March 26, 2020

Lori Rangel
Environmental Project Manager
Southern California Edison
2244 Walnut Grove Avenue
Rosemead, CA 91770

RE: Mesa 500-kV Substation Project – Minor Project Change No. 12 Request: Grounding Work

Dear Ms. Rangel,

On March 23, 2020, Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 12 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPC would involve grounding work at two existing structures within SCE Right-Of-Way (ROW). The work activities were previously approved on November 15, 2017, under SCE's Notice to Proceed Request-2 (NTPR-2). The proposed grounding work would require grading and leveling of dirt on existing access roads and an additional Construction Work Area surrounding Structure M1-T2 on the Newmark #1 and Newmark #2 Circuits and Structure M1-T2 on the Repetto-Wabash and Newmark-Ramons Circuits (see Attachment A). The proposed grading and leveling of dirt would facilitate access for a crane large enough to safely reach the upper portions of both towers to install grounds and safety harnesses to prevent the wire from slipping when transferred from old towers (M1-T3/M1-P3S/M1P3N to tubular steel poles (TSPs) 6606 and 6608).

The additional Construction Work Area in this MPC is needed to allow for the transmission crews to install protective grounds on the circuits being worked on. These grounds provide assurance that any harmful voltage on the lines can be safely shunted away from the linemen that are removing old line sections, opening jumpers at existing towers, and splicing new conductor the older line sections.

SCE anticipates that there would be a small amount of ground-disturbing activities associated with MPC No.12, such as clearing and leveling activity performed by a small bobcat to flatten the surface near the northern tower so that a large crane can set its outriggers properly to stabilize the work when the boom is extended up to reach the top level of conductors. The proposed additional Construction Work Area has been subject to previous biological resource surveys, and features developed, nonnative grass, and ornamental vegetated areas. The additional Construction Work Area comprises approximately 0.19 acres, and thus, SCE determined that an approximate area of 0.19 acres could be impacted from the work performed under MPC No. 12, including 0.03 acres of existing access road, 0.04 acres of bare earth, and 0.12 acres of nonnative grass (see Table 1, below). In addition to the grounds, the crews would be installing slings and

other measures to prevent the old conductor from sliding to the west when it is cut for its transfer to the new TSPs (6606 and 6608).

Table 1. Areas Impacted During MPC No. 12 Work Activities

Feature	Impact (acres)
Existing Access Road	0.03
Bare Earth	0.04
Nonnative Grass	0.12
Total	**0.19**

Prior to grading activities, residents would be notified of operations and expected durations of operations. Additionally, grading operations would be scheduled mid-morning to prevent early morning noise disturbances. Prior to and during grading activities, water would be applied to the soil to control fugitive dust on site.

Work under MPC No. 12 would occur during the daytime, within the Mesa 500-kV Substation project approved hours and should take approximately 16-hours to complete. The ground clearing and leveling for site preparation and restoration would entail a one 3-man crew and would take approximately 8 hours to complete. The installation and removal of grounds would entail a one 5-man crew and would take approximately 6 hours total, not necessarily on the same day. The installation and removal of slings would entail a one 5-man crew and would take approximately 2 hours total, not necessarily on the same day.

The Mesa 500-kV Substation Project was evaluated in accordance with the California Environmental Quality Act (CEQA), and an Environmental Impact Report (EIR) was prepared by the CPUC. The CPUC issued a Permit to Construct the Project on February 9, 2017 (Decision 17-02-015). The mitigation measures (MMs) and applicant proposed measures (APMs) described in the EIR were adopted by the CPUC as conditions of Project approval. In August 2017 the CPUC adopted the Mitigation Monitoring, Compliance, and Reporting Plan (MMCRP) to ensure compliance with all APMs and MMs during project implementation.

This letter documents the CPUC's evaluation of all activities covered in the MPC No. 12 Request. The CPUC has carefully reviewed this MPC request and has verified that the proposed activities adhere to all applicable APM and MM requirements. The evaluation process ensures that all APMs and MMs applicable to the location, and all activities covered in the MPC are implemented, as required in the CPUC's decision. The evaluation process further ensures that the following criteria are met:

- The proposed change does not trigger additional discretionary permit requirements that are not defined in the EIR or MMCRP.
- The proposed change does not increase the severity of an impact or create a new impact, based on the thresholds used in the EIR.
- The proposed change is within the geographic scope of the study area utilized in the EIR.
- The proposed change does not conflict with any APM or MM, and the refinements would not result in a new conflict with any applicable guideline, ordinance, code, rule, regulation, order, decision, statute, or policy not already identified within the IS/MND.

The CPUC has determined that MPC No. 12 meets the above criteria. MPC No. 12 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 12 Request

The CPUC evaluated SCE's MPC Request No. 12 to verify that they fulfill the requirements of the MMCRP. In accordance with the MMCRP, the CPUC reviewed the request to confirm that no new impacts on sensitive resources, or increases in impact severity, would result from the requested MPC activities. The following discussion summarizes this analysis for biological, cultural, paleontological, and other environmental resources, areas as well as aesthetics and visual resources.

Location of Ground Disturbance Areas

MPC No. 12 would require a total of 0.19 acres (approximately 8,276 square feet) of new temporary ground disturbance. New temporary ground disturbance footprints for the Structure M1-T2 on the Newmark #1 and Newmark #2 Circuits and Structure M1-T2 on the Repetto-Wabash and Newmark-Ramons Circuits would occur on approximately 0.03 acres (1,307 square feet) of existing access road, 0.04 acres (1,742 square feet) of bare earth, and 0.12 acres (5,227 square feet) of nonnative grass. All work areas associated with MPC No. 12 activities fall within the Final EIR Study Area and are located within existing developed and disturbed SCE ROW, immediately adjacent to an existing access road, and approximately 150 feet west of an approved construction area.

Aesthetics/Visual Impacts

MPC No. 12 activities would occur along an existing access road and in a work area under existing Structures M1-T2 on Newmark #1 and Newmark #2 Circuits, and M1-T2 on the Repetto-Wabash and Newman-Ramons Circuits. The potential impacts associated with the short-term presence of a construction crane during installation and removal of grounds and slings would be temporary and negligible when compared to pre-project conditions. Additionally, the work activities under MPC No. 12 would not result in any permanent changes to the viewshed.

Biological, Cultural, Paleontological Resources, and other Environmental Resources

As identified in the Final EIR, MPC No. 12 would occur in existing access road, bare earth, and nonnative grass areas. Additionally, all nesting birds in the vicinity of this location have fledged. However, if active nests are observed within the vicinity of Structure M1-T2 on the Newmark #1 and Newmark #2 Circuits or Structure M1-T2 on the Repetto-Wabash and Newmark-Ramons Circuits, SCE must avoid impacts to the nests by implementing the relevant protection measures of the MMCRP. These include surveying for and monitoring of active nests and other sensitive biological resources (MM BR-9) and implementing disturbance buffers and other measures in the Nesting Bird Management Plan (MM BR-11).

The MPC No. 12 work activities would not occur in suitable natural habitat for any special status species, and the work areas do not overlap with USFWS Critical Habitat for any species. The ground disturbance areas for installation and removal of grounds and slings at the existing Structures M1-T2 on Newmark #1 and Newmark #2 Circuits, and M1-T2 on the Repetto-Wabash and Newman-Ramons Circuits are located within the applicable Final EIR study areas

for sensitive resources, including special status animals and plants, wetlands, and other waters, and cultural and paleontological resources. In addition, no native vegetation or tree removal would occur under MPC No. 12.

No cultural or paleontological resources have been identified within MPC No. 12 work areas. However, potential impacts to buried resources during ground disturbing activities will be mitigated with implementation of the project's Cultural Resources Management Plan (CRMP). Furthermore, this location is mapped as high paleontological potential Fernando Formation, so there is potential for buried paleontological resources to be encountered if drilling impacts native sediments. However, potential impacts resulting from excavations in the Fernando Formation were previously analyzed and will be mitigated by implementing the project's Paleontological Resources Management Plan (PRMP). Using this area to install and remove grounds and slings on Structure M1-T2 on the Newmark #1 and Newmark #2 Circuits or Structure M1-T2 on the Repetto-Wabash and Newmark-Ramons Circuits would not be a significant additional project impact.

Construction activities under MPC No. 12 would be performed during daylight hours, within the Mesa 500-kV Substation project approved hours and should take approximately 16-hours to complete. Ground clearing and leveling for site preparation and restoration would entail a one 3-man crew and would take approximately 8 hours to complete. The installation and removal of grounds would entail a one 5-man crew and would take approximately 6 hours total, not necessarily on the same day. The installation and removal of slings would entail a one 5-man crew and would take approximately 2 hours total, not necessarily on the same day. The work area for MPC No. 12 would occur on SCE ROW away from any public roadway, and accessible via an existing access road perpendicular to Saturn street (approximately 500 feet from the Potrero Grande Mesa Substation northern boundary); therefore, no traffic control would be necessary through the work zone during construction. Furthermore, MPC No. 12 would not require intense excavation activities. Ground clearing and leveling for site preparation and restoration activities would not substantially increase air quality impacts through implementation of APM AIR-1, APM AIR-2, and MM AIR-1. Furthermore, prior to and during grading activities, water would be applied to the soil to control fugitive dust on site.

Construction activities under MPC No. 12 would not cause a substantial increased level of impact to noise and vibration through the implementation of MM NV-02 and adherence with the Mesa 500-kV Substation Project Noise Control Plan. Additionally, the noise generated from grading activities, and the installation and removal of grounds or slings would be short-termed and intermittent. Furthermore, prior to grading activities, SCE would ensure that nearby residents would be notified of operations and expected durations of operations. In addition, grading operations would be scheduled mid-morning to prevent early morning noise disturbances. Therefore, the proposed activities would not result in any permanent changes to noise levels in the surrounding areas.

Permits

No additional permits or approvals are required for MPC No. 12 activities.

MPC No. 12 Conditions of Approval

MPC No. 12 is approved by the CPUC with conditions. The conditions presented below shall be met by SCE and its contractors:

1. All applicable Project MMs, APMs, compliance plans, and permit conditions shall be implemented. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.
2. Copies of all relevant permits, compliance plans, and this MPC, shall be available on site for the duration of construction activities.
5. SCE shall implement all appropriate erosion and sediment control BMPs for the MPC No. 12 additional Construction Work Area, in compliance with the SWPPP and as specified by the Qualified SWPPP Practitioner. Sediment and erosion control BMPs shall be properly maintained throughout the duration of construction activities.
6. All activities (e.g., grading, ground and sling installation and removal, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
7. Prior to grading activities, sensitive receptors located within 100-feet of construction activities under MPC No. 12 work activities shall be notified of operations and expected durations of operations. The notification shall also include a phone number for the public to contact the Construction Relations Officer. Additionally, electronic copies of the notification sent to residences within 100 feet shall be submitted to the CPUC prior to grading operations for verification.
8. The work associated with MPC No. 12 shall occur within approved project workdays and hours. Additionally, grading operations shall be scheduled mid-morning to prevent early morning noise disturbances to nearby residents. In the event that MPC No. 12 scheduling necessitates work outside of the hours permitted under local noise ordinances, SCE shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
9. Prior to and during grading activities under MPC No. 12, water shall be applied to the soil to control fugitive dust on site.
10. All complaints related to MPC No. 12 activities received by SCE shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibration, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.
11. SCE shall notify CPUC after completing MPC No. 12 work activities and provide photos of the restored additional Work Construction Area. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SCE shall notify SCE for evaluation and approval.

Please contact me if you have any questions or concerns regarding this MPC approval.

Sincerely,

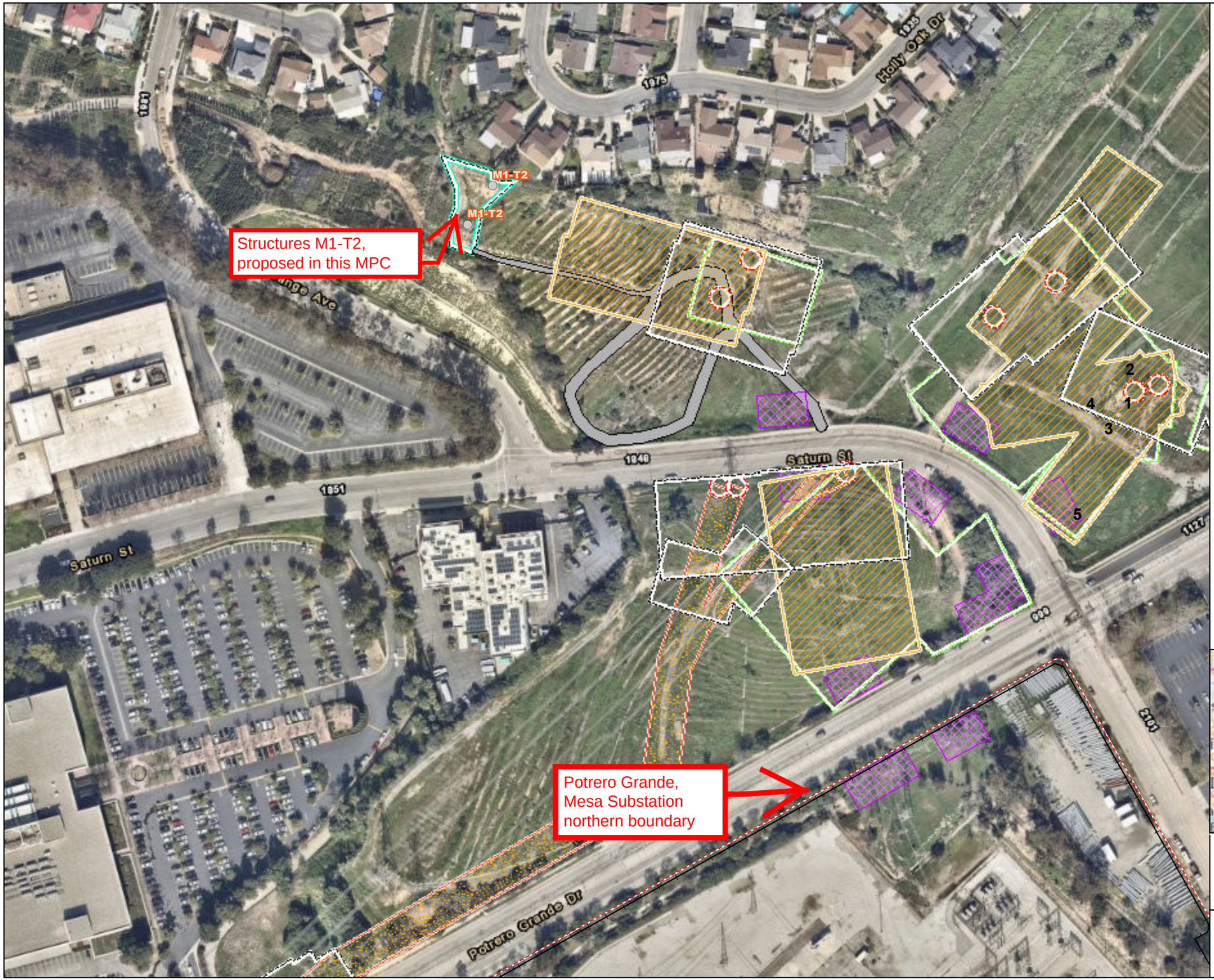
Connie Chen

Connie Chen
CPUC Project Manager

cc:
Silvia Yanez, E & E Compliance Manager
Fernando Guzman, E & E Deputy Compliance Manager
Don Dow, SCE Project Manager

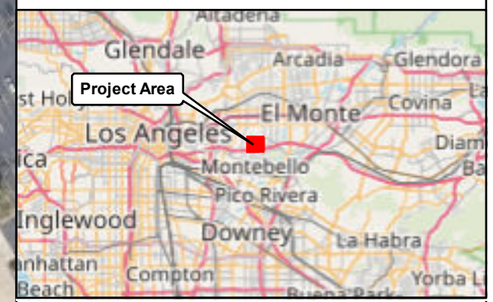
Attachment A:
MPC No. 12 Request Figures and Work Area Photos

MESA 500KV SUBSTATION
MINOR PROJECT CHANGE 12
WITH MESA SUBSTATION



Legend

- Existing 66kV Subtransmission Structure
- Existing Access Road
- Additional Construction Work Site
- Approved Construction Work Site
- Approved Demo Site
- Approved General Disturbance Area
- Approved Guard Structure
- Approved Permanent OM Areas
- Approved Construction Area
- New Substation Boundary
- Property Boundary



0 75 150 Feet

1 in = 150 ft

Date: 3/24/2020

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MESA 500KV SUBSTATION

MINOR PROJECT CHANGE 12

Legend

- Existing 66kV Subtransmission Structure
- Existing 66kV Subtransmission Line
- Existing Access Road
- Additional Construction Work Site
- Approved Construction Area

M1-T2

M1-T2

Saturn Street

0 17.5 35 Feet

1 in = 35 ft

Date: 3/22/2020

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Photographs:

Between the towers looking North.

Between the towers looking South.

Between the towers looking East.

Between the towers looking West.

South of the towers looking North at the residences.

South of the towers looking South at Saturn Street and the medical facilities.