

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 7, 2025

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

Re: Data Request #9 for LS Power Grid California, LLC's Collinsville 500/230 Kilovolt Substation Project (A.24-07-018)

Dear Mr. Joseph and Ms. Lambert:

The California Public Utilities Commission (CPUC) Energy Division submits the attached Data Request #9 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 of this data request contains questions and requested information applicable to LSPGC and PG&E. The CPUC is requesting that LSPGC submit responses to items 1, 2, and 3 in this data request by August 11, 2025 and LSPGC and PG&E collectively items 4 and 5 by August 25, 2025.

Please direct questions related to this request to me at Connie.Chen@cpuc.ca.gov.

Sincerely,

connie chen

Connie Chen
Project Manager, Energy Division

Attachment A: Data Request #9

cc: Michelle Wilson, CPUC Energy Division
Susanne Heim, Panorama Environmental, Inc.

Attachment A: Data Request



Project: LS Power Grid's Collinsville 500/230 kV Substation Project

Title: Data Request #9

From: California Public Utilities Commission
Panorama Environmental, Inc.


To: LS Power Grid California, LLC (LSPGC)
Pacific Gas and Electric Company (PG&E)

Date: August 7, 2025

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Biological Resources

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Multiple – see DR	DR-1: Benthic Disturbance for Submarine Section Based on GIS data and information in Project Description, Table 2-8, Estimated Ground Disturbance for Work Areas, temporary disturbance is calculated at 17.1 acres in aquatic (benthic) habitat for the submarine segment. In the Final LSP CV Design Update 04 BIO 20250513S, in Table 1.4-1: Impacts by Vegetation Community and Land Cover, temporary benthic habitat disturbance is calculated at 32.7 acres. In the NMFS BA, habitat impacts for salmon species are calculated at 16.78 acres, and for Delta smelt impacts are calculated at 17.04 acres.	1	Please review the different calculations of the benthic disturbance area in the BAs and Vegetation Communities by landcover type. Please verify the accuracy of each calculation or update the calculations in your response to provide a calculations that are technically accurate. Please define how the acres of benthic disturbance were calculated for the submarine segment (what is the disturbance buffer applied to the submarine cable). Please explain differences in the disturbance calculations between salmon, Delta smelt, and general benthic habitat, if differences remain after reviewing the data in detail.	
n/a	DR-2: Hydroacoustic Modeling LSPGC in response to deficiency report #1 provided an Aquatic Resource Technical Report with hydroacoustic modeling of the initial project proposal. After the project redesign, LSPGC provided an updated biological resources section to the PEA and a BRTR appendix to address the transposition sites, but neither included information on hydroacoustic analysis for pile driving associated with the transition structures to the submarine segment. The NMFS and USFWS BAs included calculations of the hydroacoustic impact from pile driving at the on-shore transition structure, but did not include a bioacoustics appendix with details supporting the calculations.	2	If LSPGC has prepared a bioacoustics appendix that is missing from the BAs, please provide that information. At a minimum, please provide the tables and/or Excel files used to generate the impact calculations and all assumptions used in the calculations.	
n/a	DR-3: Alternative 1 & 2: 12 kV Distribution Line The location of the 12 kV distribution line appears to have changed in the GIS data received on August 1, 2025 in comparison to previous alternatives data. Additionally, no work areas were included for structures under Alternative 1 or 2.	3	Our GIS specialist prepared the below KMZs (zip file) assuming the same temporary work area & buffer dimensions as the proposed project for the 12kV line. Please review the attached KMZs for accuracy and confirm or otherwise provide updated files.  20250806_12kVWorkAreas_LSPGC.zip	

Alternatives

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
DR 5 response 6/20/25	DR-4: Air Quality and GHG Modeling DR 5 requested “Anticipated peak daily and annual maximum equipment activity level (and associated emissions) for off-road equipment, on-road equipment, and helicopters for each on land alternative. Estimated peak daily and annual maximum equipment activity level and associated emissions for the reroute of the submarine segment.” LSPGC’s response from 6/20/25 provided information on the duration of the site development/staging yards, below-grade construction, and above-grade construction for Alternative 1 (scenario B) and Alternative 2	4	Please provide information comparable to Table 2-9 in the CPUC prepared Project Description for <u>each</u> of the alternatives that are being analyzed in detail in the CPUC’s EIR. Specifically, for Alternative 1 (substation site north of Talbert Lane) and Alternative 2 (substation site near SMUD windfarm substation east of wind energy substations), the alternatives would likely modify the equipment used and/or duration of equipment used for the following	

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	<p>(scenario A). PG&E’s response stated that a larger crane would be used and there would be more more grading and earthwork, but no quantities were provided sufficient to support the air quality and greenhouse gas analysis.</p> <p>The response provided by LSPGC and PG&E was incomplete and a) did not provide any emissions information, b) did not address activity levels for Alternatives 4 (230 kV alternative route) or Alternative 5 (submarine segment relocation) in any manner and c) did not address the majority of activities that would be changed by Alternatives 1 and 2, including:</p> <ul style="list-style-type: none">• PG&E 500 kV Interconnection – structure foundation installation• PG&E 500 kV interconnection lines – structure installation• PG&E 500 kV interconnection lines – conductor installation• LSPGC 230 kV transmission line overhead segment – access road construction• LSPGC 230 kV transmission line overhead segment – structure foundation installation• LSPGC 230 kV overhead segment – structure installation• LSPGC 230 kV overhead segment – conductor installation• PG&E 12 kV distribution line• LSPGC site and ROW restoration		<p>activities due to changes in the area of disturbance, location, or length of the components in the alternative relative to the Proposed Project:</p> <ul style="list-style-type: none">• LSPGC Collinsville substation – site development• LSPGC Collinsville Substation – below-grade construction• LSPGC Collinsville Substation – above-grade construction• PG&E 500 kV interconnection-structure foundation installation• PG&E 500 kV interconnection lines – structure installation• PG&E 500 kV interconnection lines – conductor installation• LSPGC 230 kV transmission line overhead segment – access road construction• LSPGC 230 kV transmission line overhead segment – structure foundation installation• LSPGC 230 kV overhead segment – structure installation• LSPGC 230 kV overhead segment – conductor installation• PG&E 12 kV distribution line• LSPGC site and ROW restoration <p>Alternative 3 would likely modify the equipment used and/or duration of the equipment used for the following activities:</p> <ul style="list-style-type: none">• PG&E 500 kV interconnection – structure foundation installation• PG&E 500 kV interconnection lines – structure installation• PG&E 500 kV interconnection lines – conductor installation <p>Alternative 4 would likely modify the equipment used and/or duration of equipment used for the following activities:</p> <ul style="list-style-type: none">• LSPGC 230 kV transmission line overhead segment – access road construction• LSPGC 230 kV transmission line overhead segment – structure foundation installation• LSPGC 230 kV overhead segment – structure installation• LSPGC 230 kV overhead segment – conductor installation• LSPGC 230 kV transmission line submarine segment – submarine cable installation <p>Alternative 5 would likely add an activity for 230 kV transmission line submarine segment site preparation and would modify the equipment used and/or duration of equipment used for the following activity:</p> <ul style="list-style-type: none">• LSPGC 230 kV transmission line submarine segment – submarine cable installation <p>In addition to providing a complete equipment list for the alternatives that reflects the equipment used and duration of use, please provide separate air quality/greenhouse gas emissions modeling for each of the Alternatives that reflects the modified activity levels and equipment used for the alternative based on the changes as listed above.</p>	

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n/a	<p>DR-7: Visual Simulations of Alternatives 1 and 2</p> <p>A visual simulation of the Alternative 1 substation and 230 kV overhead line from Talbert Lane is needed to evaluate the visibility and prominence of the substation in views from Talbert Lane. Initial evaluation of views from Montezuma Hills Road in proximity to Alternative 2 substation indicate that the Alternative 2 substation may be shielded from view by surrounding topography.</p>	5	<p>Please provide a visual simulation of the Alternative 1 substation and 230 kV overhead segment visible from Talbert Lane in proximity to the substation. If the Alternative 1 substation would not be visible from Talbert Lane, please provide documentation supporting the lack of visible structures using a GIS-based analysis and height of the substation infrastructure at the nearest location to Talbert Lane (including proposed grading elevations) to verify this conclusion.</p> <p>Please determine if the Alternative 2 substation would be visible from Montezuma Hills Road using GIS-based analysis and the height of the substation infrastructure at the Alternative 2 location. If the Alternative 2 substation would be visible from Montezuma Hills Road, please provide a visual simulation of the Alternative 2 substation from Montezuma Hills Road.</p>	