

Docket No.: Application 24-07-018

Exhibit No. \_\_\_\_\_

Date June 5, 2026

Witness: Dustin Joseph

ALJ: Robert Haga

**REBUTTAL TESTIMONY OF DUSTIN JOSEPH  
ON BEHALF OF LS POWER GRID CALIFORNIA, LLC**

1 **I. Introduction**

2 **Q. Please state your name and title.**

3 A. Dustin Joseph, Director of Environmental Permitting, LS Power.

4 **Q. On whose behalf are you testifying?**

5 A. I am testifying on behalf of LS Power Grid California, LLC (“LSPGC”).

6 **Q. Please describe your background and expertise as relevant to your testimony in this**  
7 **proceeding.**

8 A. I am an American Institute of Certified Planner (“AICP”) with over 22 years of experience  
9 with land use and energy development, environmental permitting, environmental impact  
10 assessment, and California Environmental Quality Act (“CEQA”) compliance.

11 I hold a Bachelor of Arts degree in Public Policy from the University of California, Davis and a  
12 Master of Urban and Regional Planning from California State Polytechnic Pomona. I am  
13 currently the Director of Environmental Permitting at LS Power, based in Walnut Creek,  
14 California, where I am responsible for environmental permitting associated with LS Power’s  
15 transmission line development projects in the California Independent System Operator  
16 (“CAISO”) region.

17 Prior to joining LS Power, I served as a Project Director at KP Environmental from 2017 to  
18 2023, where I worked with and managed a team of environmental planners working on  
19 environmental compliance for large-scale electric transmission and renewable energy projects,  
20 CEQA documentation, and conducting routing and siting for CAISO competitive solicitation  
21 bids. Before that, I was a Senior Land Planner at the Pacific Gas and Electric Company  
22 (“PG&E”), where I worked in Environmental Management conducting routing and siting for  
23 new transmission line projects and leading environmental and California Public Utilities  
24 Commission permitting for PG&E’s greenfield projects portfolio. Earlier in my career, I spent  
25 eight years as an environmental consultant, where I managed the development of state and  
26 federal wetland and endangered species permits and prepared numerous CEQA documents for  
27 development projects.

28 **Q. Please briefly describe the purpose of your testimony.**

29 A. The purpose of my testimony is to respond to the assertion presented in the Prepared  
30 Testimony of Expert Deborah Galimba on behalf of California Forever that the Collinsville  
31 500/230 kV Substation Project (“Collinsville Project”), the subject of this proceeding, is subject

1 to a deficient CEQA alternatives analysis, is sited in tidal wetlands that will be adversely  
2 impacted by the Project, and will conflict with federal navigation improvement projects in the  
3 Sacramento River corridor. My testimony explains why each of these assertions is not supported  
4 by the Final Environmental Impact Report (“Final EIR”) or the facts.

5 **Q. What issue are you addressing in this portion of your rebuttal testimony?**

6 **A.** I am addressing three assertions made by Ms. Galimba relating to the environmental review  
7 and siting of the Collinsville Project. First, Ms. Galimba contends that the Commission’s CEQA  
8 alternatives analysis was deficient because it did not evaluate certain alternatives she proposes.  
9 Second, Ms. Galimba asserts that the Collinsville Substation is sited in tidal wetlands and that  
10 the Project will adversely impact tidal wetlands in the Sacramento-San Joaquin Delta. Third, Ms.  
11 Galimba asserts that the Project will conflict with federal navigation improvement projects in the  
12 Sacramento River corridor.

13 **Q. What are Ms. Galimba’s contentions?**

14 **A.** Ms. Galimba makes three principal contentions. With respect to the CEQA alternatives  
15 analysis, she contends that the Commission failed to evaluate three alternatives she describes as  
16 “cost-effective, technically equivalent alternatives” to the Collinsville Project, and that the  
17 Commission should postpone Final EIR certification until CAISO conducts additional sensitivity  
18 modeling removing Humboldt offshore wind from its planning assumptions. With respect to tidal  
19 wetlands, she contends that the Collinsville Substation is “proposed in a remote location in tidal  
20 wetlands in the Sacramento-San Joaquin Delta,” implying the Project will adversely impact such  
21 wetlands. With respect to federal navigation, she contends that the Project will conflict with the  
22 federal government’s plans to deepen the Sacramento River navigation channel to -45 feet mean  
23 lower low water (“MLLW”).

24 **Q. Do you agree with those contentions?**

25 **A.** No. Each of Ms. Galimba’s contentions is incorrect and unsupported by the facts. The  
26 Commission conducted a comprehensive CEQA alternatives analysis that evaluated seventeen  
27 potential alternatives, retained six for full analysis in the Final EIR, and identified an  
28 Environmentally Superior Alternative — satisfying all applicable CEQA requirements. Ms.  
29 Galimba’s assertion that the Collinsville Substation is sited in tidal wetlands is directly  
30 contradicted by the Final EIR, which confirms that no wetlands occur within the proposed  
31 substation site. And the Project’s potential interaction with federal navigation channels is

1 addressed through the established Section 408 review process that LSPGC must complete prior  
2 to installing the proposed transmission cables.

3 **Q. What is your overall conclusion?**

4 **A.** The Final EIR for the Collinsville Project was prepared in full compliance with CEQA. The  
5 alternatives analysis was thorough and made in good faith, and identified an Environmentally  
6 Superior Alternative that LSPGC is willing to implement. Ms. Galimba’s characterization of the  
7 substation site as tidal wetlands is factually incorrect. The Final EIR confirms that no wetlands  
8 occur at the substation site, and the Project’s limited and temporary wetland interactions are  
9 confined to the submarine cable landing area and are fully mitigated. The Project’s interaction  
10 with federal navigation channels is addressed through an established federal permitting process.  
11 None of Ms. Galimba’s assertions identifies a genuine deficiency in the Final EIR or provides a  
12 basis for delaying Certificate of Public Convenience and Necessity (“CPCN”) approval.

13 **II. The Final EIR’s Evaluation of Alternatives Was Appropriate**

14 **Q. Does Ms. Galimba’s testimony identify alternatives that she contends should have been**  
15 **considered by CAISO and the Commission in connection with the Collinsville Project?**

16 **A.** Yes. In Section IV, Galimba identifies three alternatives that she asserts constitute “cost-  
17 effective, technically equivalent alternatives” to the Collinsville Project and argues that they  
18 should be evaluated before the Commission approves LSPGC’s CPCN application and certifies  
19 the Final EIR. Specifically, Ms. Galimba proposes: (1) reliance on the already-reconductored  
20 Pittsburg-Tesla 230 kV lines as a potential solution to address the Contra Costa-Newark 230 kV  
21 constraint; (2) use of PG&E’s existing Bethany Gas Compressor 230 kV substation as an  
22 interconnection point on the Vaca Dixon-Tesla 500 kV backbone; and (3) use of the California  
23 Aqueduct District Office substation in the Bethany area as an interconnection point via the  
24 Kelso-Tesla 230 kV line.<sup>1</sup>

25 **Q. Was the Final EIR deficient since it did not evaluate the alternatives recommended by**  
26 **Ms. Galimba?**

27 **A.** No. The alternatives evaluation in the Collinsville proceeding satisfies all applicable  
28 requirements under CEQA.

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<sup>1</sup> Galimba Testimony, pp. 29-33.

1 The Commission as lead agency prepared a comprehensive Alternatives Screening Report  
2 (March 2026) and conducted a full alternatives analysis in the Final EIR. The Final EIR  
3 evaluated seventeen potential alternatives or combinations of alternatives, including substation  
4 location alternatives, transmission structure alternatives, and transmission route alternatives,  
5 using a three-step screening process that assessed each alternative against CEQA criteria: (1)  
6 whether the alternative accomplishes most of the basic project objectives; (2) whether the  
7 alternative is potentially feasible from economic, environmental, legal, social, and technological  
8 standpoints; and (3) whether the alternative avoids or reduces significant environmental effects  
9 of the Proposed Project. The basic Project objectives used in the CEQA analysis were developed  
10 in coordination with LSPGC and reflect the CAISO-approved project need, including: meeting  
11 the CAISO policy-driven need by relieving stress on 230 kV lines in the Contra Costa region,  
12 providing grid support for the East Bay area, reliably supporting increased energy demand in the  
13 Greater Bay Area, facilitating deliverability of generation and energy storage resources in the  
14 Solano area, and achieving commercial operation by June 2028 consistent with the 2021-2022  
15 Transmission Plan and reaffirmed in the 2024-2025 Transmission Plan. Six of the seventeen  
16 alternatives were retained for full analysis in the EIR.

17 The CEQA alternatives analysis identified an Environmentally Superior Alternative that was not  
18 proposed by LSPGC: Alternative 1 (Collinsville Substation North of Talbert Lane) combined  
19 with the Proposed Project in remaining areas (“Alternative 1 + Proposed Project”). The Final  
20 EIR identified Alternative 1 + Proposed Project as the Environmentally Superior Alternative that  
21 meets the basic project objectives, finding that it would avoid significant and unavoidable  
22 impacts on biological resources, energy, greenhouse gases, land use, and noise compared to the  
23 Project as proposed. This result demonstrates that the CEQA alternatives analysis was thorough  
24 and conducted in good faith in that it identified an alternative that is environmentally superior to  
25 what LSPGC originally proposed. LSPGC does not oppose authorization of the Environmentally  
26 Superior Alternative and is willing to implement Alternative 1 + Proposed Project if the  
27 Commission authorizes construction of that alternative.

28 **Q. Does Ms. Galimba’s testimony identify any deficiency in the alternatives analysis that**  
29 **would warrant new analysis by CAISO or the Commission?**

30 **A.** No. The alternatives evaluation in this proceeding is comprehensive and meets all applicable  
31 requirements. Ms. Galimba’s argument that CAISO should run a sensitivity scenario removing

1 Humboldt offshore wind from its planning assumptions and that the Commission should  
2 postpone Final EIR certification until that analysis is complete fails for the reasons already  
3 discussed: the Collinsville Project was approved to resolve base-portfolio constraints that are  
4 independent of Humboldt offshore wind, and CAISO has expressly confirmed that independence  
5 in the 2024-2025 Transmission Plan. There is no regulatory basis for requiring a new CAISO  
6 sensitivity run as a condition of CPCN approval for a project whose need, independent of the  
7 status of North Coast offshore wind, has already been established and confirmed in two CAISO  
8 transmission plans.

9 Moreover, Ms. Galimba’s recommended alternatives were not identified during the  
10 Commission’s public scoping process, which ran from January 7, 2025 to February 6, 2025, and  
11 included a public scoping meeting on January 21, 2025. Although California Forever submitted  
12 two proposals for alternatives that were not selected for further analysis,<sup>2</sup> the alternatives  
13 identified in Ms. Galimba’s testimony were not submitted during the scoping period.

14 **III. Statements Regarding Tidal Wetlands**

15 **Q. Are Ms. Galimba’s statements about the Collinsville Project’s effects on tidal wetlands**  
16 **correct?**

17 **A.** No. Several times throughout her testimony, Ms. Galimba states that the Collinsville Project  
18 will impact tidal wetlands (e.g., “the Collinsville Substation is proposed in a remote location in  
19 tidal wetlands in the Sacramento-San Joaquin Delta”<sup>3</sup>). However, Section 4.10 of the Final EIR  
20 states that “[n]o wetlands occur within the proposed LSPGC Collinsville Substation site, LSPGC  
21 230 kV underground segment site, LSPGC telecommunication interconnection lines alignment,  
22 PG&E 500 kV interconnection lines alignment, or 12 kV distribution lines alignment.”<sup>4</sup> Ms.  
23 Galimba’s characterizations of the Collinsville Substation site as impacting tidal wetlands is  
24 incorrect.

25 The only wetland impacts associated with the Collinsville Project arise from the 230 kV  
26 submarine cable installation, and those impacts are limited and temporary. The submarine cable  
27 crosses the Sacramento-San Joaquin Delta through open water, not tidal wetlands. The limited  
28 wetland interaction occurs only at the northern shoreline transition area where the 230 kV

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<sup>2</sup> Final EIR, Vol. III, Appendix C, pp. 16-17.

<sup>3</sup> Galimba Testimony, p. 24.

<sup>4</sup> Final EIR. p. 4.10-8.

1 submarine cable comes to land and transitions to overhead. Those temporary wetland impacts  
2 would be less than significant with implementation of mitigation measures which require  
3 restoration of wetlands to pre-construction conditions and compensatory mitigation for any  
4 permanent impacts.<sup>5</sup>

5 Ms. Galimba conflates the Collinsville Project’s limited and temporary impacts to open water  
6 and non-tidal wetlands with impacts to active tidal wetlands that do not exist within the  
7 Collinsville Project area. The Final EIR distinguishes these clearly and confirms that the  
8 Collinsville Project’s wetland impacts are temporary, limited to the submarine cable landing area,  
9 and fully mitigated. They have no bearing on where the substation is sited.

10 **IV. Federal Navigation Improvement Projects**

11 **Q. What does Ms. Galimba’s testimony assert with respect to federal navigation**  
12 **improvement projects?**

13 **A.** Ms. Galimba asserts that the Collinsville Project will conflict with the federal government’s  
14 long-stated plans to aid marine navigation by dredging the Sacramento River corridor to a depth  
15 of -45 feet MLLW.<sup>6</sup>

16 **Q. Do you agree with this assertion?**

17 **A.** No. As reflected in Table 2-11 of the Final EIR, LSPGC must obtain a Section 408 Letter of  
18 Permission from the U.S. Army Corps of Engineers (“USACE”) San Francisco District prior to  
19 installing the proposed transmission cables. As further explained in Section 4.10.2 of the Final  
20 EIR, “Section 408 permission requires a determination that the requested alteration is not  
21 injurious to the public interest and will not impair the usefulness of the project.” The Section  
22 408 review by USACE will ensure that LSPGC’s proposed cables will not conflict with the  
23 current or future use or maintenance of the federal navigation channels.

24 **Q. Does that complete your testimony?**

25 **A.** Yes.

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<sup>5</sup> Final EIR, p. 4.4-132.

<sup>6</sup> Galimba Testimony, pp. 18-19.