



June 27, 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: Alternative Submarine Route Installation Narrative 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 detailed narrative describing the installation and construction process for the Alternative Submarine Cable Route, previously provided to the CPUC in Data Request #4 on May 23, 2025.
  - KMZ Alternative Submarine Route Dredging Impact

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 "Clayton Eversen".

Clayton Eversen  
Lead Environmental Permitting Specialist

Enclosures

cc: Jason Niven (LSPGC)  
Doug Mulvey (LSPGC)  
Lauren Kehlenbrink (LSPGC)  
Dustin Joseph (LSPGC)  
David Wilson (LSPGC)



Michelle Wilson (CPUC)  
Aaron Lui (Panorama)  
Peter Mye (Panorama)  
Susanne Heim (Panorama)

6/27/25

## South Shore Submarine Alternative Construction and Installation Methodology

LS Power Grid California, LLC (LSPGC) evaluated the construction and installation of an alternative submarine cable route located in the Delta shown in Figure 1 below in efforts of minimizing overlap with an existing sand mining operation. The alternative decreases the impacts to the Lind Marine; Martin Marietta Marine Operations, LLC, and Suisun Associates' (collectively, "Suisun Associates") (California State Land Commission Mineral Extraction Lease No. 7781.1) sand mining lease. This evaluation includes site preparation, level of impact, equipment required, and the anticipated timeframe for activities.

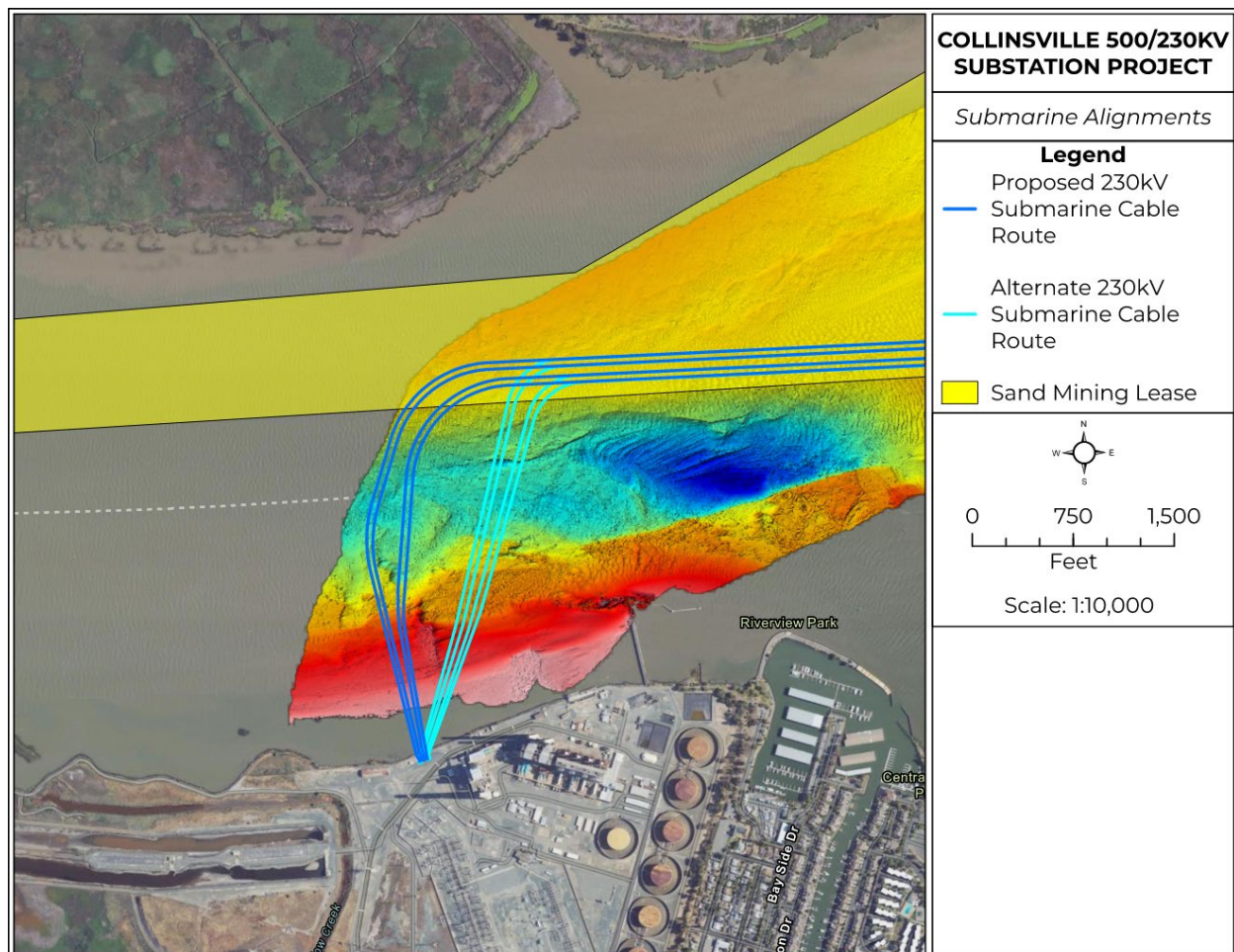
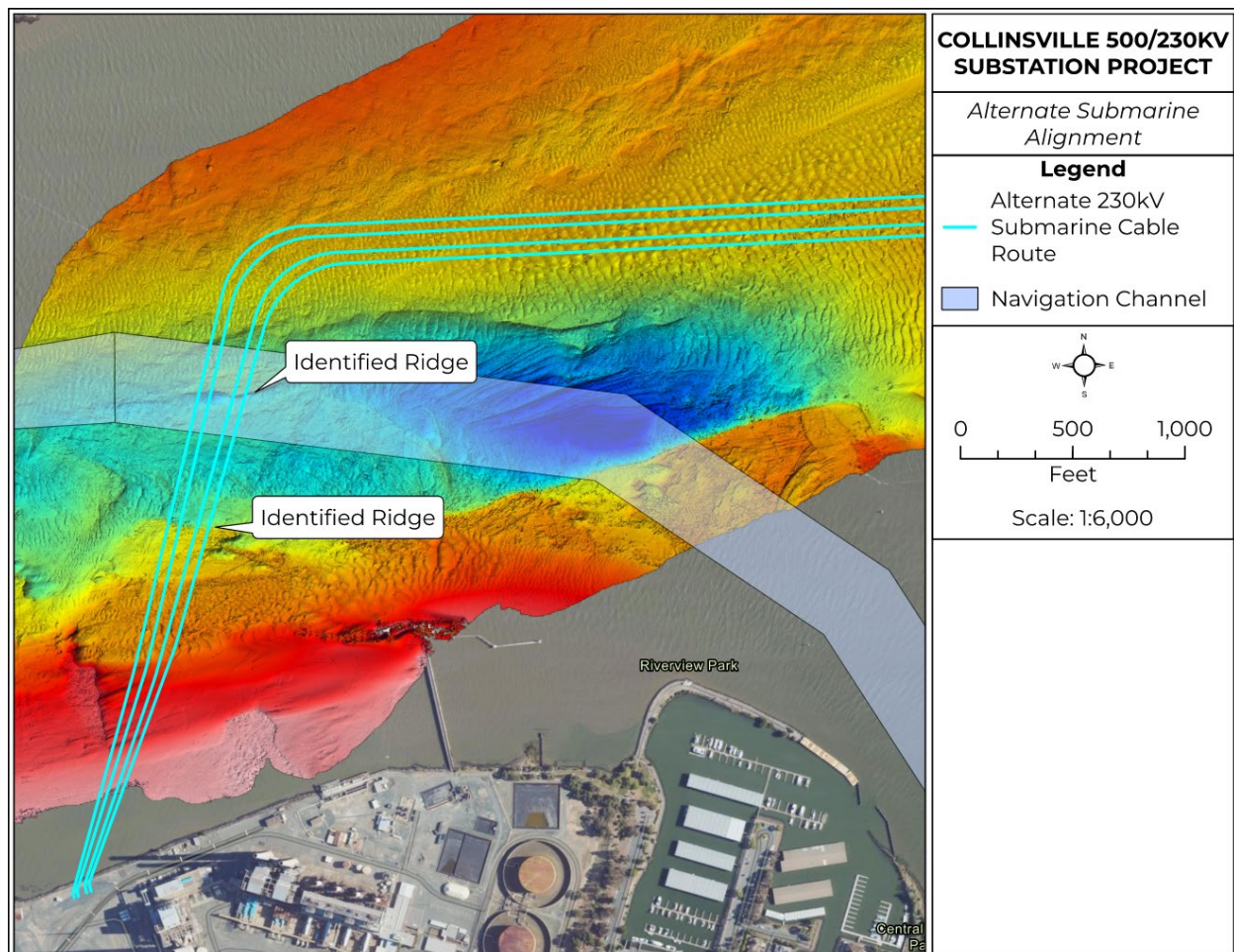


Figure 1: Submarine Alignments

While evaluating the Alternative Submarine Cable alignment LSPGC identified a ridge (via sub-bottom profile data) located within the United States Army Corps of Engineers' (USACE) Maintained Stockton Navigation Channel. Additionally, a second ridge was

identified near the southern shore approximately 1,600 feet north of the shoreline, as shown in Figure 2. The two ridges have a steep incline/decline of near vertical slopes. Because of the steep slopes, hydroplow installation in these areas becomes very difficult due to the hydroplow's skids inability to pivot at steep angles. If installation were to occur, as is, the minimum cover requirements may not be able to be met.

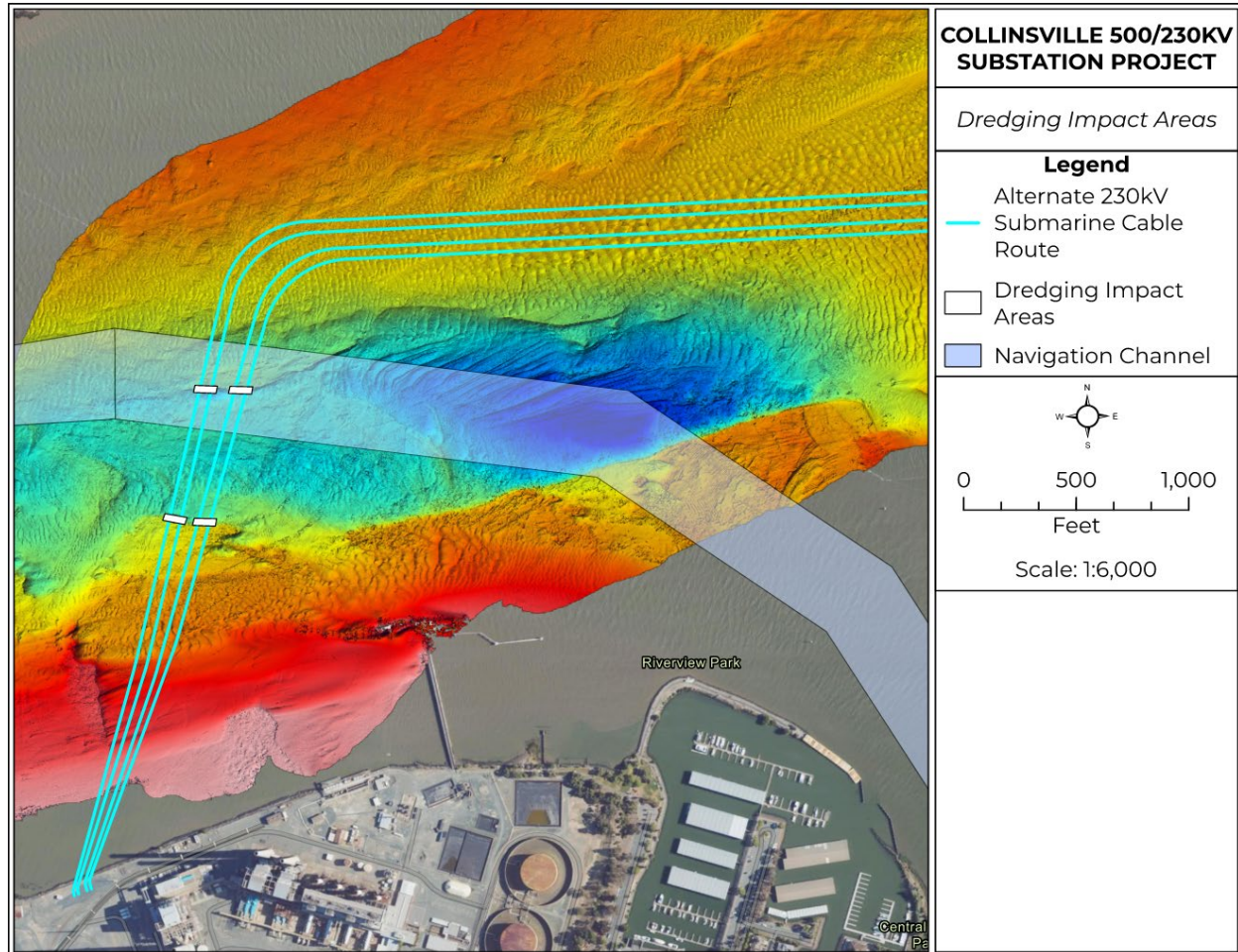


*Figure 2: Alternate Submarine Alignment*

Due to the inability to meet the minimum cover, LSPGC and its contractor believes that site preparation would be required. Dredging at the northern ridge would be required to create a smooth cable lay area for the hydroplow to ensure that the hydroplow can bury the cables to the minimum cover required. Dredging at the southern ridge may be required; however, at this time, it is undetermined. Because the southern ridge may require dredging, LSPGC has included it as part of the potential impacts. LSPGC anticipates that a total of four 100 ft wide by 32 feet long by 5 feet deep sections would need to be dredged to reduce the slope of the ridges for cable installation. The total area of impact is approximately 7,000



cubic yards and would require additional federal and state permits. LSPGC expects to side cast the material excavated within the river; however, this would need to be coordinated with the USACE, as this location is a maintained shipping channel. This impact is depicted in Figure 3, shown below, and in the attached KMZ file.



*Figure 3: Dredging Impact Areas*

The contractor has a preference for the site preparation activity in the navigation channel to take place a year prior to cable installation (2026), towards the end of the seasonal restriction. The activities are expected to require approximately two weeks to complete excavation, operating 12 hours a day. As previously described, the northern ridge is located within the Stockton Navigation Channel and is subject to heavy shipping traffic. LSPGC anticipates that work within the Navigation Channel may take up to one week, and would have to coordinate work with the USACE, United States Coast Guard, and Harbor Master, to ensure vessel traffic safety and minimize impacts to navigation.

The anticipated equipment necessary for this additional work includes;

- Crane Barge
- Material Barge
- Tug Boat
- Anchors
- Small Crew Boat
- Clam Shell Bucket and Crane

In summary, the Alternative Submarine Cable Route minimized overlap with the existing sand mining lease; however, due to engineering constraints, requires additional operations and impacts to ensure the minimum cover requirements are met. This Alternative Submarine Cable Route requires additional federal and state permitting, site preparation activities, extends the overall construction in-river, increases the required equipment, and expands the area of impact. In addition, a barge would need to be located within a heavily trafficked shipping channel for up to one week.