



September 5, 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: LSPGC Response to CPUC Data Request #11 for LS Power Grid California, LLC's
Collinsville 500/230 Kilovolt Substation Project (A.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 continue the environmental review of the Collinsville 500/230 kilovolt (kV) Substation Project (Application 24-07-018). This letter includes the following enclosures:

- A Response to Data Request Table providing the additional information requested in the Data Request #11, received September 2, 2025.
 - Attachment A: AQ Assumptions
 - Attachment B: Alternative 4 Revision
 - Attachment C: HRA Revision
 - Attachment D: Notification List Contact Information

The attachments listed above can be accessed via the following link:

[LSPGC Response to CPUC DR-11](#)

Please contact us 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
Director of Environmental



Enclosures

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

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Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
n/a	DR-1: Alternative 6a/6b – Underground Portions of the Transmission Line within Suisan Marsh Protection Plan Management Areas In response to Data Request #10, LSPGC identified a new alternative scenario that would involve installing portions of the 230 kV transmission line underground where it is within the Suisan Marsh Protection Plan Management Areas and within the PG&E property south of the proposed substation site. The route of the 230 kV underground line would be west of the Alternative 4 overhead route. The CPUC currently expects to retain this new alternative for analysis in the EIR, which is referred to as Alternative 6a/6b, with a and b variants representing minor connection differences associated with the substation location scenarios being considered (e.g., equipment locations based on the Proposed Project vs. Alternatives 1 and 2). More information is needed about Alternative 6a/6b to complete the EIR impact analysis.	1	Please provide a detailed description of all operation and maintenance activities associated with a 230 kV undergrounding scenario south of the proposed substation, including inspection frequencies, maintenance of permanent access roads, vegetation management for the underground facilities if any, operational dewatering considerations, etc.	The existing road (west of Alternative 6a/6b) would be utilized for access to the transition vaults during operations and maintenance, including annual inspections utilizing a standard pickup truck. The existing road would not need to be improved for these purposes. Vegetation is allowed to grow on and around the transition vaults and only would be cleared using manual tools if needed for access to the manholes. The right-of-way would not require vegetation management and would be allowed to remain natural. Dewatering during operations and maintenance is anticipated. Sump pumps are designed as part of the transition vault that would be able to surface discharge any water that has accumulated in the vaults, during periods of inspection. Dewatering would be completed in accordance with federal, state, and local laws and regulations.
		2	Please provide any comments from Solano County on the alternative design. Please provide the contact information for Solano County staff that LSPGC coordinated with regarding the alternative design.	LSPGC has provided contact information for Solano County members best suited for discussion on this topic. At this time, LSPGC has not received any formal feedback from Solano County.
n/a	DR-2: Alternative 4 and Alternative 6a/6b Access Roads The use of an existing access road (roughly 0.6 mile) was identified for Alternative 6a/6b. It appears this access road would also be used for Alternative 4. Additional information is needed about the conditions and use of this existing access road, as well as possible improvements that may be required to facilitate construction activities.	1	Please clarify if the existing access road identified for Alternative 6a/6b would also be used with Alternative 4.	LSPGC confirms that the existing access road identified for Alternative 6a/6b would also be used with Alternative 4. The purpose of utilizing the existing road is to ensure that areas can be accessed during operations and maintenance, while avoiding wetland areas.
		2	Please explain the conditions of this existing access road, including the existing widths and surface characteristics (dirt or gravel), etc. Please describe any improvements to the road that would be required, such as grading or the placement of gravel, and what the maximum maintained width would be.	The existing road is approximately 16 feet wide and appears to be partially covered with gravel. No improvements would be required for access. LSPGC would not need to widen the road as it is expected that only pickup trucks or similar sized vehicles would utilize the road during operations and maintenance.
n/a	DR-3: Air Quality Emissions Assumptions for Alternatives In response to Data Request #10, LSPGC provided equipment and construction schedule information to support AQ and GHG emission assumptions for the alternatives. The CPUC has follow-up questions regarding Alternative 5, and this information is needed for Alternative 6a/6b.	1	Please update the attached excel file (DR10_Alts AQ Assumptions_LSPGC and PG&E_v2.xlsx) to address both Alternative 6a (complete replacement of the 230 kV overhead route for the Proposed Project) and Alternative 6b (partial replacement of the 230 kV overhead route for Alternatives 1 and 2).	LSPGC has adjusted the schedule for these alternatives and included it as Attachment A .
		2	Please see the attached excel file (DR10_Alts AQ Assumptions_LSPGC and PG&E_v2.xlsx) (Alternative 5 tab) and clarify the equipment assumptions added below the prior values that were provided for Alternative 5.	LSPGC agrees with the proposed spreadsheet.

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n/a	DR-4: Alternative 4 Potential Design Refinements New information is now available about potentially sensitive environmental areas in the vicinity of the Alternative 4 which may not have been considered when developing the initial Alternative 4 design, such as the locations of potential wetlands and any culturally sensitive areas.	1	Please review the preliminary design for Alternative 4 and determine if any sensitive environmental areas can be avoided by adjusting the locations of poles and access routes. If such improvements can be made, please provide updated GIS for the Alternative 4 design.	LSPGC has revised Alternative 4 to remove permanent impacts to wetlands. Please see Attachment B for GIS and a KMZ.
n/a	DR-5: Alternative 4 and Alternative 6a/6b Access Roads	1	Please clarify if the existing access road identified for Alternative 6a/6b would also be used with Alternative 4.	See previous response to DR-2, above.
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	The use of an existing access road (roughly 0.6 mile) was identified for Alternative 6a/6b. It appears this access road would also be used for Alternative 4. Additional information is needed about the conditions and use of this existing access road, as well as possible improvements that may be required to facilitate construction activities.	2	Please explain the conditions of this existing access road, including the existing widths and surface characteristics (dirt or gravel), etc. Please describe any improvements to the road that would be required, such as grading or the placement of gravel, and what the maximum maintained width would be.	See previous response to DR-2, above.
n/a	DR-6: Health Risk Assessment (HRA) On August 19, 2025, LSPGC provided a revised copy of the HRA following a meeting with the CPUC and LSPGC specialist. Two remaining items should be addressed in the HRA and an updated copy should be provided.	1	Please correct the rounding error (1 percent difference) on page 12 (DR-2B Pittsburg Substation TAC DPM).	Please see the revised HRA which is included as Attachment C .
		2	The revised HRA did not provide clarification for the 8.43 acres used for the Collinsville Substation. During the meeting, it was mentioned that the active construction work areas were summed up and used as source areas in AERMOD. We agree with this approach. Although the requested clarification was not provided for the Collinsville Substation in the revised HRA. Please update the HRA to document this assumption.	Please see the revised HRA which is included as Attachment C .
n/a	DR-7: Helicopter Use Assumptions and Feasibility of Workhour Restrictions In addition, information is needed about how helicopters would be used for the project alternatives, and if it would be feasible to restrict the use of helicopters between the hours of 9am and 4pm to minimize noise impacts.	1	Where the use of helicopters is proposed during construction, is it feasible to limit the helicopters workhours between the hours of 9am and 4pm to minimize potential noise threshold exceedances? Please explain how restricting the use of helicopters to these hours would change the construction schedule, if at all.	LSPGC and PG&E agree to this revision which will minimize noise related threshold exceedances. LSPGC does not anticipate schedule changes due to this revision.
		2	Does PG&E expect to use helicopters to construction the 500 kV line under the Alternatives 1 and 2 scenarios?	LSPGC confirmed with PG&E that helicopters would not be required for the 500 kV installation for Alternative 1 and Alternative 2; however, they would still be required for the transposition structure work, as previously described.
n/a	DR-8: Aquatic Resources Technical Report (ARTR) The ARTR needs to be updated to reflect the current Proposed Project features, and old information related to the in-river structure should be replaced. LSPGC informed the CPUC that this updates to the ARTR are expected in the next week or so.	1	Please updated the ARTR to reflect the current Proposed Project per discussions with the CPUC team.	LSPGC expects to have this completed by 9/12/25.
n/a	DR-9: Notification List Contact Information Contact information is needed to supplement the CPUC's notification list in the vicinity of project alternative areas selected for evaluation in the EIR. In addition, contract information should also be provided for the PG&E transposition sites, if such information was not included with the original contact list provided to the CPUC.	1	Please provide a spreadsheet of contact information within 300 feet of the project features (i.e., new facilities and permanent roads) for the six selected alternatives. The contact information should include the names, addresses, and parcels of landowners within 300 feet as well as any available contract information for leaseholders associated with affected properties. Please separate the contact information by alternative or clearly identify which alternatives are within 300 feet.	Please see the Notification List Contact Information which is included as Attachment D .

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		2	Please provide contact information, as described above, for properties within 300 feet of the PG&E transposition site features.	Please see the Notification List Contact Information which is included as Attachment D .
n/a	DR-10: Ridgway Rail Requirements in APM BIO-15 USFWS informed the CPUC that USFWS provided comments on USFWSBA-AMM-24: California Ridgway’s Rail Avoidance, which includes similar language to LSPGC APM BIO-15.	1	If common language in AMM-24 and APM BIO-15 is updated to address USFWS’ comments, please provide a revised version of APM BIO-15 for use in the EIR to avoid potential conflicts between the two measures.	<p>LSPGC’s current measure in the USFWS BA is as follows: “To the greatest extent feasible, work within wetland habitats suitable for California Ridgway’s rail occupation will be limited to a work window of September 1 through January 15, which is outside of the breeding season for these species. If it is necessary to perform construction work in suitable wetland habitats outside of this work window, then prior to the initiation of activities, a qualified biologist will conduct protocol-level surveys for all areas within 700 feet of suitable habitat for California Ridgway’s rail and according to the USFWS June 2015 survey protocol (USFWS 2015). If California Ridgway’s rail is found to be absent following these surveys, then work may proceed within suitable habitats outside of the prescribed work window. If California Ridgway’s rail are present, then coordination with USFWS will occur to identify whether specific construction work within 700 feet of the activity centers may occur during the breeding season.”</p> <p>At this time, LSPGC has not received comments from the USFWS on this measure.</p>