

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 5, 2026

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

**Re: Data Request #16 for LS Power Grid California, LLC's Collinsville 500/230 Kilovolt Substation Project (A.24-07-018)**

Dear Mr. Joseph:

The California Public Utilities Commission (CPUC) Energy Division submits the attached Data Request #16 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. The CPUC is requesting that LSPGC submit a response to this data request by February 13, 2026.

Please direct questions related to this request to me at [Connie.Chen@cpuc.ca.gov](mailto:Connie.Chen@cpuc.ca.gov).

Sincerely,

*connie chen*

Connie Chen  
Project Manager, Energy Division

Attachment A: Data Request #16

cc: Aaron Lui, Panorama Environmental, Inc.

# Attachment A: Data Request



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**Project:** LS Power Grid's Collinsville 500/230 kV Substation Project  
**Title:** Data Request #16  
**From:** California Public Utilities Commission  
Panorama Environmental, Inc.  
**To:** LS Power Grid California, LLC (LSPGC)  
**Date:** February 5, 2026

**DATA REQUESTS**

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Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
n/a	<p><b>DR-1: Horizontal Direction Drilling (HDD) Construction Methods</b></p> <p>In LSPGC Response #3 (4/2/25) to CPUC Data Request #2 (3/3/25), LSPGC submitted information regarding the feasibility of installing the 230 kV submarine cables using HDD methods. In response to DR-19, LSPGC made the following statement: "LSPGC reviewed the feasibility of Horizontal Directional Drilling (HDD) during the design of the proposed submarine cable routing. HDD is not feasible to install the submarine cables across the sand mining lease, as the cables are not spliced together, rather one continuous cable. If an HDD was used in these locations, an HDD would be required across the entire 4.5-mile route through the river, which is not feasible. HDD is feasible at the end points of the cable (i.e., shorelines); however, due to engineering constraints of the cables, the required depth of the HDD would introduce additional cables required in order to meet specified cable ratings resulting in additional impacts and time constraints in-river. Due to this, and the potential for frac-out in the river in critical habitat, HDD was not proposed."</p> <p>In LSPGC Response #1 (5/23/25) to CPUC Data Request #4 (5/9/25), LSPGC submitted additional information regarding the feasibility of HDD methods (response to DR-10 and in Attachment E/H: Horizontal Directional Drilling). In the attachment submitted, LSPGC states "...LSPGC has reviewed the maximum extent of distance from the shoreline that the HDD could reach and has determined that distances of up to 1,500 feet waterward are feasible..."</p> <p>Additional information is needed to substantiate LSPGC's findings regarding the feasibility of HDD methods.</p>	1	Please clarify if HDD technology exists that can install the proposed submarine cables across the entire Delta waterway (4.5 miles) and substantiate LSPGC's prior findings that it would not be feasible.	
		2	Please explain the HDD technology limitations for boring as it relates to the feasibility of full HDD installation of the proposed submarine cables across the Delta.	
		3	Please explain and substantiate why it would not be feasible to cross the sand and gravel lease using HDD methods. Is this assessment based on impacts to the sand and mining lease or the feasibility of submarine cable installation? The analysis in the Draft EIR already assumes that the area of the sand mining lease crossed by the proposed submarine cables would become unavailable after the cables are installed, which is based on information provided by LSPGC obtained through coordination with the lease holder.	
		4	Please explain how splicing relates to the feasibility of HDD methods for the project, as the potential use of splicing is described in the submarine cable construction methods for the Proposed Project, such as to address any repairs that may be needed (discussed in Section 2.9.2 of the Draft EIR Project Description).	
		5	Please explain and substantiate LSPGC's determination that the maximum distance of HDD installation methods is 1,500 feet from the shorelines and why greater distances are not feasible. Please provide specific assumptions and physical constraints for the project 230 kV submarine cables that support the assessment findings.	
		6	Please explain if greater HDD distances would be feasible given the requests and responses above, and if the distance limitations would be the same or different from either shore of the Delta based on specific conditions.	