July 10, 2024

VIA EMAIL

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

RE: Response No. 2 to Data Request No. 1 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 adequately conduct 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 No. 2 providing the additional information requested in the Power the South Bay Project Data Request 1, received June 13, 2024, that was not included as part of Response No. 1.
  - Attachment A – AERMOD Input and Output Files (PM2.5)
  - Attachment B – Average Daily Emissions Calculations
  - Attachment C – Updated Proponent's Environmental Assessment (PEA) Emissions Tables

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)
Josh Taylor (KPE)
Michelle Wilson (CPUC)
Dave Davis (ESA)
Michael Manka (ESA)

LS Power - Power the South Bay Project (A. 24-05-014) CPCN and PEA Data Request 1

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 following additional information is provided in response to the Power the South Bay Project Data Request No. 1, which identified further details and evaluation that is needed to adequately conduct the CEQA review.

LS Power – Power the South Bay Project (A. 24-05-014) Data Request No. 1, Response No. 2		
PEA Section	**DATA REQUEST**	**LS POWER RESPONSE**
3.0 – Project Description		
3.3.1	Please provide preliminary design drawings for project features. • Figures 3-8 to 3-15 provide good information. The CPUC requests additional profile drawings for the substations and terminals which should show the expected facility including the security walls, poles, A-frames, etc. with dimensions showing the height. Provide drawings, including overhead and profile views, showing the excavation dimensions for typical splice vault and duct banks.	Silicon Valley Power's (SVP) Scope of work will all be located within the existing Northern Receiving Station (NRS) substation fence and will include the following: - Height of new structures will range in height up to approximately 57 feet above grade. The height of existing structures range in height up to approximately 57 feet above grade. - The existing 8-foot chain link fence on the north and west side of the NRS substation and the 10-foot concrete post and panel fence on the south and east side of the NRS substation will not be modified. For security reasons, SVP prefers not to provide figures with specific locations of existing and future equipment within substation facilities.
3.3.4	Provide diagrams with dimensions of existing facilities. • See Section 3.3.1 above.	See response 3.3.1 above.

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PEA Section	**DATA REQUEST**	**LS POWER RESPONSE**
5.3 – Air Quality		
5.3.4.1 & 5.3.4.4	The filed PEA qualitatively evaluates staging areas and worker receptors, but two items for health risk remain outstanding. Please update the Health Risk Assessment (HRA) to include: • Annual average PM2.5 concentration (including fugitive dust); and	Particulate matter less than or equal to 2.5 microns (PM2.5) is a complex mixture of substances that includes elements such as carbon and metals; compounds such as nitrates, organics, and sulfates; and complex mixtures such as diesel exhaust and wood smoke. The project-level threshold addresses the potential for an individual project to significantly elevate existing risks or hazards. A project would have a cumulatively considerable PM2.5 impact if the project would incrementally increase PM2.5 by more than 0.3 µg/m3 annual average. A project would have a significant impact if it resulted in an incremental annual increase of greater than 0.3 µg/m3 annual average PM2.5. Based on review of the CalEEMod outputs (refer to PEA **Appendix 5.3-A**), the highest PM2.5 generated within the vicinity of sensitive receptors would be at the NRS substation in construction year 2027. From this data, an AERMOD input emission rate was established, which is summarized in **Attachment A** to this Data Request No.2 response. The AERMOD dispersion model was utilized to determine the maximum Proposed Project PM2.5 emission concentration based on the highest annual emission from all sources. PM2.5 concentrations were calculated at the worst-case receptor locations as identified in PEA **Section 5.3.1.3**. Based on the modeling, the worst-case PM2.5 was calculated at 0.035 µg/m3 (refer to AERMOD output files in **Attachment A**). The 0.035 µg/m3 project-related annual increase in PM2.5 is well below the threshold of 0.3 µg/m3. Therefore, impacts would be less than significant.
5.3.4.1 & 5.3.4.4	• Cumulative HRA utilizing Bay Area Air Quality Management District (BAAQMD) tools (the filed PEA qualitatively discusses other construction projects that could be nearby, but not existing sources in the BAAQMD tools such as stationary or mobile).	Cumulative cancer risk thresholds established by BAAQMD are less than 100 people per million exposed for cancer risk, and greater than 10 for non-cancer hazards. Based upon modeling completed for the Proposed Project, as distances are increased beyond the project site(s), cancer risks drop quickly. A cumulative health risk during construction could exist if a large project(s) was occurring simultaneously to the Proposed Project using diesel construction equipment. However, based on the cumulative thresholds of 100 cases per million exposed and 10, the cumulative diesel construction equipment would essentially need to be as much as 10 times more intense to generate health risks near the thresholds. Based on review of the site and potential construction projects, no nearby construction projects would be expected to meet

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PEA Section	**DATA REQUEST**	**LS POWER RESPONSE**
		these diesel equipment conditions. Given this, a less-than-significant cumulative cancer and non-cancer health risk would be expected during construction at the SVP NRS modifications. With respect to PM2.5, a project would have a cumulatively considerable impact if it resulted in an incremental increase of greater than 0.3 µg/m3 annual average PM2.5, and it combined with cumulative sources to exceed 0.8 µg/m3 cumulative annual average. Based on review of the CalEEMod outputs, the highest PM2.5 generated within the vicinity of sensitive receptors would be at the NRS substation in construction year 2027. From this data, an AERMOD input emission rate was established, which is summarized in **Attachment A**. As stated above, the worst-case PM2.5 was calculated at 0.035 µg/m3. The Proposed Project emissions are below the project level and cumulative thresholds; and would therefore not result in a cumulatively considerable impact. Specifically, an over 22 times increase above the Proposed Project emissions would be required to exceed the cumulative threshold. Based on review of the site and potential construction projects, no nearby construction projects would be expected to meet these construction conditions. Given this, a less-than-significant cumulative PM2.5 health risk would be expected during construction at the SVP NRS modifications.
5.3.4.2	Appendix 5.3-A is provided, but it only includes model output with no Excel spreadsheets. Please provide Excel spreadsheets as they will be required to adequately estimate average daily emissions. • For context, Section 5.3.4.3, Appendix 5.3-A indicates that average daily emissions are underestimated. As an example, 2026 emissions are based on total emissions for the calendar year, divided by 365 days; however, construction in 2026 starts in June, and would occur six days a week, so the actual average daily emissions could be close to twice as much as reported. The BAAQMD recommends that average daily emissions be estimated	Emissions modeling in PEA **Appendix 5.3-A** are based on the equipment spreadsheets included as PEA **Appendix 3-A**. An Excel calculation for the average daily emissions which will be expected over the construction duration has been included as **Attachment B** to this Data Request response No.2. Updated PEA tables have been included as **Attachment C** to this Data Request response No.2. The tables have been updated to reflect the average daily emissions included as **Attachment B** to this Data Request response No.2.

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	based on the number of construction days for the year, not the total days in the year.	