

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 27, 2024

Ms. Jo Lynn Lambert
Counsel for Pacific Gas & Electric Co.
707 Brookside Avenue
Redlands, California

Dear Ms. Lambert:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit is in the process of reviewing LS Power Grid California, LLC's (LSPGC) Certificate of Public Convenience and Necessity (CPCN) Application (A.24-07-018) and Proponent's Environmental Assessment (PEA) for the Collinsville 500/230 Kilovolt (kV) Substation Project (project). Section 15100 of the California Environmental Quality Act (CEQA) requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses *CPUC's Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (November 2019) as the guide for determining the adequacy of project applications; however, the CPUC, in its judgment, may also identify other required information deemed necessary for completing CEQA review.

In their application and PEA Project Description, LSPGC identifies major project features and activities that would be carried out by Pacific Gas and Electric Company (PG&E). The CPUC has identified deficiencies with LSPGC's application related to the identified PG&E project features and activities. More information is needed about PG&E's project activities and PG&E's anticipated process for complying with General Order (GO) 131-D. The attached report (Data Request #1) identifies information requested from PG&E regarding the project.

Instructions

You are instructed to answer the data requests (attached Data Request #1) in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5 and 314, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any questions, email the Energy Division contact(s) above. Provide your response no later than the due date noted above. If you are unable to provide a response by this date, notify Energy Division as soon as possible, with a written explanation as to why the response date cannot be met and a best estimate of when the information can be provided. If you acquire additional information after providing an answer to any request, you must supplement your response following the receipt of such additional information.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy.

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(If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify Energy Division as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the data request.

A written response to Data Request 1 is requested from PG&E by October 27, 2024.

Please direct questions related to this application to me at Connie.Chen@cpuc.ca.gov.

Sincerely,



Connie Chen
Project Manager, Energy Division

CC:
Michelle Wilson, CPUC
Greg Heiden, CPUC
Eyob Embaye, PG&E
Susanne Heim, Panorama
Aaron Lui, Panorama

Data Request #1



Project: LS Power Grid's Collinsville 500/230 kV Substation Project (project)
Description: Data Request #1
From: California Public Utilities Commission (CPUC) and Panorama Environmental Inc. (Panorama)
To: Pacific Gas and Electric Company (PG&E)
Date Submitted: September 27, 2024

OVERVIEW

The data requested in Table 1 below is in reference to Pacific Gas and Electric Company's (PG&E) participation in LS Power Grid's (LSPGC) Collinsville 500/230 kV Substation Project (project), as described in the Proponents Environmental Assessment (PEA) prepared for the project. A complete copy of the PEA is available at: <https://ia.cpuc.ca.gov/environment/info/panoramaenv/Collinsville/>

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TABLE 1 DATA REQUESTED FROM PG&E

Section/Page Reference	CPUC Comment	CPUC Request	PG&E Response
<p>Application, pages 2 and 9-10 PEA Chapter 3, page 3-1 Section 3.3.1</p>	<p>DR-1: PG&E Project Activities and Application Participation The Application states: "...Certain Interconnection Facilities, Network Upgrades, and Distribution Upgrades to support the Project will be the responsibility of Pacific Gas & Electric Company (PG&E) and are analyzed in the Proponent's Environmental Assessment (PEA) included with this Application, but such PG&E facilities are not a part of the "Project" for which LSPGC seeks a CPCN pursuant to this Application." The Application also states: Also described in the PEA are certain PG&E facilities that are separate and distinct from the Project and which are not a part of this Application, but will be completed by PG&E to support the operation of the Project. The additional facilities include:</p>	<p>Please review PEA Chapter 3, Project Description, provided by LSPGC for accuracy and completeness. If any information is incorrect or incomplete about PG&E's involvement in the proposed project, including the PG&E project components and construction and operational activities, please provide corrections, as well as any supplemental information to further define PG&E's proposed activities that should be included in the EIR Project Description being prepared by CPUC.</p>	
	<ol style="list-style-type: none"> 1. Interconnection Facilities – <ol style="list-style-type: none"> a. Modifications to the existing Vaca Dixon, Tesla, and Pittsburg Substations. b. 500 kV interconnection of the existing Vaca Dixon – Tesla 500 kV line into the Collinsville Substation. 2. Network Upgrades – PG&E is undertaking a facility scope requirements study and system studies to identify any required network upgrades. No network upgrades have been identified by PG&E or affected systems as of the date of the filing. 3. Distribution Upgrades – installation of extended distribution line facilities near the Collinsville Substation. 	<p>Please provide PG&E interconnection studies completed for the project.</p>	
	<p>The introduction in Chapter 3 states: "...Although PG&E's Interconnection Facilities are part of the Proposed Project being evaluated under California Environmental Quality Act (CEQA), PG&E's construction is not part of this application and does not require authorization under this specific California Public Utilities Commission (CPUC) decision. However, PG&E's work to interconnect the LSPGC facilities into PG&E's electrical system would be subject to all applicable regulatory requirements. In addition, PG&E would implement Construction Measures (CMs) during construction of its Proposed Project components, and these CMs would be considered by the CPUC in its environmental review of the Proposed Project." Section 3.10.1 states: "... Although PG&E is not an applicant in LS Power's application for a CPCN, PG&E's scope of work is needed to interconnect the Proposed Project to PG&E's electrical grid. PG&E's substation modification and transmission line extension would be included in the CPUC's CEQA analysis.</p>	<p>Please explain the status of PG&E's design for their elements of the proposed project, and identify where there may be gaps in the design or unknown factors, including when and how they would be addressed.</p>	

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	<p>However, PG&E would likely utilize the adopted CEQA document to separately comply with the CPUC's permitting requirements under GO 131-D."</p> <p>PG&E is not a co-applicant; however, LSPGC states major portions of the proposed project would be constructed by PG&E and there is insufficient information in the PEA regarding PG&E work activities and impact areas. LSPGC has suggested CPUC coordinate directly with PG&E regarding the project elements described in the project description. The application and PEA are considered deficient until the CPUC can resolve questions related to PG&E's scope of work, PG&E's anticipated GO 131-D requirements and their reliance on the EIR for CEQA compliance, and implications for the project if PG&E's CMs are determined to be inadequate to avoid or reduce impacts to less-than-significant levels and if mitigation measures are required.</p>	<p>Please explain PG&E's anticipated permitting pathway/regulatory compliance with GO 131-D, and expectations about how the EIR would be used for a potential GO 131-D exemption in the future.</p>	
<p>Section 3.12, Table 3-16</p>	<p>DR-2: PG&E Construction Measures</p> <p>The CPUC is in the process of determining if and how PG&E's CMs, and potential mitigation measures, may or may not be enforceable since PG&E is not an applicant, and the implications for CEQA review and impact determinations. If PG&E's CMs are not adequate or enforceable, it may not be possible to obtain an exemption pursuant to GO 131-D. More information is needed about PG&E's assumptions and procedural questions related to PG&E's CMs.</p>	<p>Please explain the source of PG&E CMs identified in the PEA and how they were developed. If they were from or derived from existing standard measures, please provide copies or links to any sources.</p>	
		<p>Please explain PG&E proposed implementation process for the CMs identified for the project, with the assumption that a future GO 131-D exemption occurs. What is the proposed enforcement mechanism for the CMs and any mitigation measures in the EIR?</p>	
<p>Section 3.2.2.1.4, page 3-13</p> <p>Section 3.3.1, page 3-14</p> <p>Section 3.3.5, page 3-39</p>	<p>DR-3: Modifications at PG&E's Existing Vaca Dixon and Tesla Substations</p> <p>Section 3.2.2.1.4 states: "PG&E's existing Pittsburg Substation would be modified by shifting line positions, bus work, and modifying electrical equipment to facilitate the connection of the proposed LSPGC 230 kV Transmission Line. In addition, PG&E's existing Vaca Dixon and Tesla substations would receive modifications to their bus structures and electrical equipment to accommodate the proposed PG&E 500 kV Interconnection. All modifications would be confined within the existing substation fence lines."</p> <p>Section 3.3.1 of the Project Description states: "LSPGC has completed approximately 30 percent of the engineering design, and PG&E has completed approximately 30 percent of the engineering design on the Proposed Project. As such, the information in this document is based on preliminary engineering designs and is subject to change based on additional and/or final engineering designs; further studies to be performed by PG&E; regulatory requirements; conditions on the ground; and/or ongoing coordination discussions among LSPGC, PG&E, the CPUC, and CAISO."</p> <p>Section 3.3.5 states: "Modifications to PG&E's existing Vaca Dixon and Tesla substations would involve modifying the line relays in addition to potential series capacitor modifications at PG&E's existing Vaca Dixon Substation. Microwave modifications may also be needed at these substations to provide a high-speed communication path to the proposed LSPGC Collinsville Substation..."</p> <p>The potential temporary and permanent impact areas at PG&E's existing Vaca Dixon and Tesla substations have not been identified.</p>	<p>Please explain if any new microwave towers may be installed at or within existing PG&E substations, and if so, identify the locations.</p>	
		<p>Please identify all proposed or potential temporary and permanent impact areas for PG&E's existing Vaca Dixon and Tesla substations. Provide GIS data and figures.</p>	
		<p>Please confirm no existing substation footprints would be expanded.</p>	
<p>Section 3.5.13.2</p>	<p>DR-4: Minimum Vegetation and Equipment/Structure Clearances Distances</p>	<p>Please provide a table that identifies the minimum vegetation and equipment/structure clearance distances that PG&E would maintain (and</p>	

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<p>Section 3.8 Section 3.8.5 Section 5.9</p>	<p>GO 95 is referenced in Section 3.5.13.2 of the Project Description in relation to fire breaks. GO 95 is also discussed in Section 5.9: Hazards, Hazardous Materials, and Public Safety, where it states the project would be constructed and maintained to meet GO 95 vegetation clearances for fire prevention and equipment clearances for electric shock prevention.</p> <p>Section 3.8 states: "The Proposed Project would be operated and maintained to meet all GO 95 requirements, including minimum vegetation and equipment clearances, in addition to the vegetation clearance requirements in California PRC Section 4292 and Title 14, Section 1254 of the California CCR."</p> <p>Section 3.8.f states: "In accordance with fire break clearance requirements in GO 95, PRC Section 4292 and Title 14, Section 1254 of the CCR, LSPGC and PG&E would trim or remove flammable vegetation in the area surrounding the Proposed Project and all other safety hazards. Proposed Project-specific vegetation clearances would be determined by the CPUC. One-person crews typically conduct this work using mechanical equipment consisting of weed trimmers, rakes, shovels, and leaf blowers. State-approved herbicides would also be applied to treat bare-ground areas, as needed, during O&M activities. Pesticides would not be used during O&M activities. The proposed LSPGC 230 kV Transmission Line and Collinsville Substation would be inspected on an annual basis to determine if vegetation trimming or clearing is required. LSPGC and PG&E vegetation management activities would ensure a continuous defensible area around the substation and within transmission line ROW."</p> <p>The CPUC would not define project-specific vegetation distances beyond what is already required by GO 95 and California PRC Section 4292 and Title 14, Section 1254 of the California CCR.</p>	<p>which regulations dictate these minimum distance) for the 500 kV interconnection. Please provide both vertical and horizontal distances that would be maintained. Similar information has been requested of LSPGC based on the project description references, and PG&E and LSPGC should coordinate to ensure this requested information is consistent.</p>	
<p>Section 3.6.5, page 3-116 Table 3-16</p>	<p>DR-5: Power Clearances and Potential Night Work Section 3.6.5 states: "...Night work is not anticipated to be necessary, but could be required in limited circumstances, such as clearance restrictions..." The use of temporary lighting is discussed in APMs and CMs.</p>	<p>Please provide a detailed description of power clearances for the project related to PG&E activities, and potential night work that may be required to accommodate power clearance windows.</p> <p>Identify the locations of potential night work associated with power clearances and provide an estimate for the number of days night work could be required to ensure associated impacts are adequately considered.</p>	
<p>Section 3.3.4.2.1, page 3-39 Section 5.9.1.4</p>	<p>DR-6: Gas Pipeline and Potential Cathodic Protection/Grounding from Induced Current Section 5.9.1.4 states: "One gas transmission pipeline crosses the Delta and Lower Sherman Island approximately 0.6 mile east of the proposed LSPGC 230 kV Submarine Cable. Additionally, this gas transmission pipeline travels through Solano County, and the proposed LSPGC Collinsville Substation would be approximately 0.5 mile west of the pipeline. The proposed PG&E 500 kV Interconnection would parallel</p>	<p>Please provide the timeframe for completing the induction study.</p>	

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	<p>this pipeline along an unnamed access road off Talbert Lane for approximately 0.4 mile." This pipeline appears to be identified on Figure 5.9-2 and a potentially associated land scar along the pipeline corridor visible in Google Earth imagery indicates that the pipeline may be roughly 80 to 130 feet away from the base of proposed 500 kV structures.</p> <p>Section 3.3.4.2.1 states: "...PG&E would conduct an induction study to evaluate the potential effects of the proposed PG&E 500 kV Interconnection on the pipelines in the vicinity, and would follow applicable standards of the NESC pertaining to the need for interference analysis and anti-corrosion/cathodic protection, pending final design and engineering of the interconnections..."</p> <p>General project activities such as cathodic grounding or the installation of similar facilities are standard and foreseeable actions, particularly due to the 500 kV line's proximity to the existing gas line, and they should be defined as part of the proposed project, so the associated impacts and impact areas are considered in the EIR.</p>	<p>Once complete, please provide the induction study as well as a description of any project changes to address induction (compared to what is provided in the Project Description and subsequent comments provided by PG&E). Ensure the description of potential activities and any changes to project features are described in detail.</p> <p>Please estimate the approximate length of the existing pipeline and identify the specific segment location, as well as the maximum distance surrounding the pipeline, that could be subject to grounding actions and potential disturbance to address the potential for induction. This information will be used preliminarily while waiting for the results of the induction study to determine the extent of potential environmental impacts along the pipeline.</p>	
<p>3.5.3.1.6, page 3-43 Section 3.5.5.2, page 3-51</p>	<p>DR-7: Temporary Guard Structures</p> <p>Section 3.5.3.1.6 states: "Guard structures are temporary facilities that would be installed at transportation and utility crossings prior to conductor installation and removal. Due to the lack of transportation and utility crossings at the proposed overhead conductor locations, guard structures are not anticipated to be required as part of the Proposed Project."</p> <p>Section 3.5.5.2 states: "...Safety devices (e.g., traveling grounds, guard structures, or radio-equipped construction crews) would be in place prior to the initiation of wire-stringing activities."</p>	<p>Please identify the specific project locations, if any, where guard structures may be installed and provide a description of the various types and methods that may be used.</p>	
<p>Section 3.8.4.1.2, page 3-92</p>	<p>DR-4: Inspection and Maintenance Access to Structures</p> <p>Section 3.8.4.1.2 states: "...Should structures require direct access during maintenance, overland access consistent with easement access rights and in coordination with the landowner would be utilized..."</p> <p>In a separate response, LSPGC stated "...All maintenance access will be overland travel and may be different than original construction access and dependent on easement access rights with the landowner(s)."</p> <p>During operation and maintenance, structure and line inspections would be required and direct vehicle access to reach the structures is a foreseeable action, which would result in occasional, long-term ground impacts.</p>	<p>Please describe PG&E's ground access requirements and procedures for accessing the interconnection line and structures during operation and maintenance.</p>	
<p>Sections 3.1.1, 3.3.4.1.1, 3.3.8, and 3.3.9</p>	<p>DR-7: Substation Microwave Tower</p> <p>The Project Description describes a new microwave tower that would be constructed, owned, and operated by PG&E within the proposed Collinsville Substation. There is insufficient information about the microwave tower design and visual characteristics included in the Project Description. While the PEA states PG&E would construct the microwave tower, basic information is needed about the structure and construction methods.</p>	<p>Please provide a description of the microwave tower design and form, including the tower type (i.e., monopole or lattice), surface color(s) and finish(es), foundation, construction methods, etc. Specify if the substation tower would/could require guy wires or support structures, or if it would be self-supporting.</p>	
<p>Section 3.10 Table 3-13</p>	<p>DR-8: Anticipated Permits and Approvals</p>	<p>Please identify and explain specific permits or approvals PG&E would obtain from jurisdictional agencies to address PG&E project features and activities</p>	

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	Refer to anticipated permits and approvals identified by LSPGC for the project in Table 3-13.	(construction and operation). Please identify any existing PG&E permits that would apply to the project construction or operation.	
n/a	DR-9: Geotechnical Reports	Please provide a timeline for completing geotechnical reports for PG&E portions of the project.	
		Please provide the geotechnical reports prepared for PG&E portions of the project.	
n/a	DR-10: PG&E Bay Area Operation and Maintenance Habitat Conservation Plan (HCP)	Please explain if and how PG&E's Bay Area Operation and Maintenance HCP would be used for the project.	
		Please identify any PG&E portions of the project that would not be covered by the HCP.	
		Please identify known gaps in HCP coverage for the PG&E activities associated with the project or the covered species.	
		Please explain PG&E's approach for obtaining ITP permits, if applicable, for potential impacts on any species that are not covered in the HCP.	