March 21, 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. 3 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 (CPUC), LS Power Grid California, LLC (LSPGC) has collected and provided the additional information requested relating to Data Request No. 3 (DR-3) for the Power Santa Clara Valley Project (Project).

DR-3 Question 1: Provide an updated CalEEMod run to include the construction activity for the "PG&E Distribution Line Modifications at Skyline Terminal." Please include relevant updates to all CalEEMod runs to reflect changes to the Project, post PEA filing (Workforce numbers, equipment usage, etc.). Additionally, provide the following updated emission calculations for air quality and greenhouse gases, and energy fuel usage calculations.

Response 1: The CalEEMod air quality emissions modeling has been updated to reflect changes to the Project and work force reflected in **Attachment A (Revised Construction Equipment and Workforce Table)**. Refer to **Attachment B** (Updated Air Quality Emissions Tables, Health Risk, and APMs) and **Attachment C** (Air Quality Modeling Files). Updated Fuel Usage is provided as **Attachment D**.

DR-3 Question 2: If the construction activity described above is within the boundaries of the sensitive receptors (Receptors Location 1, 2, and 3) located near the Skyline Terminal, an updated HRA will be needed to evaluate the associated diesel particulate matter (DPM) risk and particulate matter equal to or less than 2.5 microns in diameter (PM2.5) concentrations at those receptor locations.

Response 2: Health Risk Assessment (HRA) impacts were updated based on the revised air quality modeling referenced in Response 1 above and detailed in **Attachment B**, **Attachment E** (AERMOD Files), and **Attachment F** (HRA Calculations).

DR-3 Question 3: The PEA Section 5.8, Greenhouse Gas Emissions, included SF6 emissions from the gas-insulated switchgear (GIS) from the high-voltage direct current (HVDC) Grove and Skyline Terminals. As the GIS equipment is removed from the Terminal components and added to the PG&E San Jose B Substation, provide new GHG emissions from SF6 usage at the PG&E San Jose B Substation.

Response 3: The Project would require a combined total of approximately 15,000 pounds of SF_6 for substation equipment located at the proposed Skyline and Grove terminals, as well as PG&E's substations. Specifically for the San Jose B substation, PG&E would rebuild a large portion of the existing San Jose B substation. In doing so, PG&E would remove a number of existing SF_6 air-insulated circuit breakers and replace them with GIS breakers. Based on detailed engineering conducted by PG&E, the new 115 kV GIS equipment would need to use SF_6 for the insulation medium instead of clean air for insulation. PG&E's new 230 kV GIS at the San Jose B substation would also use SF_6 for the insulation medium.

The CalEEMod greenhouse gas (GHG) emissions modeling has been updated to reflect changes in the construction schedule and equipment usage presented in **Attachment A (**Revised Construction Equipment and Workforce Table). Updated PEA GHG Emissions tables have been included as **Attachment G** (Updated GHG Emissions Tables) and the updated GHG emissions modeling files are included within **Attachment C** (Air Quality Modeling Files). The updated GHG emissions tables include updated construction emissions modeling as well as the increased SF_6 usage previously described in this response.

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: 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)