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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: 15</p> <p>September 30, 2019</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 September 1 through September 30, 2019.

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. Construction of additional project elements associated with NTP-3 were started on March 27, 2019. All project activities are scheduled to be complete by the end of 2021.

Tower crews have continued to install foundations on the South of Palermo line, remove old towers/poles, and install the steel middle and upper sections of the transmission towers. Transmission line crews have continued to install switches. Civil crews continued to perform winterization work to prepare all-weather locations on the remainder of the South of Palermo line.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party EM conducted site observations in areas under active construction. 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 period included guard structure installation (see Photo 1), work site winterization, foundation drilling (see Photo 2), foundation abutment installation, and tower removal.

The CPUC EM observed traffic control signs and flaggers along Cox Lane during guard structure installation at site 6/52, in accordance with the Traffic Control Plan and MM TRA-1 (see Photo 1).

Sensitive resource area signs were observed to be clearly posted in accordance with APM BIO-12 (see Photo 3), including signs to identify elderberry bushes for avoidance in accordance with APM BIO-8.

Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) such as silt fencing were inspected and maintenance is scheduled in accordance with APM HYDRO-1. Driving plates/track-out pads were also installed to prevent track-out at work sites (see Photo 4).

The CPUC EM observed water trucks at work sites and along access roads to control and suppress dust as required by APM AQ-2.

The EM also confirmed that preconstruction surveys and construction monitoring for the giant garter snake (GGS) were conducted in work areas and access roads with appropriate habitat, as required by APM BIO-9.

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

One Level 1 minor deviation was observed on September 17, 2019. A piece of an old tower that was removed and placed on the ground for later removal from the site was discovered to be partially outside of the approved work area due to the work area boundaries not being adequately marked. To resolve the issue, the tower piece was moved within work area boundaries. No impacts to sensitive resources were observed in the affected area outside the work limits.

ATTACHMENT A Photos



Photo 1: Crews were observed installing guard structures at site 6/52 and traffic control signs and flaggers were implemented along Cox Lane, in accordance with the Traffic Control Plan and MM TRA-1.

ATTACHMENT A (Continued)



Photo 2: Drilling work for foundation installation at site 24/176.

ATTACHMENT A (Continued)



Photo 3: Sensitive resources were marked clearly at site 29/213 and avoided in accordance with APM BIO-3.

ATTACHMENT A (Continued)



Photo 4: Driving plates were installed to provide access to work sites within a golf course and to prevent track-out between sites 24/176 and 24/177, in accordance with the project SWPPP.

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 |
| CPUC - 003 | March 27, 2019 | Construction activities at select locations along the Rio Oso Sub 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 |