December 17, 2020

Patricia Kelly CPUC Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #5 for the Valley-Ivyglen 115-kV Substation (VIG) Project

Dear Ms. Kelly

This report summarizes the compliance monitoring activities that occurred during the period from November 1 to 30, 2020, for the Valley-Ivyglen 115-kilovolt (kV) Substation (VIG) Project in Riverside County, California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Edison (SCE) and their contractors comply with the requirements of the Final Environmental Impact Report for the VIG Project, as adopted by the California Public Utilities Commission (CPUC) on August 31, 2018.

The CPUC has issued the following Notices to Proceed (NTPs) for the VIG Project to SCE:

- NTP #1 (July 1, 2020) Construction on select activities for the VIG Project throughout Segments VIG1, VIG2, and VIG3. Construction activities include the following: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. NTP-1 excludes work at sites requiring jurisdictional water permits.
- NTP #2 (September 8, 2020) Construction on select activities for the VIG Project throughout segments VIG4, VIG5, VIG6, VIG7, and VIG8. Construction activities include the following: installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTP-2 excludes work at sites requiring jurisdictional water permits.
- NTP #3 (October 29, 2020) Construction on select activities for the VIG Project throughout segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8 at sites requiring jurisdictional waters permits, NTP-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the subtransmission line to new 115-kV structures.

Onsite compliance monitoring by the WSP USA Inc. (WSP), formerly Ecology and Environment, Inc., compliance team during this reporting period focused on spot-checks of ongoing construction activities. The CPUC Compliance Monitor visited the VIG construction sites on November 4 and 19, 2020. Site inspection reports that summarize observed construction activities and compliance events and verify mitigation measures (MMs) and project commitments (PCs) were completed for the site visits. These reports are attached below (Attachment 1).

The CPUC did not issue a Non-compliance during the period from November 1 to 30, 2020.

Communication between the CPUC/WSP compliance team and SCE has been regular and effective; the correspondence pertained to and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between the CPUC/WSP and SCE, along with daily schedule updates and automated database notifications from SCE, supplied additional compliance information and construction summaries. Furthermore, SCE's monthly compliance status report for November 2020 supplied a compliance summary and included a description of construction activities from November 1 to 30, 2020, a detailed review of the construction schedule, a summary of compliance with VIG Project commitments (i.e., the MMs/PCs) for biological resources, cultural and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Program (WEAP), non-compliance issues and resolutions, and public complaints and notifications.

Compliance Incidents

No compliance incidents were reported during November 2020.

Public Concerns

There were no public concerns during November 2020.

Project Approvals

During November 2020, one Minor Project Refinement (MPR) was submitted by SCE and an existing MPR was approved by the CPUC. Table 1 summarizes the VIG Project NTPR and MPR submittals and status for November 2020.

Table 1: Approvals for November 2020.

Submittal	Description	Status
NTPR-1	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout Segments VIG1, VIG2, and VIG3. Construction activities include the following: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. NTPR-1 excludes work at sites requiring jurisdictional water permits.	Approved. NTP – 1 issued on July 1, 2020.
NTPR-2	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout Segments VIG4, VIG5, VIG6, VIG7, and VIG8. Construction activities include the following: Installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTPR-2 excludes work at sites requiring jurisdictional water permits.	Approved. NTP-2 issued on September 8, 2020.
NTPR-3	SCE is seeking a Notice to Proceed Request authorization for construction on select activities for the VIG Project throughout segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8 at sites requiring jurisdictional waters permits, NTP-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the	Approved. NTP-3 issued on October 29, 2020.

	subtransmission line to new 115-kV structures.	
MPR No. 1	Eleven staging areas were approved for use as part of the Project. None of the 11 approved project staging areas (80.4 acres) listed in FEIR Table 2-9 are suitable as a staging area for the westerly portion of the Project. Due to the elimination of options of staging areas analyzed in the FEIR (73.4 acres are not available for use), SCE proposes to add an approximately 5.9-acre (approximately 257,004 square feet) staging area located at 14570 Concordia Ranch Road, Lake Elsinore, CA 92530 (Concordia Yard) to service the western portions of the Project.	Approved 8/11/2020
MPR No. 2	SCE proposes to expand the general disturbance area so that the work described in Section 2.3.1.1 of the FEIR can be performed within work areas of the size identified in Table 2-5 of the FEIR as being necessary to construct the project components. Furthermore, NTPR-1 proposed access roads to 129E and 131E that would provide long-term accessibility needed by SCE for maintenance of the structures. However, the proposed routes traverse rough terrain that is unpassable until the roads are constructed. SCE proposes additional access roads at 129E (Figure 2) and 131E (Figure 3) that would allow construction crews to access the site prior to the completion of the engineered access roads in order to facilitate structure installation. Proposed access roads fall within the general disturbance area.	Approved 8/14/2020
MPR No. 3	SCE proposes to expand the general disturbance area at several work area locations so that SCE can perform the work described in Section 2.3.1.1 of the Final EIR within work areas of the size identified in Table 2-5 of the Final EIR. The primary activities include installing tubular steel poles, lightweight steel poles, wood poles, guard poles, guy poles, guy anchors, conductor, fiber optic, a telecommunication vault, and the transfer of distribution conductor from existing poles to the new 115-kV structures. Furthermore, a portion of the telecommunication fiber optic line for Segment VIG7 would be modified from an underground to an overhead configuration.	Approved 11/25/2020
MPR No. 4	SCE proposes an alternative shoofly route (Option 2) on the north side of Temescal Canyon Road instead of the south side of Temescal Canyon Road (Option 1). The route was within the public right-of-way and did not require additional property acquisition. Although Option 1 was the preferred route, unforeseen difficulties in property acquisition prevented its use. Option 1 required the acquisition of four private parcels, at least one of which would require condemnation. Furthermore, COVID-19 restrictions significantly delayed the court condemnation process, preventing the property from being acquired in time to meet the outage-driven construction schedule.	Approved 10/2/2020
MPR No. 6	SCE seeks to utilize additional work areas and land disturbances not included in NTP-1 but necessary to construct the Project work described in Section 2.3.1.1 of the Final EIR. The primary activities include installing wood poles, guy anchors, conductor, fiber optic, and the transfer of distribution conductor from existing poles to the new 115-kV structures.	Under CPUC review

MPR No. 7	SCE proposes to use additional work areas and land disturbances not included in NTP-2 but necessary to construct the Project work described in Sections 2.3.1.1 and 2.3.1.2 of the Final EIR. The primary activities include installing guy anchors, conductor, fiber optic, and	Under CPUC review
	telecommunication and subtransmission vaults.	

Sincerely,

Chuck Cleeves Project Manager, WSP cc: Fernando Guzman, WSP Michael Bass, SCE Marcus Obregon, SCE

ATTACHMENT 1

CPUC Site Inspection Reports November 4 and 19, 2020



Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	November 4, 2020
Project Proponent:	SCE	Report #:	VS009
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Sunny and hot with a slight breeze
CPUC-CM (WSP):	Chuck Cleeves	Start/End time:	1345 hrs – 1630 hrs
Project NTP(s):	NTP-1.	•	

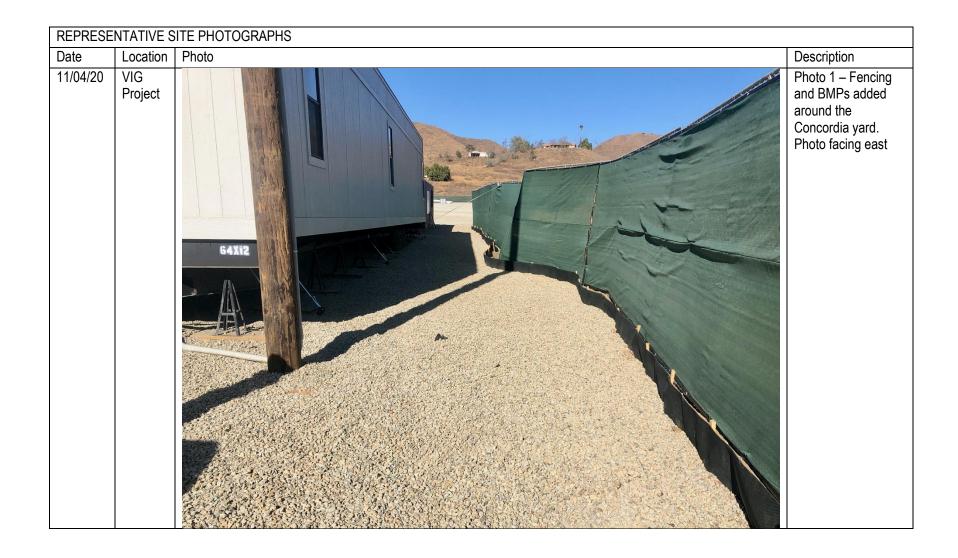
SITE INSPECTION CHECKLIST

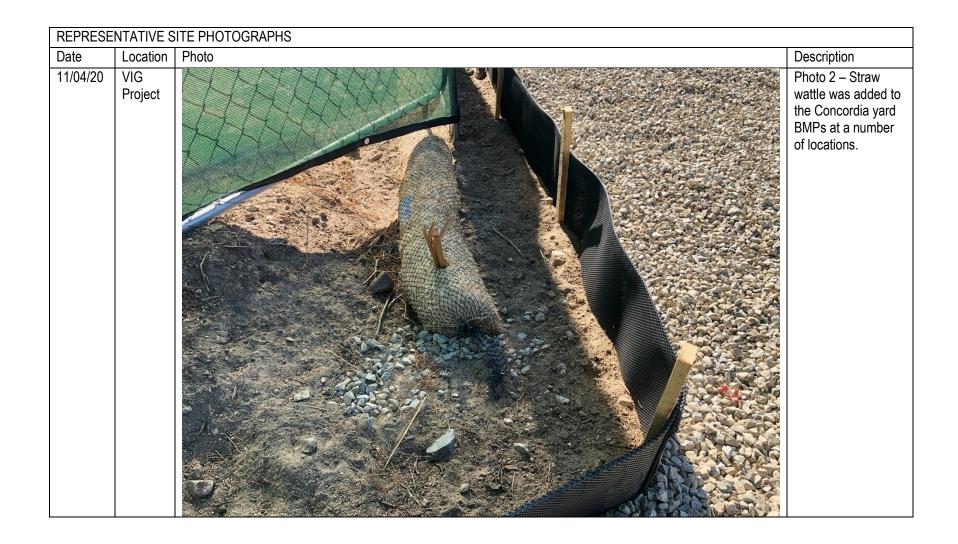
WEATP Training	Yes	No	N/A
Has WEAP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Χ		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Χ		
Is excessive fugitive dust leaving the work area?		Χ	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Χ		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

Are all excavations and trenches covered at the end of the day?	Х		
•			
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	X		
Biology			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) resources as appropriate?	Х		
Are biological monitors present onsite?	Χ		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Х	
Were any threatened or endangered species observed? If yes, list observations below:		Х	
Are there wetlands or water bodies present near construction activities?		Х	
Have there been any work stoppages for biological resources?		Х	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are appropriate fire prevention and control measures in place?	Х		
Is contaminated soil properly handled or disposed of, if applicable?	Х		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			Х
Is construction occurring within approved hours?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			Х

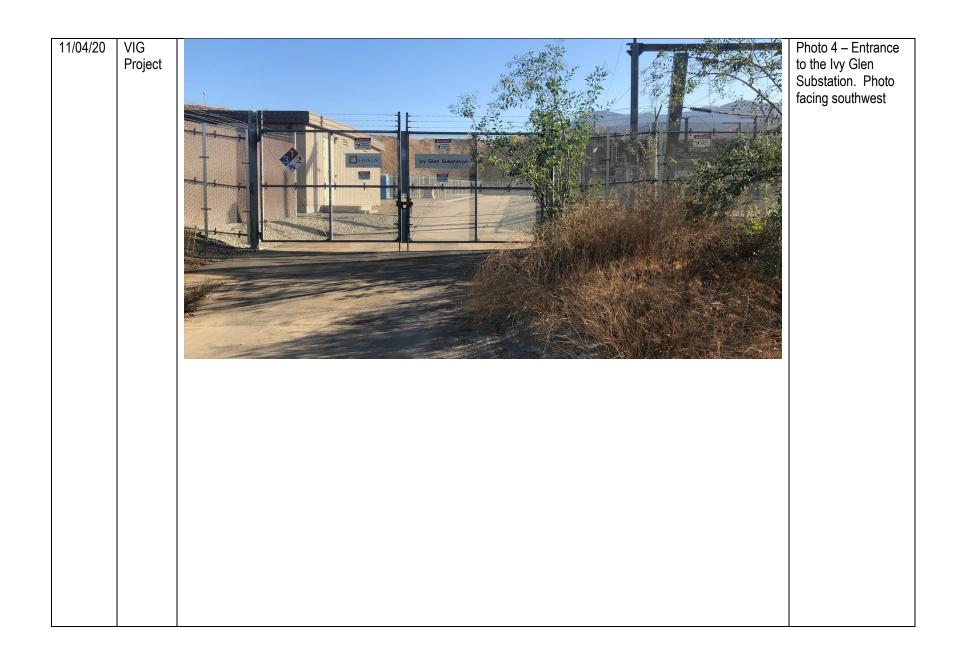
AREAS MONITORED (i.e., structure numbers, yards, or substations) Segments 1, 2, 7 and 8 DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews) I arrived onsite at 1:30 pm and met with the Environmental Project Manager (EPM) at the Concordia Yard. Best management practices (BMPs) were installed, and equipment, materials, and trailers were established (Photo 1). In addition, some maintenance was being done to the exit/entry BMPs. I met with the avian biologist. Where there was any existing drainage scar coming off of the Concordia Yard, the environmental team installed a straw wattle to the S-fence (Photo 2). Because of the gravel and filter fabric covering the yard, I expect little sediment to be draining off into the adjacent jurisdictional drainage. We drove north to segment VIG7 where crews were stringing wire on the "shoofly" portion of the work (Photo 3). The EPM explained that the temporary wooden shoofly poles had been installed along the eastern side of the roadway. Once power has been shifted over to that line, they will remove and replace the poles on the west side of the road. Once the wire has been installed on the new poles and power returned, they will remove the shoofly system. We drove to the Ivy Glen substation (Photo 4). A small jurisdictional drainage flows in front of the substation; two large tubular steel poles (TSPs) will be installed along the banks of the drainage (Photo 5). The EPM explained some of the measures they will use to limit the impacts on the drainage; there was some streamflow while we were onsite. I drove back to Segment VIG2 along Hwy 74 to inspect some work sites. The wooden pole has been installed at site 213; some dust control was needed here (Photo 6). At pole site 212, the drilling for the foundation hole still needs to be finished. BMPs were installed around the hole and the stockpiled tailings (Photo 7); however, the foundation hole was only partially covered (Photo 8). I found a crew member nearby and asked that the hole be covered up before he left for the day. At TSP #302E, the foundation has been poured and is somewhat poorly fenced (Photo 9). Some type of excavated hole was next to the foundation that was covered with wooden beams and plastic sheeting. I found several openings where wildlife could quickly enter the excavation (Photo 10). One piece of equipment was parked at the site with one tiny drip pan under it (Photo 11). The site was also dusty, with no dust control completed before the end of the day. I notified the EPM about the issues at the various pole sites.. MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today) All of the project personnel appeared to be WEAP trained. RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve) COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note) As stated in my last site visit report - Secondary containment needs to be upgraded. Also more regular dust control is needed. COMPLIANCE SUMMARY Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs. New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted. New non-compliance issues reported by SCE monitors since your last visit. Describe issues and resolution under

"compliance suggestions or additional observations" (above) and include SCE report identification number.
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

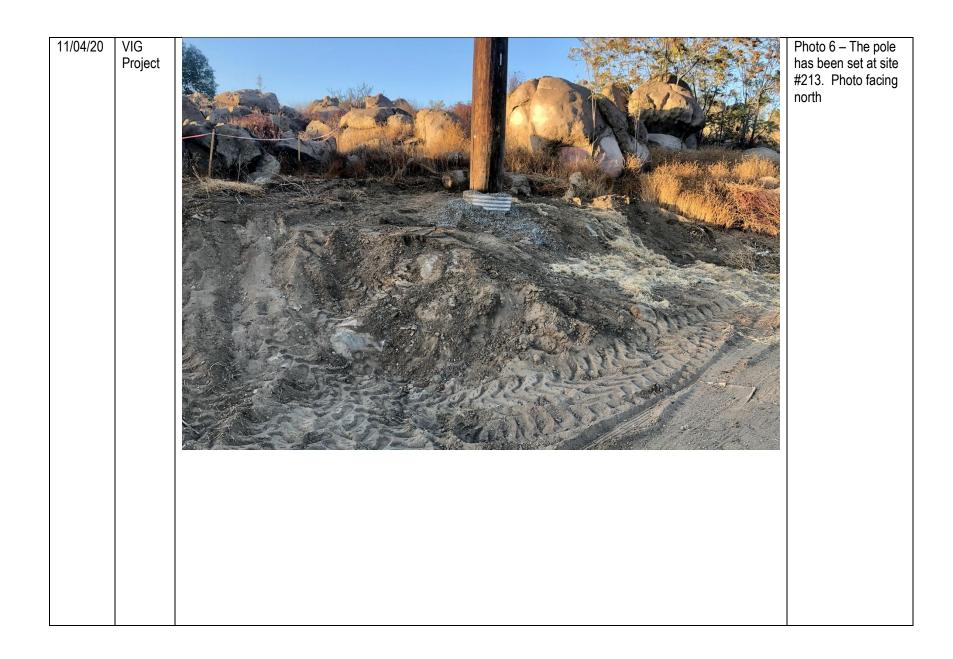












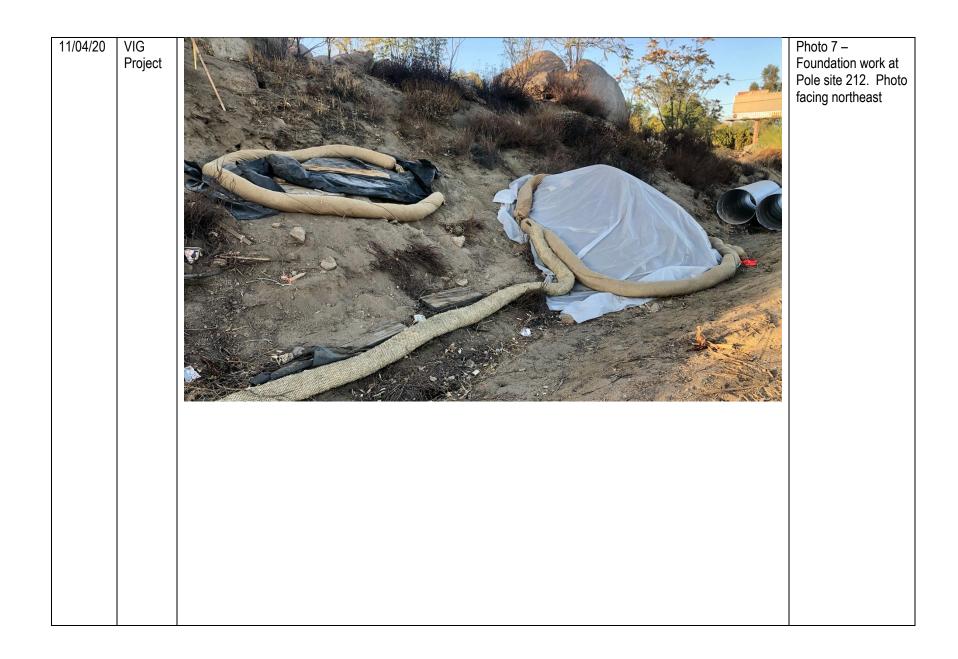
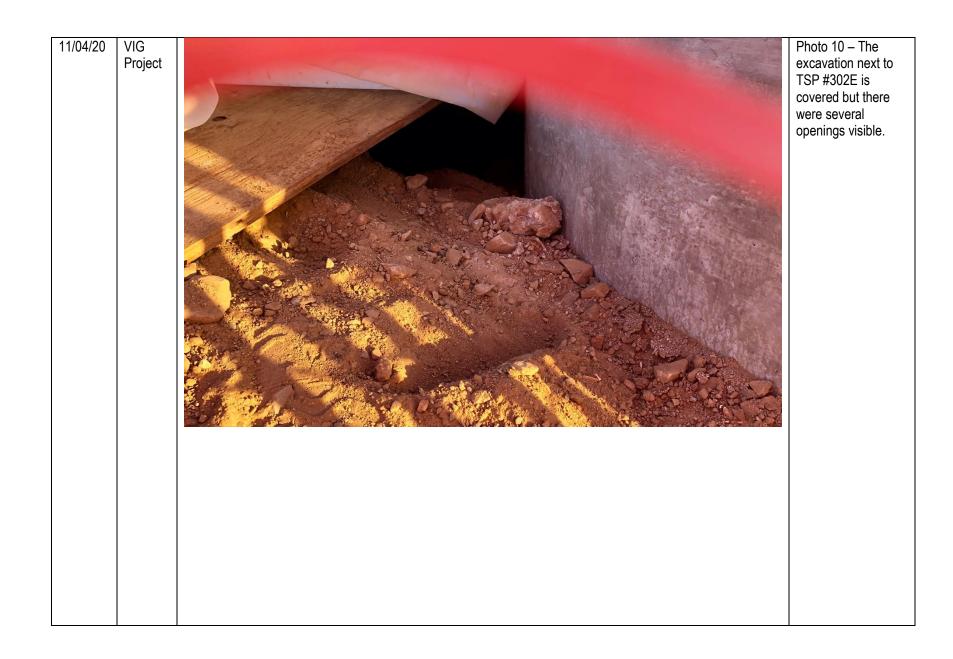
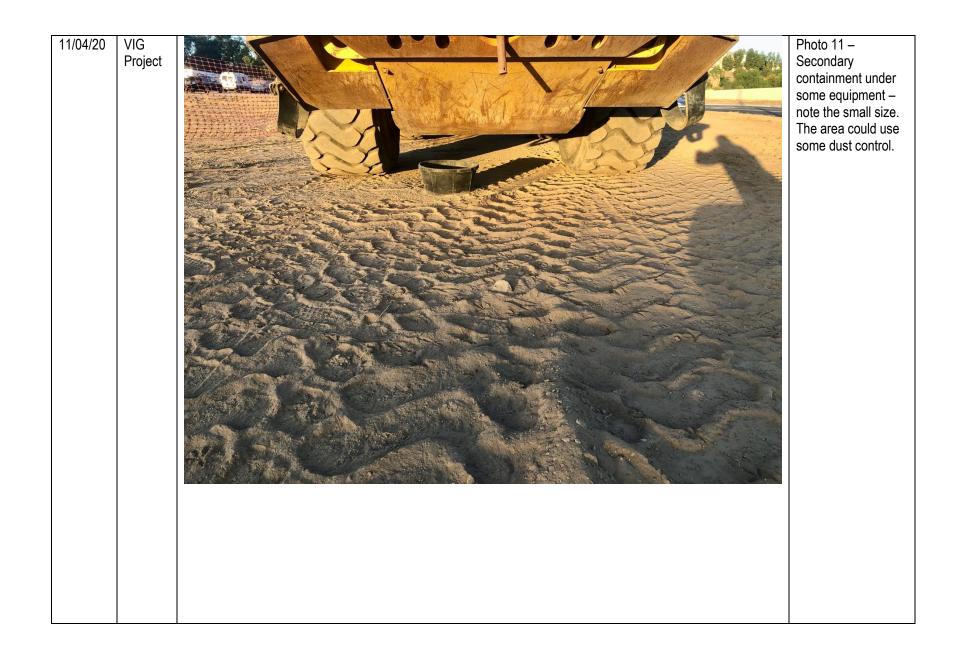






Photo 9 – At TSP #302E the foundation has been poured and some fencing installed. Photo facing south





Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	11/10/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	11/11/20



Valley – Ivyglen Subtransmission Project CPUC Site Inspection Form

Project:	Valley – Ivyglen Project	Date:	November 19, 2020
Project Proponent:	SCE	Report #:	VS010
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vincent Semonsen
CPUC PM:	Patricia Kelly, Energy Division	AM/PM Weather:	Sunny, cool and calm
CPUC-CM (WSP):	Chuck Cleeves	Start/End time:	0600 hrs – 1030 hrs
Project NTP(s):	NTP-1.		

SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEAP training been completed by all new hires (construction and monitors)?	Χ		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Χ		
Are erosion and sediment control measures properly installed and functioning?	Х		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Χ		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Is excessive fugitive dust leaving the work area?		Х	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Χ		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Χ		
Are vehicles/equipment turned off when not in use?	Χ		
Work Areas			
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Χ		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		

Are all excavations and trenches covered at the end of the day?		Х	
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology			
Have preconstruction surveys been completed for biological (coastal California gnatcatcher, least Bell's vireo, southwestern will flycatcher, rare plants) resources as appropriate?	X		
Are biological monitors present onsite?	Χ		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Χ		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Χ	
Were any threatened or endangered species observed? If yes, list observations below:		Χ	
Are there wetlands or water bodies present near construction activities?		Χ	
Have there been any work stoppages for biological resources?		Χ	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			X
Are archaeological and paleontological monitors onsite if needed?	Χ		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	Χ		
Are procedures in place to prevent spills and accidental releases?	Χ		
Are appropriate fire prevention and control measures in place?	Χ		
Is contaminated soil properly handled or disposed of, if applicable?	Χ		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?			Х
Is construction occurring within approved hours?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?	· · · · · · · · · · · · · · · · · · ·		Х

AREAS MONITORED (i.e., structure numbers, yards, or substations)

Segments 1, 2, 7 and 8

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

I was onsite for the 6 am tailboard and then met with the Environmental Project Manager (EPM) to go over the construction activities for the day.

Access road construction and pole installation continued along Segment VIG1, with most of the crews concentrated along the western portion that runs through the hills and out to Hwy 74. The EPM said some crews were working along Segment VIG2, installing new vaults and repaying the trench lines within Hwy 74.

We drove to the staging area at tower site 103E, where construction equipment was left overnight, a water tank was installed, and the security trailer was parked (Photo 1). The EPM said they were demobilizing here since most of the work was concentrated at the western end of Segment VIG1. The access point into the transmission corridor has some entry/exit BMPs, but they needed upgrades (Photo 2). The EPM said they would be adding some more rock to the BMPs. Water trucks were regularly spraying the dirt access roads.

We drove west along the access road out to pole site 107E; the pole was on site, and the hole location was identified (Photo 3). Hannah said most of the poles along this stretch were a "direct" install, meaning they drilled the hole and erected the TSP; therefore, no rebar cage or slurry was used.

This section of the transmission corridor supports some excellent habitat, and at several locations, I noticed a lot of small mammal and reptile tracks in the dirt (Photo 4). Some mammal tracks had a kangaroo rat's diagnostic tail drag. Sealing up holes to prevent animal entrapment was essential, even more so through this section of the transmission corridor.

Several crews had been out along the access road installing stabilization structures like gabion baskets, wire blankets, and filter fabric lined w/ rock (Photos 5 & 6). In addition, wire-backed silt fence was installed below some of the steeper, newly constructed slopes, and then the dirt was sprayed with a tackifier/mulch mixture (Photo 7). Crews had poured most of the new slopes and berms with the tackifier now that we had entered the rainy season. The first rain event came through the area last weekend, but the site only received 0.2 inches of rain.

We stopped at tower site 130; the tower pad had been graded, but they still needed to install the TSP (Photo 8). The EMP and I heard a California gnatcatcher in the vegetation north of the tower site.

A large TSP foundation had been drilled and poured at site number 135 (Photo 9).

At tower site 144E, the foundation hole drilling had been temporarily suspended due to the hard substrate. The drill bits and rebar cage were stockpiled nearby, and the hole was covered with wooden mats (Photo 10). The mats protect the hole but leave small openings that would allow animals to fall in. I indicated to the EPM that they should cover these with plastic. A small ephemeral drainage next to the drilling site was staked with signage showing its sensitivity (Photo 11).

A portion of the access road between towers 144 and 145 had been built (Photos 12 & 13). However, road work through this area has been put on hold due to cultural and archeological issues.

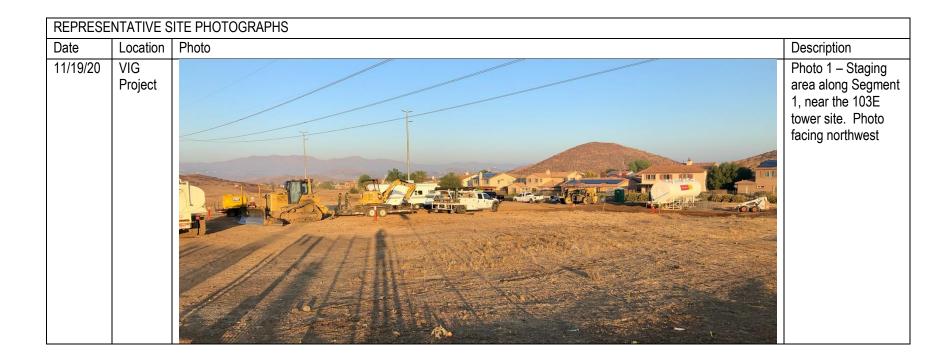
Crews continue to work on the access road from tower site 145 west toward Hwy 74 (Photo 14).

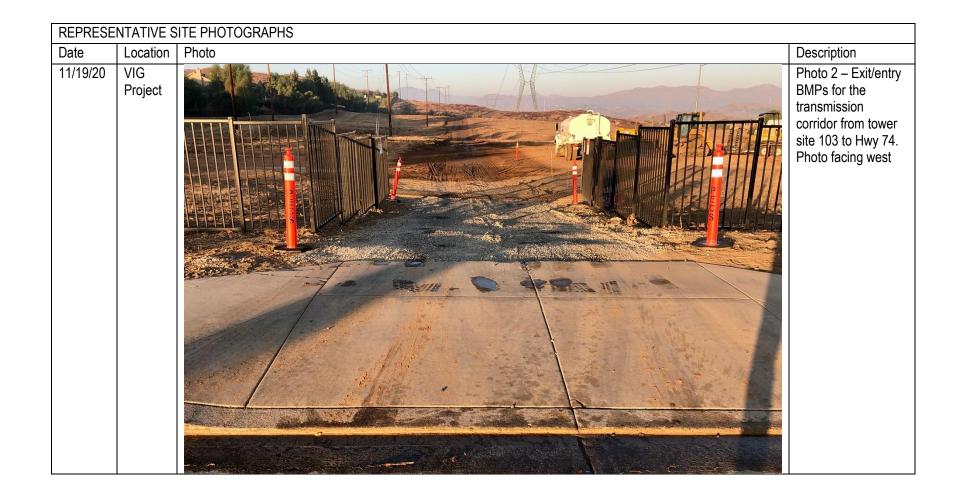
I stopped to observe the work at pole sites 218 and 229 in Segment VIG2 along Hwy 74. One of the Environmental Inspectors was onsite with the crew at tower site 229 doing cleanup work (Photo 15).

MITIGATION MEASURES VERIFIED (Refer to MMCRP Report only on MMs pertinent to your observations today)

All of the project personnel appeared to be WEAP trained.

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)
Any foundation holes left open should be completely covered to prevent animals from entering.
COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)
COMPLIANCE SUMMARY
Check all applicable boxes below to indicate new conditions or issues that have occurred since your last visit. Note this information on the monitoring datasheet and document with photographs.
New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc.
Potential compliance incident(s) observed. Document incident(s) and potential for environmental resources to be impacted.
New non-compliance issues reported by SCE monitors since your last visit. Describe issues and resolution under "compliance suggestions or additional observations" (above) and include SCE report identification number.
PREVIOUS NON-COMPLIANCE ITEMS REQUIRING FOLLOW-UP OR RESOLVED TODAY:

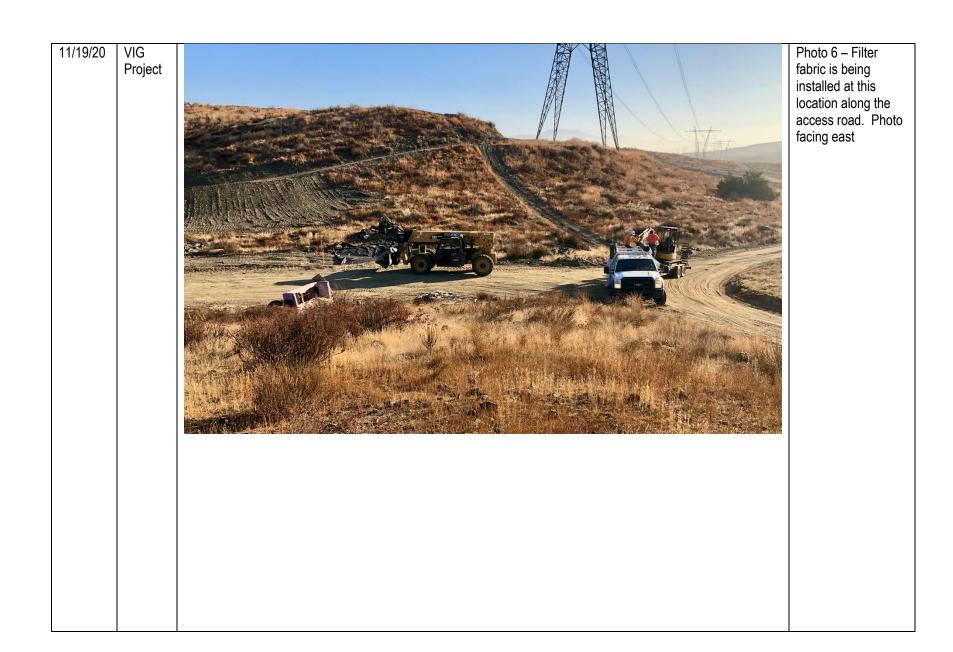


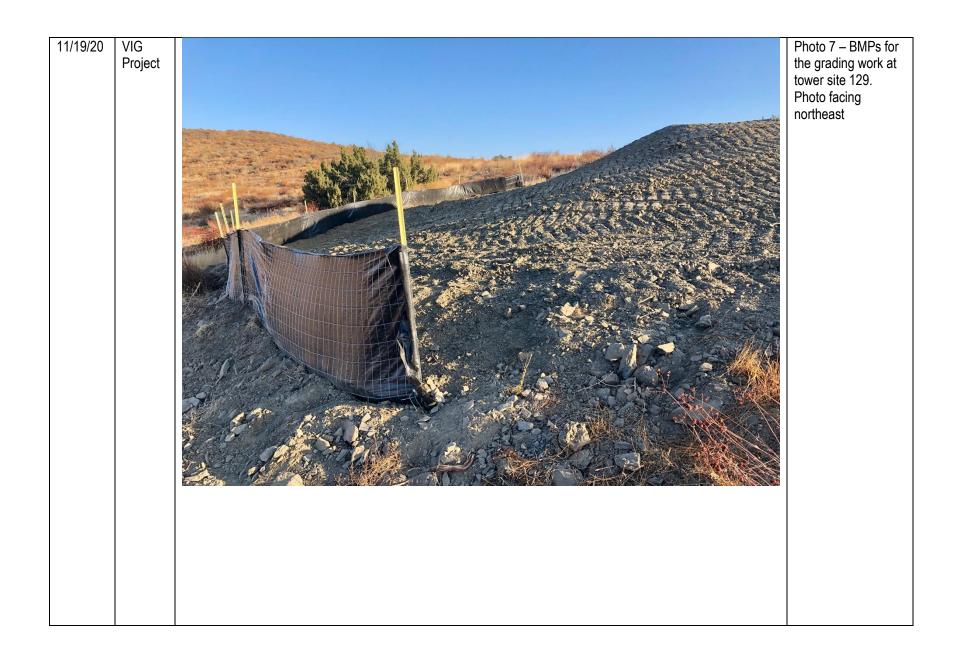


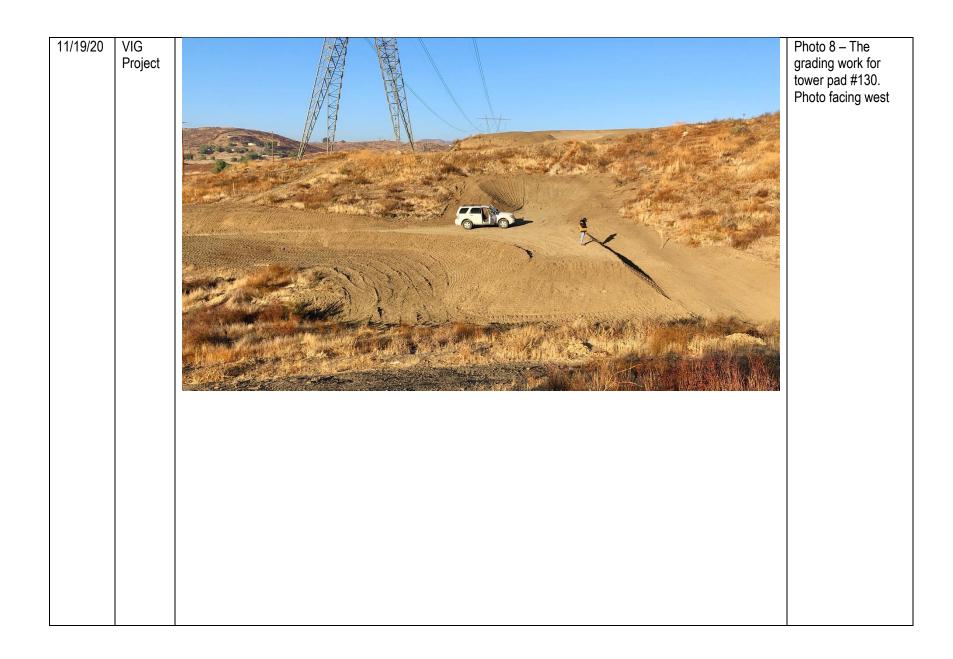


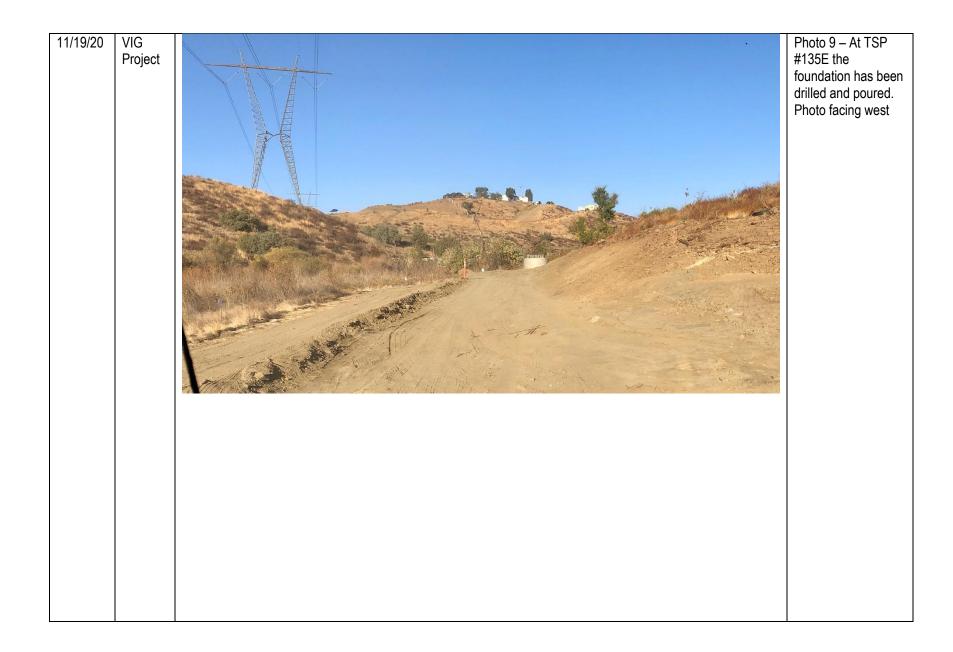


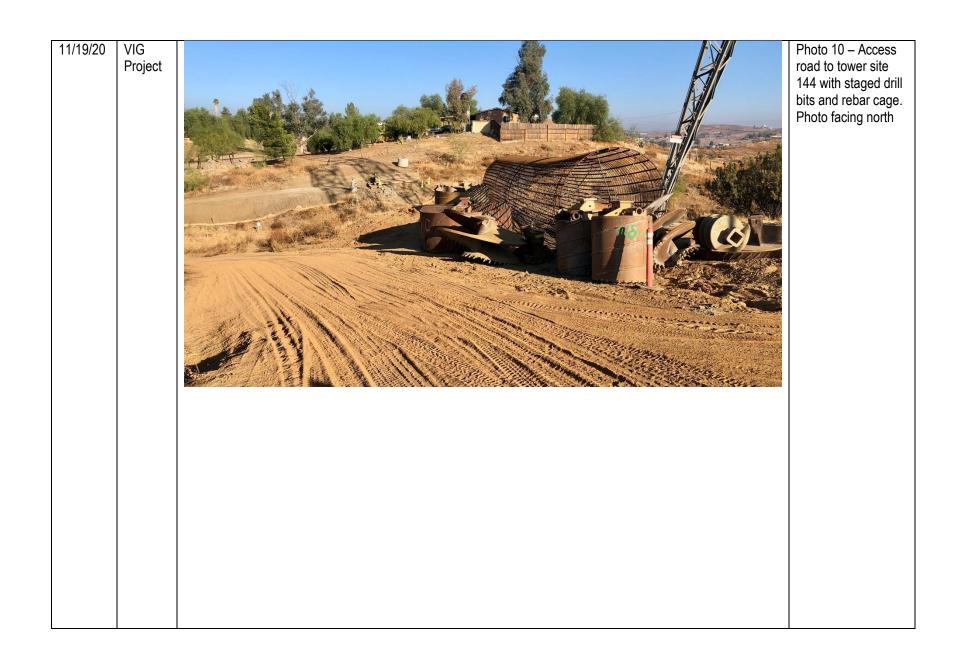




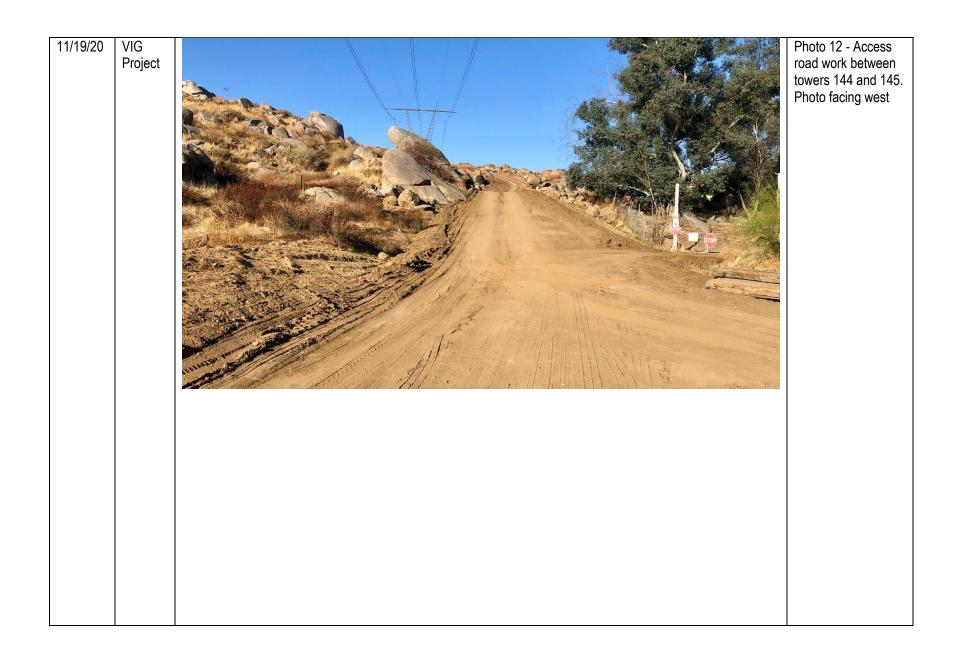


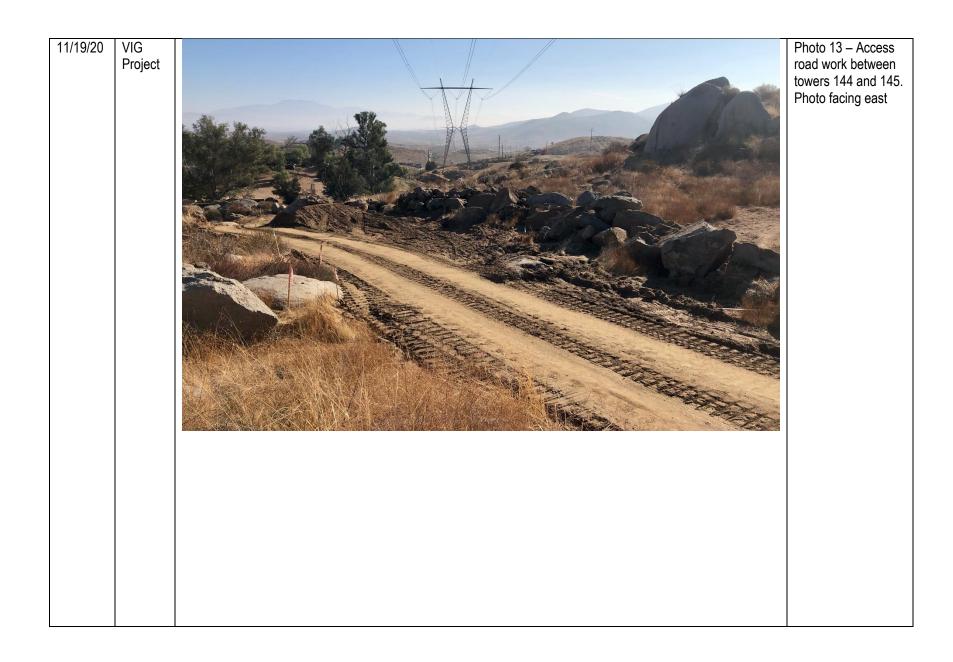


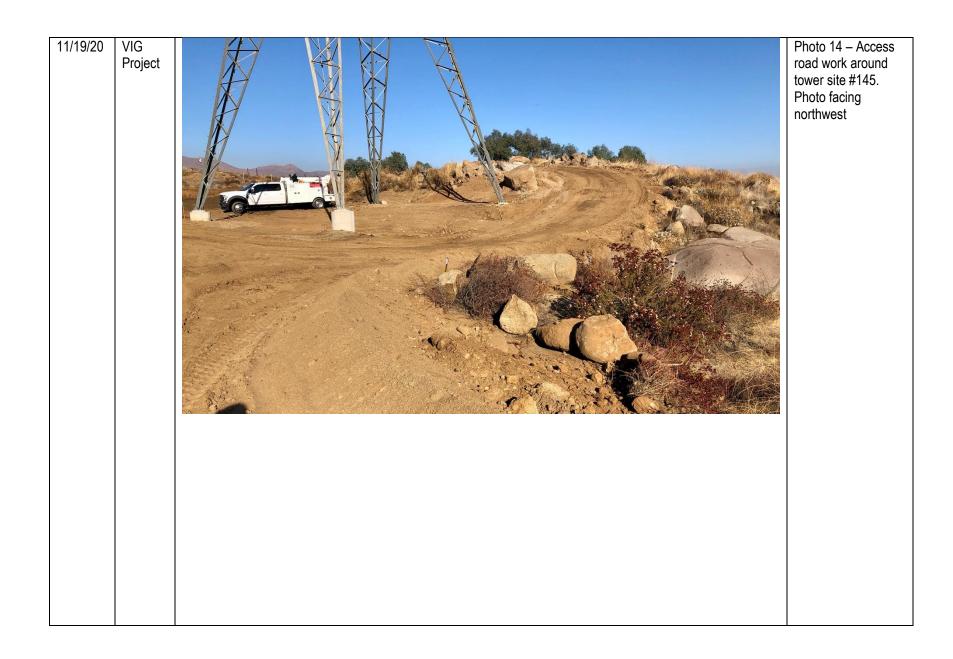














Completed by:	Compliance Monitor
Firm:	Ecotech Resources, Inc.
Date:	11/30/20

Reviewed by:	Manager
Firm:	Ecotech Resources, Inc.
Date:	11/30/20