January 14, 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. 3 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. 3, received January 10, 2025.
- Updated Fuel Usage Calculations

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

Sincerely,

D 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 3

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. 3, 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**	**RESPONSE**
Project Description		
3.3.4.1	Section 3.3.4.1, Transmission Line: In Section 3.3.4.1, the updated project description states that "the underground transmission line would be encased within a duct bank proposed to have twelve smaller internal ducts: eight eight-inch ducts for conductor (with six ducts for the installed transmission cable and two ducts as spares), four two-inch ducts for fiber optic cables, and two two-inch ducts for a ground continuity cable. Additional two-inch fiber optic cable ducts would be installed within the City of Fremont for their use as a condition of their franchise agreement." As written, this list of internal ducts suggests that there would typically be 14 smaller internal ducts (i.e., eight conductor ducts, four fiber optic cable ducts, and two ground continuity cable ducts) and 16 internal ducts for portions within the City of Fremont. However, pursuant to our conversation with the LSPGC team on January 9, 2025, we understand that there would typically be 12 internal ducts (i.e., eight conductor ducts, two fiber optic cable ducts, and two ground continuity cable ducts) except for portions of the line in	The CPUC's understanding is correct. Our typical duct bank configuration would include 12 internal ducts: • 8 eight-inch ducts for conductor (with six ducts for the installed transmission cable and two ducts as spares) • 2 two-inch ducts for fiber optic cables • 2 two-inch ducts for a ground continuity cable The exception to this would be in the City of Fremont where a condition of our Franchise Agreement may require up to two additional two-inch ducts. In that case the duct bank would include the following internal ducts: • 8 eight-inch ducts for conductor (with six ducts for the installed transmission cable and two ducts as spares) • 2 two-inch ducts for fiber optic cables • 2 two-inch ducts for a ground continuity cable • 2 two-inch ducts for the City of Fremont's future use

LS Power – Power the South Bay Project (A. 24-05-014) Data Request No. 2, Response No. 1		
PEA Section	**DATA REQUEST**	**RESPONSE**
	the City of Fremont, where there would be 14 internal ducts (i.e., the aforementioned 12 internal ducts plus two additional fiber optic cable ducts). Please confirm the number of internal ducts associated with the underground transmission line segments.	
3.5.3.2	Section 3.5.3.2, Work Area Disturbance, Table 3-5, Work Area Disturbance Summary: In Table 3-5, the updated project description states that modifications to the existing Silicon Valley Power (SVP) Northern Receiving Station (NRS) substation would result in 13.5 acres of permanent disturbance. The project description also states that the existing SVP NRS substation is approximately 13.5 acres. Please clarify if the 13.5 acres of permanent disturbance is a previously disturbed area, or if the 13.5 accounts for the new permanent disturbance resulting from the Power the South Bay Project. If this refers to a new permanent disturbance, please confirm where this disturbance would occur.	All modifications to the NRS substation would occur within the existing, pre-disturbed, NRS substation that is 13.5 acres in size. There will be no new permanent disturbance as a result of the SVP modifications to the NRS substation.
5.3 – Air Quality		
	Upon review of the updated CalEEMod modeling provided in LSPGC's Response 1 to Data Request 2, it appears that updated Health Risk Assessment (HRA) calculations were not provided. Please provide updated HRA calculations.	The emissions modeling included with Response 1 to Data Request 2 were revised to address changes in VMT and updated traffic estimates. These emissions do not affect the HRA analysis, which is a function of offroad diesel construction equipment emissions and diesel particulate matter (DPM) emissions. Therefore, the updated HRA calculations submitted as part of the CAISO updates (November 2024) are current.
	Upon review of the updated modeling and emission calculations provided in LSPGC's Response 1 to Data Request 2, it appears that there were no updates to fuel usage. Please provide updated fuel usages for the Project.	Updated Fuel Usage calculations have been provided as an attachment to this response package.

Power the South Bay Project
Updated Project Fuel Use Calculations - Project Construction
Data Request No. 3

Fuel Usage (gallons) = CO_2 emission (kg) / fuel combustion rate (kg/gallon)

Diesel Emissions		
off road equipment	4231.1	MT
onroad (haul & vendor trips)	4758.8	MT
Total Diesel Emissions	8989.9	MT
kg/MT	1000	
Total CO_2 Emissions (kg)	8989900	kg

Diesel fuel combustion rate	10.21	kg/gallon
Diesel fuel consumption	880,499.51	gallons

Gasoline Emissions		
Worker Trips	711.53	MT
kg/MT	1000	
Total Emissions (kg)	711530	kg

Gasoline combustion rate	8.78	kg/gallon
Gasoline consumption	81,039.86	gallons

Notes
Combustion rates taken from The Climate Registry 2020 default emission factors (Table 2.1).