PUBLIC UTILITIES COMMISSION
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September 5, 2025

Dustin Joseph, AICP
LS Power Grid California, LLC
16150 Main Circle Drive, Suite 310
Chesterfield, MO 63017

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

Re: Data Request #12 for LS Power Grid California, LLC's Collinsville 500/230 Kilovolt Substation Project (A.24-07-018)

Dear Mr. Joseph and Ms. Lambert:

The California Public Utilities Commission (CPUC) Energy Division submits the attached Data Request #12 associated with LS Power Grid California, LLC's (LSPGC) Certificate of Public Convenience and Necessity (CPCN) Application (A.24-07-018) for the Collinsville 500/230 Kilovolt (kV) Substation Project. Attachment A contains questions and requested information applicable to LSPGC and Pacific Gas & Electric Company (PG&E). The CPUC is requesting that LSPGC and PG&E submit responses to this data request by September 12, 2025.

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

Sincerely,

connie chen

Connie Chen
Project Manager, Energy Division

Attachment A: Data Request #12

cc: Michelle Wilson, CPUC Energy Division
Aaron Lui, Panorama Environmental, Inc.

Attachment A: Data Request

Project:	LS Power Grid's Collinsville 500/230 kV Substation Project
Title:	Data Request #12
From:	California Public Utilities Commission Panorama Environmental, Inc.
To:	LS Power Grid California, LLC (LSPGC) Pacific Gas & Electric Company (PG&E)
Date:	September 5, 2025

DATA REQUESTS

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
n/a	**DR-1: Consolidate and Update the Biological Resources Technical Report (BRTR)** The CPUC intends to attach a copy of the BRTR to the Draft EIR; however, the BRTR and supporting materials are currently divided into multiple documents covering different project areas, which is difficult to review and may lead to confusion. In addition, the project description summary and mapped features in the BRTR should be updated so they are consistent with the current proposed project, as defined in the most recent version of the Admin Draft EIR Project Description that LSPGC commented on.	1	Please consolidate and update the BRTR as follows: • Combine all BRTR addendums and address the entire project together in a single document. • Incorporate information for the PG&E transposition sites. • Summarize the results of the updated ARDR and botanical surveys and ensure the cross-referenced and summarized information in the BRTR is consistent. • Review and update the project description details in the BRTR (i.e., substation acreage, no in water transition structure, etc.). • Update maps in the BRTR where applicable to reflect the project as currently proposed (ensure the most recent GIS data layers are used in the maps). Please provide a copy of the consolidated report to the CPUC so it can be included as an attachment to the Draft EIR.	LSPGC
n/a	**DR-2: Consolidate and Updated the Public/Non-Confidential Version of the Cultural Resources Technical Report (CRTR)** LSPGC provided a public/non-confidential version of the CRTR with the original application. The primary confidential version of the CRTR was updated to address the CPUC's technical team's comments; however, the public version of the report was never updated. The CPUC intends to attach a copy of the CRTR to the Draft EIR, and an updated copy is needed. We also recommend consolidating information in supplemental cultural survey reports/CRTR addendums within a single document.	1	Please consolidate and update the Public/Non-Confidential Version of the CRTR consistent with the changes made to the Confidential Version of the CRTR, and other supplemental/addendum surveys. Please provide a copy of the consolidated report to the CPUC so it can be included as an attachment to the Draft EIR.	LSPGC
n/a	**DR-3: Wetlands and Vernal Pools** The CPUC project team has a number of questions for PG&E and LSPGC's consultant team (Insignia) that completed/will complete biological surveys at the PG&E transposition sites. These questions relate to the identification of wetlands and potential vernal pools that may be present, site access limitations, the potential for impacts, how impacts would or would not be covered by PG&E's Bay Area HCP, proposed avoidance and minimization procedures (i.e., PG&E CM BIO-1), and the need for additional permits to cover impacts. PG&E CM BIO-1 is provided for reference: ***PG&E CM BIO-1: Vernal Pool and Waters Avoidance.*** *Prohibit vehicular and equipment refueling 250 feet from the edge of vernal pools, and 100 feet from the edge of other wetlands, streams, or waterways. If refueling must be conducted closer to wetlands, construct a secondary containment area subject to review by an environmental*	1	Are the potential wetlands shown on the maps and GIS data provided with the BRTR addendum for the transposition site a conservative estimate of potential wetlands within the access roads, work areas, and a 250-foot buffer from these areas?	PG&E
		2	Based on the field methodology are there resources within work areas or access roads that may have been missed during the prior surveys?	PG&E
		3	Would the surveys completed in February have produced an accurate boundary of the vernal pool/wetland features that were identified? If the boundary was not accurate, was it estimated conservatively where one would not expect the boundaries to expand with more detailed investigation?	PG&E
		4	In the BRTR addendum for the transposition sites, vernal pool species were not ruled out in the potential to occur analysis, but vernal pools were not explicitly identified as occurring within the analysis area. Could some	PG&E

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	field specialist and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas. *Maintain a buffer of 250 feet from the edge of vernal pools and 50 feet from the edge of wetlands, ponds, or riparian areas. If maintaining the buffer is not possible because the areas are either in or adjacent to facilities, the field crew would implement other measures as prescribed by the land planner, biologist, or HCP administrator to minimize impacts by flagging access, requiring foot access, restricting work until dry season, or requiring a biological monitor during the activity.*		of the wetlands identified be vernal pools? Could there be other wetland/vernal pool features that were missed by the prior study?	
		5	For inaccessible areas, is there a way to conservatively map/define locations of wetlands and vernal pools? Or was the prior mapping already conservative in its estimate?	PG&E
		6	If wetlands and vernal pools are located within project work areas or crossed by access roads, what flexibility would you have to avoid features such as by relocating a pole, work area, or access route?	PG&E
		7	If the 250-foot setback from vernal pools and 50-foot setback from wetlands defined in CM BIO-1 cannot be met and the transposition site work would occur directly within a vernal pool or wetland, would this create a conflict with PG&E's HCP? If so, how can that conflict be resolved?	PG&E
		8	If wetland/vernal pool impacts cannot be avoided, would PG&E's HCP cover such impacts?	PG&E
		9	If wetland/vernal pool impacts cannot be avoided, what other permits would PG&E obtain, and what would the timing be for obtaining such permits prior to construction?	PG&E
		10	Would PG&E be able to use mitigation under its HCP to satisfy impacts on vernal pools or wetlands, or would separate mitigation acquisition or enhancement be required?	PG&E