

ELDORADO-LUGO-MOHAVE (ELM) SERIES CAPACITATOR PROJECT

Date: January 12, 2021
To: Eric Chiang, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #11: December 2021

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison's (SCE) El Dorado-Lugo-Mohave (ELM) Series Capacitor Project (Project). Although the following list includes Project-wide components, this report is limited to construction and compliance activities under the jurisdiction of the California Public Utilities Commission (CPUC), which includes non-federal California lands. Overall project components include:

■ **Series Capacitors:**

- Construction of two new 500 kV mid-line series capacitors (i.e., the proposed Newberry Springs Series and Ludlow Series Capacitors) and associated equipment.
- Installation of two communication paths between the series capacitor sites, which includes approximately two miles of overhead and two miles of underground alignments.
- Providing station light and power to the proposed series capacitors by extending and/or rerouting existing lines to create approximately two miles of overhead and 700 feet of underground 12 kV distribution circuits.

■ **Repeater Facilities:**

- Construction of three new fiberoptic repeater facilities (Barstow, Kelbaker, and Lanfair) within the Lugo-Mohave right-of-way (ROW).
- Installation of distribution lines for light and power at the three proposed fiberoptic repeater sites.

■ **Overhead Clearance Discrepancies:**

- Relocation, replacement, or modification of existing transmission, subtransmission, and distribution facilities at approximately 12 locations along the Eldorado-Lugo, Eldorado-Mohave, and Lugo-Mohave 500 kV transmission lines to address 14 of the overhead clearance discrepancies.
- Tower modifications would include raising nine towers up to approximately 18.5-feet by inserting new lattice steel sections in tower bodies.
- Performing minor grading at two locations along the Lugo-Mohave 500 kV transmission line to address two of the overhead discrepancies.

■ **Optical Ground Wire (OPGW):**

- Installation of approximately 232 miles of OPGW which include approximately 59 miles on the Eldorado-Mohave transmission line, approximately 173 miles on the Lugo-Mohave transmission

line, and approximately three miles of underground telecommunications facilities in the vicinity of the Mohave Substation.

- Modifications and strengthening of the ground wire peak of existing suspension towers where OPGW splices would occur (some of these towers would also require minor modifications to the steel in the tower body).

■ **Substation Upgrades:**

- Lugo Substation: Modifications to the existing series capacitors, installation of new terminating equipment, removal of two existing tubular steel poles (TSPs), and installation of two new TSPs on the Eldorado-Lugo and Lugo-Mohave 500 kV transmission lines.
- Eldorado Substation: Modifications on the existing series capacitors and upgrades to the terminal equipment on the Eldorado-Lugo 500 kV transmission line.
- Mohave Substation: Replacement of existing series capacitors on the Lugo-Mohave 500 kV transmission line and installation of new terminal equipment on the Eldorado-Mohave and Lugo-Mohave 500 kV transmission lines.
- Telecommunications Facilities: Installation of approximately 2,000 feet of underground telecommunications facilities within the existing Lugo, Eldorado, and Mohave Substations.

■ **Cathodic Protection (if necessary)**

- Installation of approximately 60 miles of Southern California Gas Company’s (SoCalGas) natural gas pipelines parallel to SCE’s Lugo-Mohave 500 kV transmission line and on other pipelines as needed.

CPUC Environmental Monitors (EMs)

CPUC EM, Nikolai Starzak was onsite December 14, 20, and 27.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs issued for the Project by the CPUC, to date. No additional NTPs are required.

| Table 1 - CPUC Notices to Proceed | | | |
|--|-----------------------|--------------------|--|
| NTP | Date Requested | Date Issued | Description |
| NTP #1 | 09-22-2020 | 12-14-2020 | <ul style="list-style-type: none"> ▪ Modifications at the Lugo Substation Mid-Line Series Capacitor Construction at Ludlow Series Capacitor 5 Distribution and Telecommunications Construction for Mid-Line series Capacitors and the Barstow Repeater Staging Yard construction at the Ludlow Series Capacitor Yard |
| NTP #2 | 03-23-2021 | 04-01-2021 | <ul style="list-style-type: none"> ▪ Tower raise modifications on the Lugo-Mohave and Eldorado-Lugo transmission lines (two locations) Establishment of Helicopter Landing Zone 184 Development of the Coolwater Staging Yard |
| NTP #3 | 04-29-2021 | 05-13-2021 | <ul style="list-style-type: none"> ▪ Installation of OPGW fiber optic line along the Lugo-Mojave transmission line from Structure M165-T4 (near California/Nevada border) to Structure M68-T2 (near Ludlow Series Capacitor) Modifications to strengthen overhead structures with new OPGW splice structures Development of the Fenner Staging Yard and Ludlow Alternative Staging Yard |

| Table 1 - CPUC Notices to Proceed | | | |
|--|-----------------------|--------------------|---|
| NTP | Date Requested | Date Issued | Description |
| NTP #4 | 05-28-2021 | 06-08-2021 | <ul style="list-style-type: none"> ▪ Installation of OPGW fiber optic line along the Lugo-Mohave transmission line from Structure M66-T3 (west end) to Lugo Substation (east end) ▪ Modifications to strengthen overhead structures with new OPGW splice structures ▪ Development of the Arrow Lake Road Staging Yard and Bear Valley Staging Yard |

Construction & Compliance

A summary of construction and compliance activities is provided below by NTP. Allowed construction activities under each NTP is summarized in Table 1 above.

- **NTP #1.** To date, all pre-compliance materials associated with NTP #1 have been approved by CPUC. Construction activities associated with NTP #1 began on January 4, 2021 and continued throughout the reporting period.
- **NTP #2.** To date, all pre-compliance materials associated with NTP #2 have been approved by CPUC. Construction activities associated with NTP #2 began on June 7, 2021 and continued throughout the reporting period.
- **NTP #3.** To date, all pre-compliance materials associated with NTP #3 have been approved by CPUC. Construction activities associated with NTP #3 began on May 19, 2021 and continued throughout the reporting period.
- **NTP #4.** To date, all pre-compliance materials associated with NTP #4 have been approved by CPUC. Construction activities associated with NTP #4 began on September 30, 2021 and continued throughout the reporting period.

Summary of All Construction Activity

Construction activities associated with NTP #1 that were conducted during the reporting period include:

1. For the currently approved Lugo Substation, distribution, and telecommunications components, construction activities are being performed by SCE crews. Currently approved components associated with construction of the Ludlow Series Capacitor and adjacent materials yard are being performed by Beta-Siemens.
2. No construction activities occurred at Lugo Substation during the subject reporting period.
3. Construction activities that occurred along the Ludlow Mid-Line Series Capacitor distribution alignment included site grading, sack and patch pier foundations (see Photo 1 and 2), conduit excavation and trenching, installation of ground grid and manholes, installation of below grade conduit, NRG mobilization and equipment inventory, assembly of platform base and pedestals, installation of 500 kV disconnect switches, reception of MEER equipment/hardware, and erection of MEER enclosure (see Photo 3).
4. To date, activities associated with the Lugo Substation and Ludlow Series Capacitor and Mid-Line are approximately 46 percent and 71 percent complete, respectively.

Construction activities associated with NTP #2 that were conducted during the reporting period include:

1. The currently approved tower modifications are being performed by AMPJACK crews.
2. No construction activities occurred along the Lugo-Mohave transmission line during the subject reporting period. Work will resume early 2022.
3. To date, activities associated with the tower raise modifications along the Lugo-Mojave transmission line are approximately 80% complete.

Construction activities associated with NTP #3 that were conducted during the reporting period include:

1. Construction activities that occurred along the Lugo-Mohave transmission line included clean up and site restoration (see Photo 4).
2. No construction activities occurred at the Fenner Staging Yard and Ludlow Alternative Staging Yard during the subject reporting period.
3. To date, activities associated with the OPGW fiber optic line along the Lugo-Mojave transmission line are approximately 100% complete.

Construction activities associated with NTP #4 that were conducted during the reporting period include:

1. No construction activities occurred at the Bear Valley Staging Yard during the subject reporting period.

Environmental Compliance

1. There were no Incident Reports, Project Memoranda, or Non-Compliance Reports issued by the CPUC during the reporting period.
2. There was one level one self-reported incidents documented during the reporting period. On December 15, a Faith Electric vehicle was traveling westbound on a non-project access road on BLM land. The vehicle turned around and joined the crew to drop off materials then exited the site. The vehicle route was inspected for impacts, since the truck had pulled off into vegetation and created tracks roughly 100-feet long about 35 feet south of the road. The truck had driven off Pisgah Crater Road onto a non-project access road paralleling the railroad tracks and driven to the southeast corner of Newberry Springs Capacitor laydown yard before turning around. No impacts to desert tortoise or any other sensitive species were observed. "No ELM Access" signs were present on the access road, but the delivery driver had not been WEAP-trained. The Lead Field Contact Representative was notified of the incident. Additional signage marking the approved roads was added.
3. There were no SWPPP maintenance items or corrective actions recorded during the reporting period. To date, there are no open SWPPP maintenance items or corrective actions.
4. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills identified during the reporting period (see Photo 5).
5. To date, there are 16 active buffers on unconfirmed golden eagle nests (nest status needs to be verified) either located within or with buffers that overlap work areas under CPUC oversight. If required, nest management, including establishment of buffers and the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the project Nesting Bird Management Plan (NBMP). There were no nest removals reported within work areas under CPUC oversight during the reporting period.

6. Special-status species observed or detected during the reporting period included loggerhead shrike, prairie falcon, Cooper’s hawk, and golden eagle. On December 20, a bird mortality was detected during the morning clearance sweep of the Ludlow Series Capacitor yard. The interim Environmental Coordinator and relevant contractor foreman were notified immediately. The mortality was documented, then removed from the work area and buried. The bird was found deceased in a pool of frozen rainwater beneath a construction generator in the materials yard. The secondary containment beneath the generator was soiled with the remnants of a contained, resolved equipment leak. The residual oil had contaminated the pooled rainwater, which collected and froze over the three day weekend. Because the deceased bird was oily with residue from the resolved leak, and because it was associated with project infrastructure, the mortality was determined to be project related. The construction contractor agreed to replace the secondary containment beneath the generator to reduce the potential for additional rainwater to collect and become contaminated. Additionally, an absorbent pad will be utilized within the containment to allow monitors and the contractor to quickly identify and remedy new leaks.
7. On June 16, 2021, SCE submitted copies of email messages identifying approvals from the County of San Bernardino for work extended hours.

Minor Project Refinements (MPRs) and Temporary Extra Workspaces (TEWS)

Table 2 summarizes the CPUC MPRs and TEWS issued since the start of construction.

| Table 2 – Minor Project Refinements and Temporary Extra Workspaces | | | |
|---|---------------------------|--------------------|--|
| MPR/ TEWS | Date Requested | Date Issued | Description |
| MINOR PROJECT REFINEMENTS (MPRs) | | | |
| 1 | 08-26-2021 | 09-08-2021 | Additional work areas. |
| 2 | 09-24-2021 | 09-30-2021 | Work areas, walking paths, water sources. |
| 3 | 10-11-2021 | 10-21-2021 | Additional work areas. |
| 4 | 10-13-2021 | 10-21-2021 | Additional work areas, distribution line modification. |
| 5 | 10-13-2021 | 10-15-2021 | Potable water source, additional work areas. |
| 6 | 12-21-2021 | 01-11-2022 | Induction fencing. |
| TEMPORARY EXTRA WORKSPACES (TEWS) | | | |
| 1 | 05-10-2021 | 05-10-2021 | <ul style="list-style-type: none"> ▪ Use of existing access road between Structures M162-T1 and M163-T1 and M164-T1 and M164-T2 |

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

Table 3 summarizes the CPUC Project Memorandum and Incident Reports issued since the start of construction.

| Table 3 – CPUC Incidents, Project Memoranda (PM), and Non-Compliance Reports | | | | |
|---|--|--------------------|--|---|
| Incident/PM/NCR | Regulatory Requirement | Date Issued | Location | Description |
| INCIDENT REPORTS | | | | |
| Level 1 Incident | MM CR-5 | 02-04-21 | Ludlow Series Capacitor | On February 3, 2021, the CPUC EM documented no monitors present in an area where monitoring is required. |
| Level 1 Incident | APM AIR-02 | 04-07-21 | Ludlow Series Capacitor | Between March 30 and April 6, 2021, a non-compliant piece of heavy equipment was utilized. |
| Level 1 Incident | MM BR-10 | 04-08-21 | Project-wide | Data associated with golden eagle surveys and potential nesting sites was not provided to the CPUC within the required timeframe. |
| Level 1 Incident | MM T-3 Helicopter Use Plan MMCRP | 06-14-21 | Project-wide | Providing insufficient data for helicopter flight tracks review |
| PROJECT MEMORANDUMS | | | | |
| PM 001 | ITP 8.8 MM BR-1 | 03-08-21 | Ludlow Series Capacitor Lugo Substation | <ul style="list-style-type: none"> ▪ On March 5, 2021, the CPUC EM observed project activities that had occurred prior to the installation of required desert tortoise exclusionary fencing. Several records identified of monitors commencing activities onsite prior to CPUC concurring with agency approvals. |
| NON-COMPLIANCE REPORTS | | | | |
| NCR 001 | MM T-3 MM BR-10 NBMP MMCRP Helicopter Use Plan | 06-16-21 | Various | <ul style="list-style-type: none"> ▪ Operating a helicopter without the required GPS tracking device Removing buffers for golden eagle nests without notification or documentation Unreported mortality event of red-tailed hawk Non-notification of nest buffer reduction at red-tailed hawk nest Late reporting of Level 1 incident of helicopter nest buffer incursion Multiple nest buffer incursions over the period of 5/17/21 to 6/6/21 Inadequate daily flight track review by contractor Inappropriate inactive nest determination based on 15-minute observation of nest Lack of self-reporting by contractor when compliance items are identified |

PROJECT PHOTOGRAPHS



Photo 1: Sack and patch pier foundations, Ludlow Series Capacitor (December 14, 2021).



Photo 2: Sack and patch pier foundations, Ludlow Series Capacitor (December 20, 2021).



Photo 3: Assembly of MEER building at Ludlow Series Capacitor (December 27, 2021).



Photo 4: Completed construction along Lugo-Mohave transmission line, Barstow Repeater (December 27, 2021).



Photo 5: Secondary containment at Ludlow Series Capacitor (December 20, 2021).