February 19, 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 #2 to CPUC Data Request #1 (CPUC Review of LSPGC Responses #3 and 4 to Deficiency Report #1)

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 attachments:

- A Response to Data Request Table providing the additional information requested in the Data Request #1, received December 4, 2024.
    - **Attachment A**: Wire Frame Diagram
    - **Attachment B**: Updated Visual Simulation
    - **Attachment C**: Update Health Risk Assessment (HRA) Redline/Strikeout, Updated HRA Clean, and final PDF HRA compiled report.

The attachments above can be downloaded using the following link: LSPGC Response to CPUC DR-1

The 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 (LSPGC)
Clayton Eversen (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Aaron Lui (Panorama)

TABLE 1 DATA REQUESTS RESPONSE

PEA Section 5.1: Aesthetics

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
Visual Resources Technical Report (VRTR) Deficiency Report #1, DEF-10	**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-1: 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.	A	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.	See **Attachment A**, Wire Frame Diagram. Please note, while modifying the simulation modeling, it was discovered that there was an error in developing the original simulation from Stratton Lane, which placed the substation at a lower elevation than it should have been. The updated simulation for Key Observation Point (KOP) 6 now represents the proper elevation. LSPGC will update the other KOP simulations to also correct this error. The remaining updated simulations will be submitted to the CPUC on 02/21/2025.
Visual Resources Technical Report (VRTR) Deficiency Report #1, DR-8	**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."	A	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-2: 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.	LSPGC, in coordination with our visual specialist, has selected Brown SW9092 as the security fence color. This color was selected to best reduce the visual contrast between the substation and the natural surroundings.

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
	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). Refer to the **DR-2: Reference Information** provided at the end of this document for discussion purposes. The KOP 2 visual simulation in the VRTR depicts the substation security fencing/wall as light grey.	B	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-2: 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.	See **Attachment B**, Updated Visual Simulation.

PEA Section 5.3: Air Quality

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
PEA, Section 5.3.4.4, page 5.3-22 Deficiency Report #1, DEF-13 Health Risk Assessment	**DR-3: Health Risk Assessment** 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.	A	**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." 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. 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.	See **Attachment C**, Updated HRA. The 1000 feet zone of influence was added as identified. The HRA also indicated that the sensitive receptors 0.3 miles away were analyzed to be conservative.
		B	**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.	See **Attachment C**, Updated HRA. The unoccupied receptor was removed.
		C	**Uncontrolled Scenario:** The HRA only includes the controlled emission scenario (with APM AIR-1). The uncontrolled emission scenario should also be analyzed.	The Applicant-Prepared Measure (APM) states: "Construction equipment with a rating between 100 and 750 hp would be required to use engines compliant with EPA Tier 4 non-road engine standards. In the event that enough Tier 4 equipment is not available, documentation of the unavailability would be provided, and engines utilizing a lower standard would be used." Since this APM was provided by the applicant as part of the Project Description (PD), and the associated emissions were used to calculate health risks no additional analysis is required under CEQA. Therefore, since uncontrolled emissions would not be a project

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
				condition, they were not analyzed. It should be noted however, LSPGC's consultant suspect that since cancer risks are so low, health risks would also be less than significant without APMs. Since Tier 4 is relatively common however, changes to the analysis with additional modeling isn't recommended.
		D	**Justification of using $PM_{2.5}$ Concentrations as a Surrogate for DPM:** Provide justifications of using $PM_{2.5}$ emissions, instead of PM_{10} emissions recommended by BAAQMD, as a surrogate for diesel PM.	See **Attachment C**, Updated HRA. The report was revised to use PM 10. LSPGC's consultant typically use PM 2.5 since DPM is typically 90% PM2.5. No impacts expected.
		E	**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 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. 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 615 days." The HRA should revised to be consisted with the PD and internal consistency. 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.	The Construction starting and ending periods are used to estimate risk. The Collinsville Substation Construction Starts on May 1, 2026 and ends February 11, 2028 not February 1st. LSPGC's consultant used the elapsed period for the cancer risk calculations which is appropriate and conservative. No modifications to the HRA are recommended.
		F	**Exhaust Emissions:** On page 5, it states "the total diesel particulate emissions during the construction activities (L-02, L-03, L-04 and L-39) would cumulatively generate 0.209 tons of diesel particulates 2.5 microns or smaller (PM2.5) 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.	See **Attachment C**, Updated HRA. This was a typo and was based on a rounding error. As noted above, the report was revised to use PM10. No impacts were identified.
		G	**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).	See **Attachment C**, Updated HRA. Revised on Page 9 within Construction Emissions Calculations section of the report.
		H	**Grading Area:** On page 7, it states "Based on the site configuration, the average emission rate over the grading area is $7.56x10^{-8}$ grams/second per meter squared (g/s-m2)…" Please define the grading area.	See **Attachment C**, Updated HRA. Site area is based on area emissions calculations in HRA Attachment C and D.
		I	**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.	See **Attachment C**, Updated HRA. This was likely a typo. Since report was revised to use PM10 risks are calculated in HRA Attachments C and D.
		J	**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 $PM_{2.5}$.	See **Attachment C**, Updated HRA. Revised.

DATA REQUEST REPONSE TABLE

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
		K	**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. Please provide AERMOD output plot which shows the sources and receptors with concentration posted.	See **Attachment C**, Updated HRA. The AERMOD files were provided as HRA Attachment A and B for PM10 and E and F for total onsite PM 2.5 which includes diesel emissions and fugitive dust. See HRA Attachments A,B,E,F where modeling input assumptions are included. The simple answers are Area Source, Initial Vertical is conservatively 1m (Could be 1.5 or 2 which would yield lower emissions), Flagpole 1.5 meter. Revised to PM10 emission type for HR and PM2.5 construction and fugitive dust for PM2.5 Total Emissions. No figure output plot was provided since emissions at the sensitive receptors nearest the site are worst-case.