

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 4, 2024

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

**Re: Completeness Review of the LSPGC Collinsville 500/230 Kilovolt (kV) Substation Project (A.24-07-018)
Proponent's Environmental Assessment and Certificate of Public Convenience and Necessity Application**

Dear Mr. Joseph:

The California Public Utilities Commission (CPUC) Energy Division CEQA Unit has completed its review of LS Power Grid California, LLC's (LSPGC) Certificate of Public Convenience and Necessity (CPCN) Application (A.24-07-018) and Proponent's Environmental Assessment (PEA) for the Collinsville 500/230 Kilovolt (kV) Substation Project. Section 15101 of the California Environmental Quality Act (CEQA) Guidelines requires the agency responsible for the certification of a proposed project to assess the completeness of the project proponent's application. The Energy Division uses *CPUC's Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments* (November 2019) as a guide for determining the adequacy of project applications; however, the CPUC, in its judgment, may also identify other required information deemed necessary for completing CEQA review.

The CPUC issued Deficiency Report #1 to LSPGC on August 28, 2024, which identified deficiencies and data requests for LSPGC to respond to. To date, LSPGC provided written responses to Deficiency Report #1 on September 30 (Response #1), October 18 (Response #2), October 31 (Response #3), and November 15 (Response #4), 2024. The CPUC completed its review of LSPGC Responses #1 and #2 and issued Deficiency Report #2 on November 14, 2024, which identified follow up deficiencies and data requests. This letter serves to inform LSPGC that the CPUC has completed its review of LSPGC Responses #3 and #4 to Deficiency Report #1.

The CPUC Energy Division finds that the supplemental application information provided in LSPGC Responses #3 and #4 to Deficiency Report #1 is adequate and no additional application deficiencies with this information; however, the CPUC has identified additional data requests that do not rise to the level of a deficiency. The attached report (Data Request #1) identifies the data requests associated with LSPGC Responses #3 and #4 to support the CPUC's review of the project.

The CPUC requests that LSPGC respond to Data Request #1 in writing no later than January 3, 2025. Information provided by LSPGC in response to the Energy Division's requests should be filed as supplements to Application A.24-07-018. One set of responses should be sent to the Energy Division and one to our consultant Panorama Environmental, Inc. (Panorama) in electronic format. Upon receipt of this information, we will review it within 30 days and determine if additional information is needed. The Energy Division reserves the right to request additional information at any point in the application proceeding and during subsequent construction of the project should LSPGC's CPCN be approved.

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

Sincerely,

connie chen

Connie Chen
Project Manager, Energy Division

Attachment A: Data Request #1

cc: Aaron Lui, Panorama
Michelle Wilson, Energy Division Program and Project Supervisor

Attachment A: Submittal Review Form



Document(s) Submitted: Application and Proponent's Environmental Assessment (PEA) for LS Power Grid's Collinsville 500/230 kV Substation Project (project)
LSPGC Responses #3 and #4 to Deficiency Report #1

Review Form Number: 3

Description: Data Request #1

From: California Public Utilities Commission (CPUC) and Panorama Environmental Inc. (Panorama)

To: LS Power Grid California, LLC (LSPGC)

Date Submitted: December 4, 2024

DETERMINATION

- Meets CPUC Requirements, No Additional Information Needed
- Does not Meet CPUC Requirements (see Deficiencies below)
- Additional Data Needed (see Data Requests below)

REPORT OVERVIEW

The California Public Utilities Commission (CPUC) has identified deficiencies in LS Power Grid California, LLC's (LSPGC) Application (A.24-07-018) and Proponent's Environmental Assessment (PEA) for a Certificate of Public Convenience and Necessity (CPCN) for the Collinsville 500/230 Kilovolt (kV) Substation Project. Deficiencies were identified using the CPUC Guidelines for Energy Project Applications Requiring CEQA Compliance: Pre-filing and Proponent's Environmental Assessments (November 2019) (PEA Checklist). Deficiencies are presented in Table 1. Data requests are presented in Table 2.

DATA REQUESTS

TABLE 1 DATA REQUESTS

PEA Section 5.1: Aesthetics

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>Visual Resources Technical Report (VRTR) Deficiency Report #1, DEF-10</p>	<p>DR-1: Visual Simulation for Key Observation Point 2 In Response #3 to Deficiency Report #1, LSPGC provided a revised version of the VRTR, as well as updated visual simulations. While the majority of the VRTR and simulation updates are adequate, the visual simulation for Key Observation Point (KOP) 2 does not display (a) the engineered/graded slopes surrounding the substation, or (b) the 30-foot firebreak surrounding the substation, as requested in DEF-10. Section 7.1.2 of the VRTR states: “The proposed north driveway, final graded slopes, and firebreak were modeled as part of the visual simulation process; however, these features are obscured from view at KOP 2 due to the intervening topography in the foreground.” After reviewing the KOP visual simulation, this statement does not appear to be accurate. There is no evidence in the simulation of changes to the existing topography (i.e., grading) that would be required to establish the substation surface. It appears at least some portion of the landscape changes due to grading, engineered slopes surrounding the substation site, and/or the 30-foot firebreak surrounding the substation site would be visible from the KOP 2 viewpoint. The visibility of these features would result in greater visual impacts than currently shown in the KOP 2 simulation. Refer to the DR-2: Reference Information provided at the end of this document for discussion purposes. Note the 10-foot-tall wall in the KOP 2 simulation and the absence of a 30-foot firebreak surrounding the wall. More information is needed to demonstrate that the missing features would not be visible at all, as stated in the VRTR, or alternatively the KOP 2 simulation should be updated to illustrate representative landscape changes and the 30-foot firebreak that would be maintained free of vegetation.</p>	<p>A</p>	<p>Please provide additional information that demonstrates the features were modelled and would not be visible from the KOP 2 viewpoint, as stated in the VRTR. For example, a wire frame simulation could be provided that isolates the features in the 3D model and overlays each in the background image or simulation as a separate color.</p>	
<p>Visual Resources Technical Report (VRTR) Deficiency Report #1, DR-8</p>	<p>DR-2: Substation Security Wall/Fence Color In Response #1 to Deficiency Report #1, LSPGC stated: “The substation security fencing would have a non-reflective finish and neutral earth-tone colors, to the extent commercially available. The access gates would be constructed with a non-reflective dulled grey galvanized steel, to the extent commercially available.”</p>	<p>A</p>	<p>Please identify the “neutral earth-tone” color that LSPGC proposes to use from the list of security fence options available from the manufacturer. Refer to the DR-3: Reference Information provided at the end of this document for discussion purposes. We recommend working with your visual specialist to consider which color selection would best reduce visual contrast.</p>	

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Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
	<p>In Response #3 to Deficiency Report #1, LSPGC provided a PDF in Attachment D titled "DR-8_SafeFence" which provides manufacturer information (Valmont Composites SafeFence) for the proposed substation security fence. The product information provides several color options; however, it is not clear to us which color LSPGC proposes to use (i.e., Olive Green, Light Grey, Light Ivory, Leaf Green, Signal White, SKP Brown, or Cocoa Brown).</p> <p>Refer to the DR-3: Reference Information provided at the end of this document for discussion purposes.</p> <p>The KOP 2 visual simulation in the VRTR depicts the substation security fencing/wall as light grey.</p>	B	<p>The KOP 2 visual simulation in the VRTR depicts the substation security fencing/wall as light grey. Please clarify if the color shown is consistent with one of the proposed wall color and which color it represents, such is Light Gray or Signal White (refer to DR-3: Reference Information below). If a different color is proposed from the list of manufacture options, please update the visual simulation to show the substation wall in the proposed color.</p>	

PEA Section 5.3: Air Quality

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>PEA, Section 5.3.4.4, page 5.3-22 Deficiency Report #1, DEF-13 Health Risk Assessment</p>	<p>DR-3: Health Risk Assessment</p> <p>In Response #3 to Deficiency Report #1, LSPGC provided a Health Risk Assessment (Ldn Consulting, Inc. October 2024). Staff with Baseline Environmental Consulting have identified the follow-up data requests listed in the columns to the right.</p>	A	<p>Construction Duration: On page 2, it states that "Given the linear nature of transmission line, distribution line, and telecommunication line work, sensitive receptors near the Project would not experience a noticeable increase in emissions due to construction of these linear project features."</p> <p>For these linear project features, the HRA should specify the anticipated construction duration within the 1,000 feet zone of influence of any given sensitive receptor. The Office of Environmental Health Hazard Assessment (OEHHA) does not recommend assessing cancer risk for projects lasting less than two months due to the uncertainty in assessing cancer risk from short-term exposures. Therefore, if construction activities will move beyond the 1,000 feet zone of influence within two months, the HRA can conclude that a health risk assessment is not necessary.</p> <p>Additionally, the HRA should state that all sensitive receptor locations identified are located more than 0.3 miles away from the proposed Collinsville Substation, outside of the 1,000 feet zone of influence recommended by the BAAQMD. These receptors are included for a conservative analysis.</p>	
		B	<p>Sensitive Receptors: The unoccupied cultural resource site is included as R1. This receptor should be removed as a health risk receptor to be consistent with the air quality section.</p>	
		C	<p>Uncontrolled Scenario: The HRA only includes the controlled emission scenario (with APM AIR-1). The uncontrolled emission scenario should also be analyzed.</p>	
		D	<p>Justification of using PM_{2.5} Concentrations as a Surrogate for DPM: Provide justifications of using PM_{2.5} emissions, instead of PM₁₀ emissions recommended by BAAQMD, as a surrogate for diesel PM.</p>	
		E	<p>Averaging Period: The construction schedule and durations included on page 4 of the HRA do not match the Project Description (PD) Tables 3-11 and 3-12 dated July 29, 2024. For example, the estimated total number of active workdays for the LSPGC Collinsville Substation should be 561 days, instead of 533 days. The construction of the LSPGC Collinsville Substation is expected to last from May 1, 2026 to February 1, 2028, according</p>	

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Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
			<p>to the PD, instead of February 11, 2028. The construction of the LSPGC Collinsville Substation should last for a total of 641 calendar days) instead of 651 days.</p> <p>In addition, the last paragraph of page 7 states that “the PM_{2.5} generated emissions for the same construction activities analyzed within this report are 1.048 tons over the same <u>615</u> days.” The HRA should be revised to be consistent with the PD and internal consistency.</p> <p>Note: The CPUC submitted separate data requests (refer to Deficiency Report #2) related to recent PG&E’s construction schedule changes, which are not reflected in the PEA PD schedule information. The CPUC requested LSPGC to confirm or update their construction schedule to account for the PG&E schedule changes, if any. Please ensure any updates to the HRA construction schedule reflect the current construction schedule proposed by LSPGC.</p>	
		F	<p>Exhaust Emissions: On page 5, it states “the total diesel particulate emissions during the construction activities (L-02, L-03, L-04 and <u>L-39</u>) would cumulatively generate 0.209 tons of diesel particulates 2.5 microns or smaller (PM_{2.5}) which is the primary TAC considered in this analysis.” Please remove L-39 from the sentence. In addition, please confirm the total emissions is 0.209 tons instead of 0.210 tons.</p>	
		G	<p>Exposure Scenario: On page 6, describe the exposure scenario analyzed in this study (e.g. cancer risk from DPM emissions during xx-month of construction of the proposed LSPGC Collinsville Substation was assessed for an infant exposed to DPM starting from birth).</p>	
		H	<p>Grading Area: On page 7, it states “Based on the site configuration, the average emission rate over the <u>grading area</u> is 7.56x10⁻⁸ grams/second per meter squared (g/s-m²)...” Please define the grading area.</p>	
		I	<p>Cancer Risk: Explain how the 3.11 per one million exposed risk was calculated for Receptor 3, since this value does not match the results included in Appendix B.</p>	
		J	<p>Incremental PM_{2.5}: In the last paragraph on page 7, specify that the 1.048 tons of PM_{2.5} emissions include both exhaust and fugitive PM_{2.5}.</p>	
		K	<p>Additional Information to Confirm the HRA Results: Please provide AERMOD model assumptions and parameters including source type and description (e.g. area source encompasses the proposed LSPGC Collinsville Substation), source emissions type (continuous or variable emissions), release height for both exhaust and fugitive PM_{2.5}, initial vertical dimension for both exhaust and fugitive PM_{2.5}, and flagpole height for all receptors. Also provide reference and justification for the model parameters.</p> <p>Please provide AERMOD output plot which shows the sources and receptors with concentration posted.</p>	

DATA REQUESTS

REFERENCE INFORMATION

DR-2: Reference Information

KOP 2 – Existing Conditions and Visual Simulation

KOP 2 – Photograph of Existing Conditions

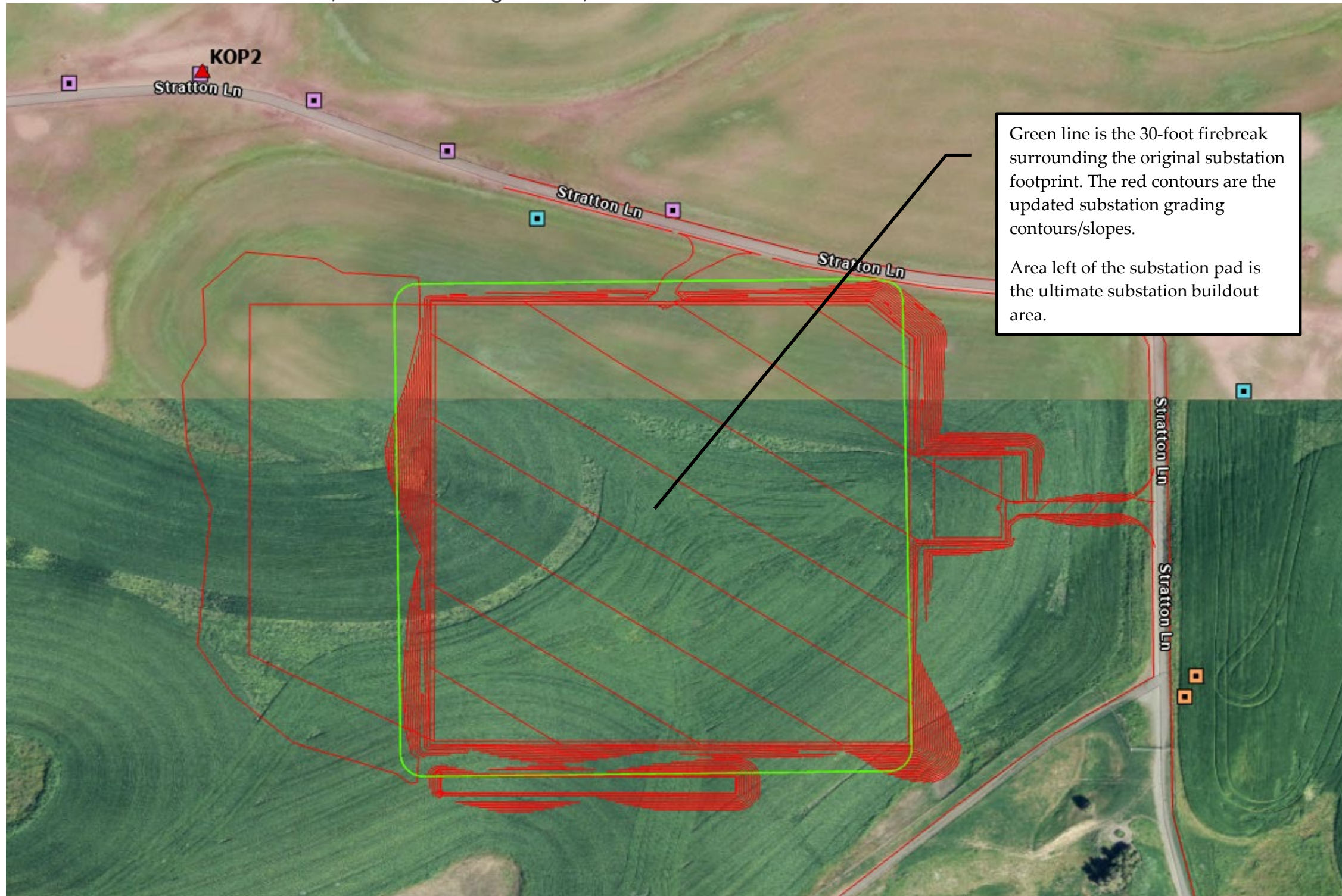


KOP 2 - Visual Simulation



DATA REQUESTS

GIS Data Screenshot of KOP 2 Location, Substation Grading Contours, and Firebreak





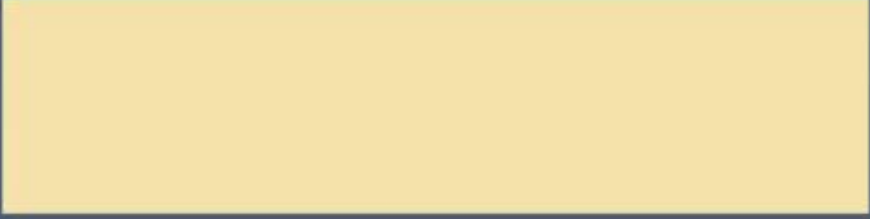

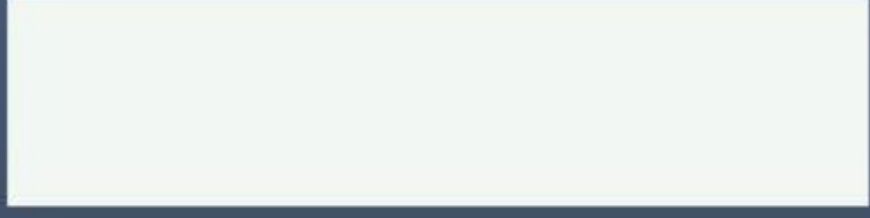
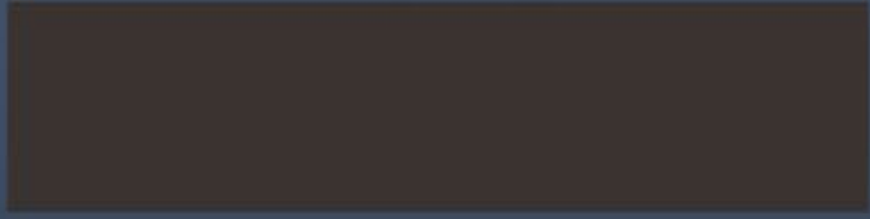

DR-3: Reference Information

Valmont SafeFence Product Colors

Valmont SafeFence™



DATA REQUESTS

RAL 6003		Olive Green
RAL 7035		Light Grey
RAL 1015		Light Ivory
RAL 6002		Leaf Green
RAL 9003		Signal White
C0163		SKP Brown
Fed Std. 20219		Cocoa Brown