

December 19, 2025

Tommy Alexander
Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Notice to Proceed (NTP) Request to Construct the Manning 500/230 kilovolt (kV) Substation Project.

Mr. Alexander:

On September 18, 2025, the California Public Utilities Commission (CPUC) voted to grant LS Power Grid California (LSPGC) a Certificate of Public Convenience and Necessity (CPCN) (Final Decision D25-09-013) for the Manning 500/230 kV Substation Project (Project) as further described in the Final Initial Study/Mitigated Negative Declaration (Final IS/MND) dated June 21, 2025 (State Clearinghouse No. 2025030618), contingent upon implementation of the Mitigation Monitoring, Compliance and Reporting Program (MMCRP).

All preconstruction requirements of the MMCRP applicable to substation construction have been satisfied. LSPGC requests that the CPUC issue a Notice to Proceed (NTP) with construction of a portion of the Project limited to all activities required to construct and operate the new Manning Substation, as shown in *Attachment A – Project Components Map*. This first NTP request is herein referred to as NTP-1; the complete list of anticipated NTPs for the Project is provided below:

- NTP-1: All activities required to construct and operate the Manning Substation;
- NTP-2: All activities required to construct and operate the Manning 230 Kilovolt Transmission Line

1.0 Location of Project Components

The work activities covered under this NTP-1 request would occur on an undeveloped, approximately 40-acre site in unincorporated western Fresno County, California. The Manning Substation site is located about 0.85 miles southwest of the Interstate 5/Manning Avenue Interchange, 1.5 miles east of the Bureau of Land Management's Tumey Hills recreation area, and south of Manning Avenue. Please refer

to *Attachment A – Project Components Map* to view the requested NTP-1 components and work areas.

2.0 Description of Activities Included within the NTP-1 Request

The Project components included in this NTP-1 request and described herein are consistent with the descriptions contained within the Final IS/MND and the Final Decision. *Attachment A – Project Components Map* presents the work activities associated with this NTP-1 request that will cause temporary and permanent disturbances at the Project site. As discussed in Chapter 2.0 of the Final IS/MND, the Project activities will be substantially similar to those in the Final IS/MND, with some minor details that may vary based on final engineering and constructability review. Those details are shown in Section 3.0 (Project Updates) below.

This NTP-1 requests authorization for all construction activities associated with the Manning Substation (i.e., substation access road, site development, below grade construction, above grade construction, testing and commissioning). This first phase of the Project will construct the new Manning Substation, which will include seven 500/230 kV transformer units, two series capacitors, gas-insulated switchgear, access roads, below ground conductor/cable, above-grade structures (e.g., electrical enclosures, tubular steel poles), telecommunication lines, stormwater detention basin, and ancillary components.

This NTP-1 request also includes the utilization of the substation property (approximately 40 acres) as a temporary construction staging area. The staging area may be used as a refueling area for vehicles and construction equipment; for equipment assemblage and storage; and for workers to park their vehicles and meet daily. In addition, the temporary staging area may be utilized for spreading spoils or as a borrow area for construction of the components included in this NTP-1 request.

3.0 Project Updates

The Project components described above are consistent with the descriptions contained within the Project's Final IS/MND and Final Decision, with the addition of minor design and engineering details that were not available during preparation of the Final IS/MND. Minor design changes include the slight reduction of the height of the interlocking substation fence from 10 feet to 8 feet, based on final security requirements. Additionally, agricultural irrigation equipment at the southwestern corner of the substation property's 160-acre parent tract was identified as a nearby source of water for dust control. The source of the water is Westlands Water District. LSPGC will purchase the water from either Westlands Water District or a private landowner. This water supply point would be

accessed via an existing road along the edge of the larger 160-acre parent tract, as shown in Attachment A. Using this nearby water source is consistent with the language of the final IS/MND, which specifies that "Water used for construction activities (e.g., for dust suppression and compaction requirements) would be trucked in from Westlands Water District or other sources, including private sources that have sufficient supply available for construction." Minor modifications to the water supply point (i.e., above ground irrigation connection) may be required to supply water.

4.0 Construction Schedule and Duration

Construction associated with the NTP-1 activities is anticipated to begin February 2026 and conclude June 2028. Construction activities at the Project site will generally be scheduled to occur during daylight hours six days per week (Monday through Saturday). Night work is not anticipated to be necessary, but in case it is required, the CPUC would be notified prior to activities occurring. Construction activities could infrequently be scheduled outside of these hours to avoid or reduce schedule delays, complete construction activities, such as continuous concrete pours, to accommodate the schedule for system outages, or to address emergencies.

5.0 Preconstruction Document Approvals Required for NTP-1

As outlined within the final Mitigation Measures (MMs) (refer to Final Decision), LSPGC must submit certain documentation and obtain CPUC approval prior to starting construction activities. For the purposes of compliance with Applicant Proposed Measures (APMs) and MMs, construction is defined as localized, direct ground-breaking or disturbance of existing features or the delivery of construction materials or equipment to a Project location. Construction activities include installation of security (e.g., chain-link) fencing, stormwater Best Management Practices (BMPs) and/or demolition/removal of similar features. These activities will not be conducted prior to issuance of an NTP. Survey-related work (environmental or civil), including staking and marking/flagging of environmentally sensitive areas, does not constitute construction activities and, therefore, can (and in some cases must) occur prior to the NTP-1.

In accordance with the Final IS/MND and terms of the MMCRP, the following pre-construction submittal documents have been completed (and approved where required) prior to submittal of this NTP-1 request:

- Plans Requiring CPUC Approval
 - Worker Environmental Awareness Program – Final version approved by the CPUC via email on November 21, 2025.

- Construction Fire Prevention Plan – Final version approved by the CPUC on November 10, 2025.
- Restoration Plan - Final version approved by the CPUC on October 22, 2025.
- Plans Sent to CPUC for Recordkeeping Only
 - Spill Prevention, Control, and Countermeasure Plan
 - Hazardous Materials Management Plan
 - Stormwater Pollution Prevention Plan
 - Landowner Coordination Notification
 - Tier 4 Memorandum

Attachment B – MMCRP Requirements Tracking Table for NTP-1 contains a listing of all required pre-construction items, how LSPGC has fulfilled each requirement, and all applicable submittal and approval dates as they relate to substation construction.

6.0 Conformance to Pre-Construction Requirements

No construction activities will commence prior to completion of the applicable pre-construction requirements. With respect to those requirements, LSPGC has completed all pre-construction items outlined in *Attachment B (MMCRP Requirements Tracking Table for NTP-1)* which are applicable to the subject construction area of this NTP-1 request.

7.0 MMCRP Compliance Implementation

During construction of the components described herein, LSPGC will implement all applicable APMs and MMs as identified in the Project’s MMCRP. The applicability and status of all APMs and MMs included within the Project’s MMCRP is provided in *Attachment B – MMCRP Requirements Tracking Table for NTP-1*. The table is color coded for easy reference by applicability, timing, and status (if the measure contains a preconstruction requirement).

8.0 Permits and Approvals

Construction activities included in this NTP-1 request are anticipated to require the State and local permits listed in *Table 2* below. LSPGC will obtain all necessary permits prior to initiating the specific Project activities that trigger each permit requirement.

Table 2. NTP-1 Required Permits

Agency	Permit	Applicability to Project Component	Status
Fresno County	Road Improvement Permit	Improving County owned ROW on Manning Avenue to support transformer delivery	A road improvement permit will be obtained by LSPGC prior to improving the County owned ROW on Manning Avenue.
	Building and Grading Permits (nondiscretionary)	Construction of the control enclosure (building permit) and grading/fill for Orchard Substation pad (grading permit).	Grading permits will be obtained prior to the start of associated work activities. Building permits are not applicable per Section 15.08.030 (D) of the Fresno County Building Code.
	Subdivision Map Act	Authorization to subdivide private property.	As described in California Government Code § 66428 (a)(2) a parcel map is not required for land conveyance to a public utility. LSPGC closed on the substation parcel on December 12, 2025.
	Williamson Act Review	Construction of Project on land subject to a Williamson Act contract.	Williamson Act contract on the property was nullified upon LSPGC's purchase of the property.
San Joaquin Valley Air Pollution Control District (SJVAPD)	Rule 8021, Dust Control Plan (DCP)	Construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site.	<p>The Project's DCP was submitted to the SJVAPD on 11/12/2025 and is currently under review.</p> <p>No construction activities which trigger Rule 8021 will occur prior to receiving an approved DCP.</p>

Agency	Permit	Applicability to Project Component	Status
	Rule 9510, Indirect Source Review	Projects exceeding listed square footage thresholds (or two tons nitrogen oxides or respirable particulate matter) to submit Air Impact Assessment applications when applying for a final discretionary approval from a public agency.	Not applicable. Project does not meet the thresholds required to trigger an Air Impact Assessment. LSPGC documented the non-applicability in the Project's DCP submittal to SJVAPD.
State Water Resource Control Board (SWRCB)	National Pollutant Discharge Elimination System Permit (NPDES) Construction General Permit	Stormwater discharges associated with construction activities disturbing more than one acre of land.	LSPGC submitted a Notice of Intent for use of the Construction General Permit on 12/18/2025, WDID# Pending. No construction activities will begin until a WDID number is issued.

9.0 Request for Approval

LSPGC respectfully requests this NTP-1 to begin the substation work approved in Final Decision D25-09-013 by January 16, 2026. Should you have any questions or need additional information, please do not hesitate to contact me at (314) 886-1940 or by email at CEversen@LSPower.com.

Sincerely,



Clayton Eversen



Attachment A: Project Components Map









Attachment B: MMCRP Requirements Tracking Table for NTP

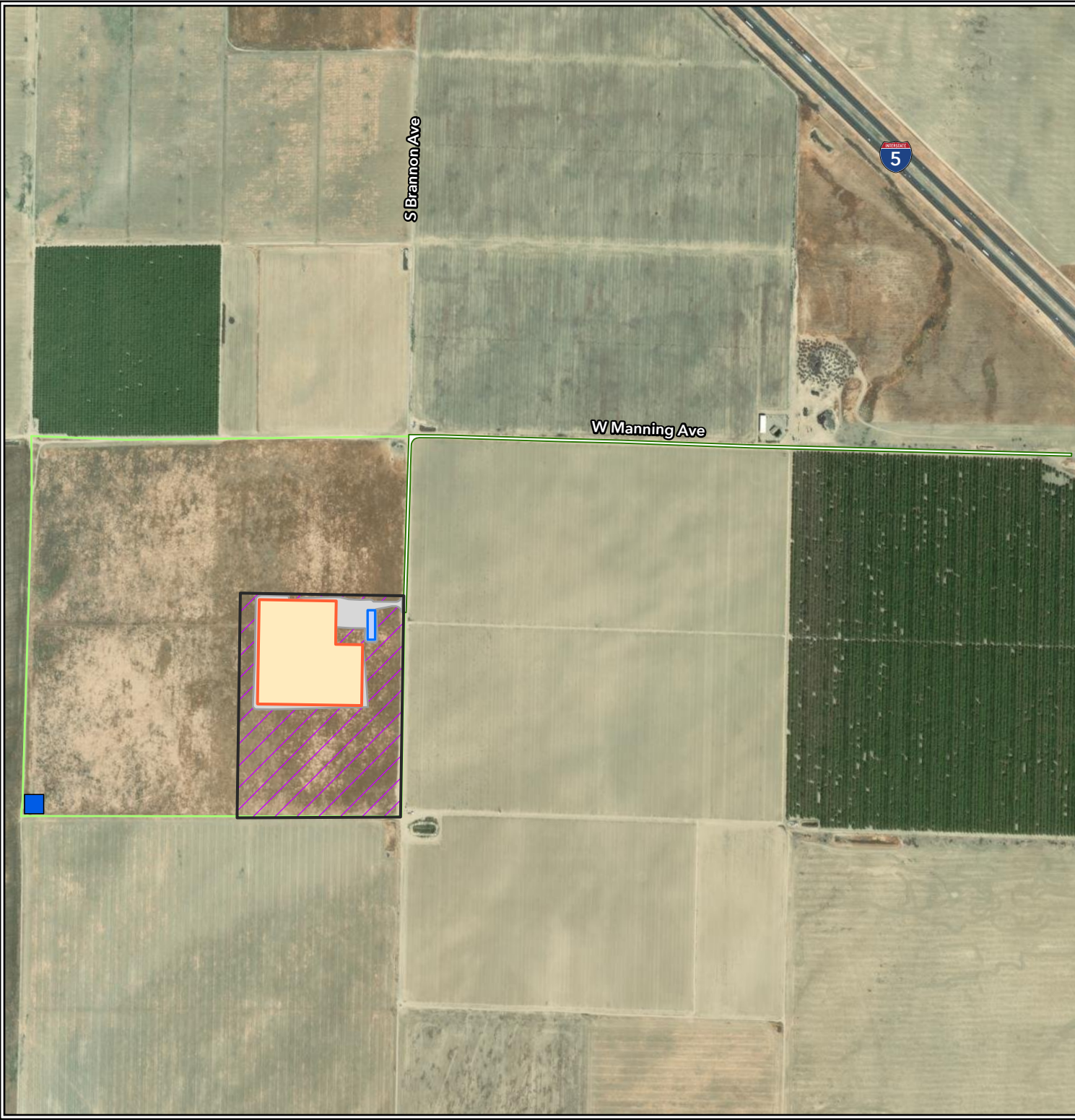
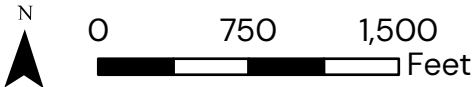
cc: Michelle Wilson, CPUC
George Dix, Ascent
Heather Blair, Ascent
Kari Zajac, Ascent
Douglas Mulvey, LSPGC
Margaret Bratcher, LSPGC
Dustin Joseph, LSPGC
David Wilson, LSPGC

ATTACHMENT A

MANNING 500/230 KV SUBSTATION PROJECT

Project Components

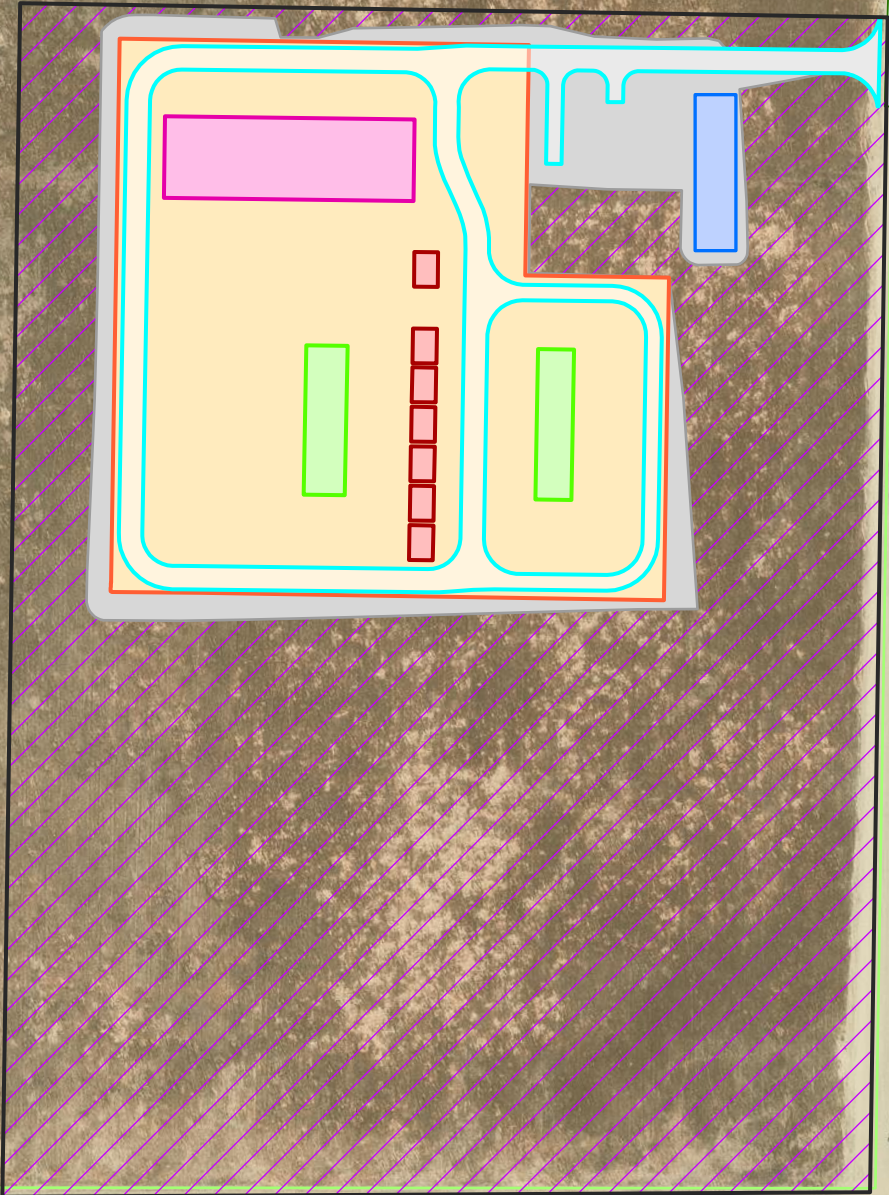
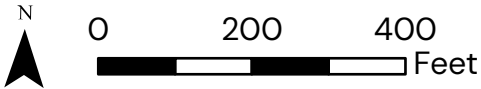
-  Water Supply Entrance
-  Existing Access Roads
-  Detention Basin
-  Extent of Grading
-  Manning Substation
-  Permanent Access Road Improvements
-  Staging Yard
-  Substation Parcel



MANNING 500/230 KV SUBSTATION PROJECT

Project Components

- Existing Access Roads
- Detention Basin
- Extent of Grading
- Fixed Series Capacitors
- GIS Halls
- Manning Substation
- Permanent Access Road Improvements
- Staging Yard
- Substation Driveway
- Substation Parcel
- Transformers



ATTACHMENT B

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
Aesthetics				
<p>APM AES-1: Staging Area Maintenance and Restoration. All Manning 500/230 Kilovolt Substation Project (Proposed Project) sites will be maintained in a clean and orderly state. Construction staging areas will be sited away from public view where possible. Temporary nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon completion of Proposed Project construction, staging and temporary work areas will be returned to pre-Proposed Project conditions, including regrading of the site and reseeding or repaving of disturbed areas to match pre-existing contours and conditions</p>	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction and upon completion of construction.	LSPGC and its contractors will implement this measure during construction activities.
Agricultural and Forestry Resources				
<p>APM AES-1: Landowner Coordination. LS Power Grid California, LLC (LSPGC) will coordinate with landowners prior to construction and during restoration efforts. Measures to be implemented may include, but are not limited to, the following:</p> <ul style="list-style-type: none"> □ Provide notice to landowners outlining construction activities and restoration efforts. □ Restore areas disturbed by construction of the Proposed Project in accordance with lease agreements, applicable operation and maintenance (O&M) standards, and environmental permit requirements. □ In areas containing permanent crops (e.g., grapevines or orchard crops) that must be removed to gain access to pole sites for construction purposes, LSPGC may provide compensation to the farmer and/or landowner in coordination with the landowner. 	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to construction and during post-construction restoration.	LSPGC will provide notice to the landowners within 300 feet of the substation construction activities at least 30 days prior to construction activities beginning. LSPGC submitted the memorandum that will be provided and a list of landowners to the CPUC on December 19, 2025.
Air Quality				
<p>Construction Measure AQ-A [PG&E] /Mitigation Measure AQ-1 [LSPGC]: The following measure shall apply for LSPGC and PG&E project components and shall supersede and replace LSPGC APM AIR-1 and PG&E CM AIR-1 as presented in the PEA:</p> <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 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>	LSPGC and PG&E	LSPGC and PG&E to maintain equipment list and provide upon request to CPUC, along with the memorandum. CPUC mitigation monitor to inspect compliance.	Prior to and during construction.	A Tier 4 Memorandum was developed and submitted to the CPUC on November 7, 2025. Additionally, LSPGC and its contractor will maintain an equipment list which can be provided to the CPUC upon request.

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NTP-1 Request
December 2025

Applicable to NTP – Measure to be implemented during construction/restoration/operation
Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
<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>APM AIR-2: Dust Control. Measures to control fugitive dust emissions will be implemented during construction. These measures will be included in a Fugitive Dust Control Plan that will be prepared in accordance with San Joaquin Valley Air Pollution Control District requirements. The measures will be implemented as needed to control dust emissions. These measures will include, but may not be limited to, the following:</p> <ul style="list-style-type: none"> □ Surfaces disturbed by construction activities will be covered or treated with a dust suppressant or water until the completion of activities at each site of disturbance. □ Inactive, disturbed (e.g., excavated or graded areas) soil and soil piles will be sufficiently watered or sprayed with a soil stabilizer to create a surface crust, or will be covered. □ Drop heights from excavators and loaders will be minimized to a distance of no more than 5 feet. Vehicles hauling soil and other loose material will be covered with tarps or maintain at least 6 inches of freeboard. □ Vehicles will adhere to a speed limit of 15 miles per hour (mph) on Proposed Project-specific construction routes and within temporary work areas. 	LSPGC	LSPGC to provide Fugitive Dust Control Plan. CPUC mitigation monitor to inspect compliance and verify report.	Dust control plan to be prepared prior to and implemented during construction.	<p>A Dust Control Plan was submitted to the SJVAPCD on November 12, 2025. The Dust Control Plan is currently under review with the SJVAPCD.</p> <p>No construction activities which trigger Rule 8021 will occur until an approved Dust Control Plan is received.</p>
Biological Resources				

Applicable to NTP – Measure to be implemented during construction/restoration/operation
Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
<p>Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts</p> <p>Special-status plant surveys described in APM BIO-4 and CM BIO-2 shall follow the CDFW <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (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> <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>	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	Submitted LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on October 9, 2025 via email.

Applicable to NTP – Measure to be implemented during construction/restoration/operation
Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
<p>Construction Measure BIO-B [PG&E] /Mitigation Measure BIO-2 [LSPGC]: Conduct Protocol-Level Surveys for Blunt-Nosed Leopard Lizard and Implement Avoidance Measures</p> <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> <ul style="list-style-type: none"> □ 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. 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. □ For project activities that could result in habitat removal: <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). □ For operation and maintenance activities that would not result in habitat removal: <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 a 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. □ 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 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 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of blunt-nosed leopard lizard.	Prior to and during project construction.	Submitted. While no areas of potential habitat (i.e., annual grasslands) occur within the area requested, LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on December 5, 2025 via email.

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Applicable to NTP – Measure to be implemented during construction/restoration/operation
Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
<p>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. 				
<p>Construction Measure BIO-C [PG&E] / Mitigation Measure BIO-3 [LSPGC]: Conduct Focused Surveys for Special-Status Reptiles and Implement Avoidance Measures</p> <ul style="list-style-type: none"> □ 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-foot buffer surrounding the project alignment area, which shall include walking linear transects. □ 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. □ 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 or will allow the individual to move out of the project area of its own volition if it is not in immediate danger. 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Up to 14 days prior to the start of construction and during construction, if applicable.	A preconstruction survey for special-status reptiles will be completed within 14 days before the initiation of any construction activity for substation activities within suitable habitat (i.e., annual grasslands, scrub) and within a 100 foot buffer of the project alignment. A report summarizing the results of the survey will be provided to the CPUC.
<p>Construction Measure BIO-D [PG&E] / Mitigation Measure BIO-4 [LSPGC]: Conduct Focused Surveys for Western Spadefoot Toads and Implement Avoidance Measures</p> <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> <ul style="list-style-type: none"> □ 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. 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS if western spadefoot toad is listed under the ESA.	Within 48 hours prior to the start of construction and during construction, if applicable.	Preconstruction surveys for western spadefoot toads are not required for substation construction since there is not habitat suitable for the species within the planned work area.

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Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP

Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
<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>				
<p>Construction Measure BIO-E [PG&E] / Mitigation Measure BIO-5 [LSPGC]: Implement Survey Area Minimums, Survey Timing Standards, and Applicable Protocols for Special-Status and Other Native Birds</p> <p>The following measure shall supplement the requirements in APMs BIO-18 and BIO-20 (for LSPGC components) and CM BIO-8 (for PG&E 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 CM BIO-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 <i>Recommended Timing and</i></p>	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction and during construction, as applicable.	Since substation construction is scheduled to occur within the nesting bird season (Feb 1 – Sept 15) a preconstruction nesting bird survey and a preconstruction Swainson Hawk survey will be completed 10 days before the initiation of any construction activity for substation activities. A report(s) summarizing the results of the survey will be provided to the CPUC.

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<p><i>Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley</i> (Swainson's Hawk Technical Advisory Committee 2000).</p> <ul style="list-style-type: none"> □ 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. □ 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. □ 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 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. 				
<p>Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures</p> <p>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.</p> <p>LSPGC and PG&E Construction Activities and LSPGC O&M Operational Activities</p> <ul style="list-style-type: none"> □ 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 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of burrowing owl.	Prior to project construction and during construction, as applicable.	<p>Submitted LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on December 18, 2025 via email.</p> <p>A take avoidance survey will also be conducted for the substation construction. The survey will be completed within 14 days prior to the beginning of ground disturbing activities associated with</p>

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<p>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> <ul style="list-style-type: none"> □ 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. □ 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. <ul style="list-style-type: none"> ▪ 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. ▪ 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. ▪ 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. ▪ Locations of burrowing owls detected during surveys shall be reported to the CNDDDB within 30 days. <p>□ PG&E O&M Activities</p> <ul style="list-style-type: none"> □ PG&E shall consult with CDFW to determine the appropriate protective buffer distance for active burrowing owl burrows detected in or within 1,640 feet of the project alignment area to avoid take 				substation construction.

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of burrowing owls from O&M activities.				
<p>Construction Measure BIO-G [PG&E] / Mitigation Measure BIO-7 [LSPGC]: Implement Limited Operating Period, Conduct Focused Surveys, and Implement Avoidance Measures for Crotch’s Bumble Bee</p> <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> <ul style="list-style-type: none"> □ 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. <ul style="list-style-type: none"> □ 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. □ 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. □ 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: <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 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as applicable, regarding presence of Crotch’s bumble bee.	Prior to project construction and during construction, as applicable.	<p>Since initial ground disturbing activities for substation construction will be occurring within the August 15–March 15 timeframe a habitat assessment and focused survey for Crotch’s bumblebee is not required</p> <p>Additionally, the substation construction activities do not contain grassland habitat, grasses, or forbs.</p>

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<p>original conditions after the temporary disturbance is complete such that habitat for Crotch's bumble bee would be available.</p> <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; ▪ 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); ▪ 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>□ 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>				
<p>Construction Measure BIO-1 [PG&E] / Mitigation Measure BIO-8 [LSPGC]: Conduct Focused Surveys for American Badger and Implement Avoidance Measures</p> <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 APM BIO-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. 	LSPGC and PG&E	LSPGC and PG&E to provide survey results.	Prior to project construction and during construction.	A preconstruction survey for American Badger will be completed within 14 days before the initiation of any construction activity for substation activities within suitable habitat. A report summarizing the results of the survey will be provided to the CPUC.

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<ul style="list-style-type: none"> 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. <p>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 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>				
<p>Construction Measure BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC]: Conduct Focused Surveys for San Joaquin Kit Foxes and Implement Avoidance Measures</p> <p>The following measures, in accordance with the <i>USFWS Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance</i> (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> <ul style="list-style-type: none"> 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. 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 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. 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. 	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW and USFWS, as applicable, regarding presence of San Joaquin kit fox.	Prior to project construction and during construction, and during construction as applicable.	<p>A preconstruction San Joaquin kit fox survey will be conducted for the substation construction. The survey will be completed no less than 14 days and no more than 30 days prior to the beginning of ground disturbing activities associated with substation construction. Written results of the preconstruction survey will be delivered to the CPUC within five days after the survey and prior to the start of ground disturbing activities.</p> <p>LSPGC and its contractors will implement this measure during construction activities.</p>

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<ul style="list-style-type: none"> ▪ 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. ▪ 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. □ During construction, LSPGC and PG&E shall observe the following measures throughout the project alignment area to minimize impacts on San Joaquin kit fox: <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. ▪ 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 kit foxes 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. 				

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<ul style="list-style-type: none"> • 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. 				
<p>Construction Measure BIO-K [PG&E] / Mitigation Measure BIO-10 [LSPGC]: Implement Avoidance Measures for State or Federally Protected Wetlands and Obtain Permits for Impacts on Wetlands</p> <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> <ul style="list-style-type: none"> ▪ 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>□ 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 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>	LSPGC and PG&E	<p>LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance.</p> <p>Coordination with USACE and RWQCB, as applicable, regarding presence of state or federally protected wetlands.</p>	Prior to project construction and during construction.	LSPGC and its contractors will implement this measure during construction activities and delineate the specified areas. There are no state or federally protected wetlands identified within the substation construction area.

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<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>				
<p>Construction Measure BIO-L [PG&E] / Mitigation Measure BIO-11 [LSPGC]: Develop and Implement an Avian Protection Plan □ 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. □ 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.</p>	LSPGC and PG&E	LSPGC to provide Avian Protection Plan. CPUC mitigation monitor to inspect compliance through quarterly reports and verify report. LSPGC coordination with CDFW and USFWS for plan approval.	Prior to project construction (LSPGC) and during project construction (LSPGC and PG&E).	Submitted LSPGC submitted the avian protection plan to the CDFW and USFWS for review on November 7, 2025, via email, meeting the 60 day requirement.
<p>APM BIO-1: Avoid Environmentally Sensitive Areas. Biological field surveys will be performed for any portion of the Proposed Project area not yet surveyed (e.g., areas that did not have landowner access, new or modified staging areas, pull sites, or other work areas). Sensitive biological resources or areas discovered during surveys will be subject to a buffer from construction activities in accordance with the applicable Proposed Project applicant-proposed measures (APMs). The findings of all biological field surveys on portions of the Proposed Project area not yet surveyed will be provided to the California Public Utilities Commission (CPUC) prior to construction commencing within those areas.</p>	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	All areas of the substation construction area have been surveyed. LSPGC provided these results in the initial BRTR (submitted with the PEA) and the BRTR Addendum (submitted on May 29, 2025).
<p>APM BIO-2: Develop and Implement Restoration Plan. A Proposed Project-specific restoration plan will be prepared for areas to be temporarily disturbed by the Proposed Project. Actively cultivated agricultural fields, developed areas, or habitats disturbed as a result of activities not related to the Proposed Project will not be subject to the restoration plan. The restoration plan will include procedures for restoration activities, including plant species to be reseeded, procedures to reduce</p>	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance and approve the report.	Restoration Plan to be developed prior to project construction.	Submitted (Approved). The Project’s Restoration Plan was submitted to the CPUC on October 10, 2025 and approved by the CPUC on October 22,

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weed encroachment, and expected timeframes for restoration. Reseeding activities will be conducted in accordance with the Proposed Project Storm Water Pollution Prevention Plan. The restoration plan will be submitted to the CPUC for approval prior to the start of construction activities.			Restoration Plan to be implemented following project construction.	2025.
<p>APM BIO-3: Worker's Environmental Awareness Program. A Worker's Environmental Awareness Program (WEAP) will be designed, implemented, and provided to all Proposed Project personnel, including construction supervisors and field personnel, prior to personnel commencing work on the Proposed Project. The WEAP will inform all construction personnel of the resource protection and avoidance measures, as well as procedures to be followed upon the discovery of environmental resources. Additionally, the WEAP will train all construction personnel on hazardous materials management, hazardous wastes and stained or odiferous soils identification, and applicable regulations. The WEAP training will include, at a minimum, the following topics so crews will understand their obligations:</p> <ul style="list-style-type: none"> □ A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to environmental and biological resource protection; □ Training on how to identify sensitive or special-status biological resources, environmentally sensitive area (ESA) boundaries, housekeeping (i.e., trash and equipment cleaning), safety, work stoppage, and communication protocol; □ A discussion of procedures to be followed in the event that unanticipated sensitive or special-status biological resources are discovered during implementation of the Proposed Project; □ A discussion of disciplinary and other actions that could be taken against persons violating environmental and biological resource protection laws and applicant policies; □ Training on the handling, storage, and disposal of hazardous materials and wastes in accordance with applicable regulations; □ Training on the identification of potentially hazardous wastes and stained or odiferous soils; and □ A statement by the construction company or applicable employer agreeing to abide by the WEAP and other applicable laws and regulations. <p>The WEAP will be submitted to and approved by the CPUC prior to construction.</p>	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction. To be completed for all new personnel.	Submitted (Approved). The Project's WEAP was submitted to the CPUC and was approved on November 21, 2025. WEAP sign-in sheets will be kept as part of the Project record and will be provided to the CPUC upon request. Additional trainings will be held for new workers as needed throughout construction.
<p>APM BIO-4: Pre-Construction Plant Surveys. 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. Surveys will be conducted during the appropriate bloom period for Lost Hills crownscale and Panoche pepper-grass (i.e., April to September and February to June, respectively). No surveys will be conducted in actively cultivated agricultural fields, bare ground, or developed areas. In the event of the discovery of a previously unknown special-status plant, the area will be marked as a sensitive area and will be avoided to the maximum extent practicable. If avoidance of species listed under the federal Endangered Species Act (FESA) or</p>	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if listed species are present.	Prior to project construction. During project construction, if appropriate.	Submitted. LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on October 9, 2025 via email.

Manning 500/230 kV Substation Project
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California Endangered Species Act (CESA) is not possible, the United States Fish and Wildlife Service (USFWS) and/or the California Department of Fish and Wildlife (CDFW) will be consulted. Any other construction activities that may impact sensitive biological resources, including movement of construction equipment and other activities outside of the fenced/paved areas, will be monitored by a qualified biologist. The monitor/inspector will have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.				
APM BIO-5: Vehicle Cleaning. Prior to their initial arrival on the Proposed Project site, all construction equipment and vehicles that will travel or operate within annual grassland habitats and/or outside of approved access roads/designated parking areas (e.g., staging yards) within these habitats will be cleaned to avoid spread of noxious weeds and non-native invasive plant species.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to project construction.	LSPGC and its contractor will implement this measure during construction activities.
APM BIO-7: Pre-Construction Giant Kangaroo Rat Surveys. Prior to the initiation of construction, a qualified biologist will conduct protocol-level surveys of the Proposed Project work area for giant kangaroo rat. Surveys will be confined to Proposed Project work areas within annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. Surveys will conform to the methodology outlined in the San Joaquin Kangaroo Rat Trapping Protocol (USFWS 2013). If species presence is determined through these surveys, the USFWS and CDFW will be consulted to ensure compliance with the FESA and CESA, respectively, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if giant kangaroo rat is present.	Prior to project construction.	Submitted LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on December 12, 2025 via email.
APM BIO-8: Pre-Construction San Joaquin Kit Fox Surveys. Prior to the initiation of construction, a qualified biologist will conduct protocol-level surveys of the Proposed Project work area for San Joaquin kit fox. Surveys will be confined to Proposed Project work areas within annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. Surveys will conform to the methodology outlined in the Standardized Recommendations for Protection of the Endangered San Joaquin Kit Fox Prior to or During Ground Disturbance (USFWS 2011). If species presence is determined through these surveys, the USFWS and CDFW will be consulted to ensure compliance with the FESA and CESA, respectively, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if San Joaquin kit fox is present.	Prior to project construction.	Superseded by Mitigation Measure BIO-9 A preconstruction San Joaquin kit fox survey will be conducted for the substation construction. The survey will be completed no less than 14 days and no more than 30 days prior to the beginning of ground disturbing activities associated with substation construction. Written results of the preconstruction survey will be delivered to the CPUC within five days after the survey and prior to the start of ground disturbing activities.

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<p>APM BIO-9: Pre-Construction San Joaquin Antelope Squirrel Surveys. Prior to the initiation of construction, a qualified biologist will conduct focused surveys of the Proposed Project work area for San Joaquin antelope squirrel in annual grassland habitats, as well as disturbed habitats and agricultural areas within a 500-foot radius of annual grassland habitats. If species presence is determined through these surveys, the CDFW will be consulted to ensure compliance with the CESA, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval in accordance with APM BIO-10.</p>	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with CDFW, as appropriate, if San Joaquin antelope squirrel is present.	Prior to project construction.	Submitted LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on December 12, 2025 via email.
<p>APM BIO-10: Burrow and Den Avoidance. If occupied burrows or dens are found during pre-construction wildlife and burrow surveys, adequate buffers will be established around burrows. Adequate buffers will be determined by a qualified biologist based on field conditions and resource agency guidelines. If avoidance of species listed under the FESA or CESA is not possible, the USFWS and/or CDFW will be consulted, and species-specific mortality reduction or avoidance plans will be developed for agency review and approval, as appropriate. These plans may include, but will not be limited to the following:</p> <ul style="list-style-type: none"> □ Detailed description of trapping methodology, □ Detailed burrow excavation methods, □ Release location(s), □ Detailed release methods, □ Artificial burrow design and installation methods, □ Description of exclusion fencing type and implementation, and □ Identification of a wildlife rehabilitation center or veterinary facility capable of and willing to treat injured special-status species. <p>Any other construction activities that may impact burrows occupied by special-status species (including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat) will be monitored by a qualified biologist. The monitor/inspector will have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.</p>	LSPGC (note APM BIO-10 has been superseded by Mitigation Measure BIO-6 for burrowing owl)	CPUC mitigation monitor to inspect compliance. Coordination with USFWS and/or CDFW, as appropriate, if species are present.	Prior to project construction and during construction.	If occupied burrows or dens are identified during preconstruction surveys, adequate buffers will be identified and implemented to protect the burrows/dens.
<p>APM BIO-11: Vehicle Travel. Vehicles will adhere to a speed limit of 15 mph on Proposed Project-specific unpaved construction routes where no posted speed limit exists and within temporary work areas. In addition, construction and maintenance employees will be required to stay on established and clearly marked and existing roads and within the limits of disturbance except when not feasible due to physical or safety constraints and will be advised that care should be exercised when commuting to and from the Proposed Project area to reduce accidents and animal road mortality.</p>	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.	LSPGC and its contractor will implement this measure during construction activities.

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APM BIO-12: Trapped Animal Prevention. All excavated holes/trenches that are not filled at the end of a workday will be covered, or a wildlife escape ramp will be installed to prevent the inadvertent entrapment of wildlife species.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.	LSPGC and its contractor will implement this measure during construction activities.
APM BIO-13: Delineation of Work Areas. All work areas within the Proposed Project area will be clearly delineated with fencing, staking, or flags prior to construction commencing. Construction activities will be restricted to delineated work areas, and all delineation will be maintained in working order until completion of construction.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	LSPGC and its contractor will delineate the work areas associated with substation construction.
APM BIO-14: Project Lighting. The use of outdoor lighting during construction and O&M will be minimized whenever practicable. Photocell-controlled lighting (i.e., motion detection) will be provided at a level sufficient to provide safe entry and exit to the proposed LSPGC Manning Substation and control enclosures. All lighting will be selectively placed, shielded, and directed downward and away from sensitive habitat and resources to the maximum extent practicable.	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction and operation.	LSPGC and its contractor will implement this measure during construction activities and O&M activities.
APM BIO-18: Nesting Bird Avoidance. If feasible, construction and vegetation trimming/removal will be avoided during the migratory bird nesting or breeding season (i.e., February 15 to August 31). When it is not feasible to avoid construction during the nesting or breeding season, a survey will be performed in the area where the work is to occur. This survey will be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified, a suitable construction buffer (which will differ based on species and location of nest) will be implemented to ensure that the nesting or breeding activities are not substantially adversely affected. If the nesting or breeding activities are being conducted by a federally or state-listed species, the USFWS and CDFW will be consulted as necessary. Monitoring of the nest will continue until the birds fledge or construction is no longer occurring on the site.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USFWS and CDFW, as appropriate, if breeding activities are being conducted.	Prior to project construction. During construction, if appropriate.	Since substation construction is scheduled to occur within the nesting bird season (Feb 1 – Sept 15) a preconstruction nesting bird survey and a preconstruction Swainson Hawk survey will be completed 10 days before the initiation of any construction activity for substation activities. A report(s) summarizing the results of the survey will be provided to the CPUC.
APM BIO-19: Vegetation. Vegetation and tree removal will be limited to the minimum area necessary to allow construction to proceed.	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	LSPGC and its contractor will implement this measure during construction activities.
APM BIO-20: Raptor Nests. If a raptor nest is observed during pre-construction surveys, a qualified biologist will determine if it is active. If the nest is determined to be active, the biological monitor will monitor the nest to ensure that nesting or breeding activities are not substantially adversely affected. If the biological monitor determines that activities associated with the Proposed Project are disturbing or disrupting nesting or breeding activities, the biological monitor will make recommendations to reduce noise or disturbance in the vicinity of the nest, such as temporarily suspending work in the area. If the nest is determined to be inactive, the nest will be removed under direct supervision of the qualified biologist.	LSPGC	LSPGC to provide survey results. CPUC mitigation monitor to inspect compliance.	Prior to project construction. During construction, if appropriate.	If raptor nests are observed during preconstruction surveys and determined to be active, LSPGC will work with its contractor and a biological monitor to implement steps to reduce any adverse effects on the occupied nest.

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Cultural and Tribal Cultural Resources				
<p>Construction Measure CR-A [PG&E] / Mitigation Measure CR-1 [LSPGC]: Conduct Built Environment Historical Resources Surveys for Built Environment Resources</p> <p>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:</p> <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, private properties with access restrictions) within PG&E or LSPGC project component areas. (e.g. 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>	LSPGC and PG&E	LSPGC and PG&E to provide survey results.	Prior to project construction.	Submitted LSPGC completed the survey(s) detailed in this mitigation measure and provided documentation of the survey(s) to the CPUC on December 18, 2025 via email.
<p>Construction Measure CR-B [PG&E] / Mitigation Measure CR-2 [LSPGC]: Protect Historical Built Environment 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> <ul style="list-style-type: none"> ▶ 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. 	LSPGC and PG&E	LSPGC and PG&E to provide project redesign plans, if applicable. CPUC to review and approve revised plans.	Prior to project construction.	Since there were no built environment historical resources identified in the survey, there is no action required as part of this measure.
<p>Construction Measure CR-C [PG&E] / Mitigation Measure CR-3 [LSPGC]: Conduct Archaeological Resources Surveys and Avoid Archaeological Resources</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>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</p>	LSPGC and PG&E	LSPGC and PG&E to provide survey results. LSPGC and PG&E to provide project redesign plans, if applicable. CPUC mitigation monitor to inspect compliance and review and approve revised plans.	Prior to project construction. During project construction, if appropriate.	Submitted All areas of the substation construction area have been surveyed and were documented in the CRTR which was submitted as part of the PEA.

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<p>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>APM CUL-1: Cultural Resources Awareness Training. In accordance with this measure, the Proposed Project’s WEAP will include, at a minimum:</p> <ul style="list-style-type: none"> ▶ Training on how to identify potential cultural resources and human remains during the construction process; ▶ A review of applicable local, state, and federal ordinances, laws, and regulations pertaining to historic preservation; ▶ A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Proposed Project; ▶ A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and policies; and ▶ A statement by the construction company or applicable employer agreeing to abide by the WEAP, and other applicable laws and regulations. <p>The WEAP will be provided to all Proposed Project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. No construction worker will be involved in ground-disturbing activities without having participated in the WEAP.</p>	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to project construction. To be repeated for all new personnel.	Submitted (Approved). Then Project’s WEAP was submitted to the CPUC and was approved on November 21, 2025. WEAP sign-in sheets will be kept as part of the Project record and will be provided to the CPUC upon request. Additional trainings will be held for new workers as needed throughout construction.
<p>APM CUL-3: Inadvertent Discoveries. In the event that previously unidentified cultural resources are uncovered during implementation of the Proposed Project, all work within 50 feet of the discovery will be halted and redirected to another location. A qualified archaeologist(s) will inspect the discovery and determine whether further investigation is required. The qualifications of the archaeologist(s) will be approved by the CPUC. If the discovery can be avoided and no further impacts will occur, the resource will be documented on California Department of Parks and Recreation cultural resources records and no further effort will be required. If the resource cannot be avoided and may be subject to further impact, the significance and NRHP and CRHR</p>	LSPGC	LSPGC to provide treatment measures, if applicable. CPUC mitigation monitor to inspect compliance and verify treatment measures.	During project construction.	LSPGC and its contractor will implement this measure during construction activities.

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<p>eligibility of the resource will be evaluated and, in consultation with the CPUC, appropriate treatment measures will be determined. All work will remain halted until a Secretary of the Interior-qualified archaeologist approves the treatment measures. Preservation in place will be the preferred means to avoid impacts to significant historical resources. Consistent with California Environmental Quality Act (CEQA) Guidelines Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, and if the unearthed resource is prehistoric or Native American in nature, a Native American representative, in consultation with the CPUC, will develop additional treatment measures, such as data recovery consistent with CEQA Guidelines Section 15126.4(b)(3)(C-D). Archaeological materials recovered during any investigation will be curated at an accredited curation facility or transferred to the appropriate tribal organization.</p>				
Geology and Soils				
<p>APM GEO-1: Geological Hazards and Disturbance to Soils. The following measures will be implemented during construction to minimize impacts from geological hazards and disturbance to soils:</p> <ul style="list-style-type: none"> ▶ Keep vehicles and construction equipment within the limits of the Proposed Project and in approved construction work areas to reduce disturbance to topsoil. ▶ Prior to grading in temporary work areas, salvage topsoil to a depth of 6 inches or to the actual depth if shallower (as identified in a site-specific geotechnical investigation report) to avoid the mixing of soil horizons. ▶ Avoid construction in areas with saturated soils whenever practical to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure. ▶ Keep topsoil material on site in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporarily disturbed areas. Recontour temporarily disturbed areas following construction to match pre-construction grades. Site and manage on-site material storage in accordance with all required permits and approvals. ▶ Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Dispose of removed vegetation off site at an appropriate licensed facility, or it can be chipped on site to be used as mulch during restoration. 	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.	LSPGC and its contractor will implement this measure during construction activities.
Greenhouse Gas Emissions and Climate Change				

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<p>APM GHG-1: Greenhouse Gas Emissions Reduction During Construction. The following measures will be implemented during construction to minimize greenhouse gas emissions:</p> <ul style="list-style-type: none"> ▶ If suitable park-and-ride facilities are available in the Proposed Project vicinity, construction workers will be encouraged to carpool to the job site. ▶ On-road and off-road vehicle tire pressures will be inflated to manufacturer specifications; tires will be checked and reinflated at regular intervals. ▶ Demolition debris will be recycled for reuse to the extent feasible. ▶ Line power, instead of diesel generators, will be used at all construction sites where feasible. ▶ Construction equipment will be maintained per the manufacturer’s specifications. 	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.	LSPGC and its contractor will implement this measure during construction activities.
Hazards and Hazardous Materials				
<p>APM HAZ-1: Air Transit Coordination. LSPGC will implement the following protocols related to helicopter use during construction and air traffic:</p> <ul style="list-style-type: none"> ▶ LSPGC will comply with all applicable Federal Aviation Administration regulations regarding air traffic within 2 miles of the Proposed Project alignment. ▶ LSPGC’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. 	LSPGC	CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	LSPGC and its contractor will implement this measure during construction activities. Helicopter activities are not anticipated for substation construction.
Noise and Vibration				
<p>Mitigation Measure N-1 [LSPGC]: Implement Measures to Reduce Exposure of Noise-Sensitive Receptors to Construction-Generated Nighttime Noise</p> <p>Construction noise at Sensitive Receptor 1 (R1) (3,400 feet from the substation site) shall not exceed the County’s nighttime noise threshold of 45 dBA between the hours of 9:00 p.m. and 7:00 a.m. To minimize noise levels during nighttime construction activities and maintain nighttime noise below the abovementioned County threshold, LSPGC could implement the following measures during nighttime construction work at the Manning Substation site:</p> <ul style="list-style-type: none"> ▶ Maintain construction equipment and equip with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturer recommendations. Equipment engine shrouds shall be closed during equipment operation. ▶ Shut down motorized construction equipment when not in use to prevent idling. ▶ Locate construction equipment and staging areas as far as possible from nearby noise-sensitive land uses. 	LSPGC	CPUC mitigation monitor to inspect compliance.	During project construction.	LSPGC and its contractor will implement this measure during construction activities. LSPGC will notify the sensitive receptor at least 7 days in advance of nighttime work. If unanticipated work, including emergency situations, extends overnight, LSPGC will immediately notify the CPUC and notify the sensitive receptor.

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<ul style="list-style-type: none"> ▶ Equip construction equipment with back-up alarms with either audible self-adjusting backup alarms or alarms that sound only when an object is detected. ▶ Install noise control devices on construction equipment, which may include but are not limited to: high-efficiency mufflers; acoustic dampening; protected internal noise absorption layers; enclosures; alternatively powered equipment; and electric motors. ▶ LSPGC shall notify R1, the single-family residence on Manning Avenue near the proposed Manning Substation, of the expected nighttime work schedule at least 7 days in advance by mail, email, phone call, personal visit, or door hanger. The notice shall contain a contact and telephone number for receipt of any public complaints and questions. The contact shall be responsible for determining the cause of the complaint and implementing any possible measures to alleviate the problem. If unanticipated work, including in emergency situations, extends to the hours of 9:00 p.m. to 7:00 a.m., LSPGC will immediately notify the CPUC and notify R1 via mail, email, phone call or personal visit 				
Utilities and Service Systems				
<p>APM UTIL-1: Conduct an Induction Study. An induction study will be conducted to evaluate the potential effects of the Proposed Project on pipelines in its vicinity. The study will comply with all national and international standards in addition to the following standards:</p> <ul style="list-style-type: none"> ▶ Pipeline Company Standards and Standard Operating Procedures; ▶ Federal Department of Transportation Part 192 Regulations; ▶ National Association of Corrosion Engineers (NACE) SP0177-2014 Standard Practice; ▶ NACE SP21424-2018 Standard Practice; and ▶ Institute of Electrical and Electronics Engineers Standard 80 Guide. <p>The study will model the electrical interference effects on pipelines during different electrical conditions, such as maximum load and fault conditions. Additionally, the study will perform a coating stress voltage and alternating current (AC) density analysis on the pipelines. The induction study will recommend AC mitigation methods based on the findings. Recommendations of the study will be incorporated into the final engineering and design for the Proposed Project as needed to ensure compliance with applicable standards.</p>	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance and verify final engineering and design.	Prior to project construction.	The induction study is not applicable to the substation components of the project, as no pipelines would be parallel to LSPGC overhead lines within this area, and overhead lines outside of the substation would not be constructed as part of this NTP.
Wildfire				
<p>APM FIRE-1: Construction Fire Prevention Plan. A Proposed Project-specific Construction Fire Prevention Plan (CFPP) will be prepared and submitted to the CPUC for review prior to initiation of construction. The CFPP will be fully implemented throughout the construction period and will include, at a minimum, the following:</p> <ul style="list-style-type: none"> ▶ The purpose and applicability of the plan; 	LSPGC	LSPGC to provide final Construction Fire Prevention Plan. CPUC mitigation monitor to inspect compliance and review final plan.	Prior to and during project construction.	Submitted (Approved). The Project's Construction Fire Prevention Plan was submitted to the CPUC on November 7, 2025 and approved by the CPUC on
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Attachment B: MMCRP Requirements Tracking Table for NTP-1

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
<ul style="list-style-type: none"> ▶ Responsibilities and duties; ▶ Preparedness training and drills; ▶ Procedures for fire reporting, response, and prevention that include the following: <ul style="list-style-type: none"> ▪ Identification of daily site-specific risk conditions, ▪ The tools and equipment needed on vehicles and to be on hand at sites, ▪ Reiteration of fire prevention and safety considerations during tailboard meetings, and ▪ Daily monitoring of the red flag warning system with appropriate restrictions on types and levels of permissible activity; ▶ Coordination procedures with federal and local fire officials; ▶ Crew training, including fire safety practices and restrictions; and ▶ Method(s) for verifying that all Plan protocols and requirements are being followed. <p>A Proposed Project Fire Marshal or similarly qualified position will be established to enforce all provisions of the CFPP, as well as perform other duties related to fire detection, prevention, and suppression for the Proposed Project. Construction activities will be monitored to ensure implementation and effectiveness of the CFPP.</p>				November 10, 2025.

Applicable to NTP – Measure to be implemented during construction/restoration/operation
Applicable to NTP – Pre-Construction Status Complete/Approved
Not Applicable to NTP