October 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: LSPGC Response to CPUC Data Request #13 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 Data Request #13, received September 24, 2025.
    - Attachment A: Revised Alterative 1 and Alternative 2 Substation Size
    - Attachment B: Revised Area of Potential Impact for Submarine Segment
    - Attachment C: Federal Aviation Administration Notification

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

LSPGC Response to CPUC DR-13

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

Dustin Joseph
Director of Environmental

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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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RESPONSE TO DATA REQUEST TABLE

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n/a	**DR-1: Requested Revision to LSPGC APM CUL-2** The CPUC requests the revisions to APM CUL-2 shown below to increase the avoidance buffers from 50 feet to 100 feet: ***LSPGC APM CUL-2: Avoid Environmentally Sensitive Areas.*** *Cultural resource surveys would be performed for any portion of the Proposed Project area not yet surveyed (e.g., new or modified staging areas, pull sites, or other work areas). Cultural resources discovered during surveys would be subject to a 100~~50~~-foot buffer around the boundary of each respective resource and designated as environmentally sensitive areas. Methods of environmentally sensitive area delineation may include, as applicable, flagging, rope, tape, or fencing. The environmentally sensitive areas should be clearly marked on all pertinent construction plans. Where operationally feasible, all NRHP- and CRHR-eligible resources would be protected from direct Proposed Project impacts by Proposed Project redesign (i.e., relocation of the line, ancillary facilities, or temporary facilities or work areas). In addition, all historic properties/historical resources would be avoided by all Proposed Project construction and restoration activities, where feasible. If work within the 100~~50~~-foot buffer cannot be avoided, then monitoring would be required.*	1	Please confirm if LSPGC agrees to the edits identified for APM CUL-2.	LSPGC agrees to the proposed edits.
n/a	**DR-2: Requested Revision to LSPGC APM CUL-3** The CPUC requests the revision to APM CUL-3 shown below to increase the avoidance buffer from 50 feet to 100 feet: ***LSPGC APM CUL-3: Inadvertent Discoveries.*** *In the event that previously unidentified cultural resources are uncovered during implementation of the Proposed Project, all work within 100~~50~~ feet of the discovery would be halted and redirected to another location. A qualified archaeologist(s) would inspect the discovery and determine whether further investigation is required. The qualifications of the archaeologist(s) would be approved by the CPUC and U.S. Army Corps of Engineers (USACE). If the discovery can be avoided and no further impacts would occur, the resource would be documented on California Department of Parks and Recreation cultural resource records, and no further effort would be required. If the resource cannot be avoided and may be subject to further impact, the significance and NRHP and CRHR eligibility of the resource would be evaluated and, in consultation with the CPUC and USACE, appropriate treatment measures would be determined. All work would remain halted until a Secretary of the Interior-qualified archaeologist approves the treatment measures. Preservation in place would be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, and if the unearthed resource is prehistoric or Native American in nature, a Native*	2	Please confirm if LSPGC agrees to the edits identified for APM CUL-3.	LSPGC agrees to the proposed edits.

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	American representative, in consultation with the CPUC and USACE, would develop additional treatment measures, such as data recovery consistent with CEQA Guidelines 15126.4(b)(3)(C-D). Archaeological materials recovered during any investigation would be curated at an accredited curation facility or transferred to the appropriate tribal organization.			
n/a	**DR-3: Removal of APM GEN-1** LSPGC provided the CPUC with a scour analysis; therefore, we believe APM GEN-1 below can be removed: ***LSPGC APM GEN-1: Scour Analysis.*** *LSPGC would submit a Scour Analysis to the USACE evaluating the appropriate burial depth of the proposed LSPGC 230 kV Submarine Segment's cables. The evaluation would consider the potential scour and dredging activities along the cables' alignment. Following the USACE's review, LSPGC would provide the study to the CPUC for its records.*	1	Please confirm APM GEN-1 can be deleted.	LSPGC agrees that this can be deleted as a scour analysis was completed and provided to the CPUC.
n/a	**DR-4: Removal of APM TRA-1** We recommend deleting APM TRA-1 as it appears to be deferral of analysis, and the EIR needs to disclose all impacts: ***LSPGC APM TRA-1: Navigational Study****. LSPGC would submit a Navigational Study to the USCG documenting the potential effects of the construction and O&M of the Proposed Project on boat navigation within the Suisun Marsh and the Delta. Following the USCG's review, LSPGC would provide the study to the CPUC for its records prior to in-river construction. LSPGC would utilize the navigational study to reduce impacts to travel during construction.*	1	Please confirm APM TRA-1 can be deleted.	LSPGC does not have issues with deleting this APM.
n/a	**DR-5: Removal of APM UTIL-1** LSPGC provided the CPUC with an induction study; therefore, we believe APM UTIL-1 below can be removed: ***LSPGC APM UTIL-1: Induction Study.*** *An induction study would be conducted to evaluate the potential effects of the Proposed Project on pipelines in its vicinity. The study would include applicable standards of the NESC pertaining to the need for interference analysis and anti-corrosion/cathodic protection. The study would model the electrical interference effects on pipelines during different electrical conditions, such as maximum load and fault conditions. Additionally, the study would perform a coating stress voltage and alternating current (AC) density analysis on the pipelines. The induction study would recommend AC mitigation methods based on the findings. All recommendations of the study would be incorporated into the final engineering and design for the Proposed Project.*	1	Please confirm APM UTIL-1 can be deleted.	LSPGC agrees that this can be deleted as the induction study was completed and provided to the CPUC.
n/a	**DR-6: Clarification and Requested Revisions to PG&E CM FIRE-1** The CPUC requests the identified clarifications and revisions to CM FIRE-1 as described: ***PG&E CM FIRE-1:*** *Fire Risk Management. PG&E would follow its standard fire risk management procedures described in PG&E Utility Standard TD-1464S, including safe work practices, work permit programs, training, and fire response. Proposed Project personnel would be directed to park away from dry vegetation. During fire season ~~in designated State Responsibility Areas~~, all motorized equipment driving off*	1	Does "standard fire risk procedures" in CM FIRE-1 refer to PG&E Utility Standard TD-1464S? If the procedures in PG&E Utility Standard TD-1464S are inclusive of all the proposed procedures applicable to CM FIRE-1, can the measure be amended to state: "PG&E would follow its standard fire risk procedures described in PG&E Utility Standard TD-1464S, including…"?	PG&E to respond separately.
		2	Please provide a copy of any other standard procedures that PG&E proposes to implement.	PG&E to respond separately.

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	paved or maintained gravel/dirt roads would have federally approved or State-approved spark arrestors. All off-road vehicles would be equipped with a backpack pump (filled with water) and a shovel. Fire-resistant mats and/or windscreens would be used when welding. In addition, during fire "red flag" conditions (as determined by CAL FIRE), welding would be curtailed. Every fuel truck would carry a large fire extinguisher with a minimum rating of 40 B:C, and all flammable materials would be removed from equipment parking and storage areas.	3	Please confirm if PG&E agrees to the edits identified for CM FIRE-1 shown, which would remove "…in designated State Responsibility Areas…".	PG&E to respond separately.
n/a	**DR-7: Clarification and Requested Revisions to PG&E CM HAZ-1** The CPUC requests the revision to CM HAZ-1 shown below to remove "Proposed Project construction would involve soil surface blading/leveling, excavation of up to several feet, and augering to a maximum depth of 35 feet in some areas…" as this information is not applicable to the CM and the depth of excavation described is outdated. ***PG&E CM HAZ-1: Hazardous-Substance Control and Emergency Response.*** *PG&E would implement its hazardous substance control and emergency response procedures to ensure the safety of the public and site workers during construction. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Proposed Project construction through operation. They address worker training appropriate to the site worker's role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on-site. If it is necessary to store chemicals on-site, they would be managed in accordance with all applicable regulations. Material safety data sheets would be maintained and kept available on-site, as applicable.* *~~Proposed Project construction would involve soil surface blading/leveling, excavation of up to several feet, and augering to a maximum depth of 35 feet in some areas.~~ In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil would be tested, and if contaminated above hazardous waste levels, would be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil would require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.* *All hazardous materials and hazardous wastes would be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control and emergency response procedures include, but are not limited to, the following:* • *Proper disposal of potentially contaminated soils.* • *Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources.* • *Emergency response and reporting procedures to address hazardous material spills.*	1	Please confirm if PG&E agrees to the edits identified for CM HAZ-1 shown, which would remove "Proposed Project construction would involve soil surface blading/leveling, excavation of up to several feet, and augering to a maximum depth of 35 feet in some areas…".	PG&E to respond separately.

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	• *Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work would be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit.*			
n/a	**DR-8: Construction Schedule Duration** The proposed construction schedule (Table 2-10 in the Project Description) shows construction is expected to start May 1, 2026 (survey) and end July 17, 2028 (cleanup and restoration). The text summary provided by LSPGC stated construction is expected to occur for 24 months; however, this period spans approximately 27 months.	1	Please confirm our understanding of the construction period is 27 months for the dates identified.	LSPGC agrees that 27 months is accurate.
n/a	**DR-9: Alternative Site Cultural Resources Memo** Pinon Heritage completed a review of the alternative site cultural resources memo: *Supplemental Cultural Resources Inventory Evaluation for the Collinsville 500/230 Kilovolt Substation Project – Alternative Site on PG&E Land* (September 10, 2025). The following revisions are requested. Additional comments and requests for revision may be submitted following CPUC's meeting with LSPGC and Insignia.	1	Please revise the Collinsville alternative site cultural report to incorporate the eligibility evaluations that were originally included in the associated memo.	LSPGC and its consultant are working on the revisions discussed in a meeting with the CPUC and its consultant on 09/25/2025. LSPGC anticipates these revisions will be completed by10/10/2025.
		2	Please expand the discussion of eligibility to include a brief discussion of all four Criteria and all 7 aspects of integrity for each resource.	LSPGC and its consultant are working on the revisions discussed in a meeting with the CPUC and its consultant on 09/25/2025. LSPGC anticipates these revisions will be completed by 10/10/2025.
n/a	**DR-10: Alternative 6 Duct Bank Access Corridor** The CPUC requests clarification regarding the proposed duct bank corridor for Alternative 6 and if any long-term or as needed operational access would be required along the corridor to access equipment, and if an access road would be maintained along the duct bank corridor after construction. It is understood that at a minimum, a temporary construction access corridor would be required along the duct bank, and within the defined construction work area limits.	1	Please explain if any long-term or as needed operational access would be required along the duct bank corridor identified for Alternative 6 to access equipment.	New permanent access roads to the transition vaults on the northern shore would not be required. LSPGC would utilize existing roads, LSPGC ROW and overland access as needed for the annual inspection. This inspection would include basic pickup vehicles and would not require any road remediation or increasing the width of the existing road. If any major maintenance is needed that requires larger vehicles, the duct bank ROW would be utilized.
		2	Would any permanent access road be maintained along the duct bank corridor, or would the temporary construction access and workspace areas be completely restored following construction?	New permanent access roads to the transition vaults on the northern shore would not be required. LSPGC would utilize existing roads, LSPGC ROW and overland access as needed. The temporary construction access and work areas would be fully restored following construction.
		3	How deep below the ground surface would the duct bank be installed? What is the depth of soil that would be restored above the duct bank after installation?	Four trenches would be excavated, approximately 3 to 6 feet deep, and 7 to 10 feet wide. Depth of native soil may vary depending on soil stability, but would be approximately 8 to 12 inches in depth from surface.
n/a	**DR-11: Collinsville Substation Footprints for Alternatives 1 and 2** Based on the GIS data provided by LSPGC for Alternatives 1 and 2, it appears the Alternative 1 substation footprint is approximately 12.9 acres, and the Alternative 2 substation footprint is approximately 9.7 acres. The Proposed Project substation footprint is approximately 12.7 acres. The substation footprint refers to the total permanent impact area.	1	Please verify the acreage and GIS data for the Alternatives 1 and 2 substations are accurate. Please explain why the Alternative 2 substation footprint is roughly 3 acres less than the Proposed Project and Alternative 1.	All three substation locations (Proposed, Alt 1, and Alt 2) should be the same acreage at 12.7 acres. LSPGC has attached a revised KMZ as part of this submission which revises the discrepancy as **Attachment A**.
n/a	**DR-12: API for Submarine Segment** The area API/area of investigation for the submarine segment was expanded in 2025; however, GIS data for the expanded survey area was not provided.	1	Please provide the GIS data for the API for the submarine segment inclusive of the entire area of evaluation.	LSPGC has included this as part of the response as **Attachment B**.
n/a	**DR-13: Updated Federal Aviation Administration (FAA) Screening Tool Results for Increased Maximum Structure Heights**	1	Please complete an FAA screening tool review of all proposed aboveground project structures using the maximum heights identified in	LSPGC has rerun the structures with the maximum heights indicated in the Project Description. Please see **Attachment C**.

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	The PEA included the preliminary results of FAA's screening tool for potential air navigation obstructions based on the original design for a portion of the Proposed Project structures. In addition, LSPGC Response #1 to Data Request #1 included the results of preliminary FAA notifications and aeronautical study determinations of potential aviation hazards pursuant to Title 14, Section 77.9 of the CFR. LSPGC and PG&E have increased the maximum heights for certain structures in the Project Description since the FAA determinations were obtained. An updated evaluation of the increased maximum structure heights is needed using FAA's screening tool to verify taller structures would not result in air navigation hazards and to support the EIR impact analysis. The current maximum heights of 230 and 500 kV structures are identified in Table 2-2 of the Project Description, which identify heights up to 150 feet for LSPGC 230 kV TSPs; up to 150 feet for PG&E 500 kV interconnection TSPs and 155 feet for LSTs; and up to 145 feet for PG&E 500 kV transposition structures. The tallest LSPGC Collinsville Substation feature would be up to approximately 90 feet tall. The PG&E microwave tower would be up to 199 feet tall.		the current EIR Project Description. Ensure the maximum potential heights are used for all aboveground structures with consideration to their proposed location and the final engineered grade above existing ground level. Please provide the results of the FAA screening tool results, including the coordinates, elevations, structure types, structure IDs, and structure heights.	