

August 25, 2025

Via Electronic Mail

Tharon Wright
CPUC Project Manager
Power Santa Clara Valley Project
Attn. V. Nez c/o Environmental Science Associates
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Re: **Power Santa Clara Valley Project, A. 24-04-017**

Dear Ms. Wright:

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) prepared by the California Public Utilities Commission (CPUC) for the Power Santa Clara Valley Project (PSCVP). LS Power Grid California, LLC (LS Power) has applied to the CPUC for a Certificate of Public Convenience and Necessity (CPCN) to build the PSCVP.

As explained in the DEIR, PG&E is an interested party to the proceeding due to its obligation to interconnect LS Power's proposed HVDC transmission line to the electric grid. However, PG&E is not an applicant in the CEQA process, and its interconnection facilities are not being permitted in this proceeding. Rather, PG&E is subject to the CPUC's General Order (GO) 131-D (or its successor, GO 131-E) and will separately comply with those permitting requirements.

General Comments:

PG&E supports approval of Grove Terminal Alternative 3 (GTA-3), which is the environmentally superior alternative that includes siting LS Power's southern terminal on land that is currently part of PG&E's Metcalf Substation property. PG&E and LS Power engineers have confirmed that the Metcalf Substation site can accommodate PG&E's remaining existing and planned uses along with LS Power's southern terminal following relocation of PG&E's existing CRESS yard, thereby avoiding LS Power's construction in Coyote Valley.

The DEIR has proposed three Mitigation Measures (MMs) to apply to PG&E's construction at San Jose B and Metcalf substations. Any provisions in these proposed measures requiring pre-construction approvals for work at San Jose B Substation would be problematic given that construction on the substation expansion is set to begin before the EIR is certified. MM 3.3-2b also purports to apply to "any other work PG&E will complete under the Project" even though some of this work has already taken place or is ongoing, and none of this "other work" requires permitting or CEQA review by the CPUC.

The MMs raise other issues of concern. For example, MM 3.3-2b requires a listing of construction equipment to be submitted for CPUC review and approval before construction can begin. Not only is this infeasible for work at San Jose B, but pre-approval of Tier 4 construction equipment is wholly unnecessary in any case. The equipment either is or is not

Tier 4, and tracking should be sufficient. If there are any issues, consultation with the CPUC team would be more appropriate than a blanket requirement to have all construction equipment in a list to be “reviewed and approved” by the CPUC. Even more questionable is the requirement to delay ongoing construction while the CPUC reviews and approves any newly-added equipment.

PG&E also shares concerns with LS Power about MM 3.3-2d because it is unnecessarily inflexible and seems to miss the overarching purpose of the fugitive dust control requirements.

Specific Comments:

Executive Summary:

PG&E’s proposed revisions to PG&E Mitigation Measure 3.3-2b, 3.3-2d, and 3.5-1 in Table ES-3 are attached in Exhibit A.

Chapter 2:

The start dates for work at and adjacent to San Jose B and Metcalf substations are incorrect in Table 2-7 and Table 2-10. In order to meet the CAISO-assigned in-service for the LS Power project, construction on PG&E’s interconnection facilities at San Jose B must begin prior to LS Power’s CPCN approval or certification of the EIR in that proceeding (in which, as the DEIR repeatedly recognizes, PG&E is not an applicant). PG&E is seeking separate approval of that work in Advice Letter (AL) 7391-E, currently awaiting disposition at the CPUC. The Santa Clara Valley Open Space District (OSA) has withdrawn its protest and has joined PG&E in supporting approval of GTA-3 as the environmentally superior alternative, as well as prompt approval of AL 7391-E.

PG&E requests the following revisions to Table 2-7 concerning target construction dates.

Page 2-77, PG&E Metcalf Modifications and 115 kV Connection Start Date: This work must precede LS Powers construction at Metcalf, so will likely occur earlier. Delete October 2026, add January 2026.

Page 2-77, PG&E San Jose B Modifications and 115 kV Connection Start Date: Original start date for this work was June 2025; it has been delayed but, if AL 7391-E is approved, construction will start in late August 2025. Delete June 2026, add August 2025.

Page 2-79, PG&E Distribution Removal at Metcalf Substation (Grove): This work must precede LS Power’s construction at Metcalf, so will likely occur earlier. Delete July 2026, add January 2026.

PG&E requests the following revisions to Table 2-10, concerning target construction schedule.

Page 2-84, Preliminary Construction Schedule, Existing Substation Upgrades:
Metcalf Substation, start date January 2026, end date December 2027
San Jose B Substation, start date August 2025.

Chapter 3-18:

PG&E disagrees with the broad-brush conclusion in Chapter 3-18, Tribal Cultural Resources, that both PG&E substation components of the interconnection will have Significant and Unavoidable Impacts (SUIs) on Tribal Cultural Resources (TCRs). At San Jose B Substation, the most sensitive area for potential TCRs is along Guadalupe River Trail and Guadalupe Parkway, which is an area recently disturbed by ongoing construction on underground distribution facilities. After two weeks of archaeological monitoring of ground disturbance, and consistent with professional best practices (and proposed MM 3.5-1), PG&E's cultural expert concluded that no further monitoring was necessary. Although ground disturbance was sufficient to uncover an underground storage tank during the construction, no TCRs or other evidence of cultural resources were discovered. Since the substation improvements needed at and adjacent to San Jose B to interconnect the new transmission facilities are further from this most sensitive area, PG&E believes it highly unlikely that Significant and Unavoidable Impacts could occur from PG&E's transmission-related interconnection work at San Jose B Substation.

Furthermore, the requirement that a Cultural Resources Treatment Plan (CRTP) must be reviewed and approved by the CPUC prior to construction at San Jose B Substation must be deleted. Such a requirement could significantly delay start of construction and, consequently, the project in-service date. Moreover, the legitimacy of imposing such a requirement on a non-applicant before the EIR is certified would be questionable. PG&E agrees to incorporate the substantive provisions of MM 3.5-1 if TCRs are discovered, but asks that the conclusion of SUI at San Jose B and the requirement for pre-approval of the CRTP be deleted. PG&E will work with the CPUC to address any remaining concerns.

As to Metcalf Substation, construction will be covered by PG&E's Cultural Resources Treatment Plan, a copy of which can be submitted to the CPUC prior to construction. Although technically non-applicants would not be subject to MMs requiring CPUC approval, PG&E has no objection to the CPUC reviewing and approving this CRTP unless doing so would cause construction delays. Note that the CPUC's CEQA review may not be completed before CRTP submittal, and it is recommended that the approval requirement be deleted.

PG&E recognizes the challenges presented by CEQA review over a non-applicant on a different schedule and is committed to working with the CPUC and LS Power to address any concerns and ensure that any impacts from its interconnection work remain less than significant.

Thank you for the opportunity to submit these comments.

Sincerely,

David Thomas

David Thomas
Senior Land Planner
DLTg@pge.com

Attachment:
Exhibit A

EXHIBIT A

Table ES-3 (excerpted):

PG&E Mitigation Measure 3.3-2b: Construction Fleet Minimum Requirements and Tracking – PG&E Tier 4 Final Emissions Controls

~~PG&E shall ensure that all off-road construction equipment used to complete the San José B Substation expansion; and the Metcalf Substation modification; and any other work PG&E will complete under the Project includes Tier 4 Final emissions controls. An initial listing that identifies each off-road unit's certified tier specification to be operated for each substation and any other work to be completed under the direction of PG&E shall be submitted to the CPUC for review and approval before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to and approved by the CPUC. As PG&E requires new or replacement construction equipment on the Project, PG&E shall document verification of the certified engine tier and provide such documentation to CPUC upon request. for approval before its use on Project sites.~~

PG&E Mitigation Measure 3.3-2d: Use Best Management Practices for Construction-Related Fugitive Dust Emissions

~~PG&E shall implement all of the following best management practices as needed to ensure that visible fugitive dust emissions do not cross property lines, which would thereby reduce~~ing fugitive PM10 and PM2.5 emissions:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day in dry weather.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible once mobilization begins. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- When working outside of paved or developed areas, aAll trucks and equipment, including their tires, shall be washed off prior to leaving the site as needed to prevent off-site tracking.
- Unpaved roads providing access to sites located 100 feet or farther from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours of receiving a complaint. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.
- Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities.
- Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have a maximum of 50 percent air porosity.
- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and water appropriately until vegetation is established.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Minimize the amount of excavated material or waste materials stored at the site.
- Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.

PG&E Mitigation Measure 3.5-1: Cultural Resources Treatment Plan (CRTP).

- CPUC, PG&E, consulting Native American representative(s), and a Secretary of the Interior– qualified archaeologist shall determine whether preservation in place of significant cultural resources is feasible. Consistent with CEQA Guidelines Section 15126.4(b)(3), this may be accomplished by planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If it is determined that

preservation in place is not feasible, data recovery through archaeological investigations shall be completed.

- PG&E shall retain a Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), to prepare and implement a Cultural Resources Treatment Plan (CRTP). The CRTP shall include a plan to treat all cultural materials identified during construction that are contributing constituents of historical resources. The purpose of the treatment program will be to identify the procedures to follow in the event that cultural materials associated with historical archaeological resources are identified, define the tribal engagement procedures, and identify a place for cultural resources to be safely stored, if needed, until they can be reburied or treated in accordance with the tribe(s) recommendations, if the materials are Native American, in accordance with all applicable laws. Treatment could consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of targeting the recovery of important data contained in the portion of the significant resource to be affected by the Project. The methods of treatment would be determined in consultation with the consulting Native American representative(s). The CRTP shall include provisions for analysis of data in a regional context; reporting of results in a timely manner and subject to review and comments by the consulting Native American representative(s); disposition of resources acceptable to the consulting Native American representative(s); and dissemination of final confidential reports to the Northwest Information Center of the California Historical Resources Information System.

- The CRTP will also include a monitoring plan. The monitoring plan will specifically identify:
 - the location(s) where monitoring will be completed based on soil types, geology, distance to known sites, and other factors;
 - the person(s) responsible for conducting monitoring activities, including consulting Native American representative(s);
 - the method for conducting the monitoring and the required format and content of monitoring reports;
 - the schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports;
 - the protocol for notifications in case of encountering cultural resources, as well as methods of managing the encountered resources (e.g., collection, identification, curation, repatriation);

– and the methods to ensure security of cultural resources sites.

- During the course of the monitoring, the archaeologist and consulting Native American representative(s) may adjust the frequency of the monitoring from continuous to intermittent based on the conditions and professional judgment of the archaeologist and Native American representative(s) regarding the potential to affect cultural resources.

- The PG&E CRTP for Metcalf Substation will be submitted to the CPUC for approval before implementation. ~~Similarly, a~~ All subsequent reports, plans, and resource documentation resulting from implementation of the CRTP will be submitted to the CPUC upon request for approval.