

SCE VALLEY SOUTH SUBTRANSMISSION PROJECT

Date: April 30, 2020
To: Eric Chiang, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #26: April 12 to April 25, 2020

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) Valley South Subtransmission Project (VSSP). Project components include:

- Installation and upgrades of the 115 kV subtransmission line
- Modification of some existing 12 kV and 33 kV distribution facilities
- Telecommunication equipment installation and upgrades
- Installation of new components at the Valley Substation

CPUC Environmental Monitor (EM): CPUC EM, Rosina Goodman, was onsite April 15 and 22, 2020.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs issued for VSSP construction. No additional NTPs are required.

Table 1 - NTPs

NTP #	Date Requested	Date Issued	Description
NTP #1	12/11/18	01/04/19	Use of 2 Material Yards and Vegetation Management at six locations along the right-of-way.
NTP #2	02/26/19	03/25/19	Construction of Project components not subject to final engineering due to use of required insulated conductor in high fire hazard areas, Segments 1 and 2.
NTP #3	05/16/19	06/07/19	Poles subject to final engineering due to required use of insulated conductor in high fire hazard areas.

Construction & Compliance

To date, all pre-compliance materials associated with NTPs #1, #2, and #3 that have been submitted have been approved. Construction activities associated with NTP #1 began on February 4, 2019. Construction activities associated with NTP #2 began on May 6, 2019. Construction activities associated with NTP #3 began on June 18, 2019.

A summary of construction and compliance activities for the subject reporting period is provided below.

Summary of Construction Activity

1. Wilson Construction and their subcontractor KV Structures, are currently using the Valley Substation Contractor Yard for mobile office headquarters and equipment and material storage. Activities associated with the yard included delivery of materials including rebar cages, tubular steel poles (TSPs), and conduit.
2. BMP inspections and maintenance occurred at TSP foundation locations in Segment 1.
3. Wilson Construction activities on Segment 1 included: Hauling, framing, and setting wood poles at Construction Areas UNK48, UNK56, UNK57, UNK59, UNK71, UNK73, UNK75, and UNK77 through UNK80; installing transformers at Construction Areas UNK145, UNK107 through UNK112 and pole 4032038E; switch installation at pole 4606518E and Construction Area UNK38; guy wire work at Construction Areas UNK141 and UNK62; anchor and crossarm work at pole 2091014E; installing rock anchors at Construction Areas UNK84, UNK85, UNK86, and UNK96; preparation for shoofly at pole UNK39 to pole 4606541E; preparation for reconductoring activities at poles 4606518E through 4606520E; replacing distribution poles 4782356E, 4782358E and 4393118E; distribution cutover activities at Construction Areas UNK20 through UNK46, and UNK138 through UNK154; installing distribution arms at pole 4393118E; reconductoring activities at Construction Areas UNK126, poles 4032041E through Construction Area UNK 140, UNK253 through UNK141, and UNK147 to 4058629E; changing arms at poles 4058629E and 4937058E; lowering arms at pole 4726838E; installing underground risers at UNK21 and UNK27; tapline work at pole 4032039E; installing arms and wire at Construction Areas UNK32 through UNK37; wreck-out of distribution poles and wire at Construction Areas UNK95 through UNK115 and UNK154 through 4937061E; lowering phases at poles 4726838E, 4726839E, and 4605894E; reconductoring and energization at Construction Areas UNK118 to 20901014E, UNK115 to 2105782E, UNK114 to 2113203E, UNK20 to 4532622E, and 4606541E (see Photo 1); and removing jumpers at poles 4606520E through 4606518E.
4. KV Structures completed the last foundation at UNK47 (see Photo 2).
5. Wilson Construction activities on Segment 2 included watering restoration sites at poles 4402023E, 4402024E, 4402027E, 4402028E, 4402043E, 4402061E, and 4402062E.
6. SCE self-perform construction activities within the Valley Substation included wiring within the MEER building and the 115 kV rack (see Photo 3).

Environmental Compliance

1. Biological, cultural, paleontological, and Native American monitoring occurred during construction activities.
2. On April 22, the CPUC EM observed existing pole wreck-out construction activities, including traffic control on Leon Road, within 300 feet of an active red-tailed hawk nest near UNK142 (see Photo 4). Upon review of Collector data, the red-tailed hawk nest showed a buffer of only 100 feet. A nest buffer reduction had been previously submitted by SCE for this nest on January 28, 2020. The reduction was from 300 feet to 100 feet for pole installation and wire stringing activities with a duration of 60 days. The request did not include pole wreck-out activities and expired on March 28, 2020. SCE was notified of the CPUC EM's observations at 10:12am. SCE stated the crew would move out of the nest buffer when it was safe to do so, and SCE would submit a nest buffer reduction. The nest buffer reduction was received at 11:21am and the CPUC EM issued a Level 1 incident report for non-compliance the Nesting Bird Management Plan which states, "Once the project activity is complete, the buffer will revert back to the original established buffer". SCE responded on April 28, stating Wilson's environ-

mental manager and field lead will review buffers in FRED bi-weekly to review status of active nests, upcoming expirations of requested reductions, and checking upcoming work activities with the approved activities listed in FRED. Additionally, as work activities are completed, reduced buffers will be set back to the default buffer size in FRED and re-staked in the field accordingly.

3. There was one SCE self-reported incident documented throughout the monitoring period that was in response to the CPUC Level 1 incident documented on April 22, 2020 and described above. Additionally, SCE included in their weekly report a Level 1 incident on March 5, 2020 for the Level 1 incident report documented by the CPUC EM for weekly reporting issues. The incident was discussed in the VSSP Monitoring Report #23 (also see Table 3 below).
4. Traffic control was in place on Leon Road and Garbani Road during construction activities on Segment 1.
5. As of the end of the monitoring period, there are six active nests associated with project activities on Segment 1, including red-tailed hawk, Eurasian collard-dove, and common raven. Buffers have been established per the Project Nesting Bird Management Plan, which specifies the establishment of buffers and the removal of inactive non-special-status bird species' nests. Two of the red-tailed hawk nests have reduced buffers for wire stringing activities and one for a common raven nest at the Valley Substation for construction activities. No nests were removed during the subject reporting period.
6. There were two special-status species observed or identified at locations associated with construction activities during the subject monitoring period. These included smooth tarplant and a red diamondback rattlesnake.
7. Five ephemeral pools suitable for fairy shrimp were identified on Segment 1. Environmentally Sensitive Area (ESA) staking was established around each pool for avoidance during construction activities.
8. Three new potential Stephen's kangaroo rat burrows were documented during the monitoring period. An ESA buffer of 10 feet was established at each potential burrow.
9. There were no SCE self-reported SWPPP maintenance items associated with construction activities reported throughout the monitoring period.
10. There were no reportable (> 1 gallon) or non-reportable (< 1gallon) spills associated with construction activities during the monitoring period.

Temporary Extra Workspaces (TEWS) and Minor Project Changes (MPCs)

No MPC or TEWS requests were approved during the subject monitoring period. Table 2 summarizes the TEWS and MPCs for the Valley South Subtransmission Project to date.

Table 2 – TEWS & MPCs
(Updated 04/30/20)

MPC/TEWS No.	Description	Status
MPCs		
1	Leon Road Realignment	Issued by CPUC 01/11/19
2	Laydown area for wood pole storage south of Valley Substation Yard.	Issued by CPUC 07/10/19

MPC/TEWS No.	Description	Status
3	Additional work areas and access roads on Segment 1 and Segment 2	Issued by CPUC 08/30/19
4	Additional work area adjacent to pole 4402074E on Segment 2.	Issued by CPUC 10/29/19
5	Additional work areas and access roads on Segment 1	Issued by CPUC 12/12/19
6	Additional overland travel access on Segment 1	Issued by CPUC 01/16/20
7	Change overhead distribution work to underground and associated workspace on Segment 1 between Construction Areas UNK44 and UNK45	Issued by CPUC 03/13/20
8	Additional work area to be used for the installation of an anchor on existing pole #4393118E	Issued by CPUC 03/26/20
TEWS		
1	Use of existing access road at Construction Area UNK241 through UNK243	Issued by Aspen 09/12/19

CPUC Compliance Incidents, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

One Incident Report, and no PMs or NCRs were issued by the CPUC EM during the subject reporting period. Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

Table 3 - CPUC Incidents, Project Memoranda, and Non-Compliance Reports
(Updated 04/30/20)

Incident/PM/NCR	Regulatory Requirement	Date Issued	Segment	Description
Level 1 Incident	NTP requirement	08-20-19	Segment 1	Wood poles staged at Construction Areas not released for construction.
Level 1 Incident	SWPPP/BIO-2/AES-1	09-25-19	Segment 1	Construction equipment without secondary containment, staging area without screening, pipes without capping, and an open trench with gaps in covering.
Level 1 incident	NTP/MMCRP	02-19-20	Segment 1	Distribution riser trenching outside of approved project disturbance limits between Construction Areas UNK44 and UNK45.
Level 1 incident	NTP/MMCRP	03-05-20	All	Weekly and daily reporting not adhering to the criterion stated in the MMCRP.
Level 1 incident	NBMP	04-22-20	Segment 1	Nest buffer reduction for a red-tailed hawk nest not managed in accordance with the Nesting Bird Management Plan (NBMP)

PROJECT PHOTOGRAPHS



Photo 1 – Reconductoring activities at Construction Area UNK115 to pole 2105782E (April 22, 2020).



Photo 2 – KV Structures foundation activities at UNK47 (April 17, 2020) (Photo courtesy of SCE).



Photo 3 – Construction activities on the 115 kV rack within the Valley Substation (April 15, 2020).



Photo 4 – Pole wreck-out activities and traffic control within active red-tailed hawk buffer at UNK142 (April 22, 2020).