



August 11, 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 #9 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 #9, received August 7, 2025.

Please contact us at (925) 808-0291 or [djoseph@lspower.com](mailto: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,

A handwritten signature in black ink that reads "Dustin Joseph". The signature is written in a cursive, flowing style.

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

Biological Resources

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC/PG&E Response
Multiple – see DR	<b>DR-1: Benthic Disturbance for Submarine Section</b> 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.	<p>The 32.7 acres value comes from a conservative calculation of the disturbance area (15-foot-wide impact from the hydroplow per cable) (15ft*4.5miles*4 cables = 32.7 acres) and is less precise compared to the values used in the BA documents. The BA's more precisely described the temporary impacts as the hydroplow ski tracks (3-foot-wide per ski; two skis), cable furrow (1.3 feet), and full silt curtain area on the south shore. This value comes up to 16.78 acres of temporary benthic habitat. The full northern shore silt curtain area was not included in these calculations, as the northern shoreline does not anticipate debris removal, only trenching for the hydroplow, while the southern shore does anticipate temporary debris removal. If the northern shore silt curtain area was included in the calculations, the value would be 17.04 acres of temporary disturbance to benthic habitat.</p> <p>The impact area for Delta Smelt, in the USFWS BA, is reported as 16.78 acres. The Delta Smelt and salmonoids should have the same benthic disturbance impact acreage since their habitat ranges fully overlap within the open water area.</p>
n/a	<b>DR-2: Hydroacoustic Modeling</b> 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.	The updated biological resources section and BRTR appendix did not include information on hydroacoustic modeling for the transition structures, as the transposition structures were removed from the Proposed Project. The NMFS and USFWS BAs do not include pile driving impacts associated with a transition structure, as the transition structure was removed from the Proposed Project. The reports do include information on potential sheet piling installation on land for the southern shore, where the transition vaults are located. The NMFS BA Section 6.1.3 and USFWS Noise Disturbance Section describes the process and assumptions for the potential noise impacts associated with fisheries on the southern shore, from vibratory sheet pile driving. The NMFS and USFWS reports reference the Aquatic Resources Technical Report (ARTR) (October 2024) for the acoustic modeling associated with vibratory sheet pile driving. The ARTR was included in the original project and revised and resubmitted as a response to Deficiency Report #1 on October 18, 2024. Information in the document regarding sheet pile driving with a vibratory hammer can be used. A separate bioacoustics appendix was not developed for this project.
n/a	<b>DR-3: Alternative 1 &amp; 2: 12 kV Distribution Line</b> 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	<p>Our GIS specialist prepared the below KMZs (zip file) assuming the same temporary work area &amp; buffer dimensions as the proposed project for the 12kV line. Please review the attached KMZs for accuracy and confirm or otherwise provide updated files.</p> <div> 20250806_12kVWorkAreas_LSPGC.zip</div>	LSPGC agrees with the work areas and buffer dimensions proposed. LSPGC expects PG&E to comment and agree or adjust.