December 12, 2024 VIA EMAIL

Dustin Joseph
LS Power Grid California, LLC
6701 Kroll Center Parkway, Suite 250
Pleasanton, CA 94566

Re: Data Request #2 LSPGC Power the South Bay Project (Application 24-05-014)

Mr. Joseph:

As the California Public Utilities Commission (CPUC) proceeds with our environmental review of the LS Power Grid California (LSPGC) Power the South Bay Project (Project), we have identified additional information that is needed to adequately conduct the CEQA review. The CPUC requests that LSPGC provide the information below (Data Request #2) by December 20, 2024, if possible, but no later than December 31, 2024.

In addition to the information requested herein, the Energy Division may request additional data as necessary to prepare a complete analysis of the potential environmental effects of the Project in accordance with CEQA.

Please do not hesitate to call me at (213) 266-4748 if you have any questions.

Sincerely,

Tommy Alexander
Senior Regulatory Analyst, CEQA and Energy Permitting
California Public Utilities Commission

cc: Michelle Wilson, CPUC Energy Division
Dave Davis, ESA
Vince Molina, ESA

Attachment A:

A. Data Request 2

Power the South Bay Project CEQA Evaluation
Data Request 2

Chapter 3, PEA Project Description:

1. Section 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?
2. Section 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?
3. Section 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.
4. Section 3.3.4.2, Underground Transmission Line Segments: Please provide the anticipated number of splice vaults for the Project.
5. Section 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.
6. Section 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.
7. Section 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?
8. Section 3.5.1.5, Helicopter Access: Explain why a Congested Area Plan would not be required.
9. Section 3.5.3.3, Temporary Power: Provide assumptions for generator specifications. This will support the Air Quality and Greenhouse Gas Emissions analyses.
10. Section 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).

11. Section 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.
12. Section 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.
13. Section 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.
14. Section 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?
15. Section 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.
16. Section 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.
17. Appendix 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.
18. Section 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.)
19. Section 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.
20. Section 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.
21. Section 3.7.2, Landscaping: Would the drought-resistant plants also be native species? If not, explain why.

Section 5.3, Air Quality

1. 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.

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