Docket No.: Application 24-07-018
Exhibit No. _____
Date June 5, 2026
Witness: Jason Niven
ALJ: Robert Haga

REBUTTAL TESTIMONY OF JASON NIVEN ON BEHALF OF LS POWER GRID CALIFORNIA, LLC

I. Introduction

Q. Please state your name and title.

A. My name is Jason Niven. I am Associate Vice President of Development at LS Power.

Q. On whose behalf are you testifying?

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

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

A. I am electrical engineer with over 20 years of technical and leadership experience in electrical engineering, with a focus on capital project execution and infrastructure development. I hold a Bachelor of Science and Master of Science in Electrical Engineering from Oklahoma State University and am currently Associate Vice President of Development at LS Power, based in Chesterfield, Missouri, where I am responsible for the project leadership of the Collinsville 500/230 kV Substation Project ("Collinsville Project").

Q. Please briefly describe the purpose of your testimony.

A. The purpose of my testimony is to respond to the assertion presented in the Prepared Testimony of Expert Deborah Galimba on behalf of California Forever that the Collinsville Project, the subject of this proceeding, 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."[1] I describe how the current scope for the Collinsville Project does not include the facilities required to interconnect the Humboldt-Collinsville transmission line that is included in the future New Humboldt 500 kV Substation, with a 500/115 kV Transformer, and a 500 kV line to Collinsville [HVDC operated as AC] ("Humboldt Project").

Q. What is Ms. Galimba's contention?

A. Ms. Galimba asserts that the Collinsville Substation was designed, sized and sited for one purpose, to accommodate the Humboldt Project.

Q. Do you agree with that contention?

A. No. The Collinsville Project selected by and under contract with the CAISO does not include the equipment required to interconnect a future Humboldt-Collinsville transmission line. A future Humboldt interconnection would require a material substation expansion.

[1] "Prepared Testimony of Expert Deborah Galimba on Behalf of California Forever," May 13, 2026 ("Galimba Testimony"), p. 18.

Q. What is your overall conclusion?

A. The sole purpose of the Collinsville Project cannot be to receive Humboldt offshore wind generation since the proposed Collinsville Project does not include the facilities required to interconnect the Humboldt project.

II. The Current Collinsville Project Scope Does Not Include Humboldt Interconnection Facilities

Q. Does the current Collinsville Project scope include the equipment necessary to interconnect the Humboldt-to-Collinsville line?

A. No. The Collinsville Project approved in the 2021-2022 Transmission Plan developed by the California Independent System Operator ("CAISO") includes the Collinsville 500/230 kV substation, the Vaca Dixon-Tesla 500 kV loop, two 500/230 kV transformers, and two 230 kV circuits to Pittsburg.[2] It does not include an additional Humboldt 500 kV line dead-end structure, additional 500 kV gas-insulated switchgear ("GIS") breakers to provide a Humboldt terminal, new 500 kV bus from that dead-end structure to the GIS breakers, or the associated protection, control, metering, communications, grounding, civil, and structural facilities needed for the Humboldt-Collinsville transmission line interconnection.

Q. Does the Approved Project Sponsor Agreement ("APSA") between LSPGC and the CAISO for the Collinsville Project confirm that the current project is not built out for the Humboldt line?

A. Yes. The APSA's functional specifications distinguish between the initial project and ultimate future expansion. The APSA states that the Collinsville Substation will be designed to accommodate future expansion, but that the items labeled "Ultimate" are informative for future expansion and are not part of the Project.[3] The initial 500 kV configuration includes two 500 kV lines and six 500 kV circuit breakers, while the ultimate configuration could include six 500 kV lines and twelve 500 kV circuit breakers.[4]

Q. Why is that important from an engineering standpoint?

A. It is important because the initial 500 kV configuration is sized around the initial terminal requirements and does not include spare terminals that could be used to connect future

[2] "Rebuttal Testimony of Diwakar Tewari," June, 5, 2026 ("Tewari Testimony"), Attachment A, p. 193.
[3] Tewari Testimony, Attachment E, p. 37.
[4] Tewari Testimony, Attachment E, p. 37.

transmission lines. In a breaker-and-a-half configuration, six 500 kV breakers support four terminal positions. Those initial terminal positions are needed for the two 500 kV line terminals required to loop the existing Vaca Dixon-Tesla line into the Collinsville Substation, and for the two 500/230 kV transformer banks. The initial configuration does not include an additional 500 kV terminal position for a Humboldt line.[5]

Q. Does the current Collinsville Project include developed, graded, fenced, and equipped space for a Humboldt 500 kV line terminal?

A. No. The Final EIR states that the substation parcel includes sufficient space to accommodate future expansion if needed, but it also accurately states that LSPGC is not currently planning future modifications to the initial buildout and that any future modification would be determined by CAISO planning or interconnection agreements and would be subject to separate Commission review under General Order 131-E ("GO 131-E").[6] In other words, the parcel may allow for future expansion, but the Commission's approval of LSPGC's application for a CPCN for the Collinsville Project will not authorize LSPGC to construct, grade, fence, equip, or approve the Humboldt-Collinsville line terminal facilities.

Q. What physical work at the Collinsville substation would be required to interconnect a future Humboldt-to-Collinsville line?

A. A future Humboldt interconnection would require a material substation expansion. At a minimum, it would require construction of a new 500 kV line terminal, including a new line dead-end structure, new 500 kV bus or GIS bus duct between the dead-end structure and the 500 kV GIS equipment, additional 500 kV GIS breakers and related GIS equipment, expansion or modification of the GIS enclosure, and associated foundations, grounding, protection and control panels, metering, telecommunications, supervisory control and data acquisition ("SCADA") equipment, relay settings, and testing. It would also require the civil engineering and site work needed to integrate that equipment into the existing substation.

Q. Would that expansion be a minor or incidental change to the Collinsville Project?

A. No. It is a significant upgrade. A new 500 kV line terminal is not simply a conductor landing point. It requires additional high-voltage equipment, civil work, protection and control systems, and integration with the existing breaker-and-a-half scheme. Because the current Collinsville

[5] Tewari Testimony, Attachment E, p.37.
[6] Final EIR, p. 2-15.

design uses GIS, adding a future 500 kV line terminal would require expansion or modification of the GIS facilities, not merely connecting a line to an already-installed bay.

Q. Does designing Collinsville for possible future expansion make Humboldt part of the current Collinsville Project?

A. No. Designing a 500 kV substation so it can be expanded in the future is prudent utility planning. But future expandability is not the same as present construction, present approval, present environmental review, or present equipment installation. The APSA expressly states that ultimate future expansion items are not part of the current Project,[7] and the Final EIR states that future modifications would require separate Commission review.[8]

Q. How does designing for possible future expansion affect Ms. Galimba's claim that Collinsville was "configured" for Humboldt?

A. It directly undermines that claim. If the Collinsville Project had been configured as the receiving terminus for the Humboldt-Collinsville line, the current scope would include the physical facilities necessary to interconnect that line. It does not. A future Humboldt interconnection would require a significant substation expansion.

III. Conclusion

Q. What is your conclusion regarding Ms. Galimba's contention that the Collinsville Project was "designed, sized, and sited for one purpose: to receive 1.6 MW of Humboldt offshore wind generation"?

A. Ms. Galimba's contention is not supported by the facts. If the Collinsville Project was designed and sized to receive Humboldt offshore wind generation, then the substation would include the 500 kV line terminal necessary to interconnect the future Humboldt—Collinsville transmission line.

Q. What should the Commission conclude regarding the alleged claim that the Collinsville project was designed and sized solely to accommodate the Humbolt Project?

A. The Commission should reject Ms. Galimba's Humboldt contention. The current Collinsville Project scope does not include the substation equipment necessary to interconnect a future Humboldt-Collinsville line. A future Humboldt interconnection would require a significant expansion of the Collinsville Substation, including additional 500 kV terminal facilities, GIS

[7] Tewari Testimony, Attachment E, p. 37.
[8] Final EIR, p. 2-15.

equipment, buswork, civil work, and separate regulatory review. The facts therefore support the conclusion that the current Collinsville Project was not physically configured as part of the Humboldt Project .

Q. Does that complete your testimony?

A. Yes.