



California Public Utilities Commission



May 23, 2025

VIA EMAIL

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

Jason Castellanos
PG&E

Jo Lynn Lambert
PG&E

Re: LS Power-PG&E Joint Data Request #1 for LS Power's Power Santa Clara Valley Project (Application 24-04-017)

To Whom It May Concern:

LS Power requests a Certificate of Public Convenience and Necessity (CPCN) for the construction of the Power Santa Clara Valley Project (project), which includes two new high-voltage direct current (HVDC) terminals and associated new transmission lines. The new transmission lines would include an approximately 13-mile 320 kilovolt (kV) direct current (DC) underground transmission line connecting the southern terminal – the proposed Grove terminal – to the northern terminal – the proposed Skyline terminal, referred to as the “Grove to Skyline transmission line,” and an approximately 1.2-mile 500 kV alternating current (AC) transmission line connecting the new Grove terminal to the existing Pacific Gas and Electric (PG&E) Metcalf Substation, referred to as the “Metcalf to Grove transmission line.” The project would also install a 100-foot overhead alternating current (AC) station transmission tie line. Pursuant to the California Environmental Quality Act (CEQA), the subject of this document is to request information for a potentially reasonable alternative for the location of the proposed Grove terminal, which is currently proposed to be sited on an approximately 13.6-acre property in the City of San José and unincorporated Santa Clara County.

The project is undergoing an environmental review process which, pursuant to CEQA, necessitates the consideration of a range of reasonable alternatives that would achieve most of the basic objectives of a project but would also avoid or substantially lessen any of the significant effects of the project (CEQA Guidelines Section 15126.6). The EIR would consider an alternative involving the Grove terminal sited at an approximately 5.5-acre site currently part of the existing PG&E Metcalf Substation, which is being used by PG&E for gas and electric crew operations and maintenance activities and includes office, staging, and storage facilities. In its CPCN application, LS Power identified Grove Terminal Site Alternatives in its PEA, including an alternative at Metcalf Substation described as “Alternative Grove 3”, which is now being revised and updated (referred to as Alternative Grove 3 (revised)).

The attached data request (**Attachment A**) seeks additional information from LS Power and PG&E to assess Alternative Grove 3 as an alternative pursuant to CEQA and, specifically, to determine if the potential alternative would: (1) meet most of the basic Project objectives, (2) be potentially feasible, (3) avoid or substantially lessen

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any of the potentially significant impacts of the Project, and (4) be remote or speculative. Please provide the requested information by Thursday, May 8, 2025, or sooner if possible.

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 (916) 594-4699 if you have any questions.
Sincerely,

Tharon Wright

Tharon Wright
Project Manager for the Power Santa Clara Valley Project
Energy Division

cc: Michelle Wilson, CPUC Energy Division
Valisa Nez, ESA
Michael Manka, ESA

Attachments:

A. LS Power – PG&E Joint Data Request #1



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Attachment A

Joint Data Request 1 Power Santa Clara Valley's CEQA Evaluation

The following data request involves an alternative where the Grove terminal would be sited at the existing PG&E Contractor Yard or CRESS Yard (Yard) at the PG&E Metcalf Substation (Alternative Grove 3). In addition to the requested information below, please provide GIS files.

1. Provide site plans, or general arrangements, of the components of the Grove terminal alternative at the PG&E Metcalf Substation (Alternative Grove 3).
 - a. Include all components as presented in PEA Figure 3-7, *HVDC Terminal General Arrangements*.
 - b. Provide a figure and accompanying GIS data or .kmz.
2. Provide site plans for the Metcalf to Grove 500 kV AC transmission line under Alternative Grove 3.
 - a. Confirm if this transmission line would be overhead or underground.
 - b. Please provide a figure for the Metcalf to Grove transmission line under Alternative Grove 3 (e.g., PEA Figure 3-4, *Project Route Map*).
 - c. Provide transmission line design details for a potential overhead line, including how many above-ground structures would be needed, what types of above-ground infrastructure would be needed, maximum height of structures, foundation information, etc.
 - d. Provide transmission line design details for a potential underground line, including information on underground installation techniques (e.g., horizontal boring, trenching),



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- duct bank/splice vaults, number of internal ducts, depths and dimensions of excavation, etc.
3. Confirm all changes required for the connection between the Metcalf to Grove 500 kV AC transmission line and the PG&E Metcalf Substation under Alternative Grove 3.
 4. Provide construction information, and as they relate to each other, for the Grove terminal, Metcalf to Grove 500 kV AC transmission line, and modifications to the existing PG&E Metcalf Substation.
 - a. Construction methodology/installation techniques, staging areas, equipment, construction schedule, demolition, temporary and permanent impacts, excavation (e.g., cut and fill).
 5. Under Alternative Grove 3, confirm if the PG&E water source line upgrade is needed.
 6. Under Alternative Grove 3, confirm where PG&E's Yard would be relocated.
 7. Under Alternative Grove 3, confirm if additional upgrades or modifications to the PG&E Metcalf Substation are needed.
 8. Confirm all changes to the Grove to Skyline 320 kV DC Transmission line under Alternative Grove 3.
 - a. Provide a figure for updates to the Grove to Skyline transmission line under Alternative Grove 3 (e.g. Figure 3-4 *Project Route Map* in the PEA).
 - b. Describe any project components that would be eliminated or no longer needed from the proposed project under Alternative Grove 3.
 - c. Describe the reduction in project footprint (permanent and temporary) associated with Alternative Grove 3.