December 23, 2024

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: Response No. 2 to the California Public Utilities Commission's Deficiency Report 2 for the LS Power Grid California, LLC's Collinsville 500/230 kV Substation Project (Application 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 evaluate environmental review for the Collinsville 500/230 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 Deficiency Report 2, received November 14, 2024.
    - Attachment DR-2a_Updated Table 3-8 and Table 3-9
    - Attachment DR-2c_Grading Elevations
    - Attachment DR-6_Revised AQ Tables

Please contact me 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 Permitting

Enclosures

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

DR	Section/Page Reference	CPUC Comments	Request ID	CPUC Request	LSPGC Response
DR-1	Table 3-11: Proposed Construction Equipment and Workforce Table 3-12: Proposed Construction Schedule	DR-1: PG&E Construction Schedule Changes PG&E responded to a separate Data Request issued directly to PG&E by the CPUC. In their response dated November 8, 2024, PG&E modified their anticipated construction schedule, which roughly doubles the total number of construction workdays identified for their project components described in Tables 3-11 and 3-12. In Table 3-12 the following changes were made by PG&E: • Prior Schedule - PG&E 500 kV Interconnection: June 2027-September 2027 (89 active workdays) - PG&E Substation Modifications: June 2026-May 2028 (102 active workdays) • Revised Schedule - PG&E 500 kV Interconnection: May 2027-Feburary 2028 (196 active workdays) - PG&E Substation Modifications: May 2027-May 2028 (250 active workdays)	A	Please clarify if any LSPGC schedule changes would occur because of PG&E's revised construction schedule, and state if PG&E's schedule changes will affect LSPGC's proposed Collinsville in-service date. Please provide a revised project schedule or confirm no other changes would occur.	LSPGC's schedule remains unchanged from the schedule presented in the Proponent's Environmental Assessment (PEA). PG&E's schedule changes can be incorporated into the Proposed Project schedule while keeping the Collinsville substation in-service date.
			B	The duration of PG&E's substation modifications is now more than double the initial estimate. Please clarify if the increase in duration is associated with the Pittsburg Substation Reactor project elements discussed in DEF-3 and consider how that specific substation work should or should not be incorporated with proposed project activities based on the response to DEF-3.	The PG&E substation modification schedule changes are associated with the Pittsburg Substation Reactor project. As described in PG&E's response to Data Request #2, PG&E is proposing to install the reactors as part of the Proposed Project.
DR-2	Deficiency Report #1, DR-10	DR-2: Work Area Disturbance and Grading Volume Tables LSPGC's Response #2 to Deficiency Report #1 (DR-10) included revised PEA tables Table 3-8 (Work Area Disturbance) and Table 3-9 (Detailed Collinsville Substation Grading Volumes). These tables should be updated if affected by the workspace and impact area changes described above in DEF-1 and DEF-4. In addition, LSPGC's Response #1 to Deficiency Report #1 (DEF-8) included a substation grading elevations figure which includes a table listing approximate earthwork quantities; the values in the figure are slightly different than those presented in Table 3-9.	A	Please review and update Table 3-8 (Work Area Disturbance) and Table 3-9 (Detailed Collinsville Substation Grading Volumes) to reflect the requested GIS data updates described in DEF-1 and DEF-4.	Table 3-8 has been updated to reflect DEF-1 and DEF-4. Table 3-9 was not impacted by DEF-1 or DEF-4 and remains the same. Both tables have been resubmitted with this data request as **Attachment DR-2a_Updated Table 3-8 and Table 3-9**.
			B	Please clarify if the grading volumes in Table 3-9 are the correct proposed values, or if they need to be updated to match the earthwork quantities shown on the substation grading elevations figure.	The values in Updated Table 3-9 are the correct proposed values.
			C	If possible, please provide a copy of the substation grading elevations figure (provided in response to DEF-8) without grading quantities for use in the EIR so the information does not conflict with other values presented in the document.	This figure is provided as part of this data request response as **Attachment DR-2c_Grading Elevations**.
DR-3	n/a	DR-3: AT&T Fiber GIS Location A GIS point location in the layer "UG_Structures" includes a feature titled "AT&T Fiber" which is located well away from the project sites and proposed work areas at the intersection of Rio Vista Road and Branscombe Road.	A	Please clarify if this is a proposed project site and what would occur at this location, or if this is a data error that should be ignored.	This is a data error and should be ignored.

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DR-4	Deficiency Report #1, DEF-15	DR-4: Acoustic Modeling/Analysis On October 18, 2024, LSPGC provided a revised copy of the Aquatic Resources Technical Report (ARTR) with updated acoustic modeling/analysis. The acoustic analysis in the ARTR uses a 10-decibel attenuation for pile driving on land and a 2020 Caltrans guidance document is cited; however, the Caltrans guidance provides a range of possible attenuation that could occur from 2 decimals (minimum attenuation) to 10 decibels (maximum attenuation). According to Boudreau and Associates, a more commonly used and agency-accepted attenuation is 5 decibels for piles 30 feet or more from water and no attenuation is applied to piles less than 30 feet from water (because pile driving within 30 feet of water in saturated soils similar to anticipated project conditions is equivalent to piles in water). The acoustic analysis must explain and justify the use of the maximum attenuation is used in the ARTR. If the author cannot provide sufficient justification, the ARTR modeling and analysis should be revised to use an attenuation of 0 decibels for structures less than 30 feet from water and 5 decibels for structures more than 30 feet from water.	A	Please provide the requested explanation and justification for the attenuation used in the ARTR, and update the ARTR accordingly. If a different attenuation is used, please revise the ARTR accordingly and provide similar justification on the attenuation assumptions that are used.	The attenuation levels in the ARTR were derived from CalTrans literature. The CalTrans literature reports scenarios where the potential attenuation from on-land pile driving exceeds 10 dB. Two examples in the Caltrans literature (The Russian River at Geyserville and the Stockton Wastewater Treatment Plant) both demonstrate attenuation for land-based pile driving at 10 dB, for piles larger and closer than those modeled for the ARTR. The Russian River project (Table 2-3 of the 2020 Caltrans guidance) notes a difference of 7 to 10 dB for 48-inch piles driven with an impact hammer in the saturated floodplain, directly adjacent to the river while at flood stage. In the Stockton Wastewater Treatment Plant example, 24-inch piles were also impact hammer driven on a levee within 2 meters (approximately 6.5 feet) of the waters edge. This data shows a 10-dB reduction for the peak (reduction of 208 to 198 dB) sound levels at 10 meters. Therefore, the 10 dB attenuation for driving on land is applicable even for piles within 30 feet of water as documented in the literature. In addition, the National Marine Fisheries Service and United States Fish and Wildlife Service regularly utilize 10 dB as an acceptable attenuation level for pile driving activities more than 30 feet from waters. As a result, the 10 dB attenuation factor utilized in the ARTR is supported by data and accepted by agencies.
DR-5	Attachment 5.5-A: Cultural Resources Technical Report, Section 1.2 Area of Potential Affects Deficiency Report #1, DEF-22	DR-5: Terrestrial Section 106 Area of Potential Effect (APE) and CEQA Area of Potential Impact (API)DR-5: Terrestrial Section 106 Area of Potential Effect (APE) and CEQA Area of Potential Impact (API) In Deficiency Report #1, DEF-22, CPUC requested an explanation for why a 50-meter buffer was used to establish the preliminary APE/API and where this information was provided in the CRTR. In a written response to DEF-22 submitted on September 30, 2024, LSGPC stated: “A 50-meter buffer was included to ensure an appropriate survey area was reviewed, as the submerged cable alignment is subject to modifications based on the results of geotechnical geophysical investigations.” This response is not sufficient and an explanation of why a 50-meter buffer is appropriate should be incorporated into the CRTR.	A	Please provide a rationale and justification for why a 50-meter buffer is appropriate, such as if this distance is commonly used and for what purposes, or if this distance represents a threshold for potential impacts, etc. Please add this information to the CRTR description where the 50-meter buffer is described.	A 50-meter buffer was applied to the Proposed Project to allow for minor modifications to the Proposed Project design, including changes to the exact placement of structures and temporary work areas. In addition, this buffer would allow for future modifications to access requirements. This buffer ensures that any overlapping or adjacent terrestrial resources would be identified and evaluated, as appropriate, prior to project implementation.

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DR-6	Attachment 5.3-A: Air Quality Calculations, Table 33 and 34	DR-6: GHG Emission Assumptions In Deficiency Report #1, DEF-31, CPUC requested a correction to Attachment 5.3-A: "Please correct the high heat value and CO2 emission factor reported in the first table, and provided an updated version of Attachment 5.3-A." LSPGC responded and provided revised calculation tables on September 30, 2024. Upon review, the number values changed; however, the weighting did not. Now it reads '72.22 MMBtu/gallon and 0.135 kg CO2/MMBtu).	A	Please correct the high heat value and CO2 emission factor reported in the first table (with consideration to the weighting), and provided an updated version of Attachment 5.3-A.	The table has been corrected and is included as an attachment to this response as **Attachment DR-6_Revised AQ Tables**.
DR-7	Attachment 5.3-A: Air Quality Calculations	DR-7: Air Quality and GHG Construction Schedule Changes PG&E roughly doubled their construction schedule duration from the original estimate provided in the PEA Project Description. The air quality and GHG emissions calculations should be updated to account for the current construction schedule.	A	Please provide revised air quality and GHG emissions calculations that account for the revised construction schedule (refer to DR-1). Please consider if the LSPGC's schedule would change based on PG&E's schedule changes, and if the estimated duration of PG&E substation modifications should be revised, based on the response to DR-1.	The Air Quality and GHG emission calculations are being revised and rerun based on the revised schedules and any other project changes. The updated emission calculations will be supplied to the CPUC by January 31, 2025.
DR-8	Table 5.13-5 Attachment 5.13-A: Noise and Vibration Impact Assessment Report Deficiency Report #1, DEF-33	DR-8: Noise and Vibration Impact Assessment Report In a written response to DEF-33 submitted on September 30, 2024, LSGPC stated: "Table 5-1 through 5-9 of Noise and Vibration Impact Assessment Report have been updated to align with construction equipment types and working days listed in Table 3-11 from Chapter 3 – Project Description of the PEA. The Noise and Vibration Impact Assessment Report has been updated and provided as part of this response (Attachment J)." Baseline has identified remaining inconsistencies with the construction information in the project description. See Attachment B with comments on where these inconsistencies occur.	A	Please review the comments on the Noise and Vibration Impact Assessment Report provided as Attachment B and address the inconsistencies. Please consider the revised schedule information provided by PG&E (refer to DR-1 above and Attachment A). Regarding the inconsistencies related to construction phase workdays, please consider if the total workdays for each phase need to be identified in the report to support the analysis or if the phase descriptions and equipment details are sufficient, as the number of workdays could continue to change.	The Noise and Vibration report is being updated to be consistent with the workdays and staging noise level estimates. The updated Noise and Vibration report will be supplied to the CPUC by January 31, 2025.

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			B	The staging area noise levels were estimated based on the construction equipment list provided for the site development phase. During construction, the noise levels from the use of the staging area are in general expected to be less than the noise levels from the establishment of the staging area. We recommended adding a brief discussion in the report to clarify this.	The Noise and Vibration report is being updated to be consistent with the workdays and staging noise level estimates. The updated Noise and Vibration report will be supplied to the CPUC by January 31, 2025.