



California Public Utilities Commission



November 6, 2024

VIA EMAIL

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

Re: Power Santa Clara Valley Project (A.24-04-017), Project Description Data Request #1

Dear Mr. Joseph:

The California Public Utilities Commission (CPUC) Energy Division, California Environmental Quality Act (CEQA) and Energy Permitting Unit, is currently developing a project description for the Power Santa Clara Valley Project (Project) pursuant to CEQA. As the CPUC proceeds with the environmental review for the proposed Project, we have identified additional information that is needed to adequately conduct the CEQA analysis.

Specifically, we are requesting further details and evaluations related to the project description. Please provide the information requested in the attached (Project Description Data Request 1) by November 20, 2024 and submit your response in electronic format to the CPUC and to our consultant, Environmental Science Associates (ESA).

Please do not hesitate to call me at (916) 594-4699 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Tharon Wright".

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

cc: Roxanne Henriquez, CPUC
Valisa Nez, ESA
Michael Manka, ESA

Attachment:

- 1) Project Description Data Request 1

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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



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Project Description Data Request 1

- **Existing Utility System:** Please provide further information about nearby existing substations (e.g., names of other substations) and transmission lines beyond the existing PG&E Metcalf and PG&E San Jose B Substations.
- **Existing Transmission Lines:** Please provide details (e.g., count, location) of existing transmission and distribution lines in the Project's vicinity, even if they are not crossed by the Project's alignment.
 - o "The Project would not directly affect any other existing transmission or distribution lines."
- **Skyline Terminal:** Please confirm if the existing PG&E distribution lines are within the 10.6-acre lot for the proposed Skyline terminal, OR if these lines are located within the existing PG&E San Jose B Substation.
- **Voltages of existing transmission/distribution lines:** Please provide the voltages of existing transmission/distribution lines in the area.
- **Oil for Transformers:** Please confirm if the Project would require a total of up to 75,000 gallons for the transformers at each site.
 - o "The maximum amount of oil required for the transformers would be approximately 25,000 for each of the three transformers".
- **Enclosure Roofs:** Please confirm if the white finishing for enclosure roofs is designed to reflect sunlight to moderate temperatures within the enclosures. Also, would this have an anti-glare finish?
 - o "Equipment and enclosures at the HVDC terminal sites would be non-reflective as practicable with neutral gray or neutral earth-tone colors. Enclosure roofs would typically be white".
- **Other substations:** The following sentence is from the PEA's Project Description (Page 3-3) – please identify the 'other substations':
 - o "There are currently two 115 kV lines that connect the existing PG&E Metcalf and San Jose B substations, with each 115 kV line having intermediate stops at other substations."
- **Metcalf to Grove Transmission Line:** Please provide the MW rating for the proposed Metcalf to Grove transmission line.
- **Downtown San José (DSJ) Segment:** The PEA's Project Description states that the alignment of the DSJ Segment is unknown (see below). Please provide an update on this development and narrow to one or two leading alternatives for this segment.
 - o "LSPGC continues to survey existing underground utilities and consult with the City of San José to identify and account for existing underground constraints within the Downtown San José area. Detailed utility surveys may ultimately determine that it is not feasible to route the Grove to Skyline transmission line in some streets in Downtown San José."
- **Proposed Grove Terminal:** Please confirm if the Monterey Road frontage, noted for visual screening in the PEA PD, is included in the 12.8 acres accounted for temporary disturbance at the proposed Grove terminal.
- **Aerial Marking and Lighting:** It is provided that, "A 100-foot-tall structure would still be below the maximum FAA authorized aboveground structure height limit for the Skyline terminal site". Please confirm if this is the same for the Grove Terminal site.



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- **Duct Bank Dimensions and Configurations:** To the extent design information is available, please provide further details on the dimensions and configurations of duct banks, especially in relation to the proposed CAISO change.
- **PG&E San Jose B Tie Line:** Please provide further detail regarding the tie line (e.g., 60 feet wood or steel pole, with concrete foundations, etc.).
 - o "...anticipated to require structure up to approximately 60 feet tall".
- **Modifications at the PG&E San Jose B Substation:** Please confirm what 'new facilities' would entail regarding expansion of the San Jose B Substation.
 - o "New facilities for the expansion of the San Jose B substation would range in height up to approximately 95 feet above grade."
- **Access Roads:** Please provide GIS files for access roads that would be used by the Project.
- **LSPGC Work at PG&E San Jose B Substation:** Please clarify if this work would occur inside or outside the boundaries of the existing San Jose B Substation (i.e., within the proposed Skyline Terminal or in the Expansion area)?
 - o "LSPGC's scope for the Skyline to San Jose B tie line between the Skyline terminal and the existing San Jose B Substation is proposed to stop at a H- frame (dead-end) or similar termination structure located adjacent to the new San Jose B Substation GIS enclosure."
- **ROW Width:** Please confirm the width (e.g., average width) of new ROWs (new easement franchise agreements or otherwise).
- **New ROW:** Please confirm if the statement below is permanent and does not include temporary work areas.
 - o "The Project is anticipated to require a total of approximately seven acres of new ROW, easement, or franchise agreements."
- **Westbury Park, LCC:** Please confirm the nature of the negotiation with Westbury Park, LLC regarding a temporary easement (i.e., is this for transmission line installation)?
- **Skyline Terminal Access Road:** It is provided that there is a potential upgrade to a paved access road apron to "provide an adequate entrance from Ryland Street to the terminal site may be required". Please confirm this potential Project component.
- **Staging and Construction Work Areas:** It is provided that the Project's underground transmission lines are sited almost exclusively within existing public roadways, however, there is also language that states, "[A]ll underground transmission not installed in roads (e.g., parking lots or sidewalk) would be restored to the original condition". Please identify where these areas would be, and if available, dimensions.
- **Temporary Power:** It is provided that, "Temporary generators would be required during construction of the underground transmission lines". Please confirm specifications of these generators.
- **Work at Coyote Ranch Road and Coyote Creek Trail:** Please provide details, including dimensions, on staging and work activities anticipated along Coyote Ranch Road and Coyote Creek Trail.
 - o Also, it is noted that the Coyote Creek Trail alignment would result in a disturbance area of approximately 0.65 acre, while Table 3-3 *Work Area Disturbance Summary* notes a disturbance of approximately 1.1 acres. Does this mean that the disturbance along Coyote Ranch Road would be the difference between these two values (i.e., 0.45 acre)?



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- **Work Disturbance Acreage for Pulling and Splicing:** Table 3-3, footnote 3 notes that the transmission line acreage includes temporary acreage for splice vaults, HDD pits, and jack-and-bore pits. Does this include pulling and splicing work areas acreage? If not, please provide details and locations.
- **Vegetation Clearing at Grove Terminal:** It is provided that the Grove terminal site would require clearing of approximately 13.6 acres of orchard trees. In considering the presence of dense grasslands at this site, please verify the total acreage of vegetation clearing that is anticipated for the Grove terminal sites, as well as all other Project locations.
- **Tree Trimming and Removal:** It is provided that ‘minimal tree clearing and trimming’ would be required for the Project, particularly near Coyote Ranch Road and Coyote Creek Trail. Please quantify these amounts to the best extent possible. Also, please provide information on coordination efforts with landowners on tree clearing and trimming.
- **Grading, Excavation, and Material Removal:** Grading, excavation, and material removal quantities anticipated for the Project based on current information are summarized in PEA Table 3-4, however, does not account for grading, excavation, and material removal at the staging areas. To the extent that information is possible, please update the table or provide values for grading, excavation, and material removal anticipated for the 12 staging areas.
- **Poles and Towers:** There is an inconsistency between the number of wooden poles associated with a radial distribution line at the Grove terminal site. Please confirm if there are three or four wooden poles.
- **Duct Bank Segments:** To the extent that information is possible, please provide the typical length of duct bank installations at any one time (e.g., are 100-foot segments installed at once, or 500 feet?)
- **Temporary Work Area Estimates:** It is provided that trenching operations would progress such that only a maximum of approximately 1,000 feet of trench at single work site would be left open at any one time. Please confirm if temporary work area estimates are consistent with the statement.
- **Dewatering and Hazardous Waste Management:** It is provided that the typical temporary workspace around sending and receiving pits at the HDD site would be approximately 200 feet by 100 feet, which equates to 2,000 square feet of workspace (4,000 square feet for both ends). Please confirm if this is sufficient space for dewatering and waste management activities, and temporary work and staging activities in general.
- **Anticipated Construction Equipment and Workforce Table:** Please provide the number of crews needed for under material delivery of terminals.
- **PG&E Construction Sequence:** To the extent that information is available, please provide details on PG&E’s proposed construction sequences (i.e., ‘means and methods’).
- **Vegetation Management Program:** Would vegetation management only occur at the terminal sites? Please confirm locations where the vegetation management program would apply.
 - o It is provided that emergency vegetation treatment would be conducted when any vegetation encroaches within the *10-foot line clearance*. Please clarify what this refers to.