

February 11, 2025

VIA EMAIL

Ms. Tharon Wright  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, California 94102

RE: Response to Project Description Data Request No. 2 for LS Power Grid California, LLC's Power Santa Clara Valley Project (Application 24-04-017)

Dear Ms. Wright:

As requested by the California Public Utilities Commission, LS Power Grid California, LLC (LSPGC) has collected and provided the additional information requested relating to Data Request No. 2 (DR-2) for the Power Santa Clara Valley Project (Project).

DR-2 Question 1: Please provide site plans showing grading and drainage at the proposed Skyline and Grove terminal sites.

Response 1: The detailed site plans showing grading and drainage at the proposed Skyline and Grove terminal sites are still being developed, however, the grading and drainage design for the new high voltage direct current (HVDC) terminals would ensure proper water management, stability, and compliance with standard substation engineering practices. Generally, substations yards have a finished surface slope of around 1% to facilitate drainage. Equipment pads and critical infrastructure areas typically have a minimum 0.5% slope to prevent water accumulation. Additionally, gravel surfacing would be placed throughout the terminal to aid in infiltration and minimize erosion. The stormwater drainage and conveyance system may include a combination of surface drainage, swales, and/or underground piping to efficiently direct stormwater towards the stormwater detention system while minimizing erosion and standing water risks.

The existing Grove terminal site generally slopes gently to the southwest, towards Monterey Road, at a 0.5% to 1% grade. To minimize site grading, LSPGC anticipates installing the stormwater detention system on the southwest side of the Grove terminal site to capture stormwater runoff associated with the newly created impervious surfaces within the proposed Grove terminal. Overall, minimal grading is anticipated for the Grove terminal site.

The existing Skyline terminal site generally slopes gently to the east, towards State Route 87, at approximately 0.5% to 1% grade. To minimize site grading, LSPGC anticipates installing the stormwater detention system on the east side of the Skyline terminal to capture and treat stormwater runoff associated with the newly created impervious surfaces within the proposed Skyline terminal in accordance with local stormwater discharge requirements. Given the urban nature of the Skyline terminal site, LSPGC may also discharge stormwater from the Skyline terminal site into the City of San Jose's existing stormwater system within Santa Theresa Street, adjacent to the Skyline terminal site. Overall, minimal grading is anticipated for the Skyline terminal.

The proposed grading and drainage plan for the new HVDC terminals would ensure efficient stormwater management by maintaining natural drainage patterns while incorporating engineered conveyance features to

direct water to the stormwater detention systems. These measures would help protect substation infrastructure, maintain site stability, and ensure long-term operational reliability.

For the PG&E San Jose B expansion area on the Skyline terminal site, PG&E plans to grade the expansion area to a similar elevation as the existing substation and install a retaining wall as necessary between the San Jose B expansion area and LSPGC's Skyline terminal. PG&E has an existing stormwater system for the existing San Jose B substation. If the existing stormwater system is not adequate for the expansion area, additional stormwater management measures may be required to address runoff from new or redeveloped impervious areas.

DR-2 Question 2: The PEA's Project Description states that the proposed Skyline terminal has a Covenant, identifying that "subsurface soils on the subject property have been impacted by metals, petroleum hydrocarbons, and semi-volatile organic compounds (SVOCs) due to past operations that consisted of a former railroad maintenance and fueling facility". Please provide Phase 1 assessment(s), or applicable environmental site assessments, and other associated documents such as the approved Site Management Plan, for the proposed Skyline terminal site.

Response 2: The Site Management Plan and associated Covenant were previously provided as part Deficiency No. 1 and are therefore not being provided again. In previous coordination with the San Francisco Bay Regional Water Quality Control Board, staff had no comments on the proposed use of the property for an electrical power substation and reminded LSPGC to implement the Site Management Plan as required.

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

Sincerely,



Dustin Joseph  
Director of Environmental Permitting

Enclosure

cc: Jacob Diermann (LS Power)  
Casey Carroll (LS Power)  
Lucy Marton (LS Power)  
David Wilson (LS Power)  
Michelle Wilson (CPUC)  
Valisa Nez (ESA)  
Michael Manka (ESA)  
Vincent Molina (ESA)