

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 14, 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), and November 4 (Response #3), 2024. The CPUC has completed its review of LSPGC's Responses #1 and #2. Response #3 is under review by the CPUC and additional LSPGC responses to Deficiency Report #1 are anticipated to address outstanding requests.

The Energy Division finds that the supplemental application information provided in LSPGC's Responses #1 and #2 to Deficiency Report #1 is largely adequate; however, remaining deficiencies have been identified regarding gaps in critical information that would prevent preparation of an adequate Environmental Impact Report in a timely manner. The attached report (Deficiency Report #2) identifies the deficiencies associated with LSPGC's Responses #1 and #2, as well as data requests that do not rise to the level of deficiencies to support the CPUC's review of the project.

The CPUC requests that LSPGC respond to Deficiency Report #2 in writing no later than December 30, 2024. Information provided by LSPGC in response to the Energy Division's finding of deficiency 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 it is adequate to accept the application as complete. 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](mailto:Connie.Chen@cpuc.ca.gov).

Sincerely,

A handwritten signature in black ink that reads "connie chen" in a cursive, lowercase font.

Connie Chen  
Project Manager, Energy Division

Attachment A: Deficiency Report #2

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

# Attachment A: Submittal Review Form



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**Document(s) Submitted:** Application and Proponent's Environmental Assessment (PEA) for LS Power Grid's Collinsville 500/230 kV Substation Project (project)  
LSPGC Responses #1 and #2 to Deficiency Report #1

**Review Form Number:** 2

**Description:** Deficiency Report #2

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

**To:** LS Power Grid California, LLC (LSPGC)

**Date Submitted:** November 13, 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.

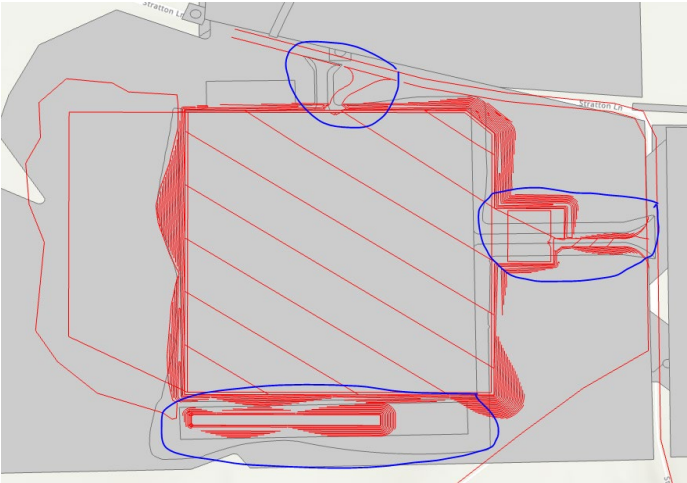
**DATA REQUESTS**

**TABLE 1 DEFICIENCIES**

**Application and PEA Chapter 1: Executive Summary, Chapter 2: Introduction, Chapter 3: Project Description**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
3.3.4.2.1 PG&E 500 kV Interconnection, Table 3-4, GIS Data Deficiency Report #1, DEF-1	<p><b>DEF-1: PG&amp;E 500 kV Interconnection Structures and GIS Data</b>                      In their response to Deficiency Report #1, DEF-1, on September 30, 2024, LSPGC provided Attachment A, PG&amp;E Preliminary Scope, which includes a PDF prepared by PG&amp;E describing their proposed project features and activities. The information provided in this document describes new and different project features that are not addressed in the PEA Project Description and are inconsistent with the features identified in the GIS data by LSPGC.</p> <p>In addition to the PDF document provided by LSPGC, PG&amp;E responded to a separate Data Request issued directly to PG&amp;E by the CPUC (Project description with comments from PG&amp;E provided as separate <b>Attachment A</b>). In their response dated November 8, 2024, PG&amp;E identified additional information about the interconnection structures that is inconsistent with the PEA Project Description and GIS data provided by LSPGC. This information is also inconsistent with the information provided in the PDF described above. It appears the current PG&amp;E interconnection structures associated with the project area as follows:</p> <ul style="list-style-type: none"> <li>• New                             <ul style="list-style-type: none"> <li>– 11 lattice steel towers (LSTs)</li> <li>– 7, 3-pole tubular steel poles (TSPs)</li> </ul> </li> <li>• Removed                             <ul style="list-style-type: none"> <li>– 2 existing LSTs</li> <li>– 1 existing transposition structure</li> </ul> </li> </ul> <p>The accurate number, types, and locations of PG&amp;E structures needs to be rectified, and revised GIS data is needed to determine impact areas. Diagrams of all proposed structures are also needed for the EIR.                      Note: this same request will be submitted to PG&amp;E directly.</p>	A	Please provide a list of types and values of all PG&E proposed interconnection structures, including existing structures along the Vaca-Dixon line to be removed or modified.	
		B	In the preliminary PG&E scope PDF, PG&E uses the term lattice steel poles (LSPs). Is this a new structure category or the same as the LSTs?	
		C	Please provide a brief definition of the 3-pole “transposition” structures and explain their purpose in comparison to the LSTs.	
		D	Please ensure diagrams of all proposed PG&E structures are provided consistent with the diagrams provided for other structures identified in the Project Description. At a minimum a new diagram for the 3-pole TSP structure type is required.	
		E	Please provide updated GIS data for the project which includes the accurate locations, categories, and other details of proposed structures for the project (including both LSPGC and PG&E structures), as well as the existing PG&E structures to be removed or modified. Please also provided updated GIS data for the associated conductor routes, structure workspaces, structure access routes, pull sites, etc. that are tied to the structure locations.	
n/a	<p><b>DEF-2: PG&amp;E Sites Near Travis Airforce Base (AFB)</b>                      PG&amp;E responded to a separate Data Request issued directly to PG&amp;E by the CPUC. In their response dated November 8, 2024, PG&amp;E described sites near Travis AFB that would be reconducted and transposition towers would be installed. This appears to be a new site and project features that are not identified in the Project Description or GIS data.                      Note: this same request will be submitted to PG&amp;E directly.</p>	A	Please describe the PG&E activities that would occur near Travis AFB, including their purpose and nature, timing and schedule, etc.	
		B	Please provide GIS data and figures identifying the project feature locations, workspaces, and access routes.	

**DATA REQUESTS**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>Section 3.1.1: Summary of Proposed Project Deficiency Report #1, DEF-1</p>	<p><b>DEF-3: PG&amp;E Pittsburg Substation Modifications</b>                      In the PDF describing PG&amp;E’s preliminary scope submitted by LSPGC, the list of outdoor work at the Pittsburg Substation includes (#3) “Due to increased fault duties, install a set of reactors on the 115kV bus 1 and bus 2.”                      The proposed reactors at Pittsburg Substation appear to be part of a separate CAISO project, referred to as the Pittsburg 115 kV Bus Reactor Project identified in CAISO’s 2022-2023 Transmission Plan.                      Section 3.1.1 of the Project Description briefly notes that the Pittsburg Reactor Project is not part of the proposed project; however, the PDF with PG&amp;E’s preliminary scope seems to link this PG&amp;E activity to the proposed project.                      Note: this same request will be submitted to PG&amp;E directly.</p>	A	<p>Please explain if and how installing reactors at Pittsburg Substation is associated with the Collinsville Substation Project and how PG&amp;E proposes to implement these projects together or separately. Is the installation of reactors at Pittsburg Substation part of the whole of the action and needed as a result of the proposed Collinsville Substation Project, thus an activity that should be analyzed under CEQA?</p>	
		B	<p>If PG&amp;E is proposing the installation of reactors at Pittsburg Substation as part of the proposed project, existing and proposed substation layout diagrams are required to identify the facility changes.</p>	
<p>Deficiency Report #1, DEF-6 and DEF-8</p>	<p><b>DEF-4: Collinsville Substation Revised Footprint and GIS Data</b>                      In response to DEF-6 and DEF-8 of Deficiency Report #1, LSPGC provided Attachment D, Ultimate Collinsville Substation Buildout GIS Files, and noted “...that the communication yard has been moved outside of the original Collinsville Substation. This change was made to comply with a PG&amp;E security requirement to maintain 30 feet of spacing between the LSPGC and PG&amp;E station fencing.”                      LSPGC provided the requested contour data; however, the GIS data provided with the PEA submittal (for work areas and impact areas) does not reflect the substation footprint changes (i.e., separated communication yard, adjusted driveways, and detention pond/bioretenion basin) which are required to determine accurate impact areas and acreages. Refer to screenshot below (*key: red lines are the recent substation contour data provided with revised feature locations; the grey polygons/lines are the prior workspaces/footprints that need to be updated to calculate impacts).</p>  <p>In a written response, LSPGC stated the “...detention basin is anticipated to be approximately 3 feet deep, 75 feet wide, and 355 feet long.” However, the substation layout figure provided in response to DEF-8 shows the pond with a length of 350 feet and a width of 25 feet.</p>	A	<p>Please provide updated GIS data for all project work areas and impact areas, which include the recent design changes at the Collinsville Substation site (i.e., separated communication yard, adjusted driveways, and detention pond/bioretenion basin).</p>	
		B	<p>Please clarify the dimensions of the retention pond and ensure the dimensions are consistent with the latest substation layout figure provided in response to DEF-8. The pond appears to be 350 feet by 25 feet. Please confirm if this is accurate and if the depth is still assumed to be 3 feet.</p>	

**DATA REQUESTS**

**TABLE 2 DATA REQUESTS**

**Application and PEA Chapter 1: Executive Summary, Chapter 2: Introduction, Chapter 3: Project Description**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
Table 3-11: Proposed Construction Equipment and Workforce Table 3-12: Proposed Construction Schedule	<p><b>DR-1: PG&amp;E Construction Schedule Changes</b> PG&amp;E responded to a separate Data Request issued directly to PG&amp;E by the CPUC. In their response dated November 8, 2024, PG&amp;E modified their anticipated construction schedule, which roughly doubles the total number of construction workdays identified for their project components described in Tables 3-11 and 3-12. In Table 3-12 the following changes were made by PG&amp;E:</p> <ul style="list-style-type: none"> <li>• Prior Schedule                             <ul style="list-style-type: none"> <li>– PG&amp;E 500 kV Interconnection: June 2027-September 2027 (89 active workdays)</li> <li>– PG&amp;E Substation Modifications: June 2026-May 2028 (102 active workdays)</li> </ul> </li> <li>• Revised Schedule                             <ul style="list-style-type: none"> <li>– PG&amp;E 500 kV Interconnection: May 2027-February 2028 (196 active workdays)</li> <li>– PG&amp;E Substation Modifications: May 2027-May 2028 (250 active workdays)</li> </ul> </li> </ul>	A	Please clarify if any LSPGC schedule changes would occur because of PG&E's revised construction schedule, and state if PG&E's schedule changes will affect LSPGC's proposed Collinsville in-service date. Please provide a revised project schedule or confirm no other changes would occur.	
		B	The duration of PG&E's substation modifications is now more than double the initial estimate. Please clarify if the increase in duration is associated with the Pittsburg Substation Reactor project elements discussed in <b>DEF-3</b> and consider how that specific substation work should or should not be incorporated with proposed project activities based on the response to <b>DEF-3</b> .	
Deficiency Report #1, DR-10	<p><b>DR-2: Work Area Disturbance and Grading Volume Tables</b> LSPGC's Response #2 to Deficiency Report #1 (DR-10) included revised PEA tables Table 3-8 (Work Area Disturbance) and Table 3-9 (Detailed Collinsville Substation Grading Volumes). These tables should be updated if affected by the workspace and impact area changes described above in <b>DEF-1</b> and <b>DEF-4</b>. In addition, LSPGC's Response #1 to Deficiency Report #1 (DEF-8) included a substation grading elevations figure which includes a table listing approximate earthwork quantities; the values in the figure are slightly different than those presented in Table 3-9.</p>	A	Please review and update Table 3-8 (Work Area Disturbance) and Table 3-9 (Detailed Collinsville Substation Grading Volumes) to reflect the requested GIS data updates described in <b>DEF-1</b> and <b>DEF-4</b> .	
		B	Please clarify if the grading volumes in Table 3-9 are the correct proposed values, or if they need to be updated to match the earthwork quantities shown on the substation grading elevations figure.	
		C	If possible, please provide a copy of the substation grading elevations figure (provided in response to DEF-8) without grading quantities for use in the EIR so the information does not conflict with other values presented in the document.	
n/a	<p><b>DR-3: AT&amp;T Fiber GIS Location</b> A GIS point location in the layer "UG_Structures" includes a feature titled "AT&amp;T Fiber" which is located well away from the project sites and proposed work areas at the intersection of Rio Vista Road and Branscombe Road.</p>	A	Please clarify if this is a proposed project site and what would occur at this location, or if this is a data error that should be ignored.	

**PEA Section 5.4 Biological Resources**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
Deficiency Report #1, DEF-15	<p><b>DR-4: Acoustic Modeling/Analysis</b> On October 18, 2024, LSPGC provided a revised copy of the Aquatic Resources Technical Report (ARTR) with updated acoustic modeling/analysis. The acoustic analysis in the ARTR uses a 10-decibel attenuation for pile driving</p>	A	Please provide the requested explanation and justification for the attenuation used in the ARTR, and update the ARTR accordingly. If a different attenuation is used, please revise the ARTR accordingly and provide similar justification on the attenuation assumptions that are used.	

**DATA REQUESTS**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
	<p>on land and a 2020 Caltrans guidance document is cited; however, the Caltrans guidance provides a range of possible attenuation that could occur from 2 decibels (minimum attenuation) to 10 decibels (maximum attenuation). According to Boudreau and Associates, a more commonly used and agency-accepted attenuation is 5 decibels for piles 30 feet or more from water and no attenuation is applied to piles less than 30 feet from water (because pile driving within 30 feet of water in saturated soils similar to anticipated project conditions is equivalent to piles in water).</p> <p>The acoustic analysis must explain and justify the use of the maximum attenuation is used in the ARTR. If the author cannot provide sufficient justification, the ARTR modeling and analysis should be revised to use an attenuation of 0 decibels for structures less than 30 feet from water and 5 decibels for structures more than 30 feet from water.</p>			

**PEA Section 5.5: Cultural Resources**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>Attachment 5.5-A: Cultural Resources Technical Report, Section 1.2 Area of Potential Affects Deficiency Report #1, DEF-22</p>	<p><b>DR-5: Terrestrial Section 106 Area of Potential Effect (APE) and CEQA Area of Potential Impact (API)</b></p> <p>In Deficiency Report #1, DEF-22, CPUC requested an explanation for why a 50-meter buffer was used to establish the preliminary APE/API and where this information was provided in the CRTR.</p> <p>In a written response to DEF-22 submitted on September 30, 2024, LSGPC stated: "A 50-meter buffer was included to ensure an appropriate survey area was reviewed, as the submerged cable alignment is subject to modifications based on the results of geotechnical geophysical investigations."</p> <p>This response is not sufficient and an explanation of why a 50-meter buffer is appropriate should be incorporated into the CRTR.</p>	A	<p>Please provide a rationale and justification for why a 50-meter buffer is appropriate, such as if this distance is commonly used and for what purposes, or if this distance represents a threshold for potential impacts, etc. Please add this information to the CRTR description where the 50-meter buffer is described.</p>	

**PEA Section 5.8: Greenhouse Gas Emissions (GHG)**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
<p>Attachment 5.3-A: Air Quality Calculations, Table 33 and 34</p>	<p><b>DR-6: GHG Emission Assumptions</b></p> <p>In Deficiency Report #1, DEF-31, CPUC requested a correction to Attachment 5.3-A: "Please correct the high heat value and CO2 emission factor reported in the first table, and provided an updated version of Attachment 5.3-A."</p> <p>LSGPC responded and provided revised calculation tables on September 30, 2024. Upon review, the number values changed; however, the weighting did not. Now it reads '72.22 MMBtu/gallon and 0.135 kg CO2/MMBtu).</p>	A	<p>Please correct the high heat value and CO2 emission factor reported in the first table (with consideration to the weighting), and provided an updated version of Attachment 5.3-A.</p>	
<p>Attachment 5.3-A: Air Quality Calculations</p>	<p><b>DR-7: Air Quality and GHG Construction Schedule Changes</b></p> <p>PG&amp;E roughly doubled their construction schedule duration from the original estimate provided in the PEA Project Description. The air quality and GHG</p>	A	<p>Please provide revised air quality and GHG emissions calculations that account for the revised construction schedule (refer to <b>DR-1</b>). Please consider if the LSPGC's schedule</p>	

**DATA REQUESTS**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
	emissions calculations should be updated to account for the current construction schedule.		would change based on PG&E's schedule changes, and if the estimated duration of PG&E substation modifications should be revised, based on the response to <b>DR-1</b> .	

**PEA Section 5.13: Noise**

Section/Page Reference	CPUC Comment	Request ID	CPUC Request	LSPGC Response
Table 5.13-5 Attachment 5.13-A: Noise and Vibration Impact Assessment Report Deficiency Report #1, DEF-33	<p><b>DR-8: Noise and Vibration Impact Assessment Report</b></p> <p>In a written response to DEF-33 submitted on September 30, 2024, LSGPC stated: "Table 5-1 through 5-9 of Noise and Vibration Impact Assessment Report have been updated to align with construction equipment types and working days listed in Table 3-11 from Chapter 3 – Project Description of the PEA. The Noise and Vibration Impact Assessment Report has been updated and provided as part of this response (Attachment J)."</p> <p>Baseline has identified remaining inconsistencies with the construction information in the project description. See <b>Attachment B</b> with comments on where these inconsistencies occur.</p>	A	Please review the comments on the Noise and Vibration Impact Assessment Report provided as <b>Attachment B</b> and address the inconsistencies. Please consider the revised schedule information provided by PG&E (refer to <b>DR-1</b> above and <b>Attachment A</b> ). Regarding the inconsistencies related to construction phase workdays, please consider if the total workdays for each phase need to be identified in the report to support the analysis or if the phase descriptions and equipment details are sufficient, as the number of workdays could continue to change.	
		B	The staging area noise levels were estimated based on the construction equipment list provided for the site development phase. During construction, the noise levels from the use of the staging area are in general expected to be less than the noise levels from the establishment of the staging area. We recommended adding a brief discussion in the report to clarify this.	