

November 17, 2020

Mr. Michael Rosauer Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #25 for the Sanger Substation Expansion Project

Dear Mr. Rosauer,

Construction for the Sanger Substation Expansion Project began on November 5, 2018. This report provides a summary of the compliance monitoring activities that occurred during the period from November 1 to 30, 2020, for the Sanger Substation Expansion Project in Fresno County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Pacific Gas & Electric (PG&E) and their contractors comply with the requirements of the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) for the Sanger Substation Expansion Project, as adopted by the California Public Utilities Commission (CPUC) on July 13, 2017.

Table 1 summarizes CPUC-approved Notice to Proceed (NTP) activities to-date for the Sanger Substation Expansion Project, based on activities proposed in PG&E's Notice to Proceed Requests (NTPRs).

Table 1 CPUC-approved NTP Activities for the Sanger Substation Expansion Project

NTP#	Final NTPR Submittal Date	CPUC NTP Issuance Date	Description of Approved Activities
NTP #1	11/1/2018	11/2/2018	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of access driveways, fencing, foundations, substation equipment, and a microwave tower; and installation of two antenna dishes at an offsite location (Fence Meadow Repeater Station).
NTP #2	6/6/2019	6/7/2019	Work within both the existing Sanger Substation footprint and the expansion area, including laydown/staging area setup; installation of pole foundations, installation of poles, power line stringing, removal of pull sites, and restoration of impacted property.

Table 2 summarizes all CPUC-approved Minor Project Refinements (MPRs) to-date for the Sanger Substation Expansion Project.

Table 2 CPUC-approved MPRs for the Sanger Substation Expansion Project

MPR#	Final MPR Submittal Date	CPUC MPR Approval Date	Description of Minor Project Refinement
MPR #001	5/24/2018	east; and 165 feet south of the existing Sanger Substation footp In total, there would be modifications to seven poles.	
MPR #002	7/17/2018	7/20/2018	An additional temporary laydown yard/staging area (approximately 974 feet by 112 feet) located north of the retention basin, running north between the western boundary of the substation expansion area and the western boundary of the existing Sanger Substation footprint. This area is owned in fee title by PG&E.
MPR #003	11/13/2018	11/14/2018	Use of an existing water well approximately 100 feet north of approved NTP #1 work areas, within the same parcel as the Sanger Substation footprint. PG&E has obtained permission from the landowner to use this well for a specified timeframe. PG&E will access the well pump by foot, and will obtain water from this well for dust control purposes. MPR #3 adds no additional ground disturbance to the existing disturbance footprint, other than impacts from light foot traffic and temporary ground placement of a water hose.

Project Compliance Incidents

Onsite compliance monitoring by the Ecology and Environment, Inc., member of WSP (hereafter referred to as WSP) compliance team during this reporting period focused on spot-checks of ongoing construction activities. Compliance Monitors Evan Studley and Sam Hopstone visited the Sanger Substation construction site on November 3 and 18, 2020. CPUC Compliance Monitoring Reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and applicant proposed measures (APMs) were completed for the site visits. These reports are attached below (Attachment 1).

Overall, the Sanger Substation Expansion Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP) Compliance Plan. Communication between the CPUC/E & E compliance team and PG&E has been regular and effective; the correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/E & E and PG&E, along with daily schedule updates and database notifications, provided additional compliance information and construction summaries. Furthermore, PG&E's weekly compliance status reports provided a compliance summary, a description of construction activities that occurred each week, a summary of compliance with MMCRP conditions (MMs/APMs) for biological, cultural and paleontological resources; the Storm Water Pollution Prevention Plan (SWPPP); noise and traffic control; onsite hazards; and the Worker Environmental Awareness Program (WEAP), as well as any non-compliance issues and resolutions, and public complaints, and notifications.

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Compliance Incidents and Minor Compliance Observations

During the November 2020 reporting period, PG&E did not self-report any compliance incidents, and the CPUC did not issue any compliance incident reports.

Noise Compliance

During the November 2020 reporting period, there were no exceedances of the stipulated noise levels.

Public Concerns

No public concerns were reported during November 2020.

Sincerely,

Ecology and Environment, Inc.

Silvia Yanez

Project Manager

CC:

Michael Calvillo, PG&E Carie Montero, Parsons Lincoln Allen, SWCA

ATTACHMENT 1

CPUC COMPLIANCE MONITORING REPORTS NOVEMBER 3 AND 18, 2020



Sanger Substation Expansion Project CPUC Compliance Monitoring Repot

Project Proponent	PG&E	Report No.	CM-CPUCDG-110320
Lead Agency	California Public Utilities Commission	Date (mm/dd/yy)	11/3/20
CPUC Project Manager	Mike Rosauer	Monitor(s)	Sam Hopstone
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	hazy, 64°F, calm
CPUC (E & E) Monitoring Supervisor	Angelica Oregel	Start/End time	09:00 – 09:30
Project NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST (Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)

Worker Environmental Awareness Program (WEAP) Training	Yes	No	N/A
Is the WEAP training in place and does it appear to have been completed by all on-site personnel (e.g., construction workers, managers, inspectors, monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (BMPs) been installed, in accordance with the project's SWPPP?	Х		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	Х		
Are measures in place to avoid/minimize mud tracking onto public roadways?	Х		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	Х		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?	Х		
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		

Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	Χ		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	Х		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	Х		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	Х		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		Χ	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Χ	
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g. cultural sites) clearly marked and being maintained?			Х
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	Χ		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	Х		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on-site properly managed?	Χ		
Are procedures in place to prevent spills and accidental releases?	Χ		
Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	Х		

Are contaminated soils properly managed for onsite storage or offsite disposal?			
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?			
Is construction occurring within approved work hours?			
Are required noise control measures in place?	Χ		

AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

09:00- Arrived on site. Entered site through south gate into existing substation. Observed crews preparing drill rig in old substation footprint to auger a hole for foundations within the existing substation. Observed portable toilets and handwash station adjacent to the main construction trailers had secondary containment (Photo 1) (APM WQ-1).

- 09:05- Checked in with SWCA biologist Angelica Oregel. Current activity includes augering foundation holes in the existing substation, servicing breakers and switches in the substation expansion, spotting equipment in the fields west of the site, installing wire drops, and slinging cables between TSPs. Vincent Zhao, a Paleo Solutions paleontologist, was present on site, ready to monitor drilling activities. Ms. Oregel conducts weekly sweeps for sensitive species (MM BIO-2, MM BIO-3). She reported that no special status species have been observed on site.
- 09:10- Proceeded southwest to stormwater detention basin. Observed crews preparing the drill rig and associated equipment (Photo 2). Checked in with Vincent Zhao, paleontologist representing Paleo Solutions. Headed north into expansion footprint, turned left, and entered laydown yard through south gate.
- 09:15- Proceeded north through laydown yard. Equipment and materials were staged neatly and out of the path of travel. Observed crews placing concrete blocks in the fields west of the site, near Jensen Avenue (Photo 3). Turned around at the end of the laydown yard, doubled back to the south gate, and exited into the expansion footprint.
- 09:20- Proceeded north along west side of expansion footprint. Crews have continued hanging conduits between the expansion substation and proximal TSPs. At northwest corner, turned right, headed east across north site boundary, and turned south along east site boundary. Observed crews have continued hanging conduits between the expansion substation and proximal TSPs (Photo 4). Continued south along east project boundary. Observed materials, remaining portable toilets, and equipment staged outside the path of travel and delineated (Photo 5) (APM GHG-2) (APM HAZ-3).
- 09:25- Continued south to southeast corner of expansion footprint, turned right and crossed adjacent to the control buildings, and continued south into the old substation footprint. Entered construction trailer to check permit binder (APM WQ-1). SWPPP is current through Mid-October 2020. Exited construction trailer.
- 09:30- Checked in with Ms. Oregel, had no compliance concerns to report. Exited site through south gate of old substation, entered McCall Avenue northbound. Observed that conduits have tied into the mainline along the east side of McCall, heading north.

NEW SENSITIVE RESOURCE DISCOVERIES
MITIGATION MEASURES VERIFIED
APM AES-3, APM-AIR-1, MM BIO-1, MM BIO-2, MM BIO-3, APM GEO-2/APM WQ-1, APM-NOI-3, APM NOI-4
See additional APMs and MMs listed in the description of observed activities section.
RECOMMENDED FOLLOW-UP
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS
COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.
Level 1: Minor Problem. An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.
Level 2: Compliance Deviation. An event or observation that deviates from project requirements and puts a resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form.
Level 3: Non-Compliance. An event or observation that violates project requirements and affects a resource. Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the MMCRP applicant proposed measures (APMs) or mitigation measures (MMs), permit conditions, or approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.
Compliance Incidents reported by PG&E's Compliance Team
PG&E's Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below.
Description: (include PG&E's report number)
New Sensitive Resources
New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit If checked, please describe the new discoveries and documentation/verification below.
Description: None.

Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #

PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

REPRESENTATIVE SITE PHOTOGRAPHS					
Date	Location	Photo	Description		
11/3/20	Old Substation		Photo 1- Portable toilets and handwash station have secondary containment. View northeast.		
11/3/20	Old Substation		Photo 2- Crews mobilize drill rig between old substation and detention basin. View south.		

Date	TATIVE SITE PH Location	Photo	Description
11/3/20	Laydown Yard	Photo	Photo 3- Crews place concrete blocks in field west of site. View southwest.
11/3/20	Expansion Footprint		Photo 4- Cables have been hung between new substation and surrounding TSPs. View southwest.
11/3/20	Expansion Footprint		Photo 5- Remaining equipment and materials are staged out of the path of travel. View southeast.

Completed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	11/3/20
Reviewed by:	Evan Studley
Firm:	Soar Environmental Consulting, Inc.
Date:	11/03/20



Sanger Substation Expansion Project CPUC Compliance Monitoring Repot

Project Proponent	PG&E	Report No.	CM-CPUCDG-111820
Lead Agency	California Public Utilities Commission	Date (mm/dd/yy)	11/18/20
CPUC Project Manager	Mike Rosauer	Monitor(s)	Sam Hopstone
CPUC (E & E) Monitoring Manager	Silvia Yanez	AM/PM Weather	cloudy, 64°F, drizzling
CPUC (E & E) Monitoring Supervisor	Angelica Oregel	Start/End time	07:30 – 08:00
Project NTP(s)	NTP #2		

SITE INSPECTION CHECKLIST (Based on monitor's observations during site visit; responses do not imply that monitor observed all staff, crews, and parts of the project during this inspection)

Worker Environmental Awareness Program (WEAP) Training			N/A
Is the WEAP training in place and does it appear to have been completed by all on-site personnel (e.g., construction workers, managers, inspectors, monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)	Yes	No	N/A
Have temporary erosion and sediment control measures (BMPs) been installed, in accordance with the project's SWPPP?	Х		
Are erosion and sediment control measures (BMPs) installed correctly (without apparent deficiencies) and functioning as intended during rain events?	Х		
Are measures in place to avoid/minimize mud tracking onto public roadways?	Х		
Is dust control being implemented, in accordance with the Dust Control Plan (e.g., access roads watered, haul trucks covered, dirt piles are covered with tarps, pull-outs and streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Are measures in place to stabilize soils and effectively suppress fugitive dust?	Х		
Equipment	Yes	No	N/A
Are vehicles maintaining speed limits: 15 mph on unpaved roads/10 mph off-road?	Х		
Are observed vehicles/equipment arriving onsite clean of sediment/mud and noxious weeds or other plant debris?			
Are observed vehicles/equipment turned off when not in use?	Х		
Work Areas	Yes	No	N/A
Is vegetation disturbance within work areas minimized?	Х		

Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources, as appropriate?	Х		
Are observed vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are trenches/excavations covered at night, or when not possible, are wildlife escape ramps installed, constructed of earth fill or wooden planks no less than 10 inches wide?	Χ		
Biology	Yes	No	N/A
Have required preconstruction surveys been completed for biological resources (special status species, raptors and other nesting birds, burrowing owls, San Joaquin kit fox), as appropriate?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, appropriate buffer distance enacted)?	Х		
Is project complying with biological monitoring requirements (e.g., if required, are monitors present)?	Х		
If there are wetlands or water bodies near construction activities, are adequate measures in place to avoid impacts on these features (e.g., is the refueling/maintenance buffer in place within 100 feet of the irrigation ditch)?	Х		
Has wildlife (sensitive species or not) been relocated from work areas? If yes, describe below.		Χ	
Have impacts occurred on adjacent habitat (sensitive or not sensitive)? If yes, describe below.		Х	
Did you observe any threatened or endangered species? If yes, describe below.		Χ	
Have there been any work stoppages for biological resources? If yes, describe below.		Х	
Cultural and Paleontological Resources	Yes	No	N/A
Are appropriate buffers/exclusion zones for identified sensitive cultural/paleo resources (e.g. cultural sites) clearly marked and being maintained?			Х
Is the project in compliance with cultural/archaeological monitoring requirements (e.g., if required, are monitors present)?	Χ		
Is the project in compliance with paleontological monitoring requirements (e.g., if required, are monitors present)?	Х		
Have there been any work stoppages for potential archaeological, cultural, or paleontological resources? If yes, describe below.		Х	
Hazardous Materials	Yes	No	N/A
Are hazardous materials that are stored or used on-site properly managed?	Χ		
Are procedures in place to prevent spills and accidental releases?	Χ		
Are required fire prevention and control measures in place, and no crew members, managers, or monitors are smoking onsite?	Х		

Are contaminated soils properly managed for onsite storage or offsite disposal?			
Work Hours and Noise	Yes	No	N/A
Are required night lighting reduction measures in place?			
Is construction occurring within approved work hours?			
Are required noise control measures in place?	Х		

AREAS MONITORED Project areas on and near the substation expansion footprint, existing substation, and the temporary laydown/staging area.

DESCRIPTION OF OBSERVED ACTIVITIES

07:30- Arrived on site. Entered fields east of McCall from the entrance at north end of project footprint. Met SWCA biologist Angelica Oregel in clearing adjacent to TSP foundations, checked in for activity report. Current activity includes TSP installation, substation testing, removal of wood poles, removing steel trellis towers, and stringing conductors. Future activities include finishing the TSP installation and stringing conductors. Ms. Oregel continues to perform wildlife sweeps, and no special status species have been observed. Observed trellis poles to be removed and foundations which will serve as bases for the TSPs (Photo 1).

07:40- Proceeded north and west to exit the field and return to McCall Avenue. Observed trucks, freight equipment, and cranes mobilizing to the clearing to commence TSP install (Photo 2). Crossed McCall Avenue, parked vehicle, and walked to south entrance gate of the expansion footprint.

07:50- Observed guys wire and pole adjacent to the gate were delineated for visibility to vehicle traffic (Photo 3). Returned to vehicle, proceeded to south boundary of old substation adjacent to Jensen Avenue. Observed all flows directed to the detention basin (Photo 4). Observed that south boundary fence remains in good condition (Photo 5).

08:00- Departed site, proceeded west along Jensen Avenue.

NEW SENSITIVE RESOURCE DISCOVERIES

MITIGATION MEASURES VERIFIED

APM AES-3, APM-AIR-1, MM BIO-1, MM BIO-2, MM BIO-3, APM GEO-2/APM WQ-1, APM-NOI-3, APM NOI-4

See additional APMs and MMs listed in the description of observed activities section.

RECOMMENDED FOLLOW-UP

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS

COMPLIANCE SUMMARY Below please describe any Compliance Incidents (Level 1, 2, or 3) that have occurred

since your last visit. If you observe a compliance issue in the field, please note this on this monitoring form. In addition, Level 1, 2 or 3 Compliance Incidents, fill out and submit a separate Compliance Incident Report Form.
∠ Level 0 Acceptable. (no compliance incidents)
Level 1: Minor Problem. An event or observation that slightly deviates from project requirements, but does not put a resource at unpermitted risk. If you checked this box, describe the incident below and fill out a separate Compliance Incident Form.
Level 2: Compliance Deviation. An event or observation that deviates from project requirements and puts a

resource at risk, or shows a trend toward placing resources at risk, but is corrected without affecting the resource. Repeated Level 1 Minor Problems left unaddressed may also rise to a Level 2 Compliance Deviation. If box is checked, summarize below and fill out a separate Compliance Incident Form. Level 3: Non-Compliance. An event or observation that violates project requirements and affects a resource. Repeated Level 2 Compliance Deviations left unaddressed may also rise to a Level 3 Incident. An action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the MMCRP applicant proposed measures (APMs) or mitigation measures (MMs), permit conditions, or approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. If box is checked, summarize below and fill out a separate Compliance Incident Form.					
PG8	Compliance Incidents reported by PG&E's Compliance Team PG&E's Compliance Team reported Compliance Incidents since last CPUC Compliance Monitor visit. If boxed checked, describe issues and resolution status below. Description: (include PG&E's report number)				
New Sensitive Resources New biological, environmental, cultural/archaeological, or paleontological discovery requiring compliance with mitigation measures, permit conditions, etc., has occurred since last CPUC Compliance Monitoring visit If checked, please describe the new discoveries and documentation/verification below. Description: None.					
Date	Level	Compliance Incident and Resolution	Relevant Mitigation Measure	Corresponding Level 1, 2, or 3 Report #	
PREVIOUS COMPLIANCE INCIDENTS OR ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:					

Date	Location	Photo	Description
11/18/20	East Field		Photo 1- TSP foundations constructed in fields east of McCall are ready for TSP install. View south.
11/18/20	McCall Avenue		Photo 2- Crews mobilize cranes and equipment to TSP foundations. View east.
11/18/20	Expansion Footprint		Photo 3- Guy wire adjacent to east gate is delineated. View northwest.

Date	Location	Photo	Description
11/18/20	Old Substation Footprint		Photo 4- Detention basin collects stormwater surface flows. View northwest.
11/18/20	Jensen Avenue		Photo 5- South site boundary fence along Jensen Avenue. View east.

Completed by:	Sam Hopstone
Firm:	Soar Environmental Consulting, Inc.
Date:	11/18/20
Reviewed by:	
Firm:	Soar Environmental Consulting, Inc.
Date:	12//20