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|  | <p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p> |
| | <p>South of Palermo 115 kV Reinforcement Project</p> <p>Compliance Status Report: 04</p> <p>October 31, 2018</p> |

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Initial Study (FIS)/Mitigated Negative Declaration (MND) for the South of Palermo 115 kV Reinforcement Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FIS/MND to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the CPUC’s third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. Photos of site observations are included in Attachment A of this report. Summaries of the Notices to Proceed (NTP) and Minor Project Refinements (MPR) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from October 1 through October 31, 2018.

CONSTRUCTION SCHEDULE AND PROGRESS

PG&E began construction activities associated with NTP-1 on July 1, 2018. Additional construction activities associated with NTP-2 were started concurrently on September 6, 2018. All project activities are scheduled to be complete by the end of 2021.

Bogue Sub-Line Segment

During this reporting period, tower crews completed installation of all foundations on the Bogue Sub-Line Segment and installed lower structure sections. Crews installed all structure tops, after which tower crews removed the lower sections of the old towers and existing foundations. Winterized landing zones and pull sites were established to support reconductoring once all towers are replaced.

South of Palermo Line Segment

Vegetation crews cleared work areas as required to support foundation installation and tower installation. Tower crews began installing hybrid tower butts on the South of Palermo Segment.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental monitor (EM) conducted site observations in areas under active construction along the Bogue Sub-Line Segment. Areas of active and inactive construction were observed to verify implementation of the mitigation measures stipulated in the project's MMCRP. Observations were documented using site inspection forms and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

Activities observed during this reporting period along the Bogue Sub-Line Segment and South of Palermo Segment included installation of foundations and lower structure sections (see photo 1), hybrid tower butt installations, structure top installations, vegetation clearance in work areas as required for the installation of foundations (MM HAZ-1) (see photo 2), installation of Storm Water Pollution Prevention Plan Best Management Practices (SWPPP BMPs) to control erosion and prevent disturbance to vernal pool habitat (APM HYDRO-1, APM BIO-6), and establishment of winterized landing zones for reconductoring work in the coming fall/winter (APM HYDRO-1).

During the reporting period, the EM observed appropriate signage marking identified sensitive resources, in accordance with APM BIO-3 (see photo 3). Construction monitoring for special-status species (including Giant Garter Snakes) was conducted in accordance with APM-BIO 4, and construction areas near suitable Giant Garter Snake habitat had exclusion fencing installed in accordance with APM BIO-9. Air quality signs were in place in accordance with APM AQ-2 and the Fugitive Dust Control Plan (see photo 4).

Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking table. A complete list of mitigation measures and applicant proposed measures is included in the FIS/MND in the Decision for the Power Line Reinforcement Project, as adopted by the CPUC on May 16, 2018 (Decision 18-05-014) and the MMCRP.

Compliance Status

A Level 1 minor deviation was issued on October 24, 2018 for inadequate dust suppression; corrective action was taken with more frequent use of a water truck on the road. No other minor deviations or non-compliances were issued this reporting period.

ATTACHMENT A Photos



Photo 1: The CPUC EM observed crews pouring the new foundation at structure 3/98.

ATTACHMENT A (Continued)



Photo 2: Completed site preparation work at structure 3/25. The area was staked to define the work boundaries prior to ground disturbance.

ATTACHMENT A (Continued)



Photo 3: Sensitive environmental resources were clearly marked with signs at Segment 7/56 in accordance with the project requirements.

ATTACHMENT A (Continued)



Photo 4: Air quality signs posted with the telephone numbers of the contractor and Air District for any questions or concerns about dust from the project in accordance with APM-AQ-2.

ATTACHMENT B Notices to Proceed

| NTP No. | Date Issued | Description | Conditions Included (Y/N) |
|------------|----------------------|--|---------------------------|
| CPUC - 001 | June 14, 2018 | Construction activities at select locations along the Bogue Sub-Line Segment, the Pease Sub-Line Segment, and the South of Palermo Line. | Y |
| CPUC - 002 | September 6, 2018 | Construction activities which would take place concurrently with work covered under NTP-1 at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line. | Y |

ATTACHMENT C

Minor Project Refinement Request

| Minor Project Refinement Request No. | Submitted | Description | Status | Approval |
|--------------------------------------|---------------|--|----------|----------|
| 001 | July 09, 2018 | Requested to add an approximately 400-by-600 foot landing zone/pull site along the Pease Sub-Line Segment and also the relocation of an approximately 200-by-200 foot landing zone along the Bogue Sub-Line Segment. | Approved | 07/19/18 |