



September 12, 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 #12 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 #12, received September 5, 2025.

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,

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

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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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 anticipates the updated biological report will be completed by September 17, 2025.
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 anticipates the updated cultural report will be completed by October 10, 2025.
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: <i>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 field specialist and/or biologist. Maintain spill prevention and cleanup equipment in refueling areas.</i>	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?	Yes, the BRTR provides a conservative estimate of potential wetlands within the accessible portions of the survey area. Potential wetlands were mapped during or immediately following the 2025 rainy season. The preliminary boundaries of these features were estimated using visible hydrology or evidence of hydrologic influence as well as vegetation indicative of wetlands and topography. An approximate 2- to 5-foot buffer was added to each feature to account for minor variation. Given that the mapping effort occurred immediately after the rainy season, there is high degree of confidence that the visible hydrology used to identify potential wetlands provides a conservative estimate of the wetlands present on-site. It is important to note that these potential wetlands were not assessed for hydric soils and that visible hydrology in these areas may fluctuate from year to year with precipitation.
		2	Based on the field methodology are there resources within work areas or access roads that may have been missed during the prior surveys?	The survey team had access to all work areas and access roads at Transposition Towers A and B. At Transposition Towers C and D, several areas were unable to be surveyed due to landowner access constraints.

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	<i>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.</i>			These areas were assessed to the greatest extent feasible from adjacent accessible locations, and no visible hydrology was observed. Many of the inaccessible areas are located within actively maintained agricultural fields (Transposition Tower D) or on sloping hillsides (Transposition Tower C), where the conditions for wetlands to be present are not expected. A National Wetland Inventory (NWI) feature is mapped north of the northernmost work area at Transposition Tower D; however, no evidence of this feature was observed during field surveys.
		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?	As described in response to Item 1, the preliminary boundary of each feature was mapped using visible wetland indicators and an approximately 2- to 5-foot buffer was added to each feature. Because the survey was conducted during or immediately following the 2025 rainy season, the mapped boundaries are expected to represent a conservative estimate of the extent of these features. Hydrology in these areas may fluctuate from year to year with precipitation.
		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 of the wetlands identified be vernal pools? Could there be other wetland/vernal pool features that were missed by the prior study?	Because no in-field soil analysis or fully floristic botanical inventory was conducted for the features identified in the BRTR addendum, a definitive assessment for each to qualify as a vernal pool has not been completed. For example, it is unknown if these pools are underlain by clay hardpan or other restrictive soil types. Additionally, while no vernal pool indicator species were observed along the margins of these features, the surveys focused on identifying dominant vegetation types to assign vegetation alliances and did not include a full floristic inventory that might have detected vernal pool species. Based on the information available, the features associated with Transposition Tower A are unlikely to qualify as vernal pools, as they appear to be (1) inundated areas within agricultural fields or (2) pools formed around the base of transmission tower footings. The features associated with Tower B may provide suitable conditions for vernal pools, as they are not associated with PG&E transmission structures and are not situated in fields that show evidence of regular tilling or disking. As a result, it is possible that some of these features could be vernal pools. As noted previously, it is unlikely that there are other features that were missed as part of the field effort.
		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?	BRTR addendum addressed the potential for wetlands and vernal pools in inaccessible areas by combining field observations of visible hydrology with mapped NWI features in inaccessible areas. All NWI features within the survey area were assessed to the extent possible through direct field observation and supplemented with satellite imagery. However, it remains possible that some pockets of potential wetland were not detectable from the vantage points available to the survey team.
		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 responded to the CPUC separately.
		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	PG&E responded to the CPUC separately.

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			create a conflict with PG&E's HCP? If so, how can that conflict be resolved?	
		8	If wetland/vernal pool impacts cannot be avoided, would PG&E's HCP cover such impacts?	PG&E responded to the CPUC separately.
		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 responded to the CPUC separately.
		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 responded to the CPUC separately.