STATE OF CALIFORNIA
GAVIN NEWSOM, *Governor*

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

May 21, 2021

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. 14 Request: Additional Splice Work for Telecom Removal

Dear Ms. Rangel,

On April 29, 2021 Southern California Edison (SCE) submitted Minor Project Change (MPC) No. 14 Request to the California Public Utilities Commission (CPUC) for review. The proposed MPC would involve additional work areas that were not included in NTPR-2 but are necessary to construct the Project work described in Sections 2.5 Telecom Relocations and Final Environmental Impact Report (FEIR), Mesa 500-kV Substation Project, Section 2.2.1.6 and 2.2.2. The proposed work areas are within the geographic scope of the study area utilized in the FEIR. The primary activities conducted at the proposed work areas would include transmission telecommunication crews accessing approximately 199 existing fiber splice cases located on existing poles, manholes, or vaults in order to disconnect splices prior to removing existing copper cable between satellite substations. Removal of these components would be accomplished in a manner consistent with the descriptions contained in the following Mesa 500-kV Substation FEIR Sections: 2.3.3.2 Removal of Existing Structures, 2.3.3.3 Underground Construction, and 2.5 Telecommunications. Site preparation activities will include the installation of best management practices, as necessary. No vegetation clearing or improvement of work areas will be needed to complete work under MPC No. 14.

MPC No. 14 work activities involve removal of approximately 24,084 feet of existing Copper Overhead Cable and approximately 9,068 feet of one-half inch diameter Copper Underground Cable. There will be no ground disturbance for work under MPC No. 14.

For overhead sections, the work will consist of the crew initially visiting each pole and preparing the cable to be pulled out between splice points by transferring the cable from its support bracket onto a small roller. At splice points, the crews will disconnect the existing splice cases and pull the old cable out using a pulley installed on their standard bucket truck, using a light-duty rope as back tension to keep the cable from falling to the ground. No guard structures will be required for this work. Safety measure will include reducing line tension, removing shorter runs of cables between splice points, and having all crews diligently watching the process. The removed cable will be collected on a large reel at one end of the pull and taken to an SCE facility for proper disposal. Some pole locations are located on private properties and SCE has the authority to access and do work on SCE facilities. Where work will occur at poles on private property, SCE

will place door hangar notifications on affected properties at least 7 days prior to the work taking place.

A similar process will occur for underground sections. The crew will visit each structure and disconnect the existing splices. Then the crew will set up a pulling machine on a small trailer at one end of a cable run between splice points and pull the abandoned cable through the ducts to the take-up reel at a structure at the other end of the cable run. The reel of removed cable is then taken to an SCE facility for proper disposal.

This existing copper cable has been idled due to the installation of other fiber optic cables as part of the Mesa 500-kV Substation Project scope. Removal of this cable from existing underground and overhead structures removes unnecessary weight and wind-driven tensions that the overhead structures are subject to and removes unnecessary clutter and other safety hazards within the underground structures. No new or additional features are added to the Mesa 500-kV Substation Project.

MPC No. 14 removal activities would occur at the following existing locations within the Cities of Pasadena, San Gabriel, and San Marino:

- City of Pasadena
    - Nine (9) wood poles: 1547096E, 1547097E, 4209280E, 1206402E, 1206404E, 1547095E, 207728E, 2077730E, and 2077731E.
    - Twenty (20) manholes and vaults: PB001, V1057, V1076, V1272, V1483, V1528, V1548, V1589, V1634, V1680, V1718, V1813, V1839, V1894, V1907, V2156, V2185, V2266, V2570, and VUKN1.
- City of San Gabriel
    - Seventeen (17) poles: 341265E, 341266E, 341267E, 341268E, 341269E, 341270E, 341271E, 341272E, 341273E, 341274E, 341275E, 341276E, 341277E, 341278E, 341279E, 4161657E, and 4161696E.
    - Eighty-two (82) poles: 1229949E, 1541203E, 2013401E, 2013402E, 2013403E, 2013404E, 2013405E, 2013406E, 2013407E, 2013408E, 2013409E, 2013410E, 2013411E, 2013412E, 2013413E, 4171875E, 1206840E, 1206841E, 1206842E, 1206843E, 1206844E, 1206845E, 1206846E, 1206848E, 1206849E, 1237352E, 1237353E, 1237354E, 1237356E, 1237357E, 1237358E, 1237359E, 1237366E, 1237367E, 1237368E, 1237369E, 1237370E, 430261H, 4503110E, 4516799E, 4663202E, 4668004E, 4686756E, 4775372E, 4814035E, 4818697E, 1206850E, 1237360E, 1237361E, 1237362E, 1237363E, 1237364E, 137911E, 137943E, 1429965E, 1541242E, 1541243E, 1541244E, 1547056E, 1547101E, 1547134E, 1724077E, 188821E, 188823E, 1962931E, 2299836E, 341280E, 4022347E, 4219729E, 4283440E, 4305907E, 4391030E, 4435904E, 4437818E, 4469499E, 4537133E, 4537136E, 4575670E, 4694728E, 4694769E, 4723629E, and 85221E.
- City of San Marino
    - Ten (10) poles: 333700E, 341253E, 341254E, 341255E, 4401366E, 473462E, 539098E, 73870E, 73871E, and 73872E.
    - Fifty-six (56) poles: 1431289E, 2005069E, 2354119E, 341256E, 341260E, 341261E, 4774151, 73869E, 966556E, 966558E, 966559E, 966560E, 966561E, 966562E, 966563E, 966564E, 1237371E, 1237372E, 1237373E, 1237374E, 1327714E, 1431957E, 1798913E, 1844666E, 4081663E, 4209164E, 4209271E,

4209272E, 4209273E, 4209275E, 4209281E, 4431460E, 493467E, 493468E, 493469E, 493470E, 493471E, 493472E, 493473E, 493474E, 73588E, 73850E, 73896E, 73897E, 73900E, 742918E, 1279282E, 1432193E, 1723981E, 1723982E, 4209274E, 4761720E, 614327E, 614328E, 73890E, and 937558.

- Five (5) manholes and vaults: M5003449, M5003550, M5003629, M5015346, and V5015347.

MPC No. 14 work activities are planned to take place during previously approved project workdays and hours unless City encroachment permits requirements dictate work to occur overnight. It is anticipated that a 5-person telecommunication crew would complete all work under MPC No. 14. The crew will use a foreman truck with a small cable pulling trailer for underground work and two bucket trucks for overhead work. There will be no modifications of any kind to the existing underground or overhead structures from which the cables will be removed.

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. 14 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. 14 meets the above criteria. MPC No. 14 is approved by the CPUC for the proposed activities based on the factors described below.

CPUC Evaluation of MPC No. 14 Request

The CPUC evaluated SCE's MPC Request No. 14 to verify that it fulfills 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
There will be no ground disturbance under MPC No. 14.

Aesthetics/Visual Impacts
MPC No. 14 does not include installation of additional aboveground structures. Therefore, work under MPC No. 14 would not be expected to substantially degrade the surrounding viewshed. Additionally, construction activities would be temporary and, therefore would not cause a permanent significant impact to visual resources. MPC No. 14 would not create a new significant impact or a substantial increase in the severity of a previously identified impact identified in Section 4.1.3.3 of the FEIR. Additionally, applicable avoidance/minimization measures identified in FEIR Chapter 8 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

Biological, Cultural, Paleontological Resources, and other Environmental Resources
MPC No. 14 would occur in areas with non-native vegetation and it is anticipated that all nesting birds in the vicinity of these location have fledged. However, if active nests are observed within the vicinity of the existing poles, vaults, or manholes, 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).

Work under MPC No. 14 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. No ground disturbance would occur under MPC No. 14. In addition, no native vegetation or tree removal would occur under MPC No. 14. The activities described in MPC No. 14 would not create a new significant impact or a substantial increase in the severity of an identified impact listed in Section 4.3.3 of the FEIR. All applicable avoidance/minimization measures identified in FEIR Chapter 8 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

No cultural or paleontological resources have been identified within MPC No. 14 work areas. There will be no ground disturbance under MPC No. 14. The work areas are currently SCE ROW's, public streets, or private properties. Using these areas to remove telecommunication cables would not be a significant additional project impact for cultural or paleontological resources.

Construction activities under MPC No. 14 would be performed during daylight or nighttime hours. It is anticipated that the Cities of Pasadena, San Gabriel, and San Marino would require that SCE remove communication fibers at night due to its short-term duration and to minimize potential impacts to transportation. The quantity of construction equipment and personnel would be the same as identified in NTPR-1 and 2.

Furthermore, the Cities of Pasadena, San Gabriel, and San Marino will be informed that SCE is conducting this work and any required encroachment permits will be obtained from the

appropriate jurisdiction prior to the start of any work in that jurisdiction. SCE will submit these permits to the CPUC prior to the start of work in each jurisdiction. Impacts to transportation and traffic associated with MPC No. 14 would not create a new or a substantial increase in the severity of a previously identified impact identified in Section 4.14.3 of the FEIR. In addition, applicable avoidance/minimization measures identified in FEIR Chapter 8 Mitigation Monitoring, Compliance, and Reporting Plan would be followed.

The Final EIR documents numerous ephemeral drainages (jurisdictional and non-jurisdictional) in a highly disturbed landscape. These drainages were identified in the Final EIR as experiencing temporary impacts related to project activities. Temporary impacts on these ephemeral drainages associated by MPC No. 14 activities would be consistent with the type and extent of impacts analyzed in the Final EIR. These drainages were identified in the Final EIR as being subject to temporary project-related impacts. The removal of telecommunication fiber cables at the various existing fiber splice cases would not fall within drainage areas, so permanent impacts are not anticipated. Furthermore, work activities under MPC No. 14 would take place in areas that are already flat and paved and thus no alteration to existing drainages would occur. Nonetheless, SCE would be required to adhere to all measures and strategies described in their Stormwater Pollution Prevention Plan (SWPPP) and Streambed Alteration Agreement (SAA) to minimize impacts to water features site-wide.

Permits

Encroachment Permit applications have been submitted to Los Angeles County, Los Angeles County Flood Control District, City of Pasadena, City of San Marino, Temple City, and City of San Gabriel. Permits have been received from Los Angeles County, Los Angeles County Flood Control District, City of Pasadena, City of San Marino, Temple City, and City of San Gabriel. All required encroachment permits will be obtained from the appropriate jurisdiction prior to the start of any work in that jurisdiction SCE will submit these permits to the CPUC prior to the start of work in each jurisdiction.

Traffic control will be maintained as follows:

- In the City of Pasadena:
    - Nine (9) poles (1547096E, 1547097E, 4209280E, 1206402E, 1206404E, 1547095E, 207728E, 2077730E, and 2077731E) are located street side and therefore will be worked on from bucket trucks parked alongside the curb, using standard temporary traffic control measures as found in the Work Area Traffic Control Handbook (WATCH) manual, including applicable pedestrian traffic control where needed. This arrangement typically does not require an encroachment permit from the City.
    - Twenty (20) manholes and vaults (PB001, V1057, V1076, V1272, V1483, V1528, V1548, V1589, V1634, V1680, V1718, V1813, V1839, V1894, V1907, V2156, V2185, V2266, V2570, and VUKN1) are located within the paths of traffic (combinations of main driving lanes and center median areas), and therefore will require additional traffic control for a lane closure. This lane closure plan shall be approved by the local jurisdiction via an encroachment permit prior to any work beginning in these structures.

- In the City of San Gabriel:
    - Seventeen (17) poles (341265E, 341266E, 341267E, 341268E, 341269E, 341270E, 341271E, 341272E, 341273E, 341274E, 341275E, 341276E, 341277E, 341278E, 341279E, 4161657E, and 4161696E) are located within and no greater than 25 feet from rear property lines and will be accessed by workers physically walking to and climbing each pole to perform the necessary work. No traffic control or encroachment permit would be required from the City for these locations.
    - Eighty-two (82) poles (1229949E, 1541203E, 2013401E, 2013402E, 2013403E, 2013404E, 2013405E, 2013406E, 2013407E, 2013408E, 2013409E, 2013410E, 2013411E, 2013412E,2013413E, 4171875E, 1206840E, 1206841E, 1206842E, 1206843E, 1206844E, 1206845E, 1206846E, 1206848E, 1206849E, 1237352E, 1237353E, 1237354E, 1237356E, 1237357E, 1237358E, 1237359E, 1237366E, 1237367E, 1237368E, 1237369E, 1237370E, 430261H, 4503110E, 4516799E, 4663202E, 4668004E, 4686756E, 4775372E, 4814035E, 4818697E, 1206850E, 1237360E, 1237361E, 1237362E, 1237363E, 1237364E, 137911E, 137943E, 1429965E, 1541242E, 1541243E, 1541244E , 1547056E, 1547101E, 1547134E, 1724077E, 188821E, 188823E, 1962931E, 2299836E, 341280E, 4022347E, 4219729E, 4283440E, 4305907E, 4391030E, 4435904E, 4437818E, 4469499E, 4537133E, 4537136E, 4575670E, 4694728E, 4694769E, 4723629E, and 85221E) are located street side and therefore will be worked on from bucket trucks parked alongside the curb, using standard temporary traffic control measures as found in the WATCH manual, including applicable pedestrian traffic control where needed. This arrangement typically does not require an encroachment permit from the City.
    - There are zero (0) underground structures that require work within the City of San Gabriel, therefore no lane closures are expected to occur, and no encroachment permit would be required from this City.

- In the City of San Marino:
    - Ten (10) poles (333700E, 341253E, 341254E, 341255E, 4401366E, 473462E, 539098E, 73870E, 73871E, and 73872E) associated with the satellite San Marino Substation within the City of San Marino are located along rear property lines and will be accessed by workers physically climbing each pole to perform the necessary work. No traffic control or encroachment permit would be required from the City for these locations.
    - Fifty-six (56) poles (1431289E, 2005069E, 2354119E, 341256E, 341260E, 341261E, 4774151, 73869E, 966556E, 966558E, 966559E, 966560E, 966561E, 966562E, 966563E, 966564E, 1237371E, 1237372E, 1237373E, 1237374E, 1327714E, 1431957E, 1798913E, 1844666E, 4081663E, 4209164E, 4209271E, 4209272E, 4209273E, 4209275E, 4209281E, 4431460E, 493467E, 493468E, 493469E ,493470E, 493471E, 493472E, 493473E, 493474E, 73588E, 73850E, 73896E, 73897E, 73900E, 742918E, 1279282E, 1432193E, 1723981E, 1723982E, 4209274E, 4761720E, 614327E, 614328E, 73890E, and 937558E) are located streetside and therefore will be worked on from bucket trucks parked

alongside the curb, using standard temporary traffic control measures as found in the WATCH manual, including applicable pedestrian traffic control where needed. This arrangement typically does not require an encroachment permit from the City.

- Five (5) manholes and vaults (M5003449, M5003550, M5003629, M5015346, and V5015347) are located within the paths of traffic (combinations of main driving lanes and center median areas), and therefore will require additional traffic control for a lane closure. This lane closure plan shall be approved by the local jurisdiction via an encroachment permit prior to any work beginning in these structures.

MPC No. 14 Conditions of Approval

MPC No. 14 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. All required encroachment permits will be obtained from the appropriate jurisdiction prior to the start of any work in that jurisdiction. SCE will submit these permits to the CPUC prior to the start of work in each jurisdiction.
3. Copies of all relevant permits, compliance plans, and this MPC, shall be available on site for the duration of construction activities.
4. SCE shall implement all appropriate erosion and sediment control BMPs for the MPC No. 14 refinement area as defined in 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, where appropriate.
5. All activities (e.g., removal etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where appropriate.
6. SCE shall ensure that idling construction equipment at the proposed locations will be turned off when not in use for periods longer than 15 minutes.
7. The work associated with MPC No. 14 shall occur within approved project workdays and hours unless specified and approved by appropriate jurisdictions. In the event that MPC No. 14 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.
8. All complaints related to MPC No. 14 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.

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

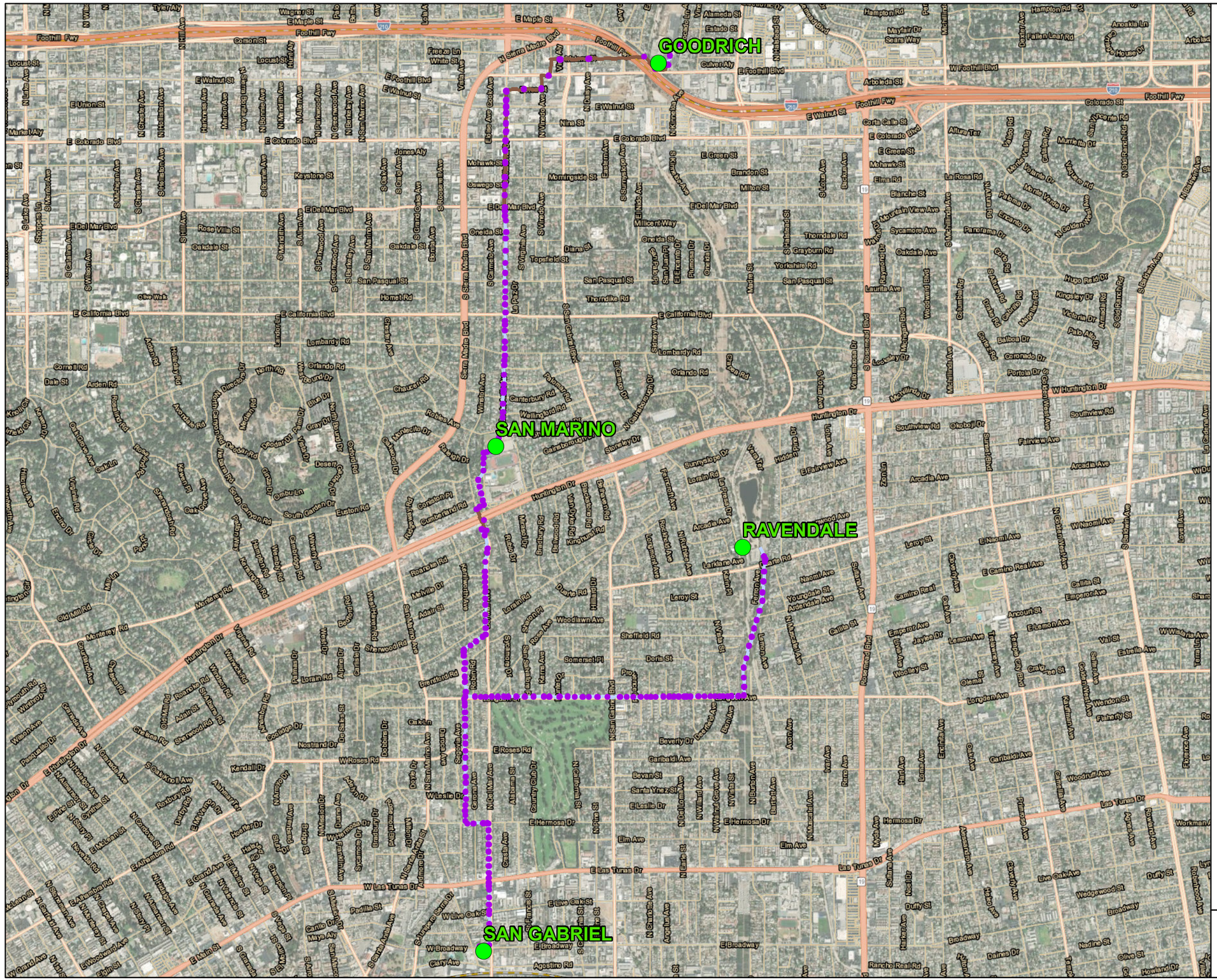
Sincerely,

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. 14 Figure 1



MESA 500KV SUBSTATION

MINOR PROJECT CHANGE 14
EXISTING VAULT AND
TSP WORK AREAS

Legend

- FEIR Analyzed Substation
- Overhead Line Removal
- Underground Line Removal
- Structure Work Area

0 1,025 2,050 Feet

1 in = 2,050 ft

Date: 4/12/2021

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