substation is accurate. If this characterization is not accurate, please explain why and provide any supplemental information necessary to correct it. - SVP would own and be responsible for installation of an overhead structure within its NRS 230 kV Substation along with CAISO metering instruments, group operated disconnect switch, and jumpers between the substation bay, metering, and disconnect switch. - LSPGC would own and be responsible for installation of the underground transmission line into the SVP NRS 230 kV Substation, cable riser termination structures, and jumpers from the cable risers to the SVP-owned disconnect switch.	This is a correct characterization.