December 4, 2024

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: Response to the California Public Utilities Commission's Deficiency Report 2 for the LS Power Grid California, LLC's Collinsville 500/230 kV Substation Project (Application 24-07-018)

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 deem the application for Certificate of Public Convenience and Necessity (CPCN) for the Collinsville 500/230 kV Substation Project (Proposed Project) as complete. This letter includes the following enclosures:

- A Response to Deficiency Report Table providing the additional information requested in the Deficiency Report 2, received November 14, 2024.
- An updated GIS database that includes the following changes to Proposed Project components:
    - Modification of "Substation Driveway" to match the design changes to the Collinsville Substation Site.
    - Modification of "Substation Fence Line" to match the design changes to the Collinsville Substation Site.
    - Addition of "Comm Yard Fence Line" to match the design changes to the Collinsville Substation Site.
    - Modification of the "Permanent Grading" to match the design changes to the Collinsville Substation Site.
    - Addition of "Retention Basin (Planned)" to match the design changes to the Collinsville Substation Site.
    - Addition of "Retention Basin Grading (Planned)" to match the design changes to the Collinsville Substation Site.
    - Addition of "Retention Basin (Maximum)" to match the original design and represent the worst-case impact of the retention basin.
    - Addition of "Retention Basin Grading (Maximum)" to match the original design and represent the worst-case impact of the retention basin.
    - Modification to "Temporary Structure Work Area" to match Pacific Gas and Electric Company (PG&E) current transmission line design and address the addition of the transposition structures.
    - Modification to "Temporary Access Road" to match PG&E current transmission line design and address the addition of the transposition structures.
    - Modification to "Pulling Site" to match PG&E current transmission line design and address the addition of the transposition structures.

- Modification to “Staging Area” to match PG&E current transmission line design and address the addition of the transposition structures.
- Modification to “Permanent Structure Work Area” to remove PG&E structure locations.
- Modification to “Riser” to increase the size of these work area to match the current design.

The updated GIS data described above can be downloaded via the following link: LSPGC Response to CPUC Deficiency Report 2. LSPGC is preparing an additional response to the Data Request items included in Deficiency Report 2 and will submit a separate response addressing those requests by December 30, 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,

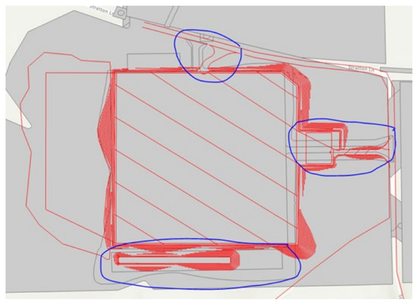
Dustin Joseph

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)

DEF	Section/Page Reference	CPUC Comments	Request ID	CPUC Request	LSPGC Response
DEF-1	3.3.4.2.1 PG&E 500 kV Interconnection, Table 3-4, GIS Data Deficiency Report #1, DEF-1	DEF-1: PG&E 500 kV Interconnection Structures and GIS Data In their response to Deficiency Report #1, DEF-1, on September 30, 2024, LSPGC provided Attachment A, PG&E Preliminary Scope, which includes a PDF prepared by PG&E describing their proposed project features and activities. The information provided in this document describes new and different project features that are not addressed in the PEA Project Description and are inconsistent with the features identified in the GIS data by LSPGC. In addition to the PDF document provided by LSPGC, PG&E responded to a separate Data Request issued directly to PG&E by the CPUC (Project description with comments from PG&E provided as separate Attachment A). In their response dated November 8, 2024, PG&E identified additional information about the interconnection structures that is inconsistent with the PEA Project Description and GIS data provided by LSPGC. This information is also inconsistent with the information provided in the PDF described above. It appears the current PG&E interconnection structures associated with the project area as follows: •New -11 lattice steel towers (LSTs) -7, 3-pole tubular steel poles (TSPs) •Removed -2 existing LSTs -1 existing transposition structure The accurate number, types, and locations of PG&E structures needs to be rectified, and revised GIS data is needed to determine impact areas. Diagrams of all proposed structures are also needed for the EIR. Note: this same request will be submitted to PG&E directly.	A	Please provide a list of types and values of all PG&E proposed interconnection structures, including existing structures along the Vaca-Dixon line to be removed or modified.	PG&E provided a table that includes a list of all structures that will be removed or added as part of the project as part of their response to PG&E Data Request #2. This list included structure numbers that will match with naming used in the GIS data, structure addition or removal designation, structure type, and structure height.
			B	In the preliminary PG&E scope PDF, PG&E uses the term lattice steel poles (LSPs). Is this a new structure category or the same as the LSTs?	PG&E addressed DEF-1B in their response to PG&E Data Request #2.
			C	Please provide a brief definition of the 3-pole “transposition” structures and explain their purpose in comparison to the LSTs.	PG&E addressed DEF-1C in their response to PG&E Data Request #2.
			D	Please ensure diagrams of all proposed PG&E structures are provided consistent with the diagrams provided for other structures identified in the Project Description. At a minimum a new diagram for the 3-pole TSP structure type is required.	PG&E addressed DEF-1D in their response to PG&E Data Request #2.
			E	Please provide updated GIS data for the project which includes the accurate locations, categories, and other details of proposed structures for the project (including both LSPGC and PG&E structures), as well as the existing PG&E structures to be removed or modified. Please also provided updated GIS data for the associated conductor routes, structure workspaces, structure access routes, pull sites, etc. that are tied to the structure locations.	The updated GIS database included with LSPGC’s first response to Deficiency Letter #2 includes structure workspaces, access routes, pulls sites, and laydown areas associated with PG&E’s 500 kV overhead transmission line scope (including transposition structures) and LSPGC’s 230 kV overhead transmission line scope as well as structure locations for LSPGC’s transmission structures. GIS data for PG&E structure locations will be submitted in a separate confidential response.
DEF-2	n/a	DEF-2: PG&E Sites Near Travis Airforce Base (AFB) PG&E responded to a separate Data Request issued directly to PG&E by the CPUC. In their response dated November 8, 2024, PG&E described sites near Travis AFB that would be reconductored and transposition towers would be installed. This appears to be a new site and project features that are not identified in the Project Description or GIS data. Note: this same request will be submitted to PG&E directly.	A	Please describe the PG&E activities that would occur near Travis AFB, including their purpose and nature, timing and schedule, etc.	The work near Travis Air Force Base (AFB) is associated with the installation of new transposition structures and was addressed by PG&E in their response to PG&E Data Request #2.
			B	Please provide GIS data and figures identifying the project feature locations, workspaces, and access routes.	This item is addressed by the response to DEF-1E.
DEF-3	Section 3.1.1: Summary of Proposed Project Deficiency Report #1, DEF-1	DEF-3: PG&E Pittsburg Substation Modifications In the PDF describing PG&E’s preliminary scope submitted by LSPGC, the list of outdoor work at the Pittsburg Substation includes (#3) “Due to increased fault duties, install a set of reactors on the 115kV bus 1 and bus 2.” The proposed reactors at Pittsburg Substation appear to be part of a separate CAISO project, referred to as the Pittsburg 115 kV Bus Reactor Project identified in CAISO’s 2022-2023 Transmission Plan.	A	Please explain if and how installing reactors at Pittsburg Substation is associated with the Collinsville Substation Project and how PG&E proposes to implement these projects together or separately. Is the installation of reactors at Pittsburg Substation part of the whole of the action and needed as a result of the proposed Collinsville Substation Project, thus an activity that should be analyzed under CEQA?	As outlined in PG&E's reponse to PG&E Data Request #2, the installation of the Pittsburg Reactors is required to facilitate energizing LSPGC’s Collinsville Substation Project scope and should be analyzed in the Proposed Project's Environmental Impact Report (EIR).

		Section 3.1.1 of the Project Description briefly notes that the Pittsburg Reactor Project is not part of the proposed project; however, the PDF with PG&E's preliminary scope seems to link this PG&E activity to the proposed project. Note: this same request will be submitted to PG&E directly.	B	If PG&E is proposing the installation of reactors at Pittsburg Substation as part of the proposed project, existing and proposed substation layout diagrams are required to identify the facility changes.	As described in PG&E's reponse to Data Request #2, PG&E is proposing to install the reactors as part of the Proposed Project. Please see Exhibit A in PG&E's reponse to PG&E Data Request #2 for the reactors location within the existing Pittsburg Substation.
DEF-4	Deficiency Report #1, DEF-6 and DEF-8	DEF-4: Collinsville Substation Revised Footprint and GIS Data In response to DEF-6 and DEF-8 of Deficiency Report #1, LSPGC provided Attachment D, Ultimate Collinsville Substation Buildout GIS Files, and noted "…that the communication yard has been moved outside of the original Collinsville Substation. This change was made to comply with a PG&E security requirement to maintain 30 feet of spacing between the LSPGC and PG&E station fencing." LSPGC provided the requested contour data; however, the GIS data provided with the PEA submittal (for work areas and impact areas) does not reflect the substation footprint changes (i.e., separated communication yard, adjusted driveways, and detention pond/bioretention basin) which are required to determine accurate impact areas and acreages. Refer to screenshot below (*key: red lines are the recent substation contour data provided with revised feature locations; the grey polygons/lines are the prior workspaces/footprints that need to be updated to calculate impacts). In a written response, LSPGC stated the "…detention basin is anticipated to be approximately 3 feet deep, 75 feet wide, and 355 feet long." However, the substation layout figure provided in response to DEF-8 shows the pond with a length of 350 feet and a width of 25 feet. 	A	Please provide updated GIS data for all project work areas and impact areas, which include the recent design changes at the Collinsville Substation site (i.e., separated communication yard, adjusted driveways, and detention pond/bioretention basin).	A link to the updated GIS database is included with LSPGC's response to Deficiency Letter #2.
			B	Please clarify the dimensions of the retention pond and ensure the dimensions are consistent with the latest substation layout figure provided in response to DEF-8. The pond appears to be 350 feet by 25 feet. Please confirm if this is accurate and if the depth is still assumed to be 3 feet.	The retention basin is currently planned to be 350 ft long by 25 ft wide by 3 ft deep. This design will be either validated or revised after the geotechnical report is completed for the Collinsville Substation site. Since there is potential for this basin to become larger as the design is updated, the original 530 ft by 75 ft by 3 ft detention basin was kept in the GIS database as a worst-case impact and should be used for the purposes of the analysis in the EIR.