December 20, 2024

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. 2 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 providing the additional information requested in the Power the South Bay Project Data Request No. 2, received December 12, 2024.
    - Attachment A: Updated Appendix 3-A, Construction Equipment and Workforce
    - Attachment B: Updated Table 3-4, Staging Areas
    - Attachment E: Updated CalEEMod Files
    - Attachment D: Updated Emissions Summary Table

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

Sincerely,

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. 24-05-14) CPCN and PEA Data Request 2

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. 2, 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. 2, Response No. 1		
PEA Section	**DATA REQUEST**	**LS POWER RESPONSE**
3.0 – Project Description		
3.1	Project Overview, Project Location, first paragraph: The word "primarily" has been inserted such that the text states that the underground portion of the Project would be "located primarily within existing roadways". Where would underground portions of the Project be other than existing roads? Is this foreshadowing the potential trenching along Cushing Parkway or the HDD waterway crossings?	The word "primarily" is used because there are a few segments of underground transmission line that will be located on private property as described below: - The underground transmission line will leave the Newark substation underground in Weber Road, which is a private road owned by PG&E. - The underground transmission line may be located adjacent to Cushing Parkway within a utility easement. - The underground transmission line will be located on property owned by the Santa Clara Valley Water District just south of McCarthy Boulevard. - There will be a small segment of underground transmission line that will be located on the Regional Wastewater Facility property before it enters Los Esteros Road. - The underground transmission line will enter private property from Nortech Parkway and will remain on private or public property until it reaches Lafayette Street. The line will cross property owned by two private landowners, California State Lands, Santa Clara Valley Transportation Authority, Santa Clara Valley Water District, and the California Department of Transportation. In this segment, the line will also cross under the Guadalupe River.

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		Use of the word primarily is not only used because of the potential trenching along Cushing Parkway, nor is it used as any indication of which option at Cushing Parkway will be chosen.
3.3.4.2	Transmission Lines, Table 3-1, Proposed Project Pole Summary: Is "Approximate Pole Height" measured from the ground surface (and including the pole foundation)? If not, where is it measured from, or how is it measured?	The approximate pole height is just the height of the structure; it does not include the foundation height. Foundation heights are only anticipated to add 1-2' of additional height with their reveals. The pole height has been measured from the final ground elevation.
3.3.4.2	Underground Transmission Line Segments: Provide assumptions for the open trench alternative along the Cushing Parkway bridge, including construction techniques, duration, operation and maintenance, etc. As this alternative is still being analyzed as the worst-case scenario, this information will better inform the impact analyses.	Trenching within the utility easement alongside the Cushing Parkway bridge will be conducted in the same manner as trenching along the rest of the Project, as described in Section 3.5.6.1 of the Updated Proposed Project Description. There would be no splice vaults within the utility easement; the splice vaults would be located on either side of the Cushing Parkway bridge. Once installed, operations and maintenance activities are not anticipated to occur alongside Cushing Parkway bridge, as the majority of those activities would occur at the splice vaults, which would not be present alongside Cushing Parkway bridge.
3.3.4.2	Underground Transmission Line Segments: Please provide the anticipated number of splice vaults for the Project.	The underground portions of the proposed Newark to NRS transmission line would require approximately 20 to 30 vaults (refer to Updated Proposed Project Description Section 3.3.7).
3.3.4.2	Underground Transmission Line Segments: What is the composition of the thermal grout? Is it the same material as the fluidized or flowable backfill? See Question 12.	Thermal grout, or flowable thermal backfill (FTB), is generally very similar to flowable backfill. Both are mixtures of fine aggregates (usually less than 3/8"), water, sand, and cement or sometimes a cement and fly ash mixture. Both are designed to harden quickly and provide 100% compaction without vibration. However, FTB has the added requirement of providing a low thermal resistivity. This is accomplished by using high quality components with inherent low thermal resistivities and adjusting the mixture as needed.
3.3.5	Other Potentially Required Facilities, Aerial Marking and Lighting: Provide the rationale as to why aviation lighting and/or marking is not anticipated for the Project. This explanation will support the Aesthetics and Hazards analyses.	As set forth in CFR Title 14 Part 77.9, notice to the FAA is required for: (a) Any construction or alteration that is more than 200 ft. AGL at its site. (b) Any construction or alteration that exceeds an imaginary surface extending outward and upward at any of the following slopes:

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		a. 100 to 1 for a horizontal distance of 20,000 ft. from the nearest point of the nearest runway of each airport described in paragraph (d) of this section with its longest runway more than 3,200 ft. in actual length, excluding heliports. b. 50 to 1 for a horizontal distance of 10,000 ft. from the nearest point of the nearest runway of each airport described in paragraph (d) of this section with its longest runway no more than 3,200 ft. in actual length, excluding heliports. c. 25 to 1 for a horizontal distance of 5,000 ft. from the nearest point of the nearest landing and takeoff area of each heliport described in paragraph (d) of this section. The overhead portions of the Newark to NRS 230 kV transmission line will not exceed 200 feet AGL or any imaginary surfaces and is not within 20,000 feet of any airports. Therefore, notice to the FAA is not required, and lighting will not be required.
3.4.3.1	New or Modified Rights-of-Way or Easements, LS Power Facilities: The proposed right-of-way (ROW) for the Project increased from 38 acres (with the HVDC terminals) to 48 acres (without the HVDC terminals). Please explain this increase. a. Additionally, is the 130-foot ROW for the overhead transmission line a ROW or an air right?	CAISO's adjusted scope required modifications to the size of the duct banks, which results in larger trench volume (either wider or deeper depending upon the orientation). The specifics on the duct bank changes are further discussed in 3.5.4.6, below. Due to these changes, the ROW for the underground duct banks increased, causing the increase in the proposed ROW. For further clarification, the 38 acres provided in the original Proposed Project Description was not intended to include the HVDC terminals as the acreages for those were accounted for in Section 3.4.1.1 in the original Proposed Project Description.
3.5.1.5	Helicopter Access: Explain why a Congested Area Plan would not be required.	Congested Area Plans (CAPs) are required by the FAA for external load operations performed over congested areas. Helicopters are anticipated to be utilized, including external load operations, during construction of the overhead portions of the Project, including for stringing conductor. However, these areas are undeveloped and restricted from public access. Therefore, LS Power does not anticipate requiring a CAP for Project construction.
3.5.3.3	Temporary Power: Provide assumptions for generator specifications. This will support the Air Quality and Greenhouse Gas Emissions analyses.	It is anticipated that 8 kW (~20 hp) diesel generators would be required during duct bank and splice vault installation work. Additionally, 25 kW (~45 hp) diesel generators would be required during cable installation work.

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3.5.4.3	Vegetation Clearing: Confirm that the 81.5 acres of temporary clearing would only be for the transmission lines and staging areas. The original Project Description did not include, or account for, temporary clearing associated with the Baylands Terminal site (if any).	The approximately 81.5 acres of temporary clearing is associated with construction staging areas as well as temporary work areas associated with the underground and overhead transmission line construction. The original Proposed Project Description accounted for the Baylands terminal site as a permanent impact, and it was not counted towards the total temporary clearing calculation.
3.5.4.6	Grading, Table 3-6, Proposed Project Grading, Excavation, and Material Removal Summary: Although the total proposed cut and fill quantities for the Project have decreased according to the revised Table 3-6, the underground transmission cut and fill quantities have increased. For context, explain why the underground transmission cut and fill quantities have increased.	CAISO's adjusted scope required modifications to the size of the duct banks, which results in larger trench volume (either wider or deeper depending upon the orientation). These updated duct bank sizes are provided in Section 3.3.4.1 of the Updated Proposed Project Description. For context, the modifications required the following duct bank changes: - Approximately 3.3 miles of the Baylands to NRS 230 kV transmission line has been modified from a single-circuit, one cable per phase 230 kV transmission line to the Newark to NRS 230 kV transmission line which would be a single-circuit, two cable per phase 230 kV transmission line. The Baylands to NRS 230 kV transmission line would have included 7 internal ducts (4-8" ducts and 3-4" ducts), and the modified Newark to NRS 230 kV AC transmission line would now include 12 smaller internal ducts (8-8" ducts and 4-2" ducts). - Approximately 6.7 miles of the Albrae to Baylands 320 kV DC transmission line has been modified to the Newark to NRS 230 kV AC transmission line. The originally proposed DC transmission line duct bank would have included 5 smaller internal ducts (3-8" ducts and 2-2" ducts), and the modified Newark to NRS 230 kV AC transmission line would now include 12 smaller internal ducts (8-8" ducts and 4-2" ducts).
3.5.6.1	Trenching: What is the composition of the fluidized backfill? Is "flowable backfill" the same as "fluidized backfill"? If not, what is its composition? This information will support the Hazards and Water Quality analyses.	Flowable backfill and fluidized backfill are synonymous. As discussed in the response to 3.3.4.2, they are a mixture of fine aggregates (usually less than 3/8"), water, sand, and cement or sometimes a cement and fly ash mixture. It is common for projects to have the same mix design for the flowable backfill and the flowable thermal backfill.

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3.5.7	Substation, Switching Stations, and Gas Compressor Stations: Describe construction activities for the modifications at the existing PG&E Newark and SVP NRS substations.	PG&E provided the following feedback: Construction activities for modifications at the existing PG&E Newark substation include installing new tubular steel poles and associated foundations located within the substation property but outside of the perimeter fence, stringing new overhead 230 kV transmission lines and OPGW fiber, and trenching for conduit. Construction activities within the Newark substation fenced area include demolition of existing lattice bay structure, installing new 230 kV dead ends, bus, CVT, and 230 kV switch support structures, and associated foundations, new 230 kV breakers and foundations, and overhead jumpers, modification of existing ground grid to address step and touch potential hazards, trenching for new conduits, pulling and terminating new control cable and fiber, and installing new breaker relays in the 230 kV M1 control enclosure. On December 12, 2024, LS Power sent a Request for Information (RFI) to SVP and is currently awaiting a response. LS Power will provide this information to the CPUC once it is received from SVP.
3.5.8.2	Traffic Control: It is not clear whether the City of Milpitas will require a traffic control plan (TCP). Is a TCP required for work in Milpitas?	The proposed underground transmission line alignment does not cross into the City of Milpitas, although it does exit McCarthy Boulevard in close proximity to the Milpitas city line (border of Milpitas and San José). LS Power does not anticipate requiring an encroachment permit and associated TCP from the City of Milpitas, although final TCPs approved by the City of San José (for work in McCarthy Boulevard) may dictate that some traffic control features (e.g., signs, cones, etc.) extend into the City of Milpitas. LS Power will coordinate closely with Milpitas and incorporate input into the City of San José TCPs as needed.
3.5.8.4	Livestock: For context, explain what has changed about the Project that Livestock is now a construction consideration. The original Project Description stated that livestock were not anticipated to be encountered, but the updated Project Description states that livestock may be encountered.	Since the submittal of the original Proposed Project Description, the structures to be built by LS Power near the existing Newark substation (NN-2 and NN-3) have moved from the east side of Weber Road to the west side of Weber Road within an area that PG&E occasionally grazes cattle on. In the original Proposed Project Description, LS Power indicated that PG&E's work would be in an area with livestock. It was stated that PG&E regularly performs work in this area

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		and implements procedures for excluding cattle from work areas during such work. LS Power would coordinate with PG&E during Project construction regarding the livestock on this property. In addition to the livestock on the PG&E property, the Don Edwards Wildlife Refuge alongside Cushing Parkway is also a grazing location for cattle. The cattle are generally excluded from the maintenance easement that would be utilized by LS Power alongside the Cushing Parkway Bridge. Due to the exclusion fencing, LS Power would not anticipate encountering livestock during Project construction but would coordinate with USFWS during construction.
3.5.12.3	Hazardous Waste, Staging Areas and Newark to NRS 230 kV Transmission Line Site Contamination: Has LSPGC committed to the applicable restrictions and requirements of the 2003 "Covenant to Restrict Use of Property" for the Project components located within Cisco Systems Site 6? If not, provide context or an explanation.	While LS Power does not currently have any agreements in place with the owners of the potential staging areas and transmission line within the Cisco Systems Site 6, LS Power is aware of the "Covenant to Restrict Use of Property" and is committed to adhering to the applicable restrictions and requirements.
App. 3-A	Construction Equipment and Workforce: Duration of Use, Hours/Day, is not given for much of the equipment for Underground Crossings and Surveying. Please explain	Duration of use for the underground crossing support equipment would be the same as for the primary equipment. The updated Appendix 3-A has been revised to clarify this (**Attachment A**).
3.6.3	Construction Traffic: Identify the potential access routes used to access the staging areas. (It is understood that adjacent local roadways would be used as needed to access active work sites. There is no need to identify all of those.)	All of the proposed construction staging areas are located adjacent to public roadways, which would provide direct access to each specific staging site. Refer to the Updated Table 3-4, Staging Areas (**Attachment B**), for a listing of access for each staging area.
3.6.3	Construction Traffic, Table 3-8, Estimated Average Daily Construction Traffic: For context, explain the reason the trip numbers increased as much as they did.	As discussed in the response to 3.5.4.6, the modifications to the Project results in modifications to the duct bank that requires a larger trench volume (either wider or deeper depending upon the orientation), which in turn results in additional hauling trips. In addition, the traffic volumes also appear greater in the Updated Table 3-8 because the Updated Proposed Project Description only includes one new transmission line (Newark to NRS 230 kV transmission line) instead of the three new transmission lines (Newark to Albrae 230 kV transmission line, Albrae to Baylands 320 kV DC transmission line, and Baylands to NRS 230 kV transmission line)

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		included in the original Proposed Project Description. Trips that were calculated to spread between the three lines are now more concentrated in the Updated Table 3-8.
3.6.4	Construction Schedule, Table 3-9, Proposed Preliminary Construction Schedule: Did the approximate number of workdays for underground transmission line construction increase due to the Guadalupe River HDD? If not, provide an explanation.	The approximate number of workdays for the underground transmission line construction increased due to additional time required to construct the increased duct bank size discussed in the response to 3.5.4.6. Additionally, the Updated Proposed Project Description only includes one transmission line segment (Newark to NRS 230 kV transmission line) rather than the three transmission line segments (Newark to Albrae 230 kV transmission line, Albrae to Baylands 320 kV DC transmission line, and Baylands to NRS 230 kV transmission line) included in the original Proposed Project Description. This increase is not a direct result of the Guadalupe River HDD which is included in the contemplated schedule.
3.7.2	Landscaping: Would the drought-resistant plants also be native species? If not, explain why.	No new landscaping is proposed as part of the Project. Any non-native landscaping impacted by the Project (specifically within the public right-of-way) would be restored to pre-project conditions and would be consistent with the restoration requirements outlined in local encroachment permits. Restoration of areas containing natural vegetation would also be restored to pre-project conditions and in accordance with APM BIO-1.
5.3 – Air Quality		
App. 5.3-A	Confirm that the One-Way Trips per Day for construction vehicle types in all CalEEMod runs match the given estimated average daily construction trips from Table 3-8 of the updated Project Description.	The modeling in CalEEMod was updated to match vehicles miles traveled (VMT) of 19,306 miles which is the total miles presented in Table 3-8 (3 models when combined). Trip generation trip distance was manually updated from defaults within CalEEMod to 45 miles which would slightly exceed 19,306 miles. Updated modeling files have been included as **Attachment C** and updated emissions summary tables have been included as **Attachment D**.
App. 5.3-A	Confirm that the Miles per Trip for worker trips is 11.7 miles (Based on attachments 1A, 1B, 1C; Section 5.3.1) or 15 miles. Based on the table notes in Table 3-8 of the updated Project Description: “Table assumes workers live approximately 15 miles away from the work site. This is based on the suburb area and the proximity of RV parks”. If	The modeling in CalEEMod was updated to match VMT of 19,306 miles which is the total miles presented in Table 3-8 (3 models when combined). Trip Generation Trip distance was manually updated from defaults within CalEEMod to 45 miles which would slightly exceed 19,306 miles. Updated modeling files have been included as **Attachment C** and updated emissions summary tables have been included as **Attachment D**.

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	the latter, all CalEEMod runs must be updated to reflect this distance.	