

January 3, 2025

VIA EMAIL

Ms. Connie Chen
California Environmental Quality Act Project Manager
California Public Utilities Commission Energy Division
505 Van Ness Avenue
San Francisco, California 94201

RE: Collinsville: Data Request #1 (CPUC Review of LSPGC Responses #3 and 4 to Deficiency Report #1)

Dear Ms. Chen,

As requested by the California Public Utilities Commission (CPUC), LS Power Grid California, LLC (LSPGC) has collected and provided the additional information that is needed to evaluate environmental review for the Collinsville 500/230 kV Substation Project (Application 24-07-018). This letter includes the following enclosure:

- A Response to Data Request Table providing the additional information requested in the Data Request #1, received December 4, 2024.

Please contact me at (925) 808-0291 or djoseph@lspower.com with any questions regarding this information. If needed, we are also available to meet with you to discuss the information contained in this response.

Sincerely,

A handwritten signature in blue ink that reads "Dustin Joseph".

Dustin Joseph
Director of Environmental Permitting

Enclosures

cc: Jason Niven (LSPGC)
Doug Mulvey (LSPGC)
Lauren Kehlenbrink
Clayton Eversen (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Aaron Lui (Panorama)

DATA REQUEST RESPONSE TABLE

TABLE 1 DATA REQUESTS RESPONSE

PEA Section 5.1: Aesthetics

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>Visual Resources Technical Report (VRTR) Deficiency Report #1, DEF-10</p>	<p>DR-1: Visual Simulation for Key Observation Point 2 In Response #3 to Deficiency Report #1, LSPGC provided a revised version of the VRTR, as well as updated visual simulations. While the majority of the VRTR and simulation updates are adequate, the visual simulation for Key Observation Point (KOP) 2 does not display (a) the engineered/graded slopes surrounding the substation, or (b) the 30-foot firebreak surrounding the substation, as requested in DEF-10.</p> <p>Section 7.1.2 of the VRTR states: "The proposed north driveway, final graded slopes, and firebreak were modeled as part of the visual simulation process; however, these features are obscured from view at KOP 2 due to the intervening topography in the foreground." After reviewing the KOP visual simulation, this statement does not appear to be accurate.</p> <p>There is no evidence in the simulation of changes to the existing topography (i.e., grading) that would be required to establish the substation surface. It appears at least some portion of the landscape changes due to grading, engineered slopes surrounding the substation site, and/or the 30-foot firebreak surrounding the substation site would be visible from the KOP 2 viewpoint. The visibility of these features would result in greater visual impacts than currently shown in the KOP 2 simulation.</p> <p>Refer to the DR-2: Reference Information provided at the end of this document for discussion purposes. Note the 10-foot-tall wall in the KOP 2 simulation and the absence of a 30-foot firebreak surrounding the wall.</p> <p>More information is needed to demonstrate that the missing features would not be visible at all, as stated in the VRTR, or alternatively the KOP 2 simulation should be updated to illustrate representative landscape changes and the 30-foot firebreak that would be maintained free of vegetation.</p>	<p>A</p>	<p>Please provide additional information that demonstrates the features were modeled and would not be visible from the KOP 2 viewpoint, as stated in the VRTR. For example, a wire frame simulation could be provided that isolates the features in the 3D model and overlays each in the background image or simulation as a separate color.</p>	<p>A wire frame simulation will be provided to the CPUC on January 24, 2025.</p>
<p>Visual Resources Technical Report (VRTR) Deficiency Report #1, DR-8</p>	<p>DR-2: Substation Security Wall/Fence Color In Response #1 to Deficiency Report #1, LSPGC stated: "The substation security fencing would have a non-reflective finish and neutral earth-tone colors, to the extent commercially available. The access gates would be constructed with a non-reflective dulled grey galvanized steel, to the extent commercially available."</p>	<p>A</p>	<p>Please identify the "neutral earth-tone" color that LSPGC proposes to use from the list of security fence options available from the manufacturer. Refer to the DR-3: Reference Information provided at the end of this document for discussion purposes. We recommend working with your visual specialist to consider which color selection would best reduce visual contrast.</p>	<p>LSPGC is currently working with our consultant to select the "neutral earth-tone" that will be used for the substation security fence. This color will be provided to the CPUC on January 24, 2025.</p>

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	<p>In Response #3 to Deficiency Report #1, LSPGC provided a PDF in Attachment D titled "DR-8_SafeFence" which provides manufacturer information (Valmont Composites SafeFence) for the proposed substation security fence. The product information provides several color options; however, it is not clear to us which color LSPGC proposes to use (i.e., Olive Green, Light Grey, Light Ivory, Leaf Green, Signal White, SKP Brown, or Cocoa Brown).</p> <p>Refer to the DR-3: Reference Information provided at the end of this document for discussion purposes.</p> <p>The KOP 2 visual simulation in the VRTR depicts the substation security fencing/wall as light grey.</p>	B	<p>The KOP 2 visual simulation in the VRTR depicts the substation security fencing/wall as light grey. Please clarify if the color shown is consistent with one of the proposed wall color and which color it represents, such is Light Gray or Signal White (refer to DR-3: Reference Information below). If a different color is proposed from the list of manufacture options, please update the visual simulation to show the substation wall in the proposed color.</p>	<p>The substation security fencing color illustrated in KOP 2 visual simulation was a "generic concrete color". As noted in the previous response, LSPGC is currently working with our consultant to select the "neutral earth-tone" that will be used for the substation security fence. This color will be provided to the CPUC on January 24, 2025.</p>

PEA Section 5.3: Air Quality

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response	
<p>PEA, Section 5.3.4.4, page 5.3-22 Deficiency Report #1, DEF-13 Health Risk Assessment</p>	<p>DR-3: Health Risk Assessment</p> <p>In Response #3 to Deficiency Report #1, LSPGC provided a Health Risk Assessment (Ldn Consulting, Inc. October 2024). Staff with Baseline Environmental Consulting have identified the follow-up data requests listed in the columns to the right.</p>	A	<p>Construction Duration: On page 2, it states that "Given the linear nature of transmission line, distribution line, and telecommunication line work, sensitive receptors near the Project would not experience a noticeable increase in emissions due to construction of these linear project features."</p> <p>For these linear project features, the HRA should specify the anticipated construction duration within the 1,000 feet zone of influence of any given sensitive receptor. The Office of Environmental Health Hazard Assessment (OEHHA) does not recommend assessing cancer risk for projects lasting less than two months due to the uncertainty in assessing cancer risk from short-term exposures. Therefore, if construction activities will move beyond the 1,000 feet zone of influence within two months, the HRA can conclude that a health risk assessment is not necessary.</p> <p>Additionally, the HRA should state that all sensitive receptor locations identified are located more than 0.3 miles away from the proposed Collinsville Substation, outside of the 1,000 feet zone of influence recommended by the BAAQMD. These receptors are included for a conservative analysis.</p>	<p>The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.</p>	
		B	<p>Sensitive Receptors: The unoccupied cultural resource site is included as R1. This receptor should be removed as a health risk receptor to be consistent with the air quality section.</p>		<p>The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.</p>
		C	<p>Uncontrolled Scenario: The HRA only includes the controlled emission scenario (with APM AIR-1). The uncontrolled emission scenario should also be analyzed.</p>		<p>The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.</p>
		D	<p>Justification of using PM_{2.5} Concentrations as a Surrogate for DPM: Provide justifications of using PM_{2.5} emissions, instead of PM₁₀ emissions recommended by BAAQMD, as a surrogate for diesel PM.</p>		<p>The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed</p>

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				and is anticipated to be completed by January 31, 2025.
		E	<p>Averaging Period: The construction schedule and durations included on page 4 of the HRA do not match the Project Description (PD) Tables 3-11 and 3-12 dated July 29, 2024. For example, the estimated total number of active workdays for the LSPGC Collinsville Substation should be 561 days, instead of 533 days. The construction of the LSPGC Collinsville Substation is expected to last from May 1, 2026 to February 1, 2028, according to the PD, instead of February 11, 2028. The construction of the LSPGC Collinsville Substation should last for a total of 641 calendar days) instead of 651 days.</p> <p>In addition, the last paragraph of page 7 states that “the PM_{2.5} generated emissions for the same construction activities analyzed within this report are 1.048 tons over the same <u>615</u> days.” The HRA should revised to be consisted with the PD and internal consistency.</p> <p>Note: The CPUC submitted separate data requests (refer to Deficiency Report #2) related to recent PG&E’s construction schedule changes, which are not reflected in the PEA PD schedule information. The CPUC requested LSPGC to confirm or update their construction schedule to account for the PG&E schedule changes, if any. Please ensure any updates to the HRA construction schedule reflect the current construction schedule proposed by LSPGC.</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.
		F	<p>Exhaust Emissions: On page 5, it states “the total diesel particulate emissions during the construction activities (L-02, L-03, L-04 and <u>L-39</u>) would cumulatively generate 0.209 tons of diesel particulates 2.5 microns or smaller (PM_{2.5}) which is the primary TAC considered in this analysis.” Please remove L-39 from the sentence. In addition, please confirm the total emissions is 0.209 tons instead of 0.210 tons.</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.
		G	<p>Exposure Scenario: On page 6, describe the exposure scenario analyzed in this study (e.g. cancer risk from DPM emissions during xx-month of construction of the proposed LSPGC Collinsville Substation was assessed for an infant exposed to DPM starting from birth).</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.
		H	<p>Grading Area: On page 7, it states “Based on the site configuration, the average emission rate over the <u>grading area</u> is 7.56x10⁻⁸ grams/second per meter squared (g/s-m²)...” Please define the grading area.</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.
		I	<p>Cancer Risk: Explain how the 3.11 per one million exposed risk was calculated for Receptor 3, since this value does not match the results included in Appendix B.</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.
		J	<p>Incremental PM_{2.5}: In the last paragraph on page 7, specify that the 1.048 tons of PM_{2.5} emissions include both exhaust and fugitive PM_{2.5}.</p>	The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.

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		K	<p>Additional Information to Confirm the HRA Results: Please provide AERMOD model assumptions and parameters including source type and description (e.g. area source encompasses the proposed LSPGC Collinsville Substation), source emissions type (continuous or variable emissions), release height for both exhaust and fugitive PM_{2.5}, initial vertical dimension for both exhaust and fugitive PM_{2.5}, and flagpole height for all receptors. Also provide reference and justification for the model parameters.</p> <p>Please provide AERMOD output plot which shows the sources and receptors with concentration posted.</p>	<p>The HRA is being reevaluated and analyzed to incorporate comments provided in this Data Request. The HRA will be supplied to the CPUC once completed and is anticipated to be completed by January 31, 2025.</p>