

Date: March 31, 2026

To: Tommy Alexander, CEQA Project Manager, California Public Utilities Commission

From: Elizabeth Pritchard, Pacific Gas and Electric Company

RE: Quarterly Report - Q1 2026:
LS Power Grid California, LLC (LSPGC) - Manning 500/230 kilovolt Substation Project Interconnection, CPCN Application No. A.24-06-017

Mr. Alexander,

This letter serves as the Q1 2026 Quarterly Report for the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) associated with the electrical transmission system interconnection (project) for the LS Power Grid California, LLC (LSPGC), Manning 500/230 kilovolt Substation Project, as described in the Initial Study/Mitigated Negative Declaration (IS/MND) for the project located in western Fresno County, California. The project will be implemented over a three-year period during 2026-2028. This Quarterly Report covers Pacific Gas and Electric's (PG&E's) project activities and implementation of the MMCRP during January 1 – March 31, 2026. Project construction for 2026 began on March 2. The compliance status of each IS/MND mitigation measure related to PG&E's scope of work is included in Attachment 1.

Progress of Construction

PG&E releases work to construction via the Environmental Release to Construction (ERTC) process. ERTC-1 was issued on February 26, 2026 and included the following scopes of work:

- Establishment and use of the Manning Avenue Staging Area, as described in Section 2.8.2 of the MND and in MPR-1
- Work on the 230 kV and 115 kV Structure Raises as described in Section 2.6.2 of the MND and in MPR-2
- Orchard tree removal as described in Section 2.8.5 of the MND at the Panoche Junction area.

The following is a summary of ERTC-1 Project activities that occurred during January 1 – March 31, 2026:

- Establishment and use of the Manning Avenue Staging Area

- Began on March 30, 2026 and is on-going
- Orchard tree removal at the Panoche Junction Area
 - March 2 – 10, 2026

Work on the 230 kV and 115 kV Structure Raises at Panoche Junction is expected to begin on April 13, 2026.

Construction Impacts

All work associated with ERTC-1 is occurring in disturbed or agricultural lands. Approximately 6.35 acres of the agricultural land was impacted from the construction activities described above.

Mitigation Implemented

Preconstruction/Focused Surveys

The following focused surveys were conducted between January 1 and March 31, 2026. Details regarding surveys are included in Attachment 1.

- Special-status Plants (CM BIO-A / CM BIO-2)
- Burrowing Owls (CM BIO-F)
- Giant Kangaroo Rats / San Joaquin Antelope Squirrel (CM BIO-H)
- Built Environment Surveys (CM CR-A)
- Archaeological Surveys (CM CR-C)

The following pre-construction surveys were conducted between January 1 and March 31, 2026. Details regarding surveys are included in Attachment 1.

- Nesting Birds and Raptors (CM BIO-E / CM BIO-8)
- Work Area Delineation (CM GNE-1 [L])

Worker Training

Worker training (CM BIO-1 / CM CUL-1 / CM HAZ-2, Worker Environmental Awareness Training) was provided as follows; training logs can be found in Attachment 2:

- January 15, 2026 – PG&E Tower Crew, 21 attendees
- February 5, 2026 – PG&E Survey Crew, 6 attendees
- February 24, 2026 – Ascent Monitoring Crew, 4 attendees
- February 25, 2026 – SWPPP BMP crew, 7 attendees
- March 2, 2026 – Vegetation Management crew for Friedenbach parcel, 11 attendees
- March 30, 2026 – AJ Excavation crew for Manning Avenue Staging Area, 7 attendees

Construction Monitoring

No biological or cultural monitoring occurred during Project activities occurring from January 1- March 31, 2026.

Compliance Issues

No non-compliance issues occurred during Project activities from January 1- March 31, 2026. Refer to Attachment 2 for a summary of compliance with each MMCRP measure.

Public Complaints

During the reporting period, no public complaints were received.

Future ERTCs and Schedule

The current approximate schedule for future ERTCs and their respective scopes are below:

- ERTC-2, June 1, 2026:
 - All brownfield temporary and permanent disturbance areas, pull sites, staging areas, landing zones, and orchard tree removal associated with the 230 kV Reconductoring scope
- ERTC-3, September 30, 2026
 - 500 kV Transposition Structures
- ERTC-4, May 1, 2027:
 - All greenfield temporary and permanent disturbance areas, pull sites, staging areas, and landing zones associated with the 230 kV Interconnections scope
 - 500 kV Interconnections

The estimated schedule for Quarter 2 of 2026 (April – June 2026) is below:

- March 30, 2026 – April 3, 2026: Establishment of the Manning Avenue Staging Area
- April 13, 2026 – May 31, 2026: PG&E Tower Crew installs 12 tower foundations at Panoche Junction

Work will restart again in Q3 2026, starting with the new structure foundations for the 230 kV Reconductoring scope, when the remaining material is received this summer.

Please let me know if you have any questions about this report.

Thank you,

Elizabeth Pritchard

Attachments

Attachment 1 - Compliance Matrix

Attachment 2 - Worker Education Training Documentation

Attachment 1 – Compliance Matrix

Measure Number	Measure Text	Status	Compliance Notes
CM GNE-1 A to L	<p>A. Vehicle parking: vehicles and equipment will be parked on pavement, existing roads, and previously disturbed areas to the extent practicable.</p> <p>B. Work hours: work will occur only during daylight hours, unless required to occur at night due to line clearances for worker safety.</p> <p>C. Vehicle access: the development of new access and right-of-way (ROW) roads will be minimized, and clearing vegetation and blading for temporary vehicle access will be avoided to the extent practicable.</p> <p>D. Speed limit: vehicles will not exceed a speed limit of 15 miles per hour (mph) in the ROWs or on unpaved roads within sensitive land-cover types.</p> <p>E. Restoration and erosion control: on completion of any Proposed Project component, all areas that are significantly disturbed and not necessary for future operations, shall be stabilized to resist erosion, and revegetated and recontoured if necessary, to promote restoration of the area to pre-disturbance conditions.</p> <p>F. Dead or injured listed species: personnel will be required to report any accidental death or injury of a listed species or the finding of any dead or injured listed species to a qualified Biologist. Notification of the California Department of Fish and Wildlife (CDFW) and/or United States Fish and Wildlife Service (USFWS) of any accidental death or injury of a listed species shall be done in accordance with standard reporting procedures.</p> <p>G. Staging Area Maintenance: Work sites will be maintained in a clean and orderly state.</p> <p>H. Environmentally Sensitive Areas: Biological field surveys will be performed for areas not yet surveyed. Sensitive biological resources or areas discovered during surveys may be subject to a buffer from construction activities.</p> <p>I. Aquatic resources: All aquatic resources will be clearly marked prior to construction within the work areas. If deemed necessary by lead biologist, a buffer from construction activities might be established around these areas.</p>	Completed; on-going during construction	<p>Work areas for ERTC-1 were delineated with flags on February 25, 2026 prior to construction.</p> <p>The remaining items will be implemented during construction.</p> <p>Implementation of this measure will be reported to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>J. Vegetation: Vegetation and tree removal will be limited to the minimum area necessary to allow construction to proceed and to meet operational requirements.</p> <p>K. Trapped Animals: All excavated holes/trenches that are not filled at the end of the workday will be covered, or a wildlife escape ramp will be installed to prevent the inadvertent entrapment of wildlife.</p> <p>L. Delineation of Work Areas: Work areas will be clearly delineated prior to construction commencing with fencing, staking, or flags.</p>		
CM AG-1 Landowner Coordination	<ul style="list-style-type: none"> - Provide notice to landowners outlining construction activities and restoration efforts. - Areas disturbed by construction of the Proposed Project restored in accordance with lease and easement conditions, applicable operation and maintenance standards, and environmental permit requirements. - In areas containing permanent crops (i.e., grapevines, orchard crops, etc.) that must be removed to gain access to pole sites for construction purposes, PG&E may compensate the farmer and/or landowner in coordination with the landowner. 	Completed	<p>A Pre-Construction Notification Letter was sent to landowners on December 18, 2025, and again on January 7, 2026.</p> <p>All landowners who received the letters will receive an automated voicemail message immediately prior to construction as well. The letter included the contact information of a PG&E Customer Outreach Specialist for any additional questions.</p>
CM AQ-A EPA Tier 4 Equipment	<p>Construction contractors for the project shall use engines that meet the EPA's Tier 4 emission standards, as defined in 40 CFR 1039, in at least 75 percent of construction equipment with a rating between 100 and 750 hp off-road construction equipment and shall comply with the appropriate test procedures and provisions contained in 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road</p>	Completed	<p>PG&E submitted the Air Quality Plan to the CPUC on January 8, 2026, which demonstrated adherence to this measure. The CPUC confirmed the Air Quality</p>

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	<p>equipment, as it becomes available, for at least 75 percent of construction equipment and/or by using a combination of engines that meet the EPA’s Tier 4 emission standards and battery-electric off-road construction equipment, as long as the total of Tier 4 and battery-electric construction equipment comprises 75 percent of construction equipment.</p> <p>Implementation of this measure shall be required in the contract the project applicant establishes with its construction contractors. LSPGC and PG&E shall separately demonstrate their plans to fulfill the requirements of this measure in a memorandum that shall be submitted to the CPUC before the use of any off-road diesel-powered construction equipment on the site. Each memorandum shall include a list of the equipment and vehicles to be used during construction of LSPGC and PG&E project components with details including equipment/vehicle engine tiers and expected daily and annual usage hours to demonstrate adherence to the 75 percent requirement above.</p>		<p>Plan met the requirements of this measure on January 12, 2026.</p>
<p>CM AIR-2 Dust Control</p>	<p>The following actions will be taken, as applicable and feasible, to control fugitive dust during construction. San Joaquin Valley Air Pollution Control District notifications will be made in accordance with any requirements in effect at the time of construction.</p> <ul style="list-style-type: none"> - Applying water to disturbed areas and to storage stockpiles. - Applying water in sufficient quantities to prevent dust plumes during activities such as clearing and grubbing, backfilling, trenching, and other earth-moving activities. - Limit vehicle speed to 15 mph. - Load haul trucks with a freeboard (space between top of truck and load) of 6 inches or greater. - Cover the top of the haul truck load. - Clean up track-out at least daily. 	<p>Completed; on-going during construction</p>	<p>Measures will be implemented during construction.</p> <p>Implementation of this measure will be reported to the CPUC as needed.</p> <p>In accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD) requirements, PG&E submitted a Dust Control Plan to the SJVAPCD on December 22, 2025, and</p>

Measure Number	Measure Text	Status	Compliance Notes
			they approved it on January 22, 2026.
CM BIO-A Special-Status Plants	<p>Special-status plant surveys described in APM BIO-4 and CM BIO-2 shall follow the CDFW Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys will be conducted within suitable habitat during the typical blooming period for the 10 species determined to have potential to occur in the project alignment area as described in Table 3.4-1.</p> <p>If plant species protected under ESA (i.e., San Joaquin woollythreads) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided.</p> <p>If plant species considered special-status under CEQA (i.e., plants with a CRPR of 1 or 2) are found during surveys for special-status plants conducted pursuant to APM BIO-4 and CM BIO-2, following the CDFW protocol described above, a protective buffer of at least 50 feet will be established around individual plants, and the plants will be avoided, if feasible. The size and shape of the protective buffer may be adjusted if a CPUC-approved biologist determines that a smaller buffer will be sufficient to avoid loss of or damage to special-status plants or that a larger buffer is necessary to sufficiently protect plants from project activities. The appropriate size and shape of the protective buffer will be determined by the CPUC-approved biologist and will depend on the plant’s growth form (e.g., annual, perennial), plant phenology at the time of implementation of project activities, the individual species’ vulnerability to the project activity, and environmental conditions and terrain.</p>	On-going. Not applicable to ERTC-1 and ERTC-2	<p>In preparation for ERTC-3 and ERTC 4 work, special-status plant surveys occurred in suitable habitat on March 18-20, 2026; the survey resulted in detections of lost hills crownscale <i>Atriplex coronata</i> var. <i>vallicola</i>, a California Rare Plant Rank (CRPR) 1B.2 species, at the southern Transposition Site (ERTC-3). Locations were mapped and CM BIO-A will be implemented prior to and during construction. It should be noted that the species recently underwent a taxonomic revision and the population detected at the southern transposition site is not named gypsum-loving saltscale (<i>Atriplex gypsophila</i>), a CRPR 1B.3 species.</p> <p>A second special status plant survey will be conducted in May 2026.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>Where avoidance of plants considered special-status under CEQA is not feasible, and the only plants present in a work area are annual plants (see Table 3.4-1), initial disturbances associated with temporary construction work activities will be scheduled to occur after seed set and prior to seedling emergence and when soil is dry. If special-status perennial plants (i.e., recurved larkspur) are present in a work area, this method would not avoid impacts, and these plants would be avoided as described above.</p> <p>When permanent ground disturbing activities cannot be avoided in known annual special-status plant locations the top 4 inches of soil will be collected and retained onsite prior to disturbance and replaced in the same approximate location following completion of project activities. If the surface topography is altered by the work, the surface will be re-contoured to existing conditions and the salvaged topsoil will be replaced.</p>		<p>No work will occur within suitable habitat until completed. A report documenting the methods and results of the survey will be provided to the CPUC.</p>
CM BIO-2 Special-Status Plants	<p>Prior to initial vegetation clearing and ground-disturbing activities in annual grassland habitat, a qualified biologist will conduct pre-construction surveys of the Proposed Project work area for special-status plants. If a covered plant species is present following special-status plant surveys, a qualified biologist will stake and flag exclusion zones of 100 feet around plant occupied habitat (both the standing individuals and the seed bank individuals) of the covered species prior to performing the activities. If an exclusion zone cannot extend the specified distance from the habitat, the biologist will stake and flag a restricted activity zone of the maximum practicable distance from the exclusion zone around the habitat. This exclusion zone distance is a guideline that may be modified by a qualified biologist, based on site-specific conditions. If avoidance of plant species listed under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA) is not possible, the USFWS and/or CDFW will be consulted.</p>	On-going. Not applicable to ERTC-1 and ERTC-2	<p>In preparation for ERTC-3 and ERTC-4 work, special-status plant surveys occurred in suitable habitat on March 18-20, 2026; the survey resulted in detections of lost hills crownscale <i>Atriplex coronata</i> var. <i>vallicola</i>, a California Rare Plant Rank (CRPR) 1B.2 species, at the southern Transposition Site (ERTC-3). Locations were mapped and CM BIO-A will be implemented prior to and during construction. It should be noted that the</p>

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			<p>species recently underwent a taxonomic revision and the population detected at the southern transposition site is not named gypsum-loving saltscare (<i>Atriplex gypsophila</i>), a CRPR 1B.3 species.</p> <p>A second special status plant survey will be conducted in May 2026.</p> <p>No work will occur within suitable habitat until completed. A report documenting the methods and results of the survey will be provided to the CPUC.</p>
CM-BIO-B BNLL	<p>The following measure shall supersede and replace LSPGC APM BIO-15 for LSPGC project components and PG&E CM BIO-5 for PG&E project components, as presented in the PEA, for blunt-nosed leopard lizard:</p> <p>Prior to construction of project components in habitats suitable for blunt-nosed leopard lizard (i.e., annual grassland), at least two qualified biologists approved by the CPUC shall conduct surveys following measures in the Approved Survey Methodology for the Blunt-Nosed Leopard Lizard (CDFW 2019) between April and September, including spring adult surveys and fall hatchling surveys. Biologists shall conduct visual search surveys while walking in parallel on adjacent transects that cover all areas within the project site with potential blunt-nosed leopard lizard habitat.</p>	Not completed. Not applicable to ERTC-1 and ERTC-2	<p>No blunt-nosed leopard lizard surveys occurred in Q1 2026.</p> <p>Blunt-nosed leopard lizard protocol surveys will be conducted in Q2 and Q3 of 2026 within suitable habitat for ERTC-3 and 4. No work will occur within suitable habitat until completed. A</p>

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	<p>Biologists shall stop periodically to scan the transect for blunt-nosed leopard lizard using close-focusing binoculars. The survey methods applied shall be commensurate with the anticipated level of disturbance, as described below.</p> <p>For project activities that could result in habitat removal:</p> <ul style="list-style-type: none"> - A total of 12 adult surveys shall take place during the optimal survey period (April 15 to July 15) with a maximum of 4 survey days per week and 8 days within any 30-day time period. At least one survey session shall be conducted for 4 consecutive days, weather permitting. - A total of 5 additional hatchling surveys shall take place during the hatchling optimal survey period (August 1 to September 15). <p>For operation and maintenance activities that would not result in habitat removal:</p> <ul style="list-style-type: none"> - A total of 8 adult surveys shall take place during the optimal survey period (April 15 to July 15) with maximum of 3 survey days per week and 6 days within any 30-day time period. - Fall hatchling surveys are not required for activities in this category. <p>If blunt-nosed leopard lizards are observed, biologists shall record the location (UTM coordinates) of individuals and the presence of habitat features important for blunt-nosed leopard lizard (e.g., washes, playas, relative abundance of small mammal burrows). Because this species is designated as Fully Protected under the California Fish and Game Code, complete avoidance of take (i.e., hunting, pursuing, catching, capturing, or killing) is required, unless PG&E and/or LSPGC consult with CDFW and obtain an Incidental Take Permit pursuant to SB 147 (Statutes of 2023) and Fish and Game Code Section 2081.15. PG&E and/or LSPGC will adhere to the provisions and conditions of the Incidental Take Permit that may include compensatory mitigation and would fully mitigate impacts on the</p>		<p>report documenting the methods and results of the survey will be provided to the CPUC.</p>

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	<p>species. In the event Fish and Game Code Section 2081.15 is deemed by CDFW to be inapplicable such that incidental take is not permissible, PG&E and/or LSPGC shall initiate consultation with CDFW to determine how the project can be designed to completely avoid take of blunt-nosed leopard lizards and potentially occupied habitat.</p> <ul style="list-style-type: none"> - All blunt-nosed leopard lizard observations shall be reported to the CNDDDB within 30 days. - If no blunt-nosed leopard lizards are observed during the survey period, then further mitigation for this species is not required. Surveys shall be accepted for one year from the date of completion. 		
CM BIO-C Special-Status Reptiles	<p>Within 14 days before the initiation of any construction activity, a qualified biologist approved by the CPUC shall conduct a focused visual survey of habitat suitable (i.e., annual grassland, scrub) for California glossy snake, coast horned lizard, and/or San Joaquin coachwhip in the project alignment area and a 100-footbuffer surrounding the project alignment area, which shall include walking linear transects.</p> <p>If California glossy snake, coast horned lizard, or San Joaquin coachwhip are not detected during the focused survey, the qualified biologist shall submit a report summarizing the results of the survey to LSPGC,PG&E, and the CPUC, and further mitigation shall not be required.</p> <p>If California glossy snake, coast horned lizard, or San Joaquin coachwhip are detected, a qualified biologist with an appropriate CDFW Scientific Collecting Permit that allows handling of reptiles shall be present during initial ground-disturbance activities and shall inspect the project site before initiation of project activities. If California glossy snake, coast horned lizard, or San Joaquin coachwhip are detected, the qualified biologist shall move individuals into nearby suitable habitat that will not be disturbed by project activities.</p>	Not completed. Not applicable to ERTC-1 and ERTC-2	<p>No special status reptile surveys occurred in Q1 2026.</p> <p>Special status reptile pre-construction surveys will be conducted prior to construction within suitable habitat for ERTC-3 and 4. No work will occur within suitable habitat until completed. The methods and results of the survey will be provided to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
CM BIO-D Western spadefoot toad	<p>The following measure shall apply for LSPGC project components and shall supersede and replace PG&E CM BIO-6 for PG&E project components, as presented in the PEA, for western spadefoot toads:</p> <p>Within 48 hours prior to project implementation within areas containing habitat suitable for western spadefoot toad, a qualified biologist approved by the CPUC shall conduct focused surveys within identified work and access areas that are located in aquatic (i.e., vernal pool, wetland) and upland (i.e., annual grassland) habitats within approximately 860 feet (262 meters) of aquatic habitat (Baumberger et al. 2019) suitable for the species. Burrows that are unavoidable and considered potentially occupied by western spadefoot toads shall be identified and further examined by a qualified biologist (e.g., with a burrow scope, through hand excavation) to determine whether an adult toad is present in the burrow.</p> <p>If western spadefoot toads are not found, the qualified biologist shall submit a report summarizing the results of the survey to LSPGC, PG&E, and the CPUC, and further mitigation will not be required.</p> <p>If western spadefoot toads are detected during focused surveys, then adults, tadpoles, and egg masses shall be relocated by a qualified biologist with a valid CDFW scientific collecting permit to nearby suitable habitat that will not be disturbed by project activities. This relocation is considered adequate to reduce impacts below the level of significance under CEQA. Because western spadefoot is proposed for listing under the ESA, if the species is listed before construction activities begin, LSPGC and PG&E shall consult with the USFWS to determine whether additional measures or permitting is required to comply with the ESA.</p>	Not completed. Not applicable to ERTC-1 and ERTC-2	<p>No western spadefoot surveys occurred in Q1 2026.</p> <p>Western spadefoot pre-construction surveys will be conducted within suitable habitat 48 hours prior to construction. No work will occur within suitable habitat until completed. The methods and results of the survey will be provided to the CPUC as needed.</p>
CM BIO-E Nesting Birds	The following measure shall supplement the requirements in APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E	Completed; ongoing during construction	Pre-construction nesting bird surveys were conducted

Measure Number	Measure Text	Status	Compliance Notes
	<p>components), as presented in the PEA, for special-status and other native birds:</p> <p>Pre-construction nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E components) shall be conducted within work areas and accessible areas (i.e., existing LSPGC or PG&E rights-of-way, public land, private land with existing access permission) in the following buffers surrounding the work area:</p> <ul style="list-style-type: none"> - 0.5 miles for Swainson’s hawk - 500 feet for northern harrier, short-eared owl, and other native raptors; and - 250 feet for other native bird species <p>To avoid trespassing, inaccessible areas (e.g., private land) shall be surveyed using binoculars or spotting scopes as feasible (i.e., to the maximum distance achievable using these tools). As a result, it may not be feasible to complete surveys in the full survey buffer in all cases; however, LSPGC and PG&E shall implement the full survey buffer wherever feasible.</p> <p>Nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and CMBIO-8 (for PG&E components) shall be conducted no more than 10 days prior to the start of construction activities during the nesting bird season (February 1 to September 15). Continuous construction within an area following a nesting bird survey will negate the need to repeat additional nesting bird surveys. If there is a five day or more lapse in project construction within an area, the nesting bird survey shall be repeated.</p> <p>Focused surveys for Swainson’s hawk shall follow the protocols found in Recommended Timing and Methodology for Swainson’s Hawk Nesting</p>		<p>at the Manning Avenue Staging Area and the Panoche Junction Area on February 25, 2026. Due to a lapse in construction activities greater than five days, additional follow up survey was conducted at the Manning Road Staging Area on March 24, 2026.</p> <p>No active nests were detected during the surveys. Additional nesting bird surveys will need to be completed if there is a lapse of project construction for more than five days.</p> <p>Reports of the methods and results of each survey were submitted to the CPUC prior to construction beginning.</p>

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	<p>Surveys in California’s Central Valley (Swainson’s Hawk Technical Advisory Committee 2000).</p> <p>If an active nest is discovered during nesting bird surveys conducted pursuant to APMs BIO-18 and BIO-20 (for LSPGC components) and construction activities would occur during the nesting bird season, no-disturbance buffers shall be established, within which no ground-disturbing construction activities would occur until the nest is no longer active as determined by a CPUC-approved biologist. No-disturbance buffers shall be at least 0.5 miles for Swainson’s hawk, 500 feet for northern harrier, short-eared owl, or other native raptors, 250 feet for non-raptor special-status birds, and 20 feet for other native birds (i.e., without special status). No-disturbance buffer sizes for other native birds (non-raptors) without special status may be increased at the discretion of the CPUC-approved biologist depending on factors including species, nest height, topography, existing vegetative or other barriers between the nest and project activities, and disturbance level surrounding the nest. Any reduction in the no-disturbance buffer for special-status bird species shall require consultation with the CPUC-approved biologist, and would require additional measures, including biological monitoring to determine whether nesting birds are exhibiting disturbance behaviors, after which the no-disturbance buffer size shall be increased.</p> <p>No-disturbance buffers described in CM BIO-8 (for PG&E components) that would follow the most recent PG&E Nesting Bird Management Plan would be sufficient to maintain impacts on nesting birds at less than significant under CEQA.</p> <p>If an active Swainson’s hawk nest is detected, and implementation of the 0.5-mile no-disturbance buffer is not feasible, LSPGC or PG&E shall consult with CDFW to discuss how to implement the project and avoid take. If take</p>		

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	cannot be avoided, take authorization through the acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) is necessary to comply with CESA.		
CM BIO-8 Nesting Birds	Prior to work activities conducted during the nesting bird season (February 1 to August 31), the work area will be inspected for nests. If a nest is discovered, a biologist will be contacted to determine the nest status, the species of the nesting birds, and if work activities are likely to impact the nest. If a nest is confirmed active (i.e., the nest contains eggs or young or the adults are exhibiting nesting behaviors such as siting in the nest, carrying food to the nest, etc.), designated avoidance buffers will be required and implemented according to the most recent PG&E Nesting Bird Management Plan and guidance available. The established buffers will remain in effect until the young have fledged or the nest is no longer active, as confirmed by the biologist. The biologist will have authority to order the cessation of nearby work activities or adjust buffers if nesting pairs exhibit signs of disturbance. Buffer sizes may be reduced if the biologist determines that a reduced buffer size will not result in the abandonment of the nest or failure based on compelling biological and ecological reasoning (e.g., the biology of the bird species, concealment of the nest by topography, land use type, vegetation, and the level of project activity). Inactive nests may be removed in accordance with PG&E's approved avian permits.	Completed; ongoing during construction	<p>Pre-construction nesting bird surveys were conducted at the Manning Avenue Staging Area and the Panoche Junction Area on February 25, 2026. Due to a lapse in construction activities greater than five days, additional follow up survey was conducted at the Manning Road Staging Area on March 24, 2026.</p> <p>No active nests were detected during the surveys. Additional nesting bird surveys will need to be completed if there is a lapse of project construction for more than five days.</p> <p>Reports of the methods and results of each survey were submitted to the CPUC prior to construction beginning.</p>
CM BIO-F BUOW	The following measure shall supersede and replace APMs BIO-6 and APM BIO-10 (for LSPGC components) and CM BIO-7 (for PG&E components), as presented in the PEA, for burrowing owl.	On-going. Not applicable to ERTC-1	In support of ERTC-2, -3, and -4, two burrowing owl surveys were conducted on

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	<p>LSPGC and PG&E Construction Activities and LSPGC O&M Operational Activities</p> <p>A qualified biologist approved by the CPUC shall conduct surveys for burrowing owls in areas of habitat suitable for the species on and within 1,640 feet of the work area. Inaccessible areas (e.g., adjacent private property) will not be surveyed directly, but the biologist may use binoculars or a spotting scope to survey these areas. A minimum of four surveys shall be conducted to determine whether burrowing owls occupy the site. Surveys shall be conducted according to Appendix D of the 2012 Staff Report on Burrowing Owl Mitigation prepared by the California Department of Fish and Game (now CDFW) (CDFW 2012) or any subsequent updated guidance. If feasible, at least one survey should be conducted between February 15 and April 15, and the remaining surveys should be conducted between April 15 and July 15, at least three weeks apart. Because burrowing owls may recolonize a site after only a few days, one of the surveys, or an additional survey, shall be conducted no less than 14 days before initiating ground disturbance activities to verify that take of burrowing owl would not occur.</p> <p>If no occupied burrows are found, the qualified biologist shall submit a report documenting the survey methods and results to LSPGC or PG&E and the CPUC, and no further mitigation shall be required.</p> <p>If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.</p>		<p>March 4-5, 2026 and March 27, 2026 with no detections. Surveys will continue in Quarter 2 (Q2) and Quarter 3 (Q3) of 2026.</p> <p>No work will occur within suitable habitat until completed. A report documenting the methods and results of the survey will be provided to the CPUC.</p>

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	<p>- If an active burrow is found within 1,640 feet of pending construction activities, LSPGC or PG&E shall establish and maintain a buffer around the occupied burrow and any identified satellite burrows (i.e., non-nesting burrows that burrowing owls use to escape predators or move young into after hatching) to prevent take of the burrowing owls.</p> <p>- The buffer may be adjusted if, in consultation with the CDFW, the qualified biologist determines that an alternative buffer shall not result in take of burrowing owl adults, young, or eggs because of particular site features (e.g., topography, natural line-of-sight barriers), level of project disturbance, or other considerations. If the buffer is reduced, the qualified biologist shall monitor the behavior of the burrowing owls during all project activities within 1,640 feet of the burrow. If the owls are disturbed or agitated (e.g., vocalizations, bill snaps, fluffing feathers to increase body size appearance, drooping wings and rotating them forward, crouching and weaving back and forth) by the project activities, the biologist shall have the authority to halt the activities and reestablish a buffer consistent with the first item above until the agitated behavior ceases and normal behavior resumes.</p> <p>- The buffer shall remain in place around the occupied burrow and associated satellite burrows until the qualified biologist has determined through noninvasive methods that the burrows are no longer occupied by burrowing owl. A previously occupied burrow will be considered unoccupied if surveys demonstrate that no owls have used the burrow for seven consecutive days.</p> <p>- Locations of burrowing owls detected during surveys shall be reported to the CNDDDB within 30 days.</p> <p>PG&E O&M Activities</p> <p>PG&E shall consult with CDFW to determine the appropriate protective buffer distance for active burrowing owl burrows detected in or within</p>		

Measure Number	Measure Text	Status	Compliance Notes
	1,640 feet of the project alignment area to avoid take of burrowing owls from O&M activities.		
CM BIO-G CBB	<p>The following measure shall supersede APMs BIO-16 and BIO-17 for LSPGC components and apply for PG&E project components and for Crotch’s bumble bee:</p> <p>Initial ground-disturbing work (e.g., grading, vegetation removal, staging) in grassland habitat or edges of agricultural areas that contain grasses or forbs shall take place between August 15 and March 15, if feasible to avoid impacts on nesting Crotch’s bumble bees.</p> <p>If the above limited operating period is not feasible (i.e., if limiting ground disturbance to the period between August 15 and March 15 would preclude achieving most of all of the project objectives) as determined by LSPGC or PG&E with concurrence from the CPUC, a qualified biologist approved by the CPUC, familiar with bumble bees of California and experienced using survey methods for bumble bees, shall conduct a habitat assessment and focused survey for Crotch’s bumble bee before the start of any ground-disturbing activities in grassland habitat or edges of agricultural areas that contain grasses or forbs. Surveys shall be performed when Crotch’s bumble bee is most likely to be identified, typically from April through August (i.e., the colony active period) when floral resources and ideal weather conditions are present, and shall follow the methods in Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (CDFW 2023). Surveys shall be conducted during the colony active period the same year as the start of planned construction activities.</p> <p>LSPGC and PG&E shall submit a survey report to the CDFW and the CPUC within 1 month of survey completion and shall notify the CDFW and the CPUC within 24 hours if Crotch’s bumble bees are detected.</p>	Not completed. Not applicable to ERTC-1, ERTC-2, and ERTC- 3	<p>No Crotch’s bumblebee surveys occurred in Q1 2026.</p> <p>No suitable habitat for the species occurs in ERTC-1 and ERTC-2. All initial ground disturbance related to ERTC-3 will occur within the work window specified in the measure (August 15 – March 15). Therefore, no surveys for Crotch’s bumblebee (CBB) will be conducted for ERTC-1, ERTC-2, and ERTC-3.</p> <p>In support of ERTC-4, CBB habitat assessment and surveys will be conducted in Q1 and Q2 2027 for those project components that cannot be constructed between August 15 and March 15. If work cannot be conducted within the work window specified in the measure, no work will occur within suitable habitat until</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>If Crotch’s bumble bees are detected during the focused survey, appropriate avoidance measures shall be implemented. Avoidance measures shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> - Protective buffers shall be implemented around active nesting colonies until these sites are no longer active. A qualified biologist, in coordination with the CDFW, shall determine the appropriate buffer size to protect nesting colonies. - If nesting colonies are detected, avoidance areas shall be implemented in areas near the colony location that contain significant floral resources for the colony, if present. A qualified biologist shall determine the appropriate avoidance area size to protect foraging resources. - If project activities involving temporary disturbance (e.g., staging) would occur where a nesting colony was detected after the nesting colony is no longer active, the area shall be restored to original conditions after the temporary disturbance is complete such that habitat for Crotch’s bumble bee would be available. <p>If take of Crotch’s bumble bee cannot be avoided, LSPGC and PG&E shall obtain an Incidental Take Permit (ITP) from the CDFW and shall implement all avoidance measures included in the ITP. The CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of Crotch’s bumble bees such that impacts on the species would be fully mitigated. These measures would include but not be limited to:</p> <ul style="list-style-type: none"> specifications for construction timing and sequencing requirements to avoid impacts on nesting Crotch’s bumble bees; - pre-construction surveys conducted within 30 days prior to the start of ground-disturbing activities; - establishment of seasonal no-disturbance buffers around nest sites; 		<p>completed. A report documenting the methods and results of the survey will be provided to the CPUC.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>- construction monitoring; - restrictions associated with construction practices, equipment, or materials that may harm bumble bees(e.g., BMPs to minimize the spread of invasive plant species); and provisions to avoid Crotch’s bumble bees or potential Crotch’s bumble bees if observed away from a nest during project activity (e.g., ceasing of project activities until the animal has left the work area).</p> <p>Documentation of compliance with this mitigation measure and any required coordination with the CDFW or acquisition of an ITP shall be provided to the CPUC before commencement of any project construction activities.</p>		
CM BIO-H GKR and SJAS	<p>Prior to the initiation of any construction activity, a CPUC-approved biologist shall conduct a habitat assessment in the project alignment area to identify habitat suitable for giant kangaroo rat and San Joaquin antelope squirrel. The habitat assessment shall consider land cover types associated with these species (e.g., grassland), presence of burrows potentially suitable for the species, and incidental sightings of giant kangaroo rats or San Joaquin antelope squirrels. Where habitat determined to be potentially suitable for these species is identified, the following measures shall apply:</p> <p>- Prior to the initiation of any construction activity, a qualified biologist approved by the CPUC, and with a valid USFWS Section 10(a)1(A) recovery permit (for giant kangaroo rat) and valid CDFW scientific collecting permit (for giant kangaroo rat and San Joaquin antelope squirrel), shall conduct surveys of the proposed project work area for giant kangaroo rat and San Joaquin antelope squirrel. Surveys shall be confined to proposed project work areas that overlap the habitat determined to be potentially suitable during the habitat assessment described above, as well as disturbed habitats and agricultural areas within a 500-foot radius of these areas (referred to below as the “survey area”). Surveys for giant kangaroo rat</p>	On-going. Not applicable to ERTC-1 and ERTC-2	<p>A GKR/SJAS habitat assessment was initiated on March 9, 2026 to support future work for ERTC-3 and ERTC-4.</p> <p>Focused trapping and visual surveys will be conducted in Q2 and Q3 2026, if required based on the results of the habitat assessment.</p> <p>No work will occur within suitable habitat until the surveys are completed. A report documenting the methods and results of the survey will be provided to the CPUC.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>shall conform to the methodology outlined in the San Joaquin Kangaroo Rat Trapping Protocol (USFWS 2013). Surveys for San Joaquin antelope squirrels shall consist of walking transects and visually inspecting the survey area for squirrels and potential burrows</p> <ul style="list-style-type: none"> - If giant kangaroo rats or San Joaquin antelope squirrels or potential burrows are determined to be absent during surveys, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation will not be required. - If giant kangaroo rats or San Joaquin antelope squirrels or potential San Joaquin antelope squirrel burrows are determined to be present through these surveys, a qualified biologist shall map all burrows suitable for giant kangaroo rat and San Joaquin antelope squirrels in the survey area. A minimum 50-foot no-disturbance buffer shall be established around all burrows determined to be occupied by giant kangaroo rat or San Joaquin antelope squirrels, within which no project activities shall occur. -If the 50-foot no-disturbance buffers cannot be fully implemented, PG&E shall consult with USFWS and CDFW prior to initiating project activities to determine whether other measures are required to ensure compliance with ESA and CESA, respectively. If additional avoidance is not feasible and take is reasonably certain to occur, PG&E shall obtain an ITP from CDFW (for giant kangaroo rat and San Joaquin antelope squirrel) and USFWS (for giant kangaroo rat) and shall implement all avoidance measures included in the ITP. CDFW may also require compensatory mitigation through on-site habitat restoration or purchase of credits at an appropriate mitigation bank. Avoidance measures included in the ITP would reduce the likelihood of take of giant kangaroo rats and San Joaquin antelope squirrels such that impacts on the species would be fully mitigated. These measures would include but not be limited to: <ul style="list-style-type: none"> - construction monitoring; 		

Measure Number	Measure Text	Status	Compliance Notes
	<ul style="list-style-type: none"> - restrictions associated with construction practices, equipment, or materials that may harm giant kangaroo rats or San Joaquin antelope squirrels; and - provisions to avoid giant kangaroo rats and San Joaquin antelope squirrels if observed away from a burrow during project activity (e.g., ceasing of project activities until the animal has left the work area). <p>Documentation of compliance with this mitigation measure and any required coordination with the USFWS and CDFW, including but not limited to the acquisition of an ITP, shall be provided to the CPUC before commencement of any project construction activities.</p>		
CM BIO-I AMBA	<p>The following measure shall supplement the requirements in APMs BIO-6 and BIO-10 (for LSPGC project components) and shall apply for PG&E project components for American badger:</p> <p>For LSPGC project components, pre-construction wildlife and burrow surveys conducted pursuant to APMBIO-6 and burrow and den avoidance implemented pursuant to APM BIO-10 shall also incorporate American badger.</p> <p>For PG&E components, the following measures shall be implemented.</p> <ul style="list-style-type: none"> - Within 14 days before commencement of project activities, a qualified wildlife biologist approved by the CPUC familiar with American badger and experienced using survey methods for the species shall conduct focused surveys of habitat suitable for the species in the project alignment area to identify any American badger dens. - If occupied dens are not found, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation shall not be required. - If occupied dens are found, then dens shall be monitored to determine if occupation is by an adult badger only or if it is a natal den. Impacts on 	Not completed. Not applicable to ERTC-1 and ERTC-2.	<p>No American badger surveys occurred in Q1 2026.</p> <p>In support of ERTC-3 and -4, AMBA pre-construction surveys will be conducted in suitable habitat within 14 days prior to construction. No work will occur until the pre-construction survey is completed. The methods and results of the survey will be provided to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>active badger dens shall be avoided by establishing exclusion zones around all active badger dens. If the qualified biologist determines that the den is a natal den, an exclusion zone of 200 feet shall be maintained around the den until the qualified biologist determines that the den has been vacated. If the den is occupied by an adult badger only, the size of the buffer shall be determined by a qualified biologist. No project activities (e.g., vegetation removal, ground disturbance, staging) shall occur within the exclusion zone until denning activities are complete (i.e., the adult badger and young have left the area) or the den is abandoned, as confirmed by a qualified biologist. The qualified biologist shall monitor each den once per week to track the status of the den and to determine when it is no longer occupied. When the den is no longer occupied, project activities within the exclusion zone may occur. Monitoring reports shall be submitted to the CPUC.</p>		
CM BIO-J SJKF	<p>The following measures, in accordance with the USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011), shall supersede the requirements in APMs BIO-8 (for LSPGC components) and CM BIO-4 (for PG&E components) as presented in the PEA for San Joaquin kit fox:</p> <p>Preconstruction surveys shall be conducted by a qualified biologist no less than 14 days and no more than 30 days prior to the beginning of ground disturbance or construction activities or any project activity likely to adversely affect the San Joaquin kit fox. Surveys shall identify San Joaquin kit fox habitat features in the project alignment area (e.g., dens), evaluate use by kit fox, and assess the potential impacts on the kit fox by the proposed activity. Survey methods shall include thoroughly inspecting suitable habitat in the project alignment area for kit fox dens using walking line transects. The status of all dens shall be determined and mapped.</p> <p>- If no San Joaquin kit foxes or potential dens (i.e., a burrow at least four inches in the diameter that opens within two feet) are found, the qualified</p>	Not completed. Not applicable to ERTC-1 and ERTC-2.	<p>No San Joaquin kit fox surveys occurred in Q1 2026.</p> <p>San Joaquin kit fox pre-construction surveys will be conducted for ERTC-3 and -4 no less than 14 days and no more than 30 days prior to construction. No work will occur until the pre-construction survey is completed. The methods and results of the survey will be provided to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>biologist shall document the findings in a letter report to USFWS, CDFW, the CPUC, and LSPGC or PG&E, and no further mitigation will be required.</p> <ul style="list-style-type: none"> - If potential or known San Joaquin kit fox dens are found, exclusion zones shall be established for all dens within the project alignment area, and construction activity and other ground disturbance shall be prohibited within these zones. Potential dens shall be marked with flagged stakes 50 feet from the den entrance. A 100-foot exclusion zone will be established and demarcated using USFWS-approved fencing around the entrance of known dens. - If a natal/pupping den is discovered within the project alignment area or within 200 feet of the project boundary, USFWS, CDFW, and the CPUC shall be immediately notified and the den shall not be disturbed or destroyed without prior authorization or a take permit. - If potential dens are identified (i.e., a burrow at least four inches in the diameter that opens within two feet), the den entrances shall be dusted, and camera and scent stations shall be deployed for three calendar days to register and track activity of any San Joaquin kit fox present. If no San Joaquin kit fox activity is identified after three days, the den may be removed. Den removal must be appropriately monitored and conducted by a qualified wildlife biologist. <ul style="list-style-type: none"> - Written results of preconstruction surveys must be received by the CPUC within five days after survey completion and prior to the start of ground disturbance or construction activities. <p>During construction, LSPGC and PG&E shall observe the following measures throughout the project alignment area to minimize impacts on San Joaquin kit fox:</p> <ul style="list-style-type: none"> - Artificial lighting of construction sites in the project alignment area during nighttime shall be limited to the extent feasible. 		

Measure Number	Measure Text	Status	Compliance Notes
	<ul style="list-style-type: none"> - Holes or trenches shall be inspected daily to ensure that no animal has become trapped despite covers. All holes or trenches shall be thoroughly inspected before filling. - All pipes, culverts, or similar structures with a diameter of 4 inches or greater shall be inspected for kitfoxes before they are buried, capped, used, or moved in any way. - All trash shall be properly disposed of and removed from the construction site at least once a week. - No firearms shall be allowed on the construction site. - No pets shall be permitted on the construction site. - Use of rodenticides and herbicides in project areas shall be restricted. - Plastic mono-filament matting shall not be used for erosion control or other purposes. Instead, tightly woven fiber or similar material shall be used. - If a kit fox is trapped: <ul style="list-style-type: none"> - Personnel shall immediately report the incident to the project biologist. - Escape ramps or structures shall be installed immediately. - If the fox cannot escape, USFWS and CDFW shall be contacted for guidance. - The project biologist shall notify USFWS and CDFW by telephone or email within 24 hours. - If a kit fox is injured or killed: <ul style="list-style-type: none"> - Personnel shall immediately report the incident to the project biologist. - Project activities shall cease until USFWS and CDFW provide guidance. - The project biologist shall notify USFWS and CDFW immediately with the date, time, and location of the incident. - Consultation with USFWS shall be reinitiated. 		

Measure Number	Measure Text	Status	Compliance Notes
CM BIO-K Wetlands	<p>If potential state or federally protected wetlands identified in the project alignment area can be avoided, a qualified biologist approved by the CPUC shall establish a buffer around wetlands and mark the buffer boundary with high-visibility flagging, fencing, stakes, or clear existing landscape demarcations (e.g., edge of a roadway). The buffer will be a minimum width of 25 feet but may be larger if deemed necessary. The appropriate size and shape of the buffer zone shall be determined in coordination with the qualified biologist and will depend on the type of wetland present (e.g., seasonal wetland, seep, pond), the timing of project activities (e.g., wet or dry time of year), whether any special-status species may occupy the wetland and the species' vulnerability to the project activities, environmental conditions and terrain, and the project activity being implemented.</p> <p>- Project activities (e.g., ground disturbance, vegetation removal, staging) shall be prohibited within the established buffer. The qualified biologist shall periodically inspect the materials demarcating the buffer to confirm that they are intact and visible, and wetland impacts are being avoided.</p> <p>If it is determined that disturbance or fill of potential state or federally protected wetlands or waters cannot be avoided, LSPGC and/or PG&E shall submit the appropriate permit applications to the relevant regulatory agencies (e.g., USACE, RWQCB).</p> <p>If it is determined that fill of waters of the United States would result from project implementation, LSPGC and/or PG&E shall secure authorization for such fill from the USACE through the Section 404 permitting process. Any waters of the United States that would be affected by the project shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE mitigation guidelines in place at the time of construction. In association with the Section 404 permit (if applicable) and prior to the issuance of any grading permit, a Section 401 Water Quality</p>	Not completed. Not applicable to ERTC-1 , ERTC-2 and ERTC-3.	The Project has been designed to avoid potential state or federally protected wetlands. Mapped channels located near the 500 kV interconnections (ERTC-4) will be delineated in the field for avoidance prior to construction in that area. Continued compliance with this measure will be reported to the CPUC as needed.

Measure Number	Measure Text	Status	Compliance Notes
	<p>Certification shall be obtained from the Central Valley RWQCB. For impacts on waters of the state that are not also waters of the United States and are therefore not covered by the 401 Water Quality Certification, the applicant shall apply to the RWQCB for Waste Discharge Requirements following the State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB 2021). Any waters of the United States or waters of the state that are to be affected by the project shall be replaced or restored on a no-net-loss basis in accordance with the applicable USACE and SWRCB mitigation standards in place at the time of construction.</p> <p>If it is determined that disturbance or fill of state protected waters cannot be avoided, LSPGC and/or PG&E shall notify the CDFW before commencing activity that may divert the natural flow or otherwise alter the bed, or bank of any 1602 jurisdictional waterway. If project activities trigger the need for a Lake or Streambed Alteration Agreement, LSPGC and/or PG&E shall obtain such an agreement from the CDFW before the activity commences. LSPGC and/or PG&E shall conduct project construction activities in accordance with the agreement, including implementing reasonable measures in the agreement necessary to protect fish and wildlife resources, when working within the bed or bank of a lake or stream. These measures may include but shall not be limited to demarcation of the construction area, biological monitoring, environmental awareness training for construction crews, and compensatory measures (e.g., restoration, long-term habitat management) such that there would be no net loss.</p>		
CM BIO-L APP	PG&E shall implement its Avian Protection Plan, PG&E’s Program to Address Avian Electrocutions, Collisions, and Nesting Birds (PG&E 2018), including all risk reduction measures and training and reporting requirements therein.	Completed; Implementation on-going during construction, as applicable	Implementation of the Avian Protection Plan will be reported to the CPUC as needed.

Measure Number	Measure Text	Status	Compliance Notes
	LSPGC must follow the recommendations outlined in Reducing Avian Collisions with Power Lines: The State of the Art in 2012 (APLIC 2012 or the most current version). In addition, LSPGC shall develop and implement an Avian Protection Plan according to the Avian Protection Plan Guidelines (APLIC and USFWS 2005). The plan shall include measures to minimize collision and electrocution risk to avian species during project operation. The plan shall be submitted for review to the CDFW and USFWS at least 60 days before construction begins.		
CM BIO-1 WEAP	A qualified biologist will develop an environmental awareness training program that is specific to the Proposed Project. All on-site construction personnel will attend the training before they begin work on the Proposed Project. Training will include a discussion of the construction management practices that are being implemented to protect biological resources as well as the terms and conditions of any Proposed Project permits.	Completed; on-going	<p>An environmental awareness training program was developed in January 2026.</p> <p>All workers will be provided the training before they begin work. This measure will be on-going through construction.</p> <p>Implementation of this measure will be reported to the CPUC as needed.</p> <p>Training sessions were held on-site and virtually for various work crews on January 15; February 5, 24, & 25; and March 2 & 30, 2026.</p>
CM CR-A BE Surveys	The following measure shall apply to LSPGC project and PG&E components and shall supersede and replace LSPGC APM CUL-2 and PG&E CM CUL-2, as presented in the PEA, for historic resources:	Completed	Built environment historic resource surveys for the areas included in this ERTC-1 were completed and a letter

Measure Number	Measure Text	Status	Compliance Notes
	<p>Prior to the start of construction, a qualified architectural historian who meets the U.S. Secretary of the Interior Professional Qualifications Standards for History or Architectural History and approved by the CPUC shall perform historical resources surveys for built environment features for any portion of the project alignment area not yet surveyed (e.g., private properties with access restrictions) within PG&E or LSPGC project component areas. PG&E and LSPGC shall be responsible for ensuring that historical resources surveys for built environment features are conducted throughout all portions of their respective project component areas. For the purposes of this mitigation measure, built-environment features 50 years and older discovered during surveys shall be assumed to be historical resources as defined by State CEQA Guidelines Section 15064.5, and depending on whether the location of the resource is in LSPGC's or PG&E's project area, either LSPGC or PG&E shall be required to comply with Mitigation Measure CR-B. All such resources will be recorded on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation by a qualified architectural historian.</p>		<p>report documenting the results of these surveys was provided to the CPUC on January 21, 2026.</p> <p>A second built environment historic resource survey report for the 500 kV line (ERTC-4) was provided to the CPUC on February 19, 2026. Requested revisions to this report were delivered to the CPUC on March 16, 2026.</p>
<p>CM CR-B BE Resources</p>	<p>The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APM CUL-2 and PG&E CM CUL-2, as presented in the PEA, for built environment historic resources:</p> <p>If a built environment historical resource is identified in the project area, PG&E or LSPGC (as applicable, depending on whether the location of the resource is in LSPGC's or PG&E's project area) shall redesign the project to avoid direct or indirect impacts to the building or structure.</p>	<p>Completed</p>	<p>No built environment historical resources will be directly or indirectly impacted by the project scope components per the provided built environment reports.</p>
<p>CM CR-C Arch Surveys</p>	<p>The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APMs CUL-2 and CUL-3 and PG&E CMs CUL-2 and CUL-3, as presented in the PEA, for archaeological resources:</p>	<p>Completed</p>	<p>All remaining unsurveyed areas (at the time of the final IS/MND publication) have been surveyed. Survey results were summarized in</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>Prior to the start of construction, a qualified archeologist who meets the U.S. Secretary of the Interior Professional Qualifications Standards for Archaeology and approved by the CPUC shall perform archeological resources surveys for any portion of the project alignment area not yet surveyed (e.g., private properties with access restrictions) within PG&E or LSPGC project component areas. PG&E and LSPGC shall be responsible for ensuring that archeological resources surveys are conducted throughout all portions of their respective project component areas. For the purposes of this mitigation measure, all archaeological resources discovered during surveys shall be assumed to be unique archaeological resources or historical resources as defined by State CEQA Guidelines Section 15064.5 and will be recorded by a qualified archaeologist on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation.</p> <p>Each such resource will be indicated, such as via a GIS device, through environmentally sensitive areas (ESA) mapping, with flagging tape, safety fencing, and/or signage designating it as an ESA to ensure that PG&E or LSPGC construction crews and heavy equipment will not intrude on these sites during construction. Mapping or GIS marking will be preferred in locations where there is a higher risk of site looting (e.g., near public roads, on land where the owner appears to be an artifact collector). At the discretion of PG&E or LSPGC, monitoring may be done in lieu of or in addition to marking.</p> <p>If it is determined that the project, as currently designed, cannot avoid impacts on one or more of the sites, then PG&E or LSPGC (as applicable) shall redesign the project so that the archaeological sites will be completely avoided.</p>		<p>a report provided to the CPUC on January 26, 2026, with a requested revision submitted on February 3, 2026.</p>
CM CUL-1 WEAP	PG&E will provide environmental awareness training on archaeological and paleontological resources protection. This training may be	Completed; on-going	An environmental awareness training program

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	<p>administered by the PG&E cultural resources specialist (CRS) or a designee as a stand-alone training or included as part of the overall environmental awareness training as required by the Proposed Project and will at minimum include: types of cultural resources or fossils that could occur at the Proposed Project site; types of soils or lithologies in which the cultural resources or fossils could be preserved; procedures that should be followed in the event of a cultural resource, human remain, or fossil discovery; and penalties for disturbing cultural or paleontological resources.</p>		<p>was developed in January 2026. All workers will be provided the training before they begin work. This measure will be on-going through construction. Implementation of this measure will be reported to the CPUC as needed.</p> <p>Training sessions were held on-site and virtually for various work crews on January 15; February 5, 24, & 25; and March 2 & 30, 2026.</p>
<p>CM CUL-2 Unanticipated Discovery</p>	<p>a. Unanticipated Cultural Resources. If unanticipated cultural resources are inadvertently discovered during site preparation or construction activities, work will stop in that area and within 50 feet of the find until the CRS or their qualified designee can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with PG&E and other appropriate agencies. Work may continue on other portions of the site with the CRS's approval. PG&E will implement the CRS's or their designee's recommendations for treatment of discovered cultural resources.</p> <p>b. Human Remains. In the unlikely event that human remains or suspected human remains are uncovered during pre-construction testing or during construction, all work within 50 feet of the discovery will be halted and redirected to another</p>	<p>In compliance</p>	<p>No unanticipated cultural resources have been discovered during Q1 2026.</p> <p>Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>location. The find will be secured, and the CRS or designated representative will be contacted immediately to inspect the find and determine whether the remains are human. If the remains are not human, the CRS will determine whether the find is an archaeological deposit and whether paragraph (a) of this APM should apply. If the remains are human, the CRS will immediately implement the applicable provisions in Public Resources Code (PRC) Sections 5097.9 through 5097.994, beginning with the immediate notification to the affected county coroner. The coroner has two working days to examine human remains after being notified. If the coroner determines that the remains are Native American, California Health and Safety Code 7050.5 and PRC Section 5097.98 require that the CRS contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC, as required by PRC Section 5097.98, will determine and notify the Most Likely Descendant.</p> <p>c. Paleontological Discoveries. If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be conducted in consultation with the landowner, PG&E, and California Public Utilities Commission (CPUC). The paleontologist will be responsible for developing the recovery strategy and will lead the recovery effort, which will include establishing recovery standards, preparing specimens for</p>		

Measure Number	Measure Text	Status	Compliance Notes
	identification and preservation, documentation and reporting, and securing a curation agreement from the approved facility.		
CM PALEO-1 Unanticipated Discovery	Unanticipated Paleontological Discoveries. If significant paleontological resources are discovered during construction activities, work will stop within 50 feet and the PG&E CRS will be contacted immediately. The CRS will work with the qualified paleontologist to evaluate the discovery. If the discovery is determined to be significant, PG&E will implement measures to protect and document the paleontological resource. Work may not resume within 50 feet of the find until approval by the CRS in coordination with the paleontologist. In the event that significant paleontological resources are encountered during the project, protection and recovery (if feasible and safe) of those resources may be required. Treatment and curation of fossils will be	In compliance	No unanticipated paleontological resources have been discovered during Q1 2026. Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.
CM GEO-1 Loose Soil	Where soft or loose soils are encountered during Proposed Project construction, several actions are available, feasible, and can be implemented to avoid, accommodate, replace, or improve such soils. Depending on site-specific conditions and permit requirements, one or more of these actions may be implemented to eliminate impacts from soft or loose soils: - Locating construction facilities and operations away from areas of soft and loose soil. - Over-excavating soft or loose soils and replacing them with engineered backfill materials. - Increasing the density and strength of soft or loose soils through mechanical vibration and/or compaction. - Installing material, such as aggregate rock, steel plates, or timber mats, over access roads. - Treating soft or loose soils in place with binding or cementing.	In compliance	No loose soils were encountered during Q1 2026. Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.
CM GHG-1 GHG BMPs	The following actions will be taken, as feasible, to minimize greenhouse gas emissions.	In compliance	Measures will continue to be implemented during construction.

Measure Number	Measure Text	Status	Compliance Notes
	<ul style="list-style-type: none"> - Encourage construction workers to carpool to the job site to the extent feasible. The ability to develop an effective carpool program for the Proposed Project will depend upon the proximity of carpool facilities to the area, the geographical commute departure points of construction workers, and the extent to which carpooling will not adversely affect worker arrival time and the project’s construction schedule. - Minimize unnecessary construction vehicle idling time for on-road and off-road vehicles. The ability to limit construction vehicle idling time will depend on the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel-powered vehicles, have extended warm-up times following start-up that limit their availability for use following start-up. Where such diesel-powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The Proposed Project will apply a “common sense” approach to vehicle use, so that idling is reduced as far as possible below the maximum of 5 consecutive minutes allowed by California law; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as part of pre-construction conferences. Those briefings will include discussion of a “common sense” approach to vehicle use. - Maintain construction equipment in proper working conditions in accordance with PG&E standards. - Minimize construction equipment exhaust by using low-emission or electric construction equipment, where feasible. Portable diesel fueled construction equipment with engines 50 hp or larger and manufactured in 2000 or later will be registered under the California Air Resources Board Statewide Portable Equipment Registration Program. - Minimize welding and cutting by using compression of mechanical applications (utilizing mechanical pressure to create a secure connection between metal components) where practical and within standards. 		<p>Implementation of this measure will be reported to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<ul style="list-style-type: none"> - Encourage use of natural gas-powered vehicles for passenger cars and light-duty trucks where feasible and available. - Encourage recycling construction waste where feasible. 		
CM HAZ-1 HAZ BMPs	<p>PG&E will implement standard hazardous substance control and emergency response procedures to ensure the safety of the public and site workers during construction. The procedures identify methods and techniques to minimize the exposure of the public and site workers to potentially hazardous materials during all phases of Proposed Project construction through operation. They address worker training appropriate to the site worker’s role in hazardous substance control and emergency response. The procedures also require implementing appropriate control methods and approved containment and spill-control practices for construction and materials stored on-site. If it is necessary to store chemicals on-site, they will be managed in accordance with all applicable regulations. Material safety data sheets will be maintained and kept available on-site, as applicable.</p> <p>Proposed Project construction will involve soil surface blading/leveling, excavation of up to several feet, and auguring to a maximum depth of 35 feet in some areas. In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil will be tested, and if contaminated above hazardous waste levels, will be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil will require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.</p> <p>All hazardous materials and hazardous wastes will be handled, stored, and disposed of in accordance with all applicable regulations, by personnel qualified to handle hazardous materials. The hazardous substance control</p>	In compliance	<p>No contaminated soils were encountered during Q1 2026.</p> <p>Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.</p>

Measure Number	Measure Text	Status	Compliance Notes
	<p>and emergency response procedures include, but are not limited to, the following:</p> <ul style="list-style-type: none"> - Proper disposal of potentially contaminated soils. - Establishing site-specific buffers for construction vehicles and equipment located near sensitive resources. - Emergency response and reporting procedures to address hazardous material spills. - Stopping work at that location and contacting the County Fire Department Hazardous Materials Unit immediately if visual contamination or chemical odors are detected. Work will be resumed at this location after any necessary consultation and approval by the Hazardous Materials Unit. 		
CM HAZ-2 WEAP	<p>The training will include the following components related to hazards and hazardous materials:</p> <ul style="list-style-type: none"> - PG&E Health, Safety, and Environmental expectations and management structure. - Applicable regulations. - Summary of the hazardous substances and materials that may be handled and/or to which workers may be exposed. - Summary of the primary workplace hazards to which workers may be exposed. - Overview of the controls identified in the Storm Water Pollution Prevention Plan. 	Completed; ongoing	<p>An environmental awareness training program was developed in January 2026.</p> <p>All workers will be provided the training before they begin work. This measure will be on-going through construction.</p> <p>Implementation of this measure will be reported to the CPUC as needed.</p> <p>Training sessions were held on-site and virtually for various work crews on January 15; February 5, 24, & 25; and March 2 & 30, 2026.</p>

Measure Number	Measure Text	Status	Compliance Notes
CM HAZ-3 Air Transit Coordination	<p>PG&E will implement the following protocols related to helicopter use during construction and air traffic:</p> <ul style="list-style-type: none"> - PG&E will comply with all applicable Federal Aviation Administration regulations regarding air traffic within 2 miles of the Proposed Project alignment. - PG&E’s helicopter operator will coordinate all Proposed Project helicopter operations with local airports before and during Proposed Project construction. - Helicopter use and landing zones will be managed to minimize impacts on local residents. 	In compliance	<p>No helicopter work occurred in Q1 2026.</p> <p>Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.</p>
CM NOI-1 Noise BMPs	<p>PG&E will employ standard noise-reducing construction practices such as the following:</p> <ul style="list-style-type: none"> - Ensure that all equipment is equipped with mufflers that meet or exceed factory new-equipment standards. - Locate stationary equipment as far as practical from noise-sensitive receptors. - Limit unnecessary engine idling. - Limit all construction activity near sensitive receptors to daytime hours unless required for safety or to comply with line clearance requirements. <p>Minimize noise-related disruption by notifying residents. Should nighttime Proposed Project construction be necessary because of planned clearance restrictions, affected residents will be notified at least 7 days in advance by mail, personal visit, or door hanger, and informed of the expected work schedule.</p>	In compliance	<p>Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.</p>
CM TRA-1 Encroachment Permits	<p>PG&E will obtain any necessary transportation and encroachment permits from the California Department of Transportation and the local jurisdictions, as required, including those related to state route crossings and the transport of oversized loads and certain materials, and will comply with permit requirements designed to prevent excessive congestion or traffic hazards during construction. PG&E will develop road and lane closure or width reduction or traffic diversion plans as required by the</p>	Not completed; not applicable to ERTC-1	<p>The scope of work included in ERTC-1 does not require the acquisition of any encroachment permits from Fresno County or CalTrans.</p>

Measure Number	Measure Text	Status	Compliance Notes
	encroachment permits. Construction activities that are in or along or that cross local roadways will follow best management practices and local jurisdictional encroachment permit requirements—such as traffic controls in the form of signs, cones, and flaggers—to minimize impacts on traffic and transportation in the Proposed Project area.		PG&E will obtain the necessary encroachment permits from Fresno County and the California Department of Transportation, as required, prior to performing work within these road rights-of-way.
CM TRA-2 Road Closures	At least 24 hours prior to implementing any road or lane closure, PG&E will coordinate with applicable emergency service providers in the Proposed Project vicinity. PG&E will provide emergency service providers with information regarding the road or lanes to be closed; the anticipated date, time, and duration of closures; and a contact telephone number.	In compliance	No road closures occurred in Q1 2026. However, should conditions arise in which road closures are required for safety, this measure will be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.
CM FIRE-1 Fire BMPs	PG&E will follow its standard fire risk management procedures, including: - Safe work practices, training, and fire response. - Proposed Project personnel will be directed to park away from dry vegetation. - During fire season in designated State Responsibility Areas, all motorized equipment driving off paved or maintained gravel/dirt roads will have federally approved or State-approved spark arrestors. - All off-road vehicles will be equipped with a backpack pump (filled with water) and a shovel.	In compliance	Measures will continue to be implemented during construction. Implementation of this measure will be reported to the CPUC as needed.

Measure Number	Measure Text	Status	Compliance Notes
	<ul style="list-style-type: none"> - Fire-resistant mats and/or windscreens will be used when welding. In addition, during fire “red flag “conditions (as determined by the California Department of Forestry and Fire Protection), welding will be curtailed. - Every fuel truck will carry a large fire extinguisher with a minimum rating of 40 B:C, and all flammable materials will be removed from equipment parking and storage areas. - Coordinate procedures with federal and local fire officials. -Identification of daily site-specific risk conditions. 		

Session Information			
Course Name	Course Code	Start Time	End Time
Manning Project_Required Env Training	ENVR-9100	7:00	8:00
Training Location Name		city, and zip)	
Virtual		Microsoft Teams	
Instructor	Instructor LAN ID	Instructor Personnel #	Training Date
Elizabeth Pritchard	enp0	240336	2/5/2026

Additional Information required ONLY if an external vendor or instructor was used	
External Instructor Name	External Instructor Company

Attendee Information			
First Name	Last Name	Personnel #	Lan Id
Courtney	Faulkenberry		CRFJ
Shawn	Dyer		S1DW
Jake	Samuelson		JR3S
Justin	Thomas		JUTV
Chip	Meredith		ACMZ
Fredi	Orellana		FXOS

From: George Dix <George.Dix@ascent.inc>
Sent: Wednesday, February 25, 2026 8:13 AM
To: Pritchard, Elizabeth <enp0@pge.com>
Cc: Alexander, Tommy <Tommy.Alexander@cpuc.ca.gov>; Michael Tom <mtom@rinconconsultants.com>
Subject: [EXT] RE: Manning Substation: WEAP Training

CAUTION: This email originated from outside of Rincon Consultants. Be cautious before clicking on any links, or opening any attachments, until you are confident that the content is safe .

Hi Liz,

Thanks for hosting the WEAP virtually. It covered everything mentioned in the mitigation/construction measures, which was good.

Your list below is correct, but if it is supposed to be limited to Ascent staff only, Isidro does not work for Ascent.

Thanks,

George Dix

D 510.327.7751 | M 510.549.6322

From: Pritchard, Elizabeth <ENPO@pge.com>
Sent: Wednesday, February 25, 2026 5:06 AM
To: George Dix <George.Dix@ascent.inc>
Cc: Alexander, Tommy <Tommy.Alexander@cpuc.ca.gov>; Michael Tom (<mtom@rinconconsultants.com>
<mtom@rinconconsultants.com>
Subject: RE: Manning Substation: WEAP Training

Classification: Internal

Hi George,

Thank you for helping coordinate the WEAP training yesterday afternoon. For our records, I will document the following folks as having completed the training. If I missed anyone, please let me know.

- Nick Kryshak
- Michael Pero
- Isidro Ponce
- George Dix

Thanks so much!

Liz

Elizabeth Pritchard | Senior Land Planner
Pacific Gas and Electric Company
| 559.339.9827 cell | elizabeth.pritchard@pge.com

