

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Application of LS Power Grid California, LLC
(U-247-E) for a Certificate of Public Convenience and
Necessity Authorizing Construction of the Collinsville
500/230 kV Substation Project.

Application 24-07-018
(Filed July 30, 2024)

OPENING BRIEF OF LS POWER GRID CALIFORNIA, LLC (U-247-E)

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TABLE OF CONTENTS

	<u>Page</u>
I. BACKGROUND	6
A. The CPCN Proceeding.....	8
B. The CAISO's Transmission Planning Process	9
1. The 2021-2022 Transmission Plan	9
2. The CAISO Selected LSPGC in a Competitive Solicitation	10
C. Environmental Review Process	11
D. The Parties' Positions	12
II. THE PUBLIC CONVENIENCE AND NECESSITY REQUIRE CONSTRUCTION OF THE COLLINSVILLE PROJECT	13
A. The Collinsville 500/230 kV Substation Project Serves the Public Convenience and Necessity	13
1. The Collinsville Project Will Mitigate Reliability Constraints.....	13
(a) Cayetano-North Dublin 230 kV line.....	15
(b) Lone Tree-USWP-JRW-Cayetano 230 kV line.....	16
(c) Las Positas-Newark 230 kV line.....	16
2. The Project Will Further California's Renewable and Clean Energy Policy Goals.....	16
3. The Project Serves the Public Convenience and Necessity	18
B. CAF's Contentions that the Project Is Not Needed Lack Support.....	18
1. CAISO's Identification of the Need for the Collinsville Project Was Not Linked to the North Coast Offshore Wind or the Humboldt Transmission Line	19
III. A REBUTTABLE PRESUMPTION OF NEED APPLIES TO THE COLLINSVILLE PROJECT	29
A. The CAISO Board Found that the Project Is Needed	29
B. CAISO Is a Party	30
C. Timing of Need Evaluation.....	30
D. No substantial changes.....	30
IV. THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE COLLINSVILLE PROJECT OR THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE.....	32
V. MITIGATION MEASURES WILL AVOID OR LESSEN THE IDENTIFIED SIGNIFICANT ENVIRONMENTAL IMPACTS	34
VI. THE PROPOSED PROJECT AND THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE.....	36

TABLE OF CONTENTS
(Continued)

	<u>Page</u>
A. Both the Collinsville Project and the Environmentally Superior Alternative Accomplish Transmission Planning Objectives and State Policy Goals	36
B. CAF’s Environmentally Superior Alternatives.....	41
VII. THE MITIGATION MEASURES AND THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE ARE FEASIBLE.....	41
VIII. OVERRIDING CONSIDERATIONS JUSTIFY APPROVAL OF THE PROPOSED PROJECT OR THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE.....	42
IX. COMPLIANCE WITH CEQA	45
A. Review and Consideration of the EIR	45
B. The EIR was Completed in Compliance with CEQA.....	45
C. Does the Final EIR Reflect the Commission’s Independent Judgment?	49
X. THE APPLICATION MEETS THE REQUIREMENTS OF GENERAL ORDER 131-D	50
A. General Order 131-D	50
B. Rule 13.1	52
XI. COMMUNITY VALUES.....	52
XII. THE MAXIMUM PRUDENT AND REASONABLE COST OF THE PROJECT.....	54
A. Estimated Project Costs	55
B. Maximum Reasonable and Prudent Cost.....	57
XIII. IMPACTS ON ENVIRONMENTAL AND SOCIAL JUSTICE COMMUNITIES	58
XIV. THE PROJECT COMPLIES WITH THE COMMISSION’S POLICIES ON MITIGATION OF ELECTRIC AND MAGNETIC FIELDS EFFECTS	60
XV. THE REQUESTED AFFILIATE TRANSACTION RULE EXEMPTIONS HAVE BEEN GRANTED	62
XVI. CONCLUSION.....	62

TABLE OF AUTHORITIES

Page

STATUTES

California Public Utilities Code

§ 380	5
§ 399.11.....	17
§ 399.15(b)(2)(B).....	4
§ 454.53.....	17
§ 454.53(a)	5
§ 1001	13, 18, 62
§ 1001.1.....	29, 31
§ 1002(a)(1)	52
CEQA Pub. Resources Code, §§ 21000–21189.91.....	11
§ 21091.....	47

OTHER AUTHORITIES

CAISO Tariff	5, 10, 17
CEQA Guidelines Cal. Code Regs., tit. 14, §§ 15000–15387	11
§ 15132(a)	47
§ 15125.....	46
§ 15126.2.....	46
§ 15082.....	47
§ 15088.....	47
§ 15105.....	47
§ 15124.....	46
§ 15126.2.....	47
§ 15126.6.....	47
§ 15130.....	47

TABLE OF AUTHORITIES
(Continued)

	<u>Page</u>
§ 15132(b).....	47
§ 15132(c).....	48
§ 15132(d).....	48
§ 15132(e).....	48
§ 15021.....	46
§ 15041.....	45
§ 15051.....	45
§ 15065.....	46
§ 15093.....	34
§ 15126.....	40
<i>Order Accepting Tariff Revisions, Granting Transmission Incentives, and Initiating a Proceeding Pursuant to Section 206 of the Federal Power Act, Oct. 15, 2024, 189 FERC ¶61,027.....</i>	56

DECISIONS OF THE PUBLIC UTILITIES COMMISSION

D. 97-12-088.....	62
D. 98-08-035.....	62
D. 98-12-075.....	62
D. 06-01-042.....	61
D. 10-12-025.....	53
D. 10-12-052.....	57
D. 16-10-005.....	44
D. 18-09-030.....	57
D. 21-02-008.....	4, 21, 22, 24
D. 21-08-007.....	53
D. 25-01-055.....	50, 60
D. 25-09-013.....	53, 57, 62
D. 26-01-010.....	8

TABLE OF AUTHORITIES
(Continued)

	<u>Page</u>
D. 26-02-057	24, 27, 28

SUMMARY OF RECOMMENDATIONS

In this Opening Brief, LS Power Grid California, LLC (LSPGC) respectfully asks the Commission to adopt the following recommendations:

- Grant LSPGC a Certificate of Public Convenience and Necessity authorizing LSPGC to construct its portion of the Collinsville 500/230 kV Substation Project, as proposed, or the environmentally superior alternative identified in the Final Environmental Impact Report;
- Find that the rebuttable presumption of need under Public Utilities Code section 1001.1 applies and has not been rebutted;
- Find that the Final Environmental Impact Report has identified the significant environmental impacts of construction and operation of the Collinsville 500/230 kV Substation Project and the environmentally superior alternative and has developed mitigation measures that will avoid or lessen the identified significant environmental impacts, except for twelve identified significant and unavoidable impacts for the Collinsville 500/230 kV Substation Project, as proposed, and seven identified significant and unavoidable impacts for the environmentally superior alternative;
- Conclude that the benefits of the Collinsville 500/230 kV Substation Project, as proposed, or the environmentally superior alternative override the significant and unavoidable environmental impacts;
- Certify the Final Environmental Impact Report prepared by Energy Division staff;
- Establish a maximum reasonable and prudent cost for LSPGC's portion of the Collinsville 500/230 kV Substation Project, as proposed, of \$437.6 million and a maximum reasonable and prudent cost for the environmentally superior alternative of \$447.2 million;

- Find that LSPGC's portion of the Collinsville 500/230 kV Substation Project, as proposed, or the environmentally superior alternative complies with the Commission's policies on Electric and Magnetic Fields; and
- Find that construction of LSPGC's portion of the Collinsville 500/230 kV Substation Project, as proposed, or the environmentally superior alternative aligns with the goals of the Commission's Environmental and Social Justice Action Plan.

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Application 24-07-018
(Filed July 30, 2024)

OPENING BRIEF OF LS POWER GRID CALIFORNIA, LLC (U-247-E)

In 2022, after a year-long study process, the California Independent System Operator (CAISO) identified the need for a new pathway to deliver renewable energy from north of the Sacramento-San Joaquin River Delta into the Greater Bay Area, where unexpected load growth was stressing the existing transmission system. Under the existing arrangements, high-voltage bulk power enters the Greater Bay Area through two 500/230 kV substations, at Moss Landing and Tesla, and consequently energy from the northern part of the state, including imported energy from the Pacific Northwest, enters the Greater Bay Area by means of the Tesla Substation in Tracy, California, east of the Greater Bay Area load centers. As power flows from the Tesla Substation westward to meet demand, several lines in the East Bay 230 kV system are strained, raising reliability concerns. A new 500/230 kV substation that allows high-voltage power to flow to the Greater Bay Area from the north would improve the deliverability of renewable energy projects in Solano County and other northern renewable resource areas, with the added benefit of allowing power flows to bypass, and thereby reduce, the congestion west of Tesla and improve the efficiency of the grid in the Greater Bay Area.¹

The CAISO Board, in its 2021-2022 Transmission Plan, identified the need for construction of the Collinsville 500/230 kV Substation with connectors to the 500 kV Vaca-

¹ Exh, LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

Dixon line and the 230 kV Pittsburg Substation, with an in-service date of June 1, 2028, to achieve these benefits.² After conducting a competitive solicitation, the CAISO designated LS Power Grid California, LLC (LSPGC) as the Approved Sponsor of the Collinsville 500/230 kV Substation Project. In July 2024, LSPGC filed its application seeking a Certificate of Public Convenience and Necessity (CPCN) authorizing LSPGC to begin construction of its portion of the Collinsville 500/230 kV Substation Project (Application). (For convenience, this brief will refer to LSPGC’s portion of the Collinsville 500/230 kV Substation Project as the “Proposed Project,” “LSPGC’s Project,” or the “Project” and to the total project that includes both LSPGC’s portion and a portion assigned to Pacific Gas and Electric Company (PG&E) as the “Collinsville Project.”)

California Forever (CAF), owner of considerable acreage in the vicinity of the proposed site for the Collinsville Substation, asks the Commission to delay its decision in this proceeding so that the CAISO can reconsider its previous authorization of the Collinsville Project. But the grounds CAF advances for its recommendation are implausible and are contradicted by the record in this proceeding. CAF’s position in this proceeding is grounded in its assertion that “[t]he [Collinsville] Substation and the transmission infrastructure that feeds into it were designed, sized, and sited for one purpose: to receive 1.6 GW of Humboldt offshore wind generation and deliver it to the California grid by June 1, 2034.”³ In essence, CAF asks the Commission to accept this premise despite overwhelming evidence to the contrary:

First, the justifications for the selection of the Collinsville Project in the 2021-2022

Transmission Plan did not include receiving 1.6 GW of Humboldt offshore wind

² Exh, LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

³ Exh. CAF-1, p. 18.

generation. Instead, the Collinsville Project was selected as a means to improve the deliverability of renewable generation resources in the northern part of the state, with the additional benefit of improving the reliability of the 230 kV transmission system in the Greater Bay Area.⁴ CAF essentially asserts that in 2022 or earlier, the CAISO hatched a plan for the Collinsville Substation to be the southern terminus for a new transmission line constructed to connect offshore wind projects in the Humboldt area with the Bay Area load centers, but withheld that plan from mention in the 2021-2022 Transmission Plan, except as an alternative in the sensitivity analysis.

Second, the specifications prescribed for the Collinsville Project in the 2021-2022 Transmission Plan did not include the physical facilities needed to connect a Humboldt transmission line to the Collinsville Substation.⁵ CAF does not offer a direct explanation of why the CAISO would omit the Humboldt connection from its specifications if the Collinsville Project's sole purpose was to receive 1.6 GW of Humboldt generation.

Third, CAF does not explain why CAISO would require a 2028 in-service date for the Collinsville Project if its sole purpose is "to receive 1.6 GW of Humboldt offshore wind generation and deliver it to the California grid by June 1, 2034." CAF asks the Commission to believe that neither the CAISO, its regulator, the Federal Energy Regulatory Commission, nor this Commission would have any concerns about the Collinsville Project being underused with full ratepayer support from 2028, when it would begin service, until 2034, at the earliest, when Humboldt offshore wind facilities were then forecasted to begin production.

⁴ Exh, LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

⁵ Exh. LS-06, pp. 2-4.

Fourth, Humboldt offshore wind was not included in the resources used in the base case analysis for the 2021-2022 Transmission Plan. Offshore wind was studied as part of the sensitivity study for the 2021-2022 Plan, but sensitivity studies are not the basis for the CAISO's identification of projects needed to solve issues that are identified in the transmission planning analysis. CAF sidesteps the inconvenient fact that the base case resources and the topic of the sensitivity study were prescribed by the Commission, not the CAISO, as part of the Commission's role in the Transmission Planning Process.⁶ If the CAISO in 2021-2022 intended to use the Collinsville Substation as a southern terminus for a Humboldt transmission line, it was tacitly foreclosed from including that justification for the Collinsville Project by the Commission's choice of base case resources, which was not challenged by CAF.

In short, CAF's position is that the Commission should accept a series of CAF's implausible allegations about the CAISO's analysis in 2022 and subsequent years and conclude that the CAISO had a disguised intent all along to use the Collinsville Substation solely as the terminus for a Humboldt-Collinsville transmission line. The record shows more direct and simpler reasons for the CAISO's selection of the Collinsville Project.

Since 2002, California has pursued a consistent policy of requiring increasing proportions of retail energy sales to be made from renewable and zero-carbon energy resources. The current Renewables Portfolio Standard target calls for 60% of retail electricity sales to come from eligible renewable energy resources by the end of 2030.⁷ Targets for sales from zero-carbon

⁶ Decision (D.) 21-02-008, pp. 20, 26.

⁷ Pub. Util. Code, § 399.15(b)(2)(B).

resources, which include renewable resources, are 90% by the end of 2035, 95% by the end of 2040, and 100% by the end of 2045.⁸

Developers of renewable and zero-carbon generation projects have responded to these policies by proposing thousands of megawatts of new projects. But transmission constraints have limited or delayed the development of many of these potential projects, and achievement of the state's ambitious goals is threatened by a lack of adequate transmission capacity to deliver the energy produced by these projects to customers.

Transmission constraints have also limited the ability of generation and storage projects to supply Resource Adequacy capacity, leading to higher market prices and load-serving entities' requests for waivers from the requirements the Commission has set in implementing Public Utilities Code section 380. Net Qualifying Capacity, the metric for Resource Adequacy capacity requirements, depends on a generation or storage project's deliverability, which in turn depends on ability of the transmission system to deliver energy to the aggregate of load on the grid at the time of peak load under a variety of stressed conditions.⁹

In its 2021-2022 Transmission Plan, the CAISO concluded that the Collinsville 500/230 kV Substation Project was the preferred solution to improve the deliverability of renewable energy from the northern areas of the state and to address identified transmission constraints. The CAISO identified the Collinsville Project as the recommended mitigation for a number of transmission constraints, including deliverability constraints on the 230 kV system in the East

⁸ Pub. Util. Code, § 454.53(a).

⁹ See the definition of "deliverability" in the CAISO Tariff, Appendix A, available at <https://www.caiso.com/legal-regulatory/tariff>.

Bay.¹⁰ The Collinsville Project will also “provide an additional supply from the 500 kV system into the northern Greater Bay Area to increase reliability to the area and advance additional renewable generation in the northern area.”¹¹ The CAISO recommended the Collinsville Project as a transmission upgrade needed “to ensure deliverability of resources that are needed to meet the State’s policy goals and resource adequacy needs.”¹²

Through a competitive solicitation, CAISO selected LSPGC to finance, construct, own, and operate the primary components of the Collinsville Project. LSPGC now asks the Commission to advance the state’s clean energy and Resource Adequacy policies by granting LSPGC a CPCN to construct a new 500/230 kV substation (the Collinsville Substation) and an approximately 6.5-mile-long double circuit 230 kV transmission line consisting of overhead, submarine, and underground components from the new Collinsville Substation to the existing PG&E Pittsburg substation. This essential infrastructure will help address transmission constraints that interfere with reliable electric service and impede the advancement of renewable generation in the Northern California area.

As instructed in the Assigned Commissioner’s Scoping Memo and Ruling of April 21, 2026 (Scoping Memo), the organization of this brief, after a background section, will correlate with the issues identified in the Scoping Memo.

I. BACKGROUND

The Collinsville 500/230 kV Substation Project is a policy-driven upgrade to the transmission system operated by the CAISO. In its 2021-2022 Transmission Plan, approved by

¹⁰ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, pp. 192-196, 246 (Table 3.10-1: On-peak deliverability constraints requiring transmission upgrades), pp. 246–248.

¹¹ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, p. 193.

¹² Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, p. 249.

the CAISO's Board of Governors on March 17, 2022, the CAISO identified the Collinsville Project as the means to provide an additional 500 kV supply into the northern Greater Bay Area to increase reliability and advance renewable generation and to address multiple overloads on the 230 kV corridor between the Contra Costa and Newark Substations.¹³

The CAISO awarded LSPGC responsibility for the primary scope of the Collinsville 500/230 kV Substation Project, consisting of a new 500/230 kV substation and two 230 kV transmission line circuits. Other interconnection facilities, network upgrades, and distribution upgrades to support the Collinsville Project are the responsibility of PG&E.

LSPGC's Application seeks a CPCN only for the Project (*i.e.*, LSPGC's portion of the larger Collinsville 500/230 kV Substation Project). Although PG&E's facilities were included in the environmental review of the Collinsville Project, they are not included in the scope of authority LSPGC requests in this proceeding.

LSPGC's Project consists of the following key elements: (1) construction of a new 500/230 kV Collinsville Substation, and (2) construction of an approximately 6.5 mile double circuit 230 kV transmission line consisting of overhead, submarine, and underground components from the new Collinsville Substation to the existing PG&E Pittsburg Substation.¹⁴ LSPGC estimates that construction of the Proposed Project will take approximately 24 months to complete once a CPCN is issued, depending upon weather, the completion of the associated PG&E facilities, and other unforeseen or unpredictable factors, with commissioning to follow prior to commercial operation.¹⁵

¹³ Exh. LS-01, Attachment A, pp. 192-196.

¹⁴ Application, pp. 9-10.

¹⁵ Application, p. 10.

A. The CPCN Proceeding

LSPGC filed Application (A.) 24-07-018 seeking a CPCN to construct the Proposed Project on July 30, 2024.¹⁶ On October 25, 2024, CAF filed its motion for party status, which was granted at the prehearing conference on March 2, 2026.¹⁷ On January 16, 2026, the Commission issued D. 26-01-010 extending the statutory deadline for resolving A.24-07-018 to February 28, 2027, noting that the Commission's California Environmental Quality Act (CEQA) staff needed adequate time to review the comments on the draft Environmental Impact Report (EIR) and prepare the final CEQA documents.¹⁸ The Final EIR was issued on March 23, 2026.

A prehearing conference was held on March 2, 2026, and the Scoping Memo was issued on April 21, 2026. The Scoping Memo set forth thirteen issues to be addressed in this proceeding.¹⁹

CAF served the *Prepared Testimony of Expert Deborah Galimba on Behalf of California Forever* on May 13, 2026.²⁰ LSPGC and CAISO served rebuttal testimonies on June 5. The Parties met and conferred on June 10. At that meet and confer session, CAF informed the Parties that its sole witness would be unable to travel for the June 22–23, 2026, evidentiary hearings. Following the June 11 status conference, the Parties filed a Joint Motion to Amend the Scoping Memo and Ruling by taking the evidentiary hearings off calendar and serving additional testimony in lieu of the evidentiary hearings. Specifically, the Parties proposed that CAF would

¹⁶ The Application was dated and submitted on July 29, but was accepted for filing by the Docket Office on July 30, 2024.

¹⁷ Reporter's Transcript, p. 4.

¹⁸ D.26-01-010.

¹⁹ Scoping Memo, pp. 5–6.

²⁰ Exh. CAF-01.

serve surrebuttal testimony on June 22, 2026, in response to LSPGC's and CAISO's rebuttal testimony, and LSPGC and CAISO would serve sur-surrebuttal testimony on June 29, 2026. The briefing schedule would remain unchanged.

Administrative Law Judge (ALJ) Robert Haga granted the Joint Motion in his June 18, 2026 Ruling.²¹ On June 30, 2026, the Parties filed separate motions to offer their respective prepared testimonies in evidence in lieu of oral testimony and a joint motion to offer the Final EIR for the Collinsville Project into evidence.

B. The CAISO's Transmission Planning Process

1. The 2021-2022 Transmission Plan

As part of the 2021-2022 Transmission Planning Process, the CAISO staff undertook a comprehensive evaluation of the CAISO-controlled transmission grid to address grid reliability requirements and to ensure compliance with applicable North American Electric Reliability Corporation (NERC) reliability standards and the CAISO planning standards and tariff requirements. The CAISO staff performed this analysis for a 10-year planning horizon, modeled a range of on-peak and off-peak system conditions, and considered facilities under CAISO operational control with voltages ranging from 60 kV to 500 kV. Where this analysis found reliability concerns, the CAISO identified transmission solutions to address these concerns.²²

The 2021-2022 Transmission Plan concluded that thermal overloading of transmission lines restricts the on-peak delivery of renewable and energy storage portfolio resources within Solano and Solano-Sacramento River areas, and that there was a need to provide additional

²¹ Administrative Law Judge's Ruling Amending the Schedule (June 18, 2026).

²² Exh. CSO-01, pp. 104; Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, pp. 2-3. The 2021-2022 Transmission Plan presents a more detailed summary of the CAISO's study and planning processes at pp. 1-45, available at <https://www.caiso.com/documents/isoboardapproved-2021-2022transmissionplan.pdf>.

energy supply into the northern Greater Bay Area.²³ To remedy these issues, the 2021-2022 Transmission Plan identified the Collinsville 500/230 kV Substation Project as a needed policy-driven transmission project.²⁴

2. The CAISO Selected LSPGC in a Competitive Solicitation

Following approval of the 2021-2022 Transmission Plan by the CAISO's Board of Governors, the CAISO initiated an open, competitive solicitation on April 18, 2022, which provided prospective project sponsors the opportunity to submit proposals to finance, construct, own, operate, and maintain the main scope of the Collinsville Project. Of the 11 selection factors listed in Section 24.5.4 of the CAISO Tariff, the CAISO identified key selection factors for this competitive process that included the capability of the sponsor to finance, construct, and operate the facility; the project sponsor's existing rights of way and substations that would contribute to transmission solution; the sponsor's experience in acquiring rights of way; the proposed schedule and ability to meet the schedule; the sponsor's financial resources; technical and engineering qualifications; and the sponsor's demonstrated cost-containment capability.²⁵

The CAISO evaluated four applications from four candidates. In selecting the Approved Project Sponsor, the CAISO performed a comparative analysis of the candidates' proposals with regard to the qualification criteria described in CAISO Tariff Section 24.5.3.1 and the selection factors in Section 24.5.4.²⁶

²³ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, pp. 192–196.

²⁴ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, p. 249.

²⁵ Application, pp. 5-6, citing the Project Sponsor Selection Report, available at <https://www.caiso.com/InitiativeDocuments/Collinsville-500-kV-Substation-Project-Project-Sponsor-Selection-Report.pdf> (Selection Report).

²⁶ Selection Report, pp. 123–129.

Through this competitive solicitation process, the CAISO selected LSPGC as the Approved Project Sponsor to finance, construct, own, operate, and maintain the primary scope of the Collinsville Project.²⁷ The CAISO and LSPGC entered into an Approved Project Sponsor Agreement (APSA) on August 28, 2023.²⁸ The APSA requires the Collinsville Project to be in service by no later than June 1, 2028. To meet this deadline, LSPGC respectfully asks the Commission to issue a final decision in this proceeding no later than October 31, 2026.

C. Environmental Review Process

The environmental review of the Collinsville Project was conducted by the Commission as the lead agency and is governed by CEQA²⁹ and the CEQA Guidelines.³⁰ The environmental review process began with the submission of the Proponent's Environmental Assessment, which was provided as Appendix B to the Application. The Commission's Energy Division and its consultant then performed the studies and analyses that resulted in the issuance of the Draft EIR on November 4, 2025, followed by public comment. The Final EIR was issued on March 23, 2026.³¹ The environmental review process covered the entire Collinsville 500/230 kV Substation proposal—the Proposed Project and the portions to be constructed by PG&E—although LSPGC's Application seeks a CPCN only for its portion, the Project. On June 30, 2026, the Parties filed a joint motion to admit the Final EIR into the record as Exh. FEIR-01.³²

²⁷ Selection Report, pp. 129–131.

²⁸ The Approved Project Sponsor Agreement was attached to the Application as Appendix A.

²⁹ Pub. Resources Code, §§ 21000–21189.91.

³⁰ Cal. Code Regs., tit. 14, §§ 15000–15387.

³¹ Exh. FEIR-01.

³² Joint Motion of LS Power Grid California, LLC (U-247-E), California Forever, LP, and the California Independent System Operator Corporation to Receive the Final Environmental Impact Report into the Record of the Proceeding (June 30, 2026).

D. The Parties' Positions

The parties to this proceeding split into two camps. LSPGC and the CAISO support the CAISO's continuing determination that the Collinsville Project is needed to support renewable generation in the northern area and to mitigate several transmission constraints in the Greater Bay Area.

CAF contends that the Project's sole justification was to receive 1.6 GW of Humboldt offshore wind generation, and with the federal government's current actions to halt the development of offshore wind in the Humboldt area and elsewhere, the Project is no longer needed. CAF asserts that the CAISO's justifications for the Collinsville Project are "implausible"³³ or "post facto" justifications.³⁴ CAF urges the Commission to pause this proceeding, remand the proceeding to the CAISO for re-evaluation in light of changed circumstances, and revise and recirculate the EIR.³⁵ CAF also asks the Commission to review additional "recommended alternatives" that CAF views as functionally equivalent to LSPGC's Project, and asserts that the U.S. Army Corps of Engineers' review of LSPGC's Project could create both scope and schedule risks.

* * *

The Scoping Memo identified thirteen issues that need to be addressed and resolved in this proceeding.³⁶ The Scoping Memo also stated that the organization of the briefs must

³³ Exh. CAF-1, p. 18.

³⁴ Exh. CAF-2, p. 15.

³⁵ Exh. CAF-2, p. 21.

³⁶ Scoping Memo , pp. 5–6.

correlate to the identified issues.³⁷ LSPGC will address each of the thirteen issues sequentially in this Brief.

II. THE PUBLIC CONVENIENCE AND NECESSITY REQUIRE CONSTRUCTION OF THE COLLINSVILLE PROJECT

Issue 1 asks whether the Project serves a present or future public convenience and necessity that meets the requirements of Public Utilities Code section 1001, et seq.³⁸

A. The Collinsville 500/230 kV Substation Project Serves the Public Convenience and Necessity

The record in this proceeding shows that the Proposed Project will serve the public convenience and necessity and that the requirements of Public Utilities Code section 1001, et seq. have been met. The Proposed Project (or the environmentally superior alternative) addresses critical grid reliability concerns and supports the state's clean energy policy goals.

The Collinsville Project was selected as a policy-driven solution that will support renewable energy and improve deliverability for renewable energy projects. But the 2021-2022 Transmission Plan also identifies the Collinsville Project as the mitigation for several constraints that affect reliability.³⁹ These dual improvements will serve the public convenience and necessity and will provide multiple benefits to the public.

1. The Collinsville Project Will Mitigate Reliability Constraints

The need for the Collinsville Project was initially identified by the CAISO in the 2021-2022 Transmission Plan, and that need has been reaffirmed in subsequent Transmission Plans.⁴⁰

³⁷ Scoping Memo, p. 7.

³⁸ Scoping Memo, p. 5.

³⁹ Exh. LS-01, p. 6 ("CAISO's 2021-2022 plan authorized the Collinsville Project to address base-portfolio deliverability constraints and to provide an additional 500 kV source into the northern Greater Bay Area; both functions will improve reliability.").

⁴⁰ E.g., Exh. LS-04, p. 14; Exh. CAF-2, Appendix D, 2025-2026 Transmission Plan, p. 171.

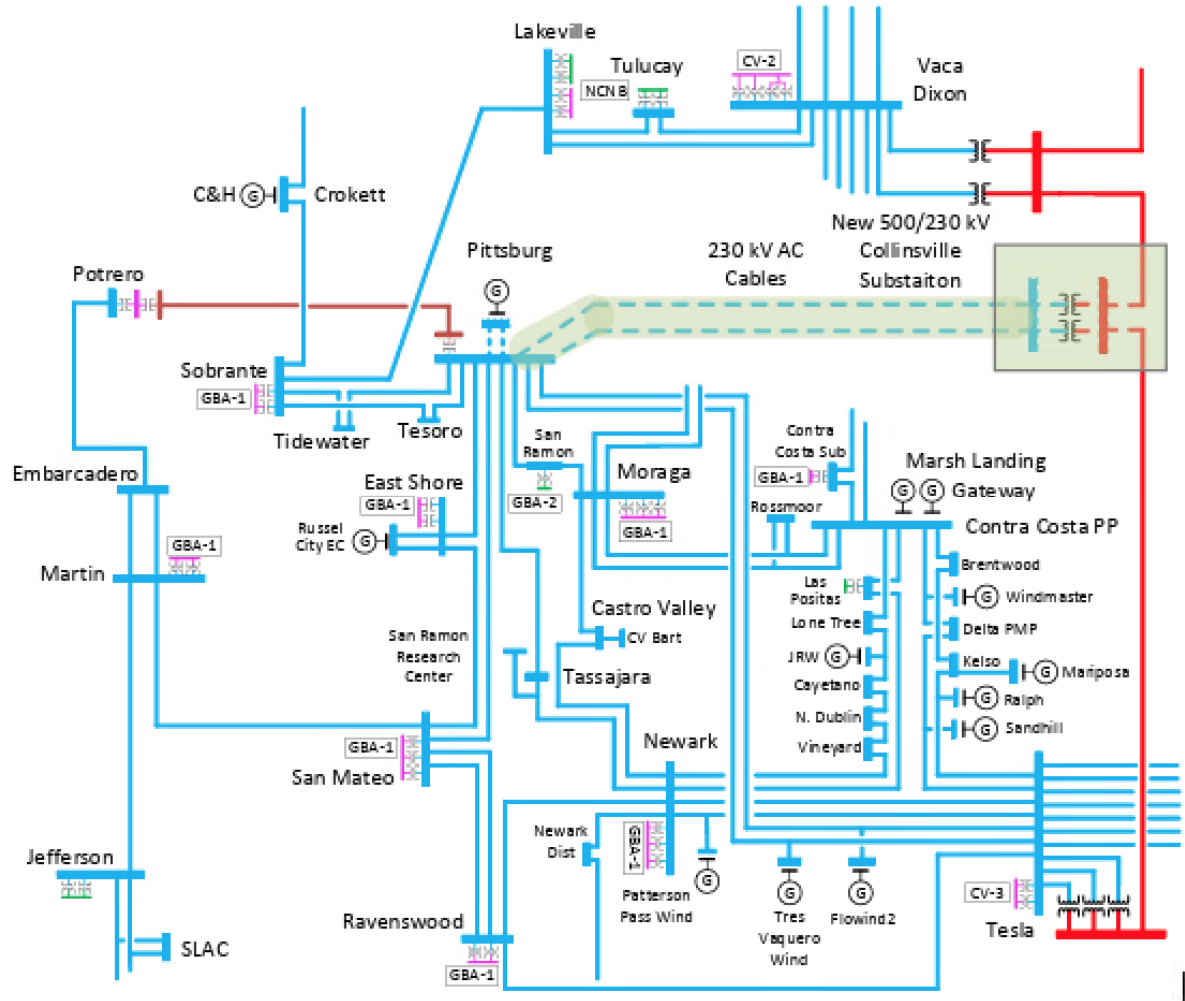
The CAISO's analyses determined that the Collinsville Project will provide benefits to the grid in several interrelated ways. The Collinsville Project will create a new path for power to flow from the 500 kV transmission system into the Greater Bay Area, where unexpected load growth is stressing the existing 230 kV transmission system in the Contra Costa-Newark corridor.

Under existing arrangements, energy from the north, including solar and wind generation from Solano and Sacramento Counties, imported energy from the Pacific Northwest, and developing renewable resource areas in Northern California, would enter the Greater Bay Area through the 500/230 kV Tesla Substation in Tracy, California, east of the Greater Bay Area load centers (the 500 kV system is represented by the bright red line to the right in Figure 1, below). As power from the Tesla Substation flows westward to meet demand, several lines in the 230 kV system experience thermal overloads, especially the lines connecting the Contra Costa Substation and the Newark Substation.⁴¹ A new 500/230 kV substation that allowed power to flow into the Greater Bay Area from the north (*i.e.*, Collinsville) would improve the deliverability of renewable energy projects in Solano County and other northern renewable resource areas, with the added benefit of allowing power to flow more directly from the Pittsburg Substation to the Newark Substation and other substations in the South Bay.⁴² Improving the flow of power from the Pittsburg Substation to the Newark Substation would allow power to bypass, and thereby reduce, the congestion on the 230 kV system in the Contra Costa-Newark corridor and improve the efficiency of the grid in the Greater Bay Area.

⁴¹ Exh. CSO-01, pp. 4-5; Exh. CSO-02, p. 2.

⁴² Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

Figure 1: Collinsville 500/230 kV Substation Project connection
(from 2021-2022 Transmission Plan, Figure 3.5-1)



By providing an additional supply path from the 500 kV transmission system to the northern Greater Bay Area, the Collinsville Project will relieve thermal overloads, mitigate identified transmission constraints, and improve reliability.⁴³

(a) Cayetano-North Dublin 230 kV line

⁴³ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

The analysis of on-peak deliverability in the 2021-2022 Transmission Plan identified a constraint on the Cayetano-North Dublin 230 kV line. Deliverability of renewable energy and energy storage would be limited to zero (0) MW under N-2 conditions (simultaneous failure of two major components) due to thermal overloading.⁴⁴ The Collinsville Project is the recommended mitigation for this constraint.⁴⁵

(b) Lone Tree-USWP-JRW-Cayetano 230 kV line

The on-peak deliverability study also identified a constraint on the Lone Tree-USWP-JRW-Cayetano 230 kV line. Deliverability of renewable energy and energy storage would be limited to zero (0) MW under N-0 conditions (baseline state with all components online and operating) due to thermal overloading.⁴⁶ The Collinsville Project is also the recommended mitigation for this constraint.⁴⁷

(c) Las Positas-Newark 230 kV line

The on-peak deliverability study also identified a constraint on the Las Positas-Newark 230 kV line. Thermal overloading would limit deliverability of renewable and energy storage portfolio resources in the Solano-Sacramento River area to zero (0) MW under N-2 conditions.⁴⁸ The Collinsville Project is the recommended mitigation for this constraint.

2. The Project Will Further California's Renewable and Clean Energy Policy Goals

The transmission constraints identified in the 2021-2022 Transmission Plan limit the deliverability of renewable energy resources and energy storage projects in the northern area.

⁴⁴ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193; Exh. CSO-01, p. 5.

⁴⁵ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

⁴⁶ Exh. CSO-01, p. 5.

⁴⁷ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, pp. 194-195.

⁴⁸ Exh. CSO-01, p. 5; Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 195.

The CAISO Tariff defines “deliverability” as “Transmission capacity enabling the delivery of Energy to the aggregate of Load on the CAISO Controlled Grid at peak Load, under a variety of modeled stressed conditions.” A resource’s deliverability also determines its Net Qualifying Capacity for purposes of Resource Adequacy. A renewable energy project or energy storage facility that lacks deliverability will be unable to sell Resource Adequacy capacity to the load-serving entities that are required to secure their allocated share of the Resource Adequacy capacity needed to maintain the grid’s reliability. Limited supply of Resource Adequacy capacity has resulted in higher prices, increasing costs for load-serving entities and their customers.

As discussed above, the Collinsville Project will remove constraints that limit the deliverability of renewable and energy storage resources. Improving the ability of the energy from renewable projects and energy storage in the northern area to reach customers in the Bay Area load centers will further the goals established for procurement and use of renewable energy (Public Utilities Code section 399.11(a)–60% of total retail electricity sales in California to come from renewable resources by December 31, 2030) and zero net-carbon resources (Public Utilities Code section 454.53(a)–eligible renewable energy resources and zero-carbon resources are to supply 100 % of all retail sales of electricity to California end-use customers by December 31, 2045).

Solano County and the Sacramento River Valley are already the site of numerous wind and solar energy projects, and development of renewable energy and storage resources will continue as the state pushes to meet the 2030 and 2045 goals. By providing a new path from the 500 kV transmission grid to the Bay Area load center, the Collinsville Project will further these statutory public policy goals.

3. The Project Serves the Public Convenience and Necessity

These examples show how projects selected as policy-driven projects can provide reliability benefits and serve the public convenience and necessity required by Public Utilities Code section 1001. When deliverability is unavailable to renewable energy and energy storage projects, those projects cannot provide Resource Adequacy capacity. An undersupply of Resource Adequacy capacity increases prices for available capacity and can eventually lead to backstop procurement by the CAISO and the threat and possible reality of outages. In addition, the revenues that renewable resources could earn from sales of Resource Adequacy capacity will be unavailable to support expansion of renewable energy and energy storage in the northern area.

The Collinsville Project will avoid the undesirable outcomes described above. It will improve the ability of renewable energy and energy storage projects to qualify for deliverability, resulting in an increase in the supply of Resource Adequacy capacity, lower prices for Resource Adequacy capacity, and a reduced risk of backstop procurement or outages.⁴⁹

For all these reasons, the record amply demonstrates that the Project serves the public convenience and necessity, and the requirements of Public Utilities Code section 1001 have been met.

B. CAF's Contentions that the Project Is Not Needed Lack Support

CAF offers several arguments for its claim that the Collinsville Project is not needed because, CAF claims, the Collinsville Project is tethered to the Humboldt to Collinsville 500 kV (HVDC operated as AC) line (the Humboldt line), which, CAF continues, is also not needed due to federal opposition to offshore wind, including Humboldt area offshore wind. To support its claims, CAF asserts:

⁴⁹ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, p. 193.

- A “consistent and significant linkage” between the Collinsville Project and the Humboldt line “long predates” the CAISO’s identification of the Humboldt line in its 2023-2024 Transmission Plan.⁵⁰
- The uncertain prospects for development of Humboldt area offshore wind mean there is no need for the Humboldt line or the Collinsville Project, which was “designed, sized, and sited for one purpose: to receive 1.6 GW of Humboldt offshore wind generation and deliver it to the California grid by June 1, 2034.”⁵¹
- The absence of Humboldt generation requires a reassessment of the need for and location of the Collinsville Project.⁵²
- Other alternatives can provide the same reliability benefits as the Collinsville Project with fewer environmental impacts.⁵³
- Federal navigational projects and permitting may create “an obvious physical and regulatory conflict” with the Collinsville Project as proposed.⁵⁴
- Recent growth of battery energy storage systems (BESS) may have eliminated the transmission constraints that justified the Collinsville Project.⁵⁵

In the following sections, LSPGC will demonstrate that none of these contentions is based on facts or other relevant considerations. When placed under scrutiny, CAF’s claims quickly unravel.

1. CAISO’s Identification of the Need for the Collinsville Project Was Not Linked to the North Coast Offshore Wind or the Humboldt Transmission Line

CAF’s allegation that the Collinsville Project was tethered to the Humboldt transmission line and offshore wind immediately collides with contradictory facts.

⁵⁰ Exh. CAF-1, pp. 7-8.

⁵¹ Exh. CAF-1, pp. 17-18.

⁵² Exh. CAF-1, pp. 19-28; Exh. CAF-2, p. 17.

⁵³ Exh. CAF-1, pp. 28-33; Exh. CAF-2, pp. 5-8.

⁵⁴ Exh. CAF-1, pp. 18-19; Exh. CAF-2, pp. 15-17.

⁵⁵ Exh. CAF-2, pp. 8-10.

Timing. First, the Collinsville Project was identified in the CAISO's 2021-2022 Transmission Plan to address transmission constraints and provide an additional 500 kV path into the Greater Bay Area. The Humboldt transmission line was not approved until two years later, in the 2023-2024 Transmission Plan.⁵⁶ CAF's efforts to overcome this temporal discrepancy are futile. CAF first cites a study prepared by the federal Bureau of Ocean Management (BOEM)—the same agency responsible for issuing leases for offshore wind—that explored options for connecting Humboldt offshore wind that included a new 500 kV substation to loop in a line from Humboldt.⁵⁷ CAF mentions that the BOEM study was issued before the CAISO Board approved the 2021-2022 Transmission Plan, but utterly fails to show that this study had anything to do with the identification of the need for the Collinsville Project in the 2021-2022 Transmission Plan.

CAF next points to a stakeholder meeting on the draft 2021-2022 Transmission Plan, which included the Collinsville Substation as a new policy-driven project and presented a Humboldt-to-Collinsville transmission scenario. This point is hardly surprising, since the Transmission Plan the CAISO Board ultimately adopted included both the Collinsville Substation as a policy-driven project and a Humboldt-to-Collinsville transmission line as a scenario in the sensitivity study, discussed below.

CAF then argues that a Humboldt-to-Collinsville transmission line was also considered in the CAISO's 20-Year Transmission Outlook published in May 2022. But the 20-Year Outlook is

⁵⁶ Exh. LS-01, p. 3, Attachment B, 2023-2024 Transmission Plan, pp. 72-73.

⁵⁷ Exh. CAF-1, p. 7.

an exercise to explore possible transmission requirements for the next two decades and it is not a vehicle for the CAISO to identify specific needs or approve projects to address those needs.⁵⁸

Finally, CAF cites a presentation at a California Energy Commission workshop held six months after the 2021-2022 Transmission Plan was approved by the CAISO Board where a Humboldt-to-Collinsville transmission line was presented as one of the options for moving Humboldt offshore wind energy to load centers. Again, this is not exactly startling; a similar option was included as a scenario in the sensitivity study for the 2021-2022 Transmission Plan.

It is clear from these assertions that CAF is relying heavily on any mention of a Humboldt-Collinsville transmission option to support its claim that this link was the “real” justification for the Collinsville Project. CAF misunderstands both the source of the resource assumptions for the Transmission Plan and the function of the sensitivity study. The CAISO does **not** develop the resource assumptions for the base case or for the sensitivity case. In an annual process, both of those inputs are developed by the Commission as part of the Integrated Resource Plan proceeding and are then transmitted to the CAISO for use in the Transmission Planning Process. The Commission adopted the resource assumptions for the 2021-2022 Transmission Plan in D.21-02-008, entitled “Decision Transferring Electric Resource Portfolios to California Independent System Operator for 2021-2022 Transmission Planning Process.” The base resource assumptions the Commission conveyed to the CAISO did not include any offshore wind capacity,⁵⁹ which means that the CAISO’s identification of the need for the Collinsville Project in the 2021-2022 Transmission Plan could not have been based on a need to “receive 1.6 GW of Humboldt offshore wind,” the foundation for CAF’s positions in this proceeding.

⁵⁸ Exh. CF-1, Appendix B, p. 5.

⁵⁹ D.21-02-008, p. 20.

Offshore wind was included in one of the two sensitivity studies adopted in D.21-02-008. Although CAF attempts to equate the sensitivity studies performed as part of the Transmission Planning Process with the base case studies that result in selection of specific projects, the Commission explained that the sensitivity cases “are used primarily for informational purposes, to help inform future planning efforts.”⁶⁰ When it adopted the offshore wind sensitivity case, the Commission offered a clarification that undermines CAF’s reliance on this sensitivity case:

We emphasize that the purpose of this study is to obtain key inputs for capacity expansion modeling to inform future portfolio development. **We do not necessarily see the OSW portfolio used for this study as part of an optimal portfolio overall.** Rather, this study is designed to test the transmission implications if barriers were to be removed to large-scale development of OSW.⁶¹

If that statement was not clear enough, the Commission later repeated and emphasized this point: “The outputs of the study in this regard may be useful for future planning; we emphasize our earlier point that this portfolio is not expected to be part of the resource planning requirements at this time.”⁶²

Physical Facility: CAF’s contention about the linkage between the Collinsville Project and the Humboldt transmission line runs up against the fact that the physical layout of the Collinsville Project does not accommodate a connection to the Humboldt line.⁶³ To connect the Humboldt line to the Collinsville Project as planned would require addition of a Humboldt 500 kV line terminal, an additional 500 kV line dead-end structure, additional 500 kV gas-insulated switchgear (GIS) breakers, 500 kV buswork or GIS bus duct for a Humboldt terminal, and the

⁶⁰ D.21-02-008, p. 24; Exh. LS-01, p. 8.

⁶¹ D.21-02-008, p. 26 (emphasis added).

⁶² D.21-02-008, p. 28; see also D.21-02-008, p. 42, Conclusion of Law No. 11: “It is likely that transmission upgrades to support [out of state] renewables will be needed earlier than transmission upgrades to support OSW.”

⁶³ Exh. LS-01, p. 7; Exh. LS-06, pp. 2-4.

associated protection, control, metering, communications, grounding, civil, and structural facilities required to interconnect the Humboldt-Collinsville line.⁶⁴ If the CAISO intended all along that the Collinsville facility's sole purpose was to serve as the terminal for the Humboldt line, it would have included this equipment in the scope of the Collinsville Project. It did not.⁶⁵

Uncertainty: As the preceding discussion makes clear, the approval of the Collinsville Project in the 2021-2022 Transmission Plan was not dependent on the development of Humboldt offshore wind. The 2021-2022 Transmission Plan justified the Collinsville Project on bases that did not include offshore wind. Like any well-planned transmission facility, the Collinsville Project could be expanded to accommodate future transmission lines,⁶⁶ including a line from Humboldt if offshore wind is developed, but the justification and planned use of the Project are unaffected by the success or failure of offshore wind. The CAISO emphasized this point in the 2024-2025 Transmission Plan:

By 2028, an additional 500/230 kV supply source will be established at Collinsville, located in the northeastern part of the Bay Area. This new facility will provide stronger support for the East Bay and alleviate stress on the 230 kV lines, particularly in the Contra Costa region. This source was approved in the ISO's 2021-2022 transmission plan, and while it may also provide a termination for the proposed Humboldt-Collinsville transmission line subsequently proposed in the ISO's 2023-2024 transmission plan, it is not dependent on the Humboldt-Collinsville project.⁶⁷

Because the Collinsville Project is not dependent on the Humboldt-Collinsville line or the successful development of offshore wind, CAF's extensive testimony questioning the future of offshore wind is irrelevant. As LSPGC's witness stated, "From a project-scope and engineering

⁶⁴ Exh. LS-06, p. 3.

⁶⁵ Exh. LS-01, p. 3 (the Collinsville APSA does not include the facilities needed to interconnect to a future Humboldt Project).

⁶⁶ Exh. LS-01, p. 5; Exh. LS-06, p. 4.

⁶⁷ Exh. LS-01, Attachment C, 2024-2025 Transmission Plan, p. 69.

standpoint, uncertainty regarding a future Humboldt project does not change the scope of the current Collinsville Project.”⁶⁸ With regard to the need for the Collinsville Project, it simply does not matter whether offshore wind succeeds or not.

Reassessment: For similar reasons, no reassessment of the justification of the Collinsville Project is needed. The Collinsville Project was identified through an analysis that included zero (0) MW of offshore wind resources.⁶⁹ The possibility that offshore wind may be delayed or cancelled altogether does not require a reassessment, because no offshore wind was assumed when the CAISO approved the Collinsville Project. The delay or cancellation of offshore wind does not require a reassessment.

In addition, the CAISO’s annual Transmission Planning Process results in a continuing reassessment of transmission needs. In determining the overall needs of the system in each planning cycle, CAISO considers projects that were identified in previous cycles.⁷⁰ The CAISO has continued to include the Collinsville Project in its list of existing resources in subsequent planning cycles,⁷¹ even as assumptions about offshore wind were adjusted.⁷²

Delaying or cancelling the Collinsville Project could have widespread consequences beyond this proceeding, including effects on deliverability assumptions, network upgrade assumptions, interconnection study results, and the ability of resources to obtain or retain

⁶⁸ Exh.LS-06, p. 6.

⁶⁹ D.21-02-008, p. 20.

⁷⁰ Exh. CSO-02, p. 7.

⁷¹ Exh. CSO-02, p. 6.

⁷² *E.g.*, the Commission’s decision on the base case resource assumptions for use in the 2026-2027 Transmission Planning Process delays the assumed online date for 1.6 GW of Humboldt offshore wind from 2035 to 2041. D.26-02-057, p. 59.

deliverability.⁷³ The Commission should avoid adopting drastic recommendations that, like CAF's proposals, are not supported by the appropriate technical analyses.⁷⁴

Alternatives: CAF continues to argue either that thermal overload concerns in the 230 kV corridor between the Contra Costa and Newark substations are no longer an issue, or that alternatives could provide the same reliability solutions as the Collinsville Project.⁷⁵ Both arguments are mistaken.

First, CAF asserts that the 2025-2026 Transmission Plan has determined that these thermal overloads are no longer an issue, in part due to upgrades that have been completed or identified after the 2021-2022 Transmission Plan identified the Collinsville Project as the mitigation for these problems. CAF's assertion is based on the mistaken assumption that the Collinsville Project is no longer needed to address these issues. In fact, the CAISO includes the Collinsville Project and its mitigation in its modelling for subsequent Transmission Plans. Without the Collinsville Project, "the CAISO's reliability assessments show overloads occurring in the mid-term planning scenario and then worsening in the long-term scenarios," even with the completion of the projects CAF cites.⁷⁶

Second, even with the completion of the North Dublin-Cayetano 230 kV reconductoring project and the Lone Tree-Cayetano-Newark corridor series compensation project, thermal overloads will still occur in the absence of the Collinsville Project. As the CAISO witness

⁷³ Exh. LS-04, p. 12.

⁷⁴ Exh. LS-04, p. 14.

⁷⁵ Exh. CAF-2, pp. 5-10.

⁷⁶ Exh. CSO-02, p. 3.

concluded, “the Collinsville 500/230 kV Substation Project remains important to address overloads on the Contra Costa and Newark 230 kV corridor.”⁷⁷

Navigation Issues: CAF claims that the Collinsville Project as planned will conflict with federal projects to dredge the Sacramento River in the vicinity of the submarine cable⁷⁸ and that the need to obtain a Section 404 authorization and Section 408 clearance from the Army Corps of Engineers (ACOE) could require relocation of the cable or result in higher costs and significant delays for completion of the Project.⁷⁹

LSPGC’s sur-surrebuttal testimony successfully refutes those claims.⁸⁰ LSPGC’s witness, who led the permitting effort for another project that used a submarine cable, describes how LSPGC has consulted closely with the ACOE and concludes that the Project will qualify for Section 404 approval under the streamlined Nationwide Permit 57 process.⁸¹ That process is “highly unlikely” to force a change in the location or depth of the submarine cables.⁸² LSPGC has also consulted with the ACOE on the Section 408 clearance, and the LSPGC’s plans for cable burial are consistent with ACOE’s recommendations. LSPGC has planned to position the cable 15 feet below the current river bottom, well beneath the ACOE approved channel depths in the Project area. Nothing to date has suggested that the Section 408 process will result in the “significant delays” that CAF raises.⁸³

⁷⁷ Exh. CSO-02, p. 4.

⁷⁸ Exh. CAF-01, pp. 18-19.

⁷⁹ Exh. CAF-02, pp. 15-17.

⁸⁰ Exh. LS-05.

⁸¹ Exh. LS-05, pp. 2-3.

⁸² Exh. LS-05, p. 2.

⁸³ Exh. LS-05, pp. 4-6.

BESS Growth: CAF speculates that the rapid growth in BESS capacity in California could mitigate the constraints that were part of the justification for the Collinsville Project and requires new studies by the CAISO.⁸⁴ No re-study is required for several reasons.

First, the base case resource assumptions that the Commission provides to the CAISO include BESS capacity. The base case resources for the 2025-2026 Transmission Planning Process, for example, include 11.6 GW of 4-hour BESS in 2030 and 15.7 GW in 2045, and 1.2 GW of 8-hour BESS in 2030, increasing to 21.1 GW by 2045.⁸⁵ Despite this forecasted growth in BESS, however, the 2025-2026 Transmission Plan retained the Collinsville Project without modification in its list of existing resources.⁸⁶

Second, general statewide growth in BESS capacity does not by itself eliminate the need for a specific transmission project. As LSPGC's witness, an expert with extensive experience in transmission planning, noted, "A BESS resource must be located, deliverable, modeled, dispatchable, available, and operationally capable of relieving the specific constraint under the relevant system condition and contingency. A statewide battery capacity number does not demonstrate anything about how BESS affects the need for a particular transmission resource."⁸⁷

Third, the CAISO includes battery storage and the two specific BESS projects cited by CAF in the studies performed as part of the Transmission Planning Process. The conclusion? "Neither of these projects nor other battery energy storage resources included in the CPUC's resource portfolios have eliminated the reliability need for the Collinsville 500/230 kV Substation Project, which remains part of the overall solution to meet the overloads on the

⁸⁴ Exh. CAF-2, pp. 8-10.

⁸⁵ D.26-02-057, p. 60.

⁸⁶ Exh. CAF-2, Appendix D, 2025-2026 Transmission Plan, p. 171.

⁸⁷ Exh. LS-04, p. 11.

Contra Costa and Newark 230 kV corridor observed in mid-term and long-term planning studies.”⁸⁸

Timing Revisited: CAF’s theory that the Collinsville Project is tethered to the Humboldt transmission line raises one obvious question that is not addressed in CAF’s testimony: If the sole purpose of the Collinsville Project is “to receive 1.6 GW of Humboldt offshore wind generation and deliver it to the California grid by June 1, 2034,” as CAF has alleged, why would the CAISO approve a project in 2022 with an in-service date of 2028 if the project would not be needed until 2034 (and now 2041⁸⁹)? If one accepts CAF’s premise that “a consistent and significant linkage between the Project and proposed [Humboldt] line . . . long predates CAISO’s identification of the [Humboldt] line in its 2023-2024 Transmission Plan,”⁹⁰ what possibly could explain the CAISO’s motivation in selecting a project in 2022 that it knew would not be needed until 2034 at the earliest? Did CAISO expect that its economic regulator, the Federal Energy Regulatory Commission, would allow ratepayers to bear the full cost of the Collinsville Project while it was underused for six to thirteen years, and that the Commission would accede to that treatment?

Answering these questions seems to require a complicated explanation alleging defects in the CAISO’s transmission planning (although CAF’s witness has no transmission planning experience), arrangements with the Commission (for handing the CAISO a resource plan with no offshore wind), or some other questionable explanation. As usual, the simple explanation is the correct one: CAISO identified the Collinsville Project in the 2021-2022 Transmission Plan

⁸⁸ Exh. CSO-02, p. 4.

⁸⁹ D.26-02-057, p. 59.

⁹⁰ Exh. CAF-1, p. 7.

because it was needed by 2028 to address constraints in the Contra Costa to Newark 230 kV corridor and to create a new high-voltage path into the Greater Bay Area for renewable energy projects in the area north of the Sacramento-San Joaquin River Delta and to serve load growth.

These questions expose the irreparable flaw in CAF's approach. The Commission should reject CAF's speculation and unsupported assertions and instead find that the Proposed Project will serve the future public convenience and necessity.

III. A REBUTTABLE PRESUMPTION OF NEED APPLIES TO THE COLLINSVILLE PROJECT

The Scoping Ruling's second question asks whether the Project qualifies for Public Utilities Code section 1001.1's rebuttable presumption. That statute requires the Commission, in a CPCN proceeding, to establish a "rebuttable presumption with regard to need for the proposed transmission project in favor of an Independent System Operator governing board-approved need evaluation" if four conditions are met. The Collinsville Project meets each of those four conditions, and the Commission should apply the rebuttable presumption.

A. The CAISO Board Found that the Project Is Needed

The statute's first condition is:

The Independent System Operator governing board has made explicit findings regarding the need for the proposed transmission project and has determined that the proposed project is the most cost-effective transmission solution.

The 2021-2022 Transmission Plan, approved by the CAISO Board of Governors on March 17, 2022, included a "New Collinsville 500 kV substation" on its list of policy-driven transmission projects "[f]ound to be needed."⁹¹ The 2021-2022 Transmission Plan also determined that the Collinsville Project was eligible for a competitive solicitation. In its

⁹¹ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, p. 378.

Selection Report, the CAISO stated that “the ISO has determined that LSPGC and its team are qualified, experienced, and have the financial resources to capably, cost-effectively, and reliably license, finance, construct, operate, and maintain this particular project at the lowest cost and by the specified in-service date.”⁹²

B. CAISO Is a Party

The second statutory condition simply requires:

The Independent System Operator is a party to the proceeding.

The CAISO filed a motion for party status in this proceeding on February 26, 2026. ALJ Haga granted the CAISO’s motion at the prehearing conference.⁹³ The CAISO filed rebuttal testimony and sur-surrebuttal testimony and has been an active participant in this proceeding.⁹⁴

C. Timing of Need Evaluation

The third condition of the statute reads:

The Independent System Operator governing board-approved need evaluation is submitted to the commission within sufficient time to be included within the scope of the proceeding.

A link to the 2021-2022 Transmission Plan, which identified the need for the Collinsville Project, was provided in footnote 2 to the Application filed on July 30, 2024, sufficiently in advance of the issuance of the Scoping Memo that defines the scope of the proceeding on April 21, 2026. This condition has been met.

D. No substantial changes

The statute’s final condition requires:

There has been no substantial change to the scope, estimated cost, or timeline of the proposed transmission project as approved by the Independent System Operator governing board.

⁹² Selection Report, pp. 130–131.

⁹³ Reporter’s Transcript, Vol. 1, p. 4.

⁹⁴ Exh. CSO-01 and CSO-02.

The scope of the Proposed Project and the timeline for the Proposed Project have not changed since the CAISO Board approved the 2021-2022 Transmission Plan on March 17, 2022. In the intervening four years, costs have been affected by tariffs, inflation, increases in the price of copper and submarine cable, and a potential site relocation to the environmentally superior alternative identified in the Final EIR. Despite these challenges, LSPGC retains its estimate that the capital cost of the Proposed Project is the \$324.7 million estimated in the Application, or \$364.7 million including Allowance for Funds Used During Construction (AFUDC).⁹⁵ This condition has been met.

Because these four conditions have been met, Public Utilities Code section 1001.1 requires the Commission to presume and find that the Proposed Project is needed. The Scoping Memo determined that this issue was not contested.

LSPGC estimates that the capital cost of the environmentally superior alternative, discussed in Section VI, \$332.7 million, or \$372.7 million with AFUDC, is not materially different from that of the Proposed Project, both when it was approved by the CAISO Board and currently. In addition, the higher costs LSPGC will incur due to the relocation of the Collinsville Substation farther away from the terminus of the 230 kV line at the Pittsburg Substation may be somewhat offset by lower costs of PG&E's shorter connecting lines from the Vaca-Dixon 500 kV line. The environmentally superior alternative also does not result in a material difference in the scope or timeline of the Proposed Project. Thus, the environmentally superior alternative, if the Commission were to order its implementation, also qualifies for the rebuttable presumption of need.

⁹⁵ The 2021-2022 Transmission Plan showed an estimated cost for this project of \$475-\$675 million, but that estimate includes the cost of the PG&E facilities.

IV. THE SIGNIFICANT ENVIRONMENTAL IMPACTS OF THE COLLINSVILLE PROJECT OR THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Scoping Memo's third question asks, "What are the significant environmental impacts of the Project?"

The Final EIR comprehensively evaluates the Collinsville Project's potential environmental impacts across 20 resource categories. The Collinsville Project would have no impact or less than significant impact on resource categories, including Aesthetics, Hydrology and Water Quality, Population and Housing, Public Services, Recreation, and in several subcategories, as detailed in the Final EIR.⁹⁶

However, the Final EIR also finds that the Collinsville Project has significant and unavoidable impacts in the following areas:

- **Air Quality** (temporary cumulative net increase in criteria pollutants in non-attainment region during construction);⁹⁷
- **Biological Resources** (substantial direct or indirect adverse effect on bird species);⁹⁸
- **Cultural Resources** (substantial adverse effect on potential archaeological or historical resources; potential disturbance of human remains, coring tests needed to evaluate);⁹⁹

⁹⁶ Exh. FEIR-01, Vol. 2, Table ES-2, pp. ES-5 to ES-28.

⁹⁷ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-8.

⁹⁸ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-10.

⁹⁹ Exh. FEIR-01, Vol. 2, Table ES-2, pp. ES-15 to ES-16.

- **Energy** (conflict with a state or local plan for renewable energy or energy efficiency);¹⁰⁰
- **Greenhouse Gas Emissions** (conflict with an applicable plan, policy, or regulation adopted to reduce emissions of greenhouse gases);¹⁰¹
- **Land Use and Planning** (conflict with any land-use plan, policy, or regulation adopted to avoid or mitigate an environmental effect);¹⁰²
- **Mineral Resources** (loss of availability of a valuable known mineral resource or locally important mineral resource recovery site);¹⁰³
- **Noise** (substantial temporary increase in ambient noise level in excess of applicable standards);¹⁰⁴ and
- **Tribal Cultural Resources** (substantial adverse effect on potential tribal cultural resource).¹⁰⁵

The significant and unavoidable impacts to tribal cultural resources warrant additional comment. Section 4.18 of the Final EIR notes that within the Project Site plus a one-mile buffer, there is the potential for impacts to tribal cultural resources along the north bank of the Sacramento River that will be significant and unavoidable.¹⁰⁶ As set forth in Section 4.18 of the Final EIR, LSPGC will implement mitigation measures focused on training its workforce on

¹⁰⁰ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-17.

¹⁰¹ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-18.

¹⁰² Exh. FEIR-01, Vol. 2, Table ES-2, pp. ES-21 to ES-22.

¹⁰³ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-22.

¹⁰⁴ Exh. FEIR-01, Vol. 2, Table ES-2, pp. ES-22 to ES-23.

¹⁰⁵ Exh. FEIR-01, Vol. 2, Table ES-2, p. ES-26.

¹⁰⁶ Exh. FEIR-01, Vol. 2, pp. 4.18-21.

identifying and reporting sensitive tribal cultural resources if and when they are found to address and reduce the potential impact to these tribal cultural resources. Nevertheless, these mitigation measures would not reduce the potential impact on tribal cultural resources to a less-than-significant level. The Commission's adoption of the Environmental Superior Alternative (Alternative 1 + Proposed Project) would result in the same significant and unavoidable potential impacts to tribal cultural resources.¹⁰⁷

The Commission will also need to consider adopting a statement of overriding considerations. The CEQA Guidelines require the Commission to balance, as applicable, the economic, legal, social, technological, or other benefits of the Collinsville Project against its unavoidable environmental risks.¹⁰⁸ Based on the record in this proceeding, the Commission can and should conclude that the benefits of the Collinsville Project, as discussed in detail in Section VIII of this Brief, override the significant and unavoidable environmental impacts of the Collinsville Project. LSPGC will implement appropriate mitigation measures to reduce the potential significant and unavoidable impacts across 20 resource categories. Furthermore, and as identified in the 2021-2022 Transmission Plan and in the Application, the construction and operation of the Project addresses transmission constraints, provides reliability support, and facilitates the development of renewable generation in the northern Greater Bay Area, benefits that the Commission may consider in its balancing.

The Scoping Memo determined that this issue does not raise contested, material issues of fact.

V. MITIGATION MEASURES WILL AVOID OR LESSEN THE IDENTIFIED SIGNIFICANT ENVIRONMENTAL IMPACTS

¹⁰⁷ Exh. FEIR-01, Vol. 2, Section 6, p. 6-32.

¹⁰⁸ CEQA Guidelines, § 15093.

The Scoping Memo's fourth question asks whether there are potentially feasible mitigation measures that will avoid or lessen the identified significant environmental impacts.

The Final EIR identifies comprehensive feasible mitigation measures that will avoid or lessen the Collinsville Project's significant environmental impacts. Attachment 1 to Volume 3 of the Final EIR presents the Mitigation Monitoring and Reporting Program (MMRP). The MMRP lists three types of environmental mitigation measures:

Applicant-Proposed Measures (APMs): LSPGC has proposed extensive APMs designed to reduce potential impacts in a broad array of resource areas.¹⁰⁹

PG&E's Proposed Construction Measures (CMs): PG&E has proposed CMs for its portion of the work, which are incorporated into the Final EIR's mitigation framework. PG&E's CMs include measures for biological resources protection, hazardous materials management, and construction equipment emissions controls.¹¹⁰

Final EIR-Identified and Recommended Mitigation Measures: Based on the environmental review, the MMRP identifies additional mitigation measures to supplement or supersede the APMs or CMs where necessary to ensure impacts are reduced to less-than-significant levels.¹¹¹ If the Commission grants a CPCN for the Proposed Project or the environmentally superior alternative and adopts the MMRP, a detailed Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) would be developed, with specific guidelines and expectations established to ensure compliance with the adopted MMRP.¹¹²

¹⁰⁹ Exh. FEIR-01, Vol. 2, Table 2-12 pp. 2-8 to 2-96.

¹¹⁰ Exh. FEIR-01, Vol. 2, Table 2-13, pp. 2-97 to 2-106.

¹¹¹ Exh. FEIR-01, Vol. 3, Attach. 1, p. 1.

¹¹² Exh. FEIR-01, Vol. 3, Attach. 1, p. 1.

LSPGC agrees to implement all of the APMs and recommended mitigation measures as part of the Proposed Project. With implementation of these measures, all potentially significant impacts other than the significant and unavoidable impacts identified above would be reduced to less-than-significant levels for LSPGC's Project. The measures are feasible from technical, economic, and legal perspectives for the Collinsville Project. Similarly, PG&E's CMs and mitigation measures would reduce impacts for PG&E's portion of the Collinsville Project, and the Commission can enforce PG&E's implementation of these measures.¹¹³

The Scoping Memo determined that this issue does not raise contested, material issues of fact.

VI. THE PROPOSED PROJECT AND THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The Scoping Memo's fifth issue asks, "As between the Project and the project alternatives, which is environmentally superior?" LSPGC stands ready to implement the Commission's selection of either the Proposed Project or the Final EIR's identified environmentally superior alternative, Alternative 1 + Proposed Project.

A. Both the Collinsville Project and the Environmentally Superior Alternative Accomplish Transmission Planning Objectives and State Policy Goals

The Final EIR's Alternatives Screening Report culminated in the identification and screening of 17 potential alternatives to the Collinsville Project, six of which were retained for analysis as part of the Commission's CEQA review process.¹¹⁴ The Final EIR eliminated certain alternatives from detailed review because they were unable to meet most of the basic Project objectives, infeasible, or unable to avoid or substantially lessen one or more potential significant

¹¹³ Exh. FEIR-01, Vol. 3, Attach. 1, p. 3.

¹¹⁴ Exh. FEIR-01, Vol. 3, Appendix C.

impacts of the Collinsville Project.¹¹⁵ The alternatives eliminated from detailed consideration included:

- **Substation Relocation Alternatives** (Collinsville Substation South of Talbert Lane, Collinsville Substation East of Talbert Lane, Collinsville Substation on Industrial Zoned Land, Collinsville Substation North of Pittsburg Substation, Collinsville Substation South of Pittsburg Substation);
- **Route Relocation Alternative** (Route Relocation Outside of Bay Conservation and Development Commission Jurisdiction);
- **Transition and Transmission Structure Alternatives** (In-river Transition Structure, 500 kV Interconnection Lines on a Single Set of Transmission Structures); and
- **Construction Methods Alternatives** (230 kV Submarine Segment – Full Horizontal Directional Drilling (HDD) Installation, 230 kV Submarine Segment – Partial HDD Installation, Reduced Activity Level for In-Water Work).¹¹⁶

The Final EIR then evaluated in detail the following:¹¹⁷

- **No Project Alternative:** The CEQA-required alternative reflects existing conditions and identifies what would reasonably be expected to occur if the Collinsville Project were not approved.¹¹⁸
- **Alternative 1: Collinsville Substation North of Talbert Lane:** This alternative would move the Collinsville Substation site approximately 1.2 miles north to approximately 500 feet north of Talbert Lane and approximately 1 mile east of Collinsville Road. The 500

¹¹⁵ Exh. FEIR-01, Vol 2, pp. 3-2, 3-6 to 3-7.

¹¹⁶ Exh. FEIR-01, Vol. 2, pp. 3-6 to 3-7.

¹¹⁷ Exh. FEIR-01, Vol. 2, pp. 3-7 to 3-30.

¹¹⁸ Exh. FEIR-01, Vol. 2, p. 3-30.

kV interconnection lines would be approximately 0.4-mile long in total (both lines combined) and would require 3 to 4 multi-pole tubular steel pole (TSP) structures (up to 9 individual poles) to interconnect to the existing 500 kV Vaca Dixon–Tesla 500 kV Transmission Line.¹¹⁹

- **Alternative 2: Collinsville Substation East of Wind Energy Substations:** This alternative would relocate the Collinsville Substation site approximately 3.0 miles north to 200 to 300 feet east of the Vaca Dixon–Tesla 500 kV Transmission Line. The Alternative 2 substation site is also located east of existing wind energy substations including substations located 650 feet northeast of Russel Substation (owned and operated by Sacramento Municipal Utility District (SMUD) and 500 feet east of Birds Landing Switching Station (owned and operated by PG&E).¹²⁰
- **Alternative 3: 500 kV Interconnection Lines on Entirely TSPs:** Alternative 3 involves the exclusive use of TSPs to support the 500 kV interconnection lines. Preliminary engineering indicates that PG&E would use six monopole TSPs and eight three-pole TSPs (up to approximately 30 individual poles).¹²¹ Alternative 3 would result in no other changes to any of the Collinsville Project components.
- **Alternative 4: 230 kV Overhead Segment Alternative Route:** Alternative 4 would locate the 230 kV overhead segment primarily on PG&E-owned property directly south of the proposed Collinsville Substation.¹²²

¹¹⁹ Exh. FEIR-01, Vol. 2, pp. 3-8 to 3-11.

¹²⁰ Exh. FEIR-01, Vol. 2, pp. 3-12 to 3-15.

¹²¹ Exh. FEIR-01, Vol. 2, pp. 3-16 to 3-19.

¹²² Exh. FEIR-01, Vol. 2, pp. 3-19 to 3-21.

- **Alternative 5: 230 kV Submarine Segment Alternative Route:** Alternative 5 involves relocation of a 0.6 mile-long portion of the submarine cable. Alternative 5 would be functionally equivalent to the Proposed Project and the cable would be buried at a similar depth as the Proposed Project's cable.¹²³
- **Alternative 6a/6b: Underground Portions of the 230 kV Transmission Line within Suisun Marsh Protection Plan Management Areas:** Alternative 6a/6b would locate the 230 kV transmission line primarily on PG&E-owned property south of the proposed Collinsville Substation site (similar to Alternative 4). In addition, Alternative 6a/6b would involve installing portions of the 230 kV transmission line underground on land within the Suisun Marsh Protection Plan Management Areas. Alternative 6a and Alternative 6b are the same, except for the northern portion of this alternative route (200 to 350 feet) which reflect slightly different connection points.¹²⁴

The Final EIR identifies the No Project Alternative as the environmentally superior alternative for CEQA purposes because it would avoid all impacts of the Collinsville Project. However, the No Project Alternative would fail to meet the basic objectives of the Collinsville Project, including addressing the reliability needs in the Greater Bay Area, meeting CAISO's technical specifications, and facilitating energy deliverability from existing and proposed generation projects to the Greater Bay Area.¹²⁵

Because the environmentally superior alternative is the No Project Alternative, CEQA requires identification of an environmentally superior alternative from among the other

¹²³ Exh. FEIR-01, Vol. 2, pp. 3-21 to 3-23.

¹²⁴ Exh. FEIR-01, Vol. 2, pp. 3-24 to 3-30.

¹²⁵ Exh. FEIR-01, Vol. 2, pp. ES-31, 3-30.

alternatives.¹²⁶ The Final EIR identifies the environmentally superior alternative that meets the basic project objectives as Alternative 1, Collinsville Substation North of Talbert Lane, plus the Proposed Project in remaining areas. Alternative 1 + Proposed Project in the remaining areas is environmentally superior to the Proposed Project because it would avoid significant and unavoidable impacts on biological resources, energy, and greenhouse gases due to installation of much shorter 500 kV interconnection lines on TSPs only. Alternative 1 would also avoid significant and unavoidable impacts on land use due to relocation of the substation and associated infrastructure outside of the Suisun Marsh Priority Habitat Management Area, and Alternative 1 would avoid significant and unavoidable impacts on noise due to relocation of the substation and associated construction noise away from sensitive receptors.¹²⁷

LSPGC has completed preliminary diligence on Alternative 1 + Proposed Project in the remaining areas and anticipates that the cost of the environmentally superior alternative is expected to not be materially greater than the estimated cost of the Project as proposed. LSPGC currently estimates that the environmentally superior alternative would have capital costs of \$332.7 million and a total cost, with AFUDC, of \$372.7 million, about 2.5% greater than the Proposed Project.

Implementing Alternative 1 + Proposed Project in remaining areas would still result in seven significant and unavoidable impacts including impacts on air quality, cultural resources, mineral resources, and tribal cultural resources.¹²⁸ In short, neither the Proposed Project nor Alternative 1 + Proposed Project in remaining areas would completely avoid significant and

¹²⁶ CEQA Guidelines, § 15126.6(e)(2).

¹²⁷ Exh. FEIR-01, Vol. 2, p. ES-31.

¹²⁸ Exh. FEIR-01, Vol. 2, p. ES-31.

unavoidable impacts to air quality, cultural resources, mineral resources, and tribal cultural resources. LSPGC supports the Commission’s selection of either the Proposed Project or Alternative 1 + Proposed Project in remaining areas, as each would meet the Project’s objectives, and LSPGC does not dispute the Final EIR’s conclusions regarding the environmental attributes of Alternative 1 + Proposed Project in remaining areas.

B. CAF’s Environmentally Superior Alternatives

CAF presented what it described as “Environmentally Superior Transmission Alternatives” in Section IV of Exhibit CAF-1.¹²⁹ Because the Scoping Memo determined that Issue 5 did not raise potentially contested, material issue of fact and was not an appropriate issue for the presentation of evidence,¹³⁰ LSPGC filed a Motion to Strike this portion of CAF’s testimony but also presented rebuttal testimony showing that the Final EIR’s consideration and evaluation of alternatives complied with CEQA.¹³¹ In response to LSPGC’s Motion, CAF represented that this section of its testimony is not intended to address the Final EIR’s selection of an environmentally superior alternative but instead is relevant to other potentially, contested issues of fact that the Scoping Memo designated as appropriate for evidence. LSPGC accepts CAF’s representation and will address the contentions of this portion of CAF’s testimony in other sections of this brief.

VII. THE MITIGATION MEASURES AND THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE ARE FEASIBLE

¹²⁹ Exh.CAF-1, pp. 28–34.

¹³⁰ Scoping Memo, p. 6; Administrative Law Judge’s Ruling Amending the Schedule (June 18, 2026), p. 3.

¹³¹ Exh. LS-02, pp. 3-5.

The sixth issue identified in the Scoping Memo is, “Are the mitigation measures or environmentally superior project alternatives infeasible for economic, social, legal, technological, or other considerations?”

LSPGC has considered the environmentally superior alternative as set forth in the Final EIR and has determined that implementation of the environmentally superior alternative is feasible. LSPGC has reviewed the Mitigation Monitoring and Reporting Program¹³² and the mitigation measures proposed for the Proposed Project and the environmentally superior alternative in the Mitigation Monitoring and Reporting Program Matrix. None of the mitigation measures assigned to LSPGC are infeasible for economic, social, legal, technological, or other considerations. LSPGC does not seek to modify, defer, or substitute any mitigation measure as described in the MMRP. Accordingly, LSPGC commits to implement the applicable mitigation measures if the Commission grants a CPCN for either the Proposed Project or the environmentally superior alternative.

The Scoping Memo determined that this issue does not raise contested, material issues of fact.

VIII. OVERRIDING CONSIDERATIONS JUSTIFY APPROVAL OF THE PROPOSED PROJECT OR THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The next question posed by the Scoping Memo is, “To the extent that the Project and/or project alternatives result in significant and unavoidable impacts, are there overriding considerations that nevertheless merit Commission approval of the Project or alternative?”

The Proposed Project and the environmentally superior alternative identified in the Final EIR would both result in significant and unavoidable environmental impacts. Despite these

¹³² Exh. FEIR-01, Attach. 1.

unavoidable impacts, compelling overriding considerations warrant the Commission's approval of either the Proposed Project or the environmentally superior alternative.

Critical Reliability Benefits: The Project and the environmentally superior alternative address significant reliability concerns in the Greater Bay Area. Multiple thermal overloads on the existing 230 kV corridor between the Contra Costa and Newark substations under normal, N-1, and N-2 conditions threaten reliable electric service for Bay Area residents and businesses.¹³³ Without the Proposed Project or the environmentally superior alternative, these reliability issues will worsen with demand growth as electrification accelerates, potentially leading to outages that could impact hospitals, schools, businesses, and residences.¹³⁴

Economic Benefits: The Greater Bay Area is one of the most economically productive areas in the nation. Unreliable electric service could have severe economic consequences, affecting major technology and financial companies, small businesses, and the broader California economy. The Proposed Project or the environmentally superior alternative will support the Bay Area's continuing economic growth and increasing load.

Public Policy Benefits: The Proposed Project or the environmentally superior alternative will directly advance multiple state policies by:

- Supporting the development of renewable generation in northern California and facilitating the delivery of renewable energy to Bay Area load centers, supporting Senate Bill 100 clean energy goals;
- Supporting building and vehicle electrification mandates that are central to California's climate strategy; and

¹³³ Exh. LS-04, Attachment A, 2021-2022 Transmission Plan, App. G, p. G-11.

¹³⁴ Exh. CSO-01, p. 6; Exh. CSO-02, p. 3.

- Supporting local government climate action plans that depend on reliable electric service for electrification initiatives.

Environmental Benefits: The Proposed Project's or the environmentally superior alternative's long-term operation will facilitate environmental benefits, including the reduction of greenhouse gas emissions by:

- Supporting the electrification of buildings and vehicles;
- Improving the efficiency of the transmission system, reducing line losses and the need for additional generation resources; and
- Facilitating the integration of efficient new generation resources into the grid.

Public Safety Benefits: Reliable electric service is essential for public safety, powering emergency services, hospitals, communication systems, and other critical services. The Proposed Project or the environmentally superior alternative will enhance grid resilience and reduce the risk of outages during extreme weather events or other emergencies.

The potential significant and unavoidable impacts of the Proposed Project and the environmentally superior alternative must be weighed against these substantial, long-term benefits to reliability, the economy, public policy goals, the environment, and public safety. The Commission has previously recognized that reliability concerns can constitute overriding considerations justifying project approval despite significant environmental impacts.¹³⁵ Here, where the benefits are permanent and region-wide, the balance strongly favors approval of the Proposed Project or the environmentally superior alternative.

The Scoping Memo determined that this issue does not raise contested, material issues of fact.

¹³⁵ See D.16-10-005, pp. 16, 21-22 (Conclusion of Law No. 3).

IX. COMPLIANCE WITH CEQA

The Scoping Memo's eighth issue asks, "Did the Commission review and consider the EIR for the Project, was the EIR completed in compliance with CEQA, and does the EIR reflect the Commission's independent judgment?" The answer to each of these questions is, "Yes."

A. Review and Consideration of the EIR

The Commission is in the best position to determine whether it will have reviewed and considered the Final EIR when it decides whether to certify the Final EIR. The Final EIR was issued in time to give the Commissioners and their advisory staffs a reasonable opportunity to review the Final EIR, and the parties' briefs, and the Proposed Decision will also present and discuss environmental issues for the Commission's consideration. The Commission's practice has been to review and give close consideration to EIRs related to its proceedings, and LSPGC expects that the Commission will follow that practice in this instance.

B. The EIR was Completed in Compliance with CEQA

Under CEQA, the lead agency is either the public agency that carries out the project or the agency that has the greatest responsibility for supervising or approving the project.¹³⁶ For the Collinsville Project, the CPCN is the key approval, and accordingly the Commission is the lead agency. As the lead agency, the Commission must review and consider the potential significant environmental impacts of the Collinsville Project. The Commission has the further authority to order implementation of measures that will mitigate or avoid the significant direct and indirect environmental effects of the Collinsville Project¹³⁷ and must approve any mitigation measures within the Commission's jurisdiction that avoid or mitigate the significant environmental effects

¹³⁶ CEQA Guidelines, § 15051(a), (b).

¹³⁷ CEQA Guidelines, § 15041(a).

of the Collinsville Project, unless the changes or alterations are infeasible due to specific economic, legal, social, technical, and other considerations.¹³⁸

The process for developing, issuing, revising, and approving an EIR is set forth in sections 15080-15097 of the CEQA Guidelines. Under the Guidelines, an EIR is required when a project may have a significant effect on the environment that cannot be reduced to a less-than-significant level through revisions to the project.¹³⁹ Here, the Proponent's Environmental Assessment submitted as Appendix B to the Application identified potentially significant environmental impacts, requiring preparation of an EIR.

The Final EIR covered all of the topics required by sections 15120-15132 of the CEQA Guidelines, including:

- Project description (section 15124; Final EIR, Vol. 2, Chapter 2);
- Environmental setting (section § 15125; Final EIR, Vol. 2, Chapter 4 (the analysis of each environmental resource begins with a discussion of the specific environmental setting¹⁴⁰));
- Significant environmental impacts (section § 15126.2; Final EIR, Vol. 2, Chapter 4 (the analysis of each environmental resource identifies the significant environmental impact), pp. ES-4 to ES-28; Vol. 3, Attachment 1);
- Mitigation measures proposed to minimize significant effects (section § 15126.4; Final EIR. Vol. 2, Chapter 4 (the analysis of each environmental resource

¹³⁸ CEQA Guidelines, § 15021.

¹³⁹ CEQA Guidelines, § 15065(a); see CEQA Guidelines, § 15065(b)(1).

¹⁴⁰ Exh. FEIR-01, Vol. 2, p. 4.0-0.

identifies mitigation measures for significant environmental impacts); Vol. 3, Attachment 1);

- Alternatives to the proposed project (section 15126.6; Final EIR, Vol. 2, Chapters 3, 6, pp. ES-29 to ES-33);
- Cumulative impacts (section 15130; Final EIR, Vol. 2, Chapter 4 (the cumulative impact analysis for each individual environmental resource is included at the end of the chapter for each resource), pp. 4.0-2 to 4.0-3); and
- Growth-inducing impacts (section 15126.2(e); Final EIR, Vol. 2, pp. 5-2 to 5-3).

The Notice of Preparation was issued on January 6, 2025, followed by a 30-day scoping period as required by CEQA Guidelines section 15082. The Draft EIR was issued on November 4, 2025, and was circulated for public review for 45 days as required by CEQA Guidelines section 15105(a) and Public Resources Code section 21091.

Comments on the Draft EIR were received during the public review period from various agencies and stakeholders.¹⁴¹ The Final EIR addresses all comments received, as required by CEQA Guidelines section 15088. The Final EIR includes:

- The Draft EIR or a revision of the draft (section 15132(a); Vol. 2);
- Comments and recommendations received on the Draft EIR (section 15132(b); Vol. 1);

¹⁴¹ The Energy Division received comments on the Draft EIR from the Amah Mutsun Tribal Band of San Juan Bautista & AMTB, Military Aviation and Installation Siting Clearinghouse, Yocha Dehe Wintun Nation, California Forever LP, the Sacramento Metropolitan Air Quality Management District, the California Department of Fish and Wildlife, the Sacramento Metropolitan Utility District, the Solano County Department of Resource Management – Planning Services Division, the California State Lands Commission, LS Power, and Pacific Gas and Electric Company.

- A list of persons, organizations, and public agencies commenting on the Draft EIR (section 15132(c); Vol. 1, pp. 2-2 to 2-3);
- Responses to significant environmental points raised in the review process (section 15132(d); Vol. 1, Chapter 3); and
- Any other information added by the Commission's Energy Division, including in response to comments (section 15132(e)).

For the Collinsville 500/230 kV Substation Project, the Commission's Energy Division prepared the Final EIR that identifies all potentially significant environmental impacts and specifies mitigation measures to address these impacts, in combination with the APMs proposed by LSPGC and the CMs proposed by PG&E.

Thus, the Final EIR was completed in compliance with CEQA. The Final EIR describes the CEQA process and the steps taken to comply with those requirements, including extensive public outreach and notice efforts as documented in the Scoping Report (Appendix B to the Vol. 3 of Final EIR) and public participation documentation (Chapter 2 of Vol. 1 of the Final EIR).

The Scoping Memo determined that this issue does not raise contested, material issues of fact. CAF has not expressly commented on this issue in this proceeding. However, in Exhibit CAF-1, CAF refers to CAF's comments on the Draft EIR that recommended including the Humboldt transmission line as a component of the Collinsville Project to avoid improper piecemealing under CEQA. In this proceeding, CAF's position that posits "a consistent and significant linkages between the [Collinsville] Project and the proposed [Humboldt] line"¹⁴² seems to be an effort to reinforce the position it took on the Draft EIR.

¹⁴² Exh. CAF-1, p. 6.

In Section II of this brief, LSPGC conclusively demonstrated that the Collinsville Project is a separate and independent project that is not dependent on the Humboldt line for its justification. The CAISO has considered other options for interconnecting Humboldt offshore wind energy to the Greater Bay Area load centers. The 2021-2022 Transmission Plan considered three options as part of a sensitivity case,¹⁴³ and five options were considered in the 2023-2024 Transmission Plan.¹⁴⁴ The CAISO's consideration of multiple Humboldt interconnection options undermines the claim that the sole purpose of the Collinsville Project is to receive Humboldt offshore wind.¹⁴⁵

The demise of CAF's contention that the Humboldt line and the Collinsville Project are significantly linked also resolves CAF's claim that the CEQA review of the Collinsville Project engaged in piecemealing a single project. CEQA does not require the Commission to combine separate projects into one CEQA review simply because they may eventually become tangentially related.

C. Does the Final EIR Reflect the Commission's Independent Judgment?

The Final EIR reflects two levels of the Commission's independent judgment and analysis. At the first level, the Final EIR reflects the independent judgment and analysis of the Commission's Energy Division, which was tasked with overseeing the CEQA environmental review. The Energy Division and its consultants were primarily responsible for the development and issuance of the Final EIR.

¹⁴³ Exh. LS-01, Attachment A, 2021-2022 Transmission Plan, pp. 226-228.

¹⁴⁴ Exh. LS-01, Attachment B, 2023-2024 Transmission Plan, pp. 69-74.

¹⁴⁵ Exh. LS-01, p. 8.

At the second level, the five Commissioners that make up the Commission will exercise their collective independent judgment and analysis when they review and consider the Final EIR and the Proposed Decision in this proceeding, and when the Commission ultimately renders its decision on LSPGC's Application.

The Commission itself is in the best position to determine whether the Final EIR reflects the Commission's independent judgment and analysis, but Energy Division and LSPGC have presented the Commission with the information needed for the Commission to exercise its independent judgment and analysis.

X. THE APPLICATION MEETS THE REQUIREMENTS OF GENERAL ORDER 131-D

The next questions the Scoping Memo poses is, "Does the application meet the requirements of General Order 131-D and Rule 13.1 to obtain a CPCN?"

A. General Order 131-D

Section IX.A and Section X of General Order (GO) 131-D set forth the requirements for applications for a CPCN. The Application's compliance with GO 131-D is addressed in the Section IV (pp. 9-18) of the verified Application.¹⁴⁶ That passage explains how the requirements of GO 131-D are met including:

- Description of the Project and Proposed Schedule (GO 131-D, Section IX.A.1.a). A description of the project is presented in Chapter 3.0 of the Proponent's Environmental Assessment (PEA), Appendix B to the Application. A proposed schedule is set forth in Section V.D.4 on p. 22 of the Application.
- Map of the Project (Section IX.A.1.b). A map of the proposed Project is attached as Appendix C to the Application.

¹⁴⁶ The Application filed on July 30, 2024, complied with the requirements of GO 131-D. On January 30, 2025, D.25-01-055 adopted GO 131-E, which superseded GO 131-D.

- Why the Public Convenience and Necessity Require Construction and Operation of the Project (Section IX.A.1.c). The need for the Project is presented in Section II.B (pp. 3-5) and on pp. 10-12 of the Application.
- The Estimated Cost of the Project (Section IX.A.1.d). The Application (p. 12) stated that the estimated total capital cost of the Project is \$324,675,000, excluding AFUDC.
- Reasons for Selecting the Route or Site (Section IX.A.1.e). LSPGC presented a description and a comparison of alternatives in Chapter 4.0 and Chapter 6.0 respectively of the PEA, Appendix B to the Application. Those discussions evaluate the advantages and disadvantages of the alternatives considered and provide the rationale for the adoption of the selected route and substation sites.
- Schedule of Right of Way Acquisition (Section IX.A.1.f). LSPGC presented a preliminary schedule for construction and right-of-way acquisition activities in the Project Implementation Plan, attached as Appendix E to the Application.
- List of Reviewing Government Agencies (Section IX.A.1.g). LSPGC met with several governmental agencies to solicit input on Project design and potential resource and land use issues in the vicinity of the Project site. Written position statements on the proposed Project location were provided by the City of Pittsburg and the Sacramento Municipal Utility District. In lieu of a written position statement from the Native American Heritage Commission, LSPGC drafted a statement of its understanding of the Native American Heritage Commission's position. These statements are attached as Appendix F to the Application.
- Proponent's Environmental Assessment (Section IX.A.1(h)). The PEA was attached as Appendix B to the Application.
- Measures Taken to Reduce Exposure to Electric and Magnetic Fields (Section X). This topic is discussed on pp. 16-18 of the Application, and LSPGC's Electric and Magnetic Fields Management Plan is Appendix G to the Application.

- Notice (Section XI.A). GO 131-D requires Applicants for a CPCN to give notice of the Application within 10 days of filing by direct mail, newspaper advertisement, and posting on- and off-site. LSPGC’s proposed form of notice is attached as Appendix H to the Application. In addition, LSPGC filed its Declarations of Mailing, Posting, and Publication of Notice on August 9, 2024.¹⁴⁷

B. Rule 13.1

Rule 13.1 requires an applicant to give notice of evidentiary hearings and of public participation hearings in applications for a rate increase. No evidentiary hearings or public participation hearings were held in this proceeding, and LSPGC is not requesting a rate increase. Rule 13.1 has no application to this proceeding.

XI. COMMUNITY VALUES

The next question the Scoping Memo asks is, “What, if any, are the community values affected by the Project under Public Utilities Code Section 1002(a)(1)?” Section 1002(a)(1) requires the Commission to “give consideration” to community values as a basis for granting a CPCN. LSPGC has provided information about community values for the Commission’s consideration.

The Proposed Project or the environmentally superior alternative is located in Solano, Contra Costa, and Sacramento counties within an existing regional transmission system. The proposed parcels where LSPGC’s Collinsville Substation, 230 kV Overhead Segment, 230 kV Underground Segment, PG&E’s 500 kV Interconnection, and the environmentally superior alternative would be constructed are under private ownership by the state, the City of Pittsburg, and private landowners. The Commission has acknowledged that “[t]he concept of community

¹⁴⁷ Available at <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M538/K612/538612879.PDF> .

values is not strictly defined in statute” and is somewhat fluid.¹⁴⁸ In evaluating community values, the Commission considers the views of the community, including the positions of elected officials.¹⁴⁹

The Application attached position statements from the Sacramento Municipal Utility District (SMUD), the City of Pittsburg, and the Native American Heritage Commission (NAHC). SMUD noted its support for the Project and stated that LSPGC has coordinated with SMUD since 2023 to avoid any conflicts with SMUD’s Solano Wind Project. The City of Pittsburg expressed its strong support for the Project’s strengthening of the infrastructure serving the City of Pittsburg and providing reliable electric transmission for the region’s residents and businesses. NAHC indicated that LSPGC, through its subcontractor PaleoWest, requested a search of the Sacred Lands File in May 2023 and conducted outreach to 23 tribal contacts to investigate potential cultural resources in the Project area.

In addition, interested parties have participated in this proceeding. California Forever, which is working on a large development in southeastern Solano County, and the CAISO have participated in this proceeding.

The positive effect of the Proposed Project on the local community is also relevant. The Project will provide economic benefits to communities in the vicinity of the Project in the form of increased employment and tax revenues. In addition, the Proposed Project will improve the reliability of the electric grid in the surrounding area, which will benefit all residents, businesses, and critical infrastructure throughout the region and will advance renewable generation in the area.

¹⁴⁸ D.25-09-013, p. 16, citing D.21-08-007, p. 17, D.10-12-025, p. 8.

¹⁴⁹ D.21-08-007, pp. 17-18; D.10-12-025, p. 8.

Moreover, LSPGC considered community benefits and values in designing the Proposed Project. Before filing the present Application, LSPGC conducted extensive public outreach for the Proposed Project, meeting with agencies and stakeholders from the early planning stages and throughout the development of the Project to solicit input on its design and potential resource and land use issues in the vicinity of the Project. Consistent with CEQA, the Collinsville Project has been designed to avoid, minimize, or mitigate potential environmental impacts to the maximum extent practicable. Notably, the Project or the environmentally superior alternative does not run through densely populated communities: the portion on the southern side of the Sacramento River will be underground and the portion on the northern side is on agricultural land. LSPGC also proposed Project-specific APMs to minimize impacts on nearby communities.¹⁵⁰

LSPGC recognizes that any new construction may result in temporary disruptions to the nearby communities, and that there is the potential to encounter cultural resources. LSPGC has kept and will keep area residents and property owners, government officials, Native American tribes, and other interested parties informed about the scope and construction status of the Proposed Project through printed materials, online materials, one-on-one meetings, and presentations to local organizations. LSPGC is committed to working closely with nearby communities to identify and expeditiously address any potential concerns that may arise during construction.

XII. THE MAXIMUM PRUDENT AND REASONABLE COST OF THE PROJECT

The Scoping Memo's eleventh issue asks, "What is the maximum prudent and reasonable cost of the Project?"

¹⁵⁰ Exh. FEIR-01, Table 2-12, pp. 2-87 to 2-96.

A. Estimated Project Costs

LSPGC currently estimates that the total capital cost of the Proposed Project is \$324,675,000, with a total cost including AFUDC of \$364,716,000.¹⁵¹ Since the Application was filed in July 2024, capital cost estimates for the Project have been revised to reflect the costs of additional engineering studies, design modifications, and evolving market conditions for labor, equipment, and materials. Despite these challenges, LSPGC believes that it can construct the Project for about the same cost as the original estimate. A detailed estimate of the capital cost of the Project as set forth in the Application was presented in confidential Appendix D to the Application.

As discussed elsewhere in this brief, LSPGC was selected as the sponsor of the Proposed Project in a competitive solicitation conducted by the CAISO, in which “demonstrated cost containment capability of the Project Sponsor and its team” was a key selection factor.¹⁵² The fact that LSPGC was selected over three other proposed project sponsors through a highly competitive process provides assurance that the estimated costs are reasonable. The cost-containment provisions of LSPGC’s proposal also ensure that ratepayers are protected from key cost increases in the future.

LSPGC agreed to cost-containment provisions for the Project that are incorporated in the APSA¹⁵³ and will be included in LSPGC’s formula rates that are set by the Federal Energy Regulatory Commission (FERC). The cost-containment provisions specify that the recovery of costs for the development, construction, commissioning, operations, and maintenance of the

¹⁵¹ Application, Appendix D.

¹⁵² Selection Report, pp. 110–116.

¹⁵³ Application, Appendix A.

Project in LSPGC's FERC-approved formula rates is subject to a binding, levelized, annual revenue requirement (ARR) cap for each of the first 40 full calendar years of Project operations, subject to certain exceptions.

Under the proposed levelized ARR cap, if LSPGC's revenue requirement exceeds the cap, LSPGC will recover revenues in that year only up to the cap, except for increases in revenue requirements that are related to costs specifically excluded from the cost cap. The unrecovered difference between the calculated revenue requirement and the calculated cap will be tracked in a deferred recovery account. The costs placed in the deferred recovery account will not earn interest and could be recovered in future years only if LSPGC's calculated revenue requirement for the Project is below the annual cap for such year. Any unrecovered balance remaining in the deferred recovery account at the end of the 40-year period will be forfeited, and LSPGC will be unable to recover those amounts in rates. If LSPGC's calculated revenue requirement for the Project is below the annual cap in a certain year and there is no balance in the deferred recovery account, only the actual costs for that year will be recovered.

In an order issued on October 15, 2024 in FERC docket ER24-2668, FERC approved the proposed levelized ARR cap.¹⁵⁴

LSPGC's Project contains sufficient safeguards for ratepayers. The combination of CAISO's competitive solicitation and the cost-containment mechanism proposed by LSPGC and approved by FERC in a separate proceeding ensures that ratepayers will pay only the reasonable costs of constructing and operating the Proposed Project.

¹⁵⁴ *Order Accepting Tariff Revisions, Granting Transmission Incentives, and Initiating a Proceeding Pursuant to Section 206 of the Federal Power Act*, Oct. 15, 2024, 189 FERC ¶61,027, pp. 9-11.

As discussed in Section III of this Brief, LSPGC expects that the estimated cost of the environmentally superior alternative is not materially greater than the estimated cost of the Proposed Project.

B. Maximum Reasonable and Prudent Cost

Public Utilities Code section 1005.5 requires the Commission to specify a reasonable and prudent maximum cost when it issues a CPCN for new construction estimated to cost more than \$50 million. In setting the maximum cost, the Commission must consider “an estimate of the anticipated construction cost, taking into consideration the design of the project, the expected duration of construction, an estimate of the effects of economic inflation, and any known engineering difficulties associated with the project.”¹⁵⁵

Section 1005.5 does not distinguish between projects whose costs are recovered in rates set by the Commission and those, like the Project, whose costs are recovered in rates set by FERC. To comply with section 1005.5, although the costs of the Project will be recovered in rates set by FERC, LSPGC respectfully asks the Commission to set the maximum reasonable and prudent cost for the Proposed Project of \$437.6 million, which includes both the estimated total capital cost including AFUDC of \$364.7 million and a 20% contingency,¹⁵⁶ and a maximum reasonable and prudent cost for the environmentally superior alternative of \$447.2 million, including a total estimated capital cost and AFUDC of \$372.7 million, to account for route or

¹⁵⁵ Pub. Util. Code § 1005.5(a).

¹⁵⁶ The Commission has included a contingency amount in its determination of the maximum reasonable and prudent costs for other transmission projects. See D.25-09-013, p. 15; D.18-09-030, p. 41; D.10-12-052, p. 47.

scope changes, final engineering design, final environmental mitigation requirements, changes in laws or tariffs,¹⁵⁷ and other factors beyond LSPGC’s control that may impact the final cost.

XIII. IMPACTS ON ENVIRONMENTAL AND SOCIAL JUSTICE COMMUNITIES

The Scoping Memo next asks, “What are the impacts on environmental and social justice communities, including the extent to which the construction of the Project impacts the achievement of any of the nine goals of the Commission’s Environmental and Social Justice Action Plan?”

The Commission’s Environmental and Social Justice Action Plan 2.0 defines disadvantaged communities as those census tracts that rank in the top 25% of California Communities Environmental Health Screening Tool Version 3 (CalEnviroScreen 3.0), and those that score within the highest 5% of CalEnviroScreen 3.0 Pollution Burden but do not receive an overall CalEnviroScreen score. Other agencies use different criteria to classify disadvantaged or low-income communities. California’s Office of Environmental Health and Hazard Assessment updated the CalEnviroScreen 3.0 to CalEnviroScreen 4.0 on October 13, 2021. The California Environmental Protection Agency (CalEPA) defines the following four types of communities as disadvantaged as a result of new data in Senate Bill (SB) 535: (1) census tracts with the highest 25% of CalEnviroScreen 4.0 overall scores; (2) census tracts that do not meet overall scores but are within the highest 5% of CalEnviroScreen 4.0 cumulative Pollution Burden Scores; (3) census tracts recognized as disadvantaged in CalEPA’s 2017 disadvantaged communities

¹⁵⁷ Existing and contemplated tariffs could apply to equipment and materials needed for the Project. Because of the dynamic nature of tariff policy, it is not possible to forecast whether tariffs will be in effect when equipment or materials are delivered or what the magnitude of any tariffs will be. If the effect of the proposed tariffs will cause the cost of the Project to exceed the adopted maximum reasonable and prudent cost, LSPGC will make appropriate filings asking the Commission to increase the maximum reasonable and prudent cost.

designation; and (4) areas under the control of federally recognized tribes. The California Air Resources Board's California Climate Investments program defines Priority Populations to include both CalEPA's disadvantaged communities and low-income communities and households with incomes at or below the statewide median or below a threshold designated as low-income by the Department of Housing and Community Development.¹⁵⁸

Section IX of Application depicts maps of the Collinsville Project overlaid with CalEnviroScreen 4.0 disadvantaged communities, CalEPA-SB 535 disadvantaged communities, and California Climate Investments Priority Populations. Although the Project will involve overhead and underground transmission lines located within an ESJ community, it is not expected to have significant impacts as the Project generally traverses remote and rural areas with low population density.

The Final EIR confirms that, with implementation of mitigation measures, potential impacts that are capable of being mitigated will be reduced to less-than-significant levels. These protections apply equally to all communities along the Project (or environmentally superior alternate) route, including ESJ communities.

Importantly, any construction-related impacts are temporary. Once construction is complete, the Collinsville Project will provide substantial long-term benefits to ESJ communities through improved electrical reliability, which is essential for cooling during heat events, powering medical equipment, and maintaining other essential services. ESJ communities in other parts of the Greater Bay Area will also benefit from the improved reliability made possible by construction of the Collinsville Project.

¹⁵⁸ California Climate Investments, Priority Populations, available at <https://www.caclimateinvestments.ca.gov/priority-populations>.

Members of low-income and other disadvantaged communities may also benefit from the short-term economic stimulus from construction activities and expenditures, short-term and longer-term increases in tax revenues, and improved electrical reliability. The Project meets Goal 4 of the Commission’s Environmental and Social Justice Action Plan of increasing climate resiliency in ESJ communities by facilitating the transmission of renewable and low-carbon energy. In addition, by improving the efficiency of the transmission system, the Project could lead to increased investment in clean energy resources to benefit ESJ communities, improving local air quality and public health (Goal 2). The Project will also promote economic benefits in nearby communities during the construction through employment and increased tax revenues.

Based on these considerations, the Commission should conclude that construction of the Proposed Project or the environmentally superior alternative aligns with the goals of the Commission’s Environmental and Social Justice Action Plan.

XIV. THE PROJECT COMPLIES WITH THE COMMISSION’S POLICIES ON MITIGATION OF ELECTRIC AND MAGNETIC FIELDS EFFECTS

The Scoping Memo’s final issue asks, “Is the Project and/or environmentally superior project alternative in compliance with the Commission’s policies governing the mitigation of EMF effects using low-cost and no-cost measures?”

Compliance with the Electric and Magnetic Fields (EMF) requirements of GO 131-D and GO 131-E was demonstrated in the Electric and Magnetic Fields Management Plan (EMF Management Plan), Appendix G to the Application.¹⁵⁹

¹⁵⁹ The Application filed on July 30, 2024, attached an EMF Management Plan that complied with the requirements of GO 131-D, including Section X on Potential Exposure to Electric and Magnetic Fields. On January 30, 2025, D.25-01-055 adopted GO 131-E, which superseded GO 131-D. The EMF Management Plan meets the requirements of Section VII.A.2.h of GO 131-E.

The overhead portions of the Project on the northern side of the Sacramento River are on agricultural and undeveloped land, and therefore “low-cost EMF mitigation” is not necessary.¹⁶⁰

As the EMF Management Plan explains, the Commission has previously acknowledged that “placing a transmission line underground should normally provide sufficient mitigation.”¹⁶¹ The underground portions of the Project are located on undeveloped land near the Pittsburg Substation, and therefore “low-cost EMF mitigation” is also not necessary.¹⁶²

Notwithstanding the significant magnetic field level mitigation provided by placing transmission lines underground and by the routing of the overhead lines, LSPGC evaluated additional EMF mitigation measures in its design and construction plan and adopted certain no-cost or low-cost mitigation measures.

As explained in the EMF Management Plan, the no-cost measures LSPGC will implement for certain transmission line segments include:

- Phasing circuits to reduce the level of magnetic fields;
- Locating the lines as close as possible to the centerline of the right of way; and
- Arranging cables in a triangular configuration.¹⁶³

These same measures will mitigate EMF effects for the environmentally superior alternative, which largely follows the route of the Project as proposed.

The submarine segment of the Project will not be a source of direct electric fields because the grounded, metallic cable sheathing around the cables effectively blocks electric fields. The

¹⁶⁰ See California Public Utilities Commission, EMF Policy; See Application, Appendix G, p. 6.

¹⁶¹ D.06-01-042, p. 12.

¹⁶² See California Public Utilities Commission, EMF Policy; See Application, Appendix G, p. 5.

¹⁶³ Application, Appendix G, p. 18.

calculated magnetic fields and induced electric fields will be low because the cables will be installed up to 15 feet beneath the riverbed.¹⁶⁴

XV. THE REQUESTED AFFILIATE TRANSACTION RULE EXEMPTIONS HAVE BEEN GRANTED

LSPGC's Application also asked the Commission to grant exemptions from certain of the Commission's affiliate transaction rules adopted in D.97-12-088 and amended in D.98-08-035 and D.98-12-075 and from certain reporting requirements.

In D.25-09-013, the Commission confirmed LSPGC's requested exemption and confirmed that this determination would be considered precedent.¹⁶⁵ These exemptions had previously been granted in Commission-approved settlements, which, under Rule 12.5 of the Commission's Rules of Practice and Procedure, did not constitute precedent. D.25-09-013 did not involve a settlement and therefore can be considered as precedent. Thus, it is no longer necessary for the Commission to address the exemptions requested in the Application.

XVI. CONCLUSION

The key question in this proceeding is the one posed by section 1001 of the Public Utilities Code: does "the present or future public convenience and necessity require . . . construction" of the Proposed Project? LSPGC's affirmative answer to this question is expected, but the CAISO's continuing support for the Collinsville Project deserves the Commission's attention. The CAISO, whose primary interest is maintaining the reliability of the transmission grid that it controls and operates, as part of its regular Transmission Planning Process, conducted a year-long transmission planning study that identified the Collinsville Project as the solution to reliability issues affecting the 230 kV transmission system in the East

¹⁶⁴ Application, pp. 17-18.

¹⁶⁵ D.25-09-013, p. 22.

Bay and a way to improve reliability in the Greater Bay Area by opening up a new path for 500 kV power to enter the Greater Bay Area from the north. In this role, the CAISO is a neutral and objective party; it had no reason to favor or disfavor selection of the Collinsville Project. In particular, the CAISO had no reason to select the Collinsville Project because it wanted a terminus for a separate transmission line that it secretly planned to select two years later. The CAISO selected the Collinsville Project, and has continued to include the Collinsville Project in its base of previously approved projects that continue to be solutions to identified needs,¹⁶⁶ because the Collinsville Project promoted the state’s policy goals and was the best solution for reliability issues.

The sole entity arguing against the issuance of a CPCN for the Proposed Project, California Forever, is the largest landowner in Solano County,¹⁶⁷ including some of the property that the Collinsville Project would occupy. CAF is certainly entitled to pursue its interests in this proceeding, but it has not made an effective presentation for its position that the Commission should delay issuing a CPCN for the Collinsville Project until some uncertain future point. CAF has asserted transmission planning claims without having performed the transmission studies required to lend support for those claims. CAF has advanced the imaginative theory that the sole purpose of the Collinsville Project was to receive 1.6 GW of Humboldt offshore wind by serving as the southern terminus of the Humboldt transmission line that would not be approved until two years after the Collinsville Project and would not go in-service for at least six years after the Collinsville Project. CAF has unsuccessfully attempted to show that the CAISO’s reasons for selecting the Collinsville Project were “implausible” or “post facto” justifications.

¹⁶⁶ Exh. CSO-02, p. 2.

¹⁶⁷ Motion for Party Status of California Forever LP, Oct. 25, 2024, p. 4.

When the Commission examines the record in this proceeding, it will recognize the actual reasons the CAISO approved the Collinsville Project: the Proposed Project will open up a new path for power from the 500 kV transmission system to flow into the Greater Bay Area from the north, enhancing reliability in the Greater Bay Area and improving deliverability for renewable energy projects in Solano County and other renewable energy areas north of the Sacramento-San Joaquin River Delta. In addition, the Collinsville Project will have the added benefit of addressing thermal overloading issues that have plagued the 230 kV system in the Contra Costa-Newark corridor. Those solutions will bring significant benefits to the grid in Northern California and the people, businesses, and larger economy of the Greater Bay Area.

For these reasons, LSPGC respectfully requests the Commission to:

- Grant LSPGC a Certificate of Public Convenience and Necessity authorizing LSPGC to construct its portion of the Collinsville 500/230 kV Substation Project, as proposed, or the environmentally superior alternative identified in the Final Environmental Impact Report;
- Find that the rebuttable presumption of need under Public Utilities Code section 1001.1 applies and has not been rebutted;
- Find that the Final Environmental Impact Report has identified the significant environmental impacts of constructing and operating the Collinsville 500/230 kV Substation Project and has developed mitigation measures that will avoid or lessen the identified significant environmental impacts, except for twelve identified significant and unavoidable impacts for the Project as proposed and seven identified significant and unavoidable impacts for the environmentally superior alternative;

- Conclude that the critical reliability, economic, public policy, environmental, and public safety benefits of the Project as proposed or the environmentally superior alternative override the significant and unavoidable environmental impacts;
- Certify the Final Environmental Impact Report prepared by Energy Division staff;
- Establish a maximum reasonable and prudent cost for the Proposed Project of \$437.6 million and a maximum reasonable and prudent cost for the environmentally sensitive alternative of \$447.2 million,
- Find that the Collinsville 500/230 kV Substation Project or the environmentally superior alternative complies with the Commission's policies on Electric and Magnetic Fields; and
- Find that construction of the Collinsville 500/230 kV Substation Project or the environmentally superior alternative aligns with the goals of the Commission's Environmental and Social Justice Action Plan.

Respectfully submitted this 10th day of July, 2026, at San Francisco, California.

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