

November 22, 2024

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. 1 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 has collected and provided the additional information requested relating to the Draft California Environmental Quality Act, Project Description Data Request No. 1 (DR-1) for the Power Santa Clara Valley Project (Project). This letter includes the following enclosure:

- DR-1 Response Table providing the additional Project information requested.

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

Sincerely,

A handwritten signature in cursive script that reads "Dustin Joseph".

Dustin Joseph
Director of Environmental Permitting

Enclosure

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



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LSPGC - Power Santa Clara Valley Project (A. 24-04-017) Administrative Draft Environmental Impact Report (ADEIR) Project Description Data Request No. 1

REPORT OVERVIEW

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.

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Project Description		
1	<p>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.</p>	<p>Figure 3-5 of the Proponent’s Environmental Assessment (PEA) shows the existing transmission system in proximity to the Project, including substations and transmission lines.</p> <p>Existing substations in electrical proximity to the Project include but are not limited to, San Jose A, FMC, El Patio, Markham, Evergreen, IBM Baily, and IBM Harry Rd.</p>
2	<p>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.</p> <ul style="list-style-type: none"> • “The Project would not directly affect any other existing transmission or distribution lines.” 	<p>The following is based on publicly available data.</p> <p>The Metcalf to Grove transmission line would cross under numerous existing transmission lines outside of the existing Metcalf substation including approximately one 500 kV, three 230 kV, and five 115 kV transmission lines</p> <p>The Grove to Skyline transmission line would be located near existing transmission and lines including:</p> <ul style="list-style-type: none"> - Crossing under numerous existing transmission lines outside of the existing Metcalf substation including approximately one 500 kV, three 230 kV, and five 115 kV transmission lines. - Paralleling the existing Hummingbird Battery Storage to Metcalf underground 115 kV transmission line in Monterey Road from near the Metcalf substation to just south of State Route 85 with a crossing of this underground transmission line just south of State Route 85. - Paralleling a 60 kV transmission line from approximately Capitol Expressway Street to Umbarger Road with an overhead 60 kV crossing of Monterey Road near Umbarger Road

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		<ul style="list-style-type: none"> - Paralleling a 115 kV transmission line from approximately Umbarger Road to Phelan Avenue with overhead 115 kV crossings of Monterey Road near Umbarger Road and Phelan Avenue. <p>Numerous existing distribution lines are in the vicinity of the Project, all owned by PG&E. Distribution lines in the vicinity of the Project are generally fed from the following PG&E substations:</p> <ul style="list-style-type: none"> - San Jose B - San Jose A - Stone - Evergreen - Piercy - Edenvale <p>LSPGC will work closely with PG&E to ensure all required clearances are met.</p>
3	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.	PG&E has numerous existing distribution circuits that leave the existing San Jose B substation. Four existing distribution circuits leave the San Jose B substation and cross the 10.6-acre lot for the proposed Skyline terminal in underground duct bank(s) that conflict with PG&E's planned rebuild and expansion of the existing PG&E San Jose B substation. As described in the PEA, these four distribution lines will be relocated to allow the rebuild and expansion of the existing PG&E San José B Substation.
4	Voltages of existing transmission/distribution lines: Please provide the voltages of existing transmission/distribution lines in the area.	The voltages of existing distribution and transmission lines in the Project area include 12 kV, 21 kV, 60 kV, 115 kV, 230 kV, and 500 kV.
5	Oil for Transformers: Please confirm if the Project would require a total of up to 75,000 gallons for the transformers at each site. <ul style="list-style-type: none"> • “The maximum amount of oil required for the transformers would be approximately 25,000 for each of the three transformers”. 	The three energized transformers would be filled with up to approximately 25,000 gallons each. In addition, the on-site spare would also be filled with up to approximately 25,000 gallons. Therefore, each terminal would have up to approximately 100,000 gallons for the transformers at each site.
6	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?	The white finish for the enclosure roofs is designed to reflect sunlight to be more environmentally friendly and moderate temperatures. This finish is commonly used for commercial buildings of all types (i.e., offices, apartments, large commercial buildings). A low gloss finish would be selected as available to avoid glare.

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	<ul style="list-style-type: none"> “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”. 	
7	<p>Other substations: The following sentence is from the PEA’s Project Description (Page 3-3) – please identify the ‘other substations’:</p> <ul style="list-style-type: none"> “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.” 	Based on publicly available data, one 115 kV line has intermediate stops at both the San Jose A substation and the El Patio substation with tapped connections to the IBM Harry Rd and IBM Baily substations. The other 115 kV line has an intermediate stop at the Evergreen substation with a tapped connection to the Markham, Catalyst and Stone substations.
8	<p>Metcalf to Grove Transmission Line: Please provide the MW rating for the proposed Metcalf to Grove transmission line.</p>	The proposed Metcalf to Grove 500 kV AC transmission line has a rating of 1,000 MW.
9	<p>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.</p> <ul style="list-style-type: none"> “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.” 	<p>Since submitting the PEA, LSPGC has conducted a significantly greater amount of due diligence in the DSJ segment. This includes desktop utility work, topographical surveys, utility markout surveys, and potholing. There is still a level of uncertainty regarding the final route for the DSJ segment. However, based on the additional due diligence conducted since the PEA was submitted, LSPGC has identified an apparent fatal routing issue for a portion of the proposed alignment on Bassett Street. As such, LSPGC is currently further evaluating three primary alternatives in the DSJ area:</p> <ol style="list-style-type: none"> 1. Revised Grove to Skyline 320 kV DC transmission line alignment <ol style="list-style-type: none"> a. The Revised Grove to Skyline 320 kV DC transmission line begins at the Interstate 280 (I-280) underpass for First Street and aligns with the Proposed Project’s Grove to Skyline 320 kV DC transmission line alignment within First Street and Market Street for the first approximately 1.1 mile. The Revised Grove to Skyline 320 kV DC transmission line would then follow Devine Street west for approximately 0.1 mile and then turn north on Terraine Street for approximately 0.15 mile. Revised Grove to Skyline 320 kV DC transmission line would turn west onto Bassett Street and align with the Proposed Project’s Grove to Skyline 320 kV DC transmission line alignment for the last approximately 0.15 mile.



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		<p>2. Downtown San José Alternative 1 from the PEA</p> <p style="padding-left: 20px;">a. Downtown San José Alternative 1 begins at the I-280 underpass for First Street and then turns onto West Reed Street for approximately 0.3 mile before turning north on Almaden Boulevard. Downtown San José Alternative 1 continues north on Almaden Boulevard for approximately one mile, including a crossing underneath State Route (SR) 87. Downtown San José Alternative 1 would then cross Julian Street and enter the parking lot of a private property leased to the County of Santa Clara. Downtown San José Alternative 1 would travel through the private parking lot for approximately 0.2 mile before aligning with the Proposed Project’s Grove to Skyline 320 kV DC transmission line alignment for the last approximately 0.05 mile.</p> <p>3. Modified Downtown Alternative</p> <p style="padding-left: 20px;">a. The Modified Downtown Alternative begins at the I-280 underpass for First Street and aligns with the Proposed Project’s Grove to Skyline 320 kV DC transmission line alignment within First Street and Market Street for the first approximately 1.0 mile. The Modified Downtown Alternative would then follow West Saint James Street, which turns into Julian Street, west for approximately 0.3 mile, and turn north and enter the parking lot of a private property leased to the County of Santa Clara. The Modified Downtown Alternative would travel through the private parking lot for approximately 0.2 mile before aligning with the Proposed Project’s Grove to Skyline 320 kV DC transmission line alignment for the last approximately 0.05 mile.</p> <p>Updated mapping showing these alternatives is being developed and will be provided to the CPUC by December 6, 2024.</p>
10	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.	The entire Grove Terminal site is approximately 13.6 acres with the frontage accounting for approximately 0.8 acres of the site. Since the planned frontage area would retain its vegetation, this 0.8 acres was not included in the 12.8 acres of temporary disturbance.
11	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 Grove terminal site is subject to less strict FAA structure height limits because it is approximately 13.5 miles from the San Jose Mineta International Airport, whereas the Skyline terminal site is approximately 1

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	the same for the Grove Terminal site.	mile from the airport. Based on the FAA Notice Criteria Tool, a 100-foot-tall structure does not exceed the Notice Criteria at the Grove terminal.
12	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.	The proposed duct bank design would not change from the typical duct bank that was included as Figure 3-9 in the PEA to account for the CAISO change. As shown in, Figure 3-9, the duct banks would typically be approximately 2.5 feet wide and 2.5 feet tall with a minimum of 3 feet of cover from the ground surface to the top of duct bank.
13	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.). <ul style="list-style-type: none"> • “...anticipated to require structure up to approximately 60 feet tall”. 	The tie line structures are anticipated to be approximately 60-foot-tall steel H-frame (dead-end) or similar termination structure with reinforced concrete drilled shaft or pile foundations.
14	Modifications at the PG&E San Jose B Substation: Please confirm what ‘new facilities’ would entail regarding expansion of the San Jose B Substation. <ul style="list-style-type: none"> • “New facilities for the expansion of the San Jose B substation would range in height up to approximately 95 feet above grade.” 	LSPGC sent an RFI to PG&E and is waiting for a response. As of November 21, 2024, PG&E is targeting a response by November 27, 2024. LSPGC will provide this information to the CPUC once it is received from PG&E.
15	Access Roads: Please provide GIS files for access roads that would be used by the Project.	The Proposed Project would include two new access roads, which would connect the proposed Grove and Skyline terminals to existing roadways. GIS files for these access roads were submitted with the PEA. All construction and operations traffic would utilize the existing public roadway network. PEA Table 3-2, Construction Staging Areas, lists the primary public roadways that would be utilized to access each staging yard.
16	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)? <ul style="list-style-type: none"> • “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 	The PG&E H-frame (dead-end) or similar termination structure located adjacent to the new San Jose B Substation GIS enclosure would be located within the San Jose B substation expansion area, outside of the existing San Jose B substation fence line.

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	to stop at a H- frame (dead-end) or similar termination structure located adjacent to the new San Jose B Substation GIS enclosure.”	
17	ROW Width: Please confirm the width (e.g., average width) of new ROWs (new easement franchise agreements or otherwise).	The permanent ROW for the Grove to Skyline and Metcalf to Grove transmission lines would vary in width but would typically range in width from 3 to 5 feet. The ROW would be expanded at vault locations to encompass the entire splice vault (i.e., approximately 10 feet wide). The specific width of necessary easements, ROW, or franchise agreements along the transmission line alignments would be refined during the final engineering process.
18	<p>New ROW: Please confirm if the statement below is permanent and does not include temporary work areas.</p> <ul style="list-style-type: none"> • “The Project is anticipated to require a total of approximately seven acres of new ROW, easement, or franchise agreements.” 	Confirmed.
19	Westbury Park, LLC: Please confirm the nature of the negotiation with Westbury Park, LLC regarding a temporary easement (i.e., is this for transmission line installation)?	A temporary easement is required from Westbury Park, LLC for transmission line construction workspace including horizontal bore work area. A smaller permanent easement would also be required for the transmission line ROW.
20	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.	It is believed that the road apron to the Skyline terminal site off Ryland Street would need to be upgraded to tie the new Skyline access road into the existing Ryland Street.
21	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.	<p>Based on preliminary design information, the locations where the transmission line would not be located within existing public roadways are shown in Figure 3-4 of the PEA and include:</p> <ol style="list-style-type: none"> 1) The Metcalf substation for approximately 100 feet, the Grove terminal for approximately 1,000 feet, and the Skyline terminal for approximately 600 feet; 2) The parking lot south of the Skyline terminal for approximately 130 feet;

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		<p>3) Coyote Creek Parkway between the Grove terminal and Coyote Ranch Road for approximately 1,200 feet and approximately 850 feet for the realignment of Coyote Ranch Road; and</p> <p>4) While exact locations are unknown, sidewalks and road medians may be affected where the proposed Project is constructed within existing roads in close proximity to these features.</p> <p>The permanent ROW for the Grove to Skyline and Metcalf to Grove transmission lines would vary in width but would typically range in width from 3 to 5 feet. The ROW would be expanded at vault locations to encompass the entire splice vault (i.e., approximately 10 feet wide). The specific width of necessary easements, ROW, or franchise agreements along the transmission line alignments would be refined during the final engineering process.</p>
22	<p>Temporary Power: It is provided that, “Temporary generators would be required during construction of the underground transmission lines”. Please confirm specifications of these generators.</p>	<p>It is anticipated that 8 kW (~20 hp) diesel generators would be required during duct bank and splice vault installation work. Additionally, 25 kW (~45 hp) diesel generators would be required during cable installation work.</p>
23	<p>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.</p> <ul style="list-style-type: none"> 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 different between these two values (i.e., 0.45 acre)? 	<p>The staging and work areas are shown as Construction Staging Area and Limits of Construction in Figure 3-4. Staging Area No. 2 is located adjacent to Coyote Ranch Road and is approximately 7.8 acres in size. Staging Area No. 3 is also located adjacent to Coyote Ranch Road and is approximately 9.3 acres in size.</p> <p>The total permanent disturbance area for the Coyote Creek Trail and Coyote Ranch Road re-alignments would be approximately 1.1 acres (conservatively rounded up). The Coyote Creek Trail realignment is approximately 12 feet wide and would result in a permanent disturbance area of approximately 0.65 acre while the Coyote Ranch Road realignment would be approximately 20 feet wide and would result in approximately 0.36-acre permanent disturbance area.</p> <p>Temporary work areas surrounding Coyote Ranch Road and Coyote Creek Trail would differ in size, shape, and width, but would total approximately 13.1 acres. This temporary construction work area would encompass the permanent road and trail realignment area and would extend from the Metcalf Substation to the HDD work area on the north side of Coyote Creek (refer to PEA Figure 3-4). This work area would be used for transmission line construction as well as construction of the road and trail realignment with most work occurring within the permanent disturbance area.</p>

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24	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.	Transmission line work area/ disturbance acreage also includes all anticipated pulling and splicing work areas. The transmission line temporary construction work area polygons are intended to encompass all required construction activities.
25	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.	The Grove terminal site would require the clearing of approximately 12.8 acres of orchard trees and surrounding vegetation. Approximately 0.8 acre of existing orchard trees along the Monterey Road frontage of the Grove terminal site would be preserved as screening in place of new landscaping. Vegetation removal would also be required for the Metcalf to Grove transmission line. This includes approximately 1.1 acres associated with the permanent impacts from the Coyote Creek Trail and Coyote Ranch Road re-alignments. Additional vegetation clearing would be needed within a portion of the temporary work area for the Coyote Creek Trail and Coyote Ranch Road re-alignments. Finally, vegetation clearing would be required within part of the identified work area for the Metcalf to Grove transmission line between the Grove terminal and Coyote Ranch Road which is approximately 1.7 acres.
26	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.	LSPGC has met with the Santa Clara County Parks Department multiple times to discuss the Project alignment and related tree trimming in Coyote Creek Parkway, including near Coyote Ranch Road and Coyote Creek Trail. Approximately 30 trees would need to be trimmed or removed based on the final location and width of the new Coyote Creek Road and Trail alignment and to support the HDD and duct bank installation work. Beyond Coyote Creek Parkway, minimal tree clearing and trimming near would be required to allow sufficient work area to construct the transmission lines within existing roads. This included trees in the median and along the shoulder that overhang the road and would prevent the necessary equipment from operating as required. The final route details will dictate tree clearing requirements near roads so exact trees and quantities have not been identified yet.
27	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	Almost all identified potential staging areas are existing pre-disturbed sites, many of which have historically been used for staging material on other projects. Therefore, these proposed staging areas are anticipated to require a negligible amount of grading, excavation, and material removal. The remaining

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	extent that information is possible, please update the table or provide values for grading, excavation, and material removal anticipated for the 12 staging areas.	proposed staging areas that are not pre-disturbed sited, are generally flat and are anticipated to require a negligible amount of grading, excavation, and material removal.
28	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.	There are currently four distribution poles on the Grove terminal site. Three would be removed and one is anticipated to be left in place to support providing station service power to the Grove terminal.
29	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?)	The duct bank would generally move in a linear fashion, with multiple installation crews working simultaneously along the route in different locations. The duct bank installation would progress such that only a maximum of approximately 1,000 feet of trench at a single work site would be left open at any one time or as allowed by permit requirements. Each crew would be spaced out along this work area conducting different tasks (i.e. excavation, conduit installation, and backfilling) concurrently in a linear fashion. Duct bank installation daily production rates would vary significantly as it is highly dependent on site specifics including but not limited to duct bank depth, soil types encountered, utility crossings, and traffic constraints.
30	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.	Confirmed. Temporary work areas identified within the PEA would encompass all anticipated construction activities, including open trenches for underground transmission line construction.
31	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.	The typical temporary work areas around the sending and receiving pits at the HDD site would be approximately 200 feet by 100 feet, which equates to approximately 20,000 square feet of workspace (40,000 square feet for both ends). The dimensions for each temporary workspace dimensions may significantly vary to accommodate the site-specific constraints at each setup location. The approximate 40,000 square feet of work area would be sufficient for HDD equipment staging, dewatering, and waste management activities. Pull back area for pipe staging and fusion is not included in this work area and typically begins at the receiving pit and is longer than the HDD's entire length.
32	Anticipated Construction Equipment and Workforce Table: Please provide the number of crews needed for under material delivery of	Two crews are anticipated for material delivery.

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	terminals.	
33	<p>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’).</p>	<p>LSPGC sent an RFI to PG&E and is waiting for a response. As of November 21, 2024, PG&E is targeting a response by November 27, 2024. LSPGC will provide this information to the CPUC once it is received from PG&E.</p>
34	<p>Vegetation Management Program: Would vegetation management only occur at the terminal sites? Please confirm locations where the vegetation management program would apply.</p> <ul style="list-style-type: none"> • It is provided that emergency vegetation treatment would be conducted when any vegetation encroaches within the <i>10-foot line clearance</i>. Please clarify what this refers to. 	<p>Routine vegetation management is not anticipated to be required for the underground transmission lines with the transmission line predominately located within city streets. If tree roots, water intrusion, and other natural occurring environmental encroachments are impacting the underground transmission line, the encroaching vegetation would be removed to ensure the integrity of the transmission line.</p> <p>The 10-foot line clearance would only apply to overhead lines. With the only overhead transmission line being the Skyline to San Jose B transmission line, no vegetation should ever be near this line given the transmission line’s location within the Skyline terminal site.</p> <p>Vegetation management would primarily occur at the terminal sites to ensure that required vegetation clearances are met.</p>