

July 15, 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 #7 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 #7, received July 3, 2025.
 - Attachment A: Air Quality Calculations
 - o Attachment B: Health Risk Assessment (HRA) Revisions

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

LSPGC Response to CPUC DR-7

Please contact us at (925) 808-0291 or <u>djoseph@lspower.com</u> 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

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)
Peter Mye (Panorama)

Susanne Heim (Panorama)

DATA REQUESTS

DATA REQUESTS RESPONSE

Air Quality

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
Attachment 1-3 AQ & GHG Emissions & excel sheet	DR-1: Air Quality Calculations The air quality calculations spreadsheet provided on 6/27/25 is currently being manipulated to break out the terrestrial-based emissions for LSPGC and PG&E by year and by criteria air pollutant to obtain the average daily emissions by air district in support of the analysis of air quality impacts in the EIR. To ensure that the reporting is accurate this must also be provided by the LSPGC team.		Please provide an update to the 6/27/25 air quality calculations spreadsheet to show emission contributions by year for the LSPGC activities and the PG&E activities.	Please see updated air quality calculations included as Attachment A .
PEA, Section 5.3.4.4, page 5.3-22 Deficiency Report #1, DEF-13 Data Request #1, DR-3 Data Request #2, DR-9 Data Request #3, DR-13 Data Request #5,	DR-2: Health Risk Assessment In Response #1 to Data Request #4, LSPGC provided a Health Risk Assessment (Ldn Consulting, Inc. June 19 2025). Staff with Baseline Environmental Consulting have identified the follow-up data requests listed in the columns to the right.	A B	Attachment E. Provide AERMOD report for the controlled scenario. Pittsburg Substation TAC DPM (minor comment): Page 12, 1st paragraph, it states that "Based on the site configuration, the average emission rate over the grading area is estimated at 1.24 × 10 ⁻⁸ g/s-m² for the uncontrolled case and 8.10 × 10 ⁻⁹ g/s-m² for the controlled case." The emission rate for the controlled case differs slightly (about 1%) from our calculation of 8.19 × 10 ⁻⁹ g/s-m². This discrepancy is minor and does not affect the overall conclusions or warrant revisions. We are noting it here for transparency; however, based on Items C and D below, with changes potentially being implemented the LSPGC team may want to update.	Please see HRA Attachments for the AERMOD Report. Please see Attachment B for an updated HRA.
		С	TAC DPM Emission Rates (for both substations): On page 11, the HRA states that "Over the construction duration, the project would emit an estimated 0.366 tons of diesel PM ₁₀ under uncontrolled conditions and 0.217 tons under controlled conditions, over a 651-day elapsed period. This equates to an average emission rate of approximately 0.00590 grams per second (g/s) under the uncontrolled scenario, and 0.0035 g/s under the controlled scenario." It appears that these exhaust PM10 emission rates (0.0059 g/s and 0.0035 g/s) were estimated assuming 24-h of construction activity on every calendar day. In our previous review, we suggested that Ldn include a brief discussion on whether this assumption is more conservative than assuming emissions would occur on active workdays during daylight hours. The same comment applies to the Pittsburg Substation TAC DPM discussion. This comment does not appear to have been addressed in the revised HRA.	Please see Attachment B for an updated HRA.

DATA REQUESTS

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
		D	Grading Area (DR#1, DR-3H follow-up): On page 11, under Collinsville Substation TAC DPM, it was mentioned that "Based on the site configuration, the average emission rate over the grading area is estimated at 1.73×10 ⁻⁷ grams/second per meter squared (g/s-m²) for the uncontrolled scenario and 1.02×10 ⁻⁷ g/s-m² for the controlled scenario". Please clarify which figure, table, or Site Plan was referenced here. It is unclear to us how the source area was determined (does it refer to the total area of disturbance? If so, was the area of disturbance determined based on a site plan or map?). The same comment applies to the Pittsburg Substation TAC DPM discussion on pages 11 and 12.	Please see Attachment B for an updated HRA.
		E	Additional clarifications (DR#1, DR-3K follow-up). The AERMOD files are provided as Attachment A, B, E, and F, which include the model parameters, but do not include reference and justification for the model parameter used. Please provide references or justification for the model parameters used, such as release height and initial vertical dimensions. Provide meteorological data source (e.g. data obtained from which MET station).	Please see Attachment B for an updated HRA.