

Richard Quasarano SOCRE Environmental Project Manager San Diego Gas & Electric Company (T) 858-654-8211

December 16, 2022

Louis Torres Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Minor Project Refinement No. 15 for the South Orange County Reliability Enhancement Project.

Mr. Torres:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 15 (MPR-15) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-15 will authorize the use of two new temporary work areas contiguous with the approved Location 50 work area, on its east and west sides. The requested additional work areas will total approximately 2,925 square feet, or 0.07 acre. Please refer to **Attachment B, MPR-15 Figure** and **Attachment C, MPR-15 Site Photographs** to view the MPR-15 work areas.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-15 Figure

Attachment C: MPR-15 Site Photographs

Preconstruction Requirements and Permit/Approvals

Approval of MPR-15 will not change the conditions set forth in the CPUC's Notice to Proceed No. 7 (NTP-7) approval letter dated February 04, 2021, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction requirements described in NTP-7. The approval of MPR-15 will also not change the conditions set forth in the Amended Request for Environmental Impact Report (REIR) approval issued by Marine Corps Base Camp Pendleton (MCBCP) on September 7, 2022. No additional permits are anticipated to be required for MPR-15 activities.

MPR-15 Request for Approval

SDG&E respectfully requests approval of MPR-15 to utilize the new temporary work areas near Location 50, by January 13, 2023. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,

Richard Quasarano

SOCRE Environmental Project Manager

cc: Kevin Kimball, Ecology and Environment, Inc.

Omar Miranda, SDG&E

Kenda Pollio, KP Environmental

ATTACHMENT A MPR-15 Form



South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: J	January 23, 2023		Report No.: 15			
Date Approved: TBD			Approval Agency: California Public Utilities Commission (CPUC).			
Property Owner(s): The Minor Project Refinement No. 15 (MPR-15) temporary work areas are located entirely within the SDG&E right-of-way (ROW) on Marine Corps Base Camp Pendleton (MCBCP) property.			Location/Milepost: The MPR-15 temporary work areas are contiguous with the Location 50 work area south of Avenida Pico in San Diego County.			
 Land Use/Vegetative Cover: The land use and vegetative cover for the proposed MPR-15 work areas is estimated as follows: Location 50 Additional Work Area (western work area) – 1,600 sf (0.04 acre) in disturbed. Location Z100153 Additional Work Area (eastern work area) – 1,325 sf (0.03 acre) in disturbed. 			Sensitive Resources: The MPR-15 work areas are located in an area with undetermined paleontological potential. There is also potential for cultural resources in the area. See resource discussions below.			
Modification From:	☐ Permit ☐ Mitigation ☐ Measure	Plan/Pro	cedure Specification Drawing			

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-15 for two new temporary work areas for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work areas are contiguous with the approved Location 50 work area, on its east and west sides. Location 50 was previously approved in Notice to Proceed No. 7 (NTP-7). The MPR-15 work areas will total approximately 2,925 square feet (0.07 acre).

The western MPR-15 temporary work area is being included as part of the corrective action for the compliance incident that took place on November 29, 2022. The area was mowed outside of the approved work limits during vegetation trimming activities at Location 50. The Project does not currently anticipate the use of this western area, but the additional temporary impact is being recorded in MPR-15 for the Project record.

The eastern MPR-15 temporary work area is required in order to access the remove-from-service (RFS) pole Z100153. Existing RFS pole Z100153 was mapped incorrectly in the NTPR-7 Mapbook and its true position falls outside of the approved Project work areas (See **Attachment B, MPR-15 Figure**). The pole will be accessed from the east via the existing access road. The pole will be dismantled by crane and hauled away by a flatbed truck as described in Section 2.4.5.4 of the FEIR. The concrete foundation will be jackhammered and removed with an excavator. There is no ground disturbance anticipated to be required within the MPR-15 work areas with the exception of the Z100153 pole removal activities.

Following the use of the MPR-15 temporary work areas, the sites will be stabilized in accordance with the Stormwater Pollution Prevention Plan (SWPPP).

Describe how project refinement deviates from current project. Include photos.

Original Condition: The MPR-15 work areas were not included in the approved Project. However; the MPR-15 work areas are located within the geographic study area of the Final Environmental Impact Report (FEIR), and therefore have been previously analyzed. Since the approval of NTPR-7, it was discovered that Z100153 was mapped incorrectly, and its true position is approximately 50 feet south of where it is mapped in NTPR-7. This has resulted in the need for the eastern MPR-15 work area for the reasons described below.

Justification for Change:

The construction contractor identified the need to utilize the eastern MPR-15 work area in order to access the RFS pole Z100153. RFS pole Z100153 is currently located approximately 50 feet south of its original mapped location within the 12A work area due to a mapping error. It now falls outside of the approved Project work areas (See **Attachment B, MPR-15 Figure**). Therefore, MPR-15 is proposing the use of the eastern additional work area and associated land disturbance that was not included in NTPR-7, but is necessary to construct the Project as described in Section 2.3.3.1 of the Final Environmental Impact Report (FEIR) and the REIR approved by the MCBCP. The pole will be accessed from the east via the existing access road. The pole cannot be accessed from the west (existing Location 50 work area) due to the slope and existing transmission structure down guy wires. As stated above, the western MPR-15 work area is not anticipated to be utilized by the Project, but is being included as part of the corrective action for the compliance incident on November 29, where the area was mowed.

<u>Maps & Figures</u>: Refer to **Attachment B, MPR-15 Figure**, for a map of the proposed MPR-15 temporary work area locations. Refer to **Attachment C, MPR-15 Site Photographs**, for pictures of the current conditions within the MPR-15 temporary work areas.

<u>Environmental Impact</u>: Utilization of the MPR-15 temporary work areas would not change the nature or increase the severity of any impacts disclosed within the FEIR; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. The MPR-15 work areas are approximately 2,925 square feet combined (0.07 acre) and are located within disturbed habitat.

The MPR-15 work areas are located within an area with undetermined paleontological potential requiring adaptive paleontological monitoring per the Paleontological Monitoring and Treatment Plan (PMTP). Although the MPR-15 work areas are not located within 100 feet of a cultural environmentally sensitive area (ESA), there is potential for cultural resources in the vicinity of the MPR-15 work areas and monitoring will take place during ground disturbing activities, or at the recommendation of the Project Archaeologist. Specific discussions for each resource area are provided below.

The removal of the RFS pole Z100153 was included in the scope of the amended Request for Environmental Impact Report (REIR) approved by MCBCP on September 7, 2022. The Project impact area has been reduced by approximately 14,300 square feet (0.32 acre) of temporary impacts as final engineering eliminated the need for the temporary poles and associated work areas south of Locations 15A and 16A which will no longer be utilized by the Project (see **Attachment B, MPR-15 Figure**). REIR Approval Condition No. 1b states, "The NEPA PM [MCBCP] shall be notified of any significant changes to design, footprint, or Project scope. Certain changes will require additional NEPA [MCBCP] review." The addition of the MPR-15 work areas would not increase the overall Project footprint or involve any activities outside of the approved amended REIR scope. All MPR-15 activities would take place in compliance with the amended REIR approval conditions.

<u>Concurrence (if appropriate)</u>: Concurrence is not required as the proposed MPR-15 work areas are located immediately adjacent to the previously approved work area for Location 50 and are within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

Resources:						
Biological	\boxtimes	No Resources		Resources		N/A, Change would
3 - 3		Present	_	Present		not affect resources
		1 1000111		1 1000110		not anost recourses
Previous Biological S	surve	ey Report Refer	ence:			
Biological resources al	ong t	he Project alignn	nent w	vere studied, review	/ed, a	and documented as part
•	_	, ,		•		the SOCRE Project and
						re also discussed within
		•				of the FEIR, no sensitive
•						ological pre-construction
survey was conducted	for t	he MPR-15 work	area	on November 23,	2022	2. No suitable habitat for
special-status species	was	identified during	g the	survey. The Proje	ct bi	iologist verified that the
current condition of the	e MP	R-15 work areas	was	consistent with the	resu	alts provided in previous
						tat dominated by black
mustard (Brassica nigi			•			···· · · · · · · · · · · · · · · · · ·
madiara (Braddida mgr	u, ui	ia bromee (Brom	uo op	./.		
Cultural		No Resources	\boxtimes	Resources		N/A, Change would
		Present		Present		not affect resources
Previous Cultural Survey Report Reference:						
Cultural and paleontological resources within the Project's study area (including the MPR-15 work						
•	_			,	•	•
areas) were studied, reviewed, and documented as part of SDG&E's application for a CPCN for						

the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 4.5) as well as the MCBCP REIR review process.

Although there are no cultural sites or ESAs within 100 feet of the proposed MPR-15 work areas, isolated cultural finds have been discovered in the vicinity of the MPR-15 work areas. Therefore, cultural monitoring will take place during ground disturbing activities, or at the recommendation of the Project Archaeologist.

Consistent with Section 4.5 of the FEIR and the PMTP, the MPR-15 work areas are located in an area with undetermined paleontological potential that requires adaptive monitoring for ground disturbing activities. Paleontological monitoring would therefore take place for the pole removal activities (RFS pole Z100153) in the eastern MPR-15 work area. There are no other ground disturbing activities anticipated within the MPR-15 work areas.

Disturbance Acreage Changes:	☐ Yes	⊠ No
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Although the proposed MPR-15 temporary work areas total 2,925 square feet (0.07 acre), a large portion of the work area contiguous to the Location 50, 2B, 15A, and 16A work area is no longer being utilized by the Project (see **Attachment B, MPR-15 Figure**). This southern portion of work area is 14,300 square feet (0.32 acre), therefore the overall temporary disturbance acreage would not be increased by the addition of the MPR-15 work areas. The overall temporary disturbance area would be reduced by 11,375 square feet (0.26 acre) as a result.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of
Geology, Soils, and Seismicity	□ Y ⊠ N	impact, and avoidance/minimization measures to be taken. Although MPR-15 would involve ground disturbance to remove existing pole Z100153, this activity would take place in approximately the same area as approved in the FEIR. RFS pole Z100153 is currently located approximately 50 feet south of its originally anticipated location due to a mapping error (see Attachment B, MPR-15 Figure). Vegetation trimming will occur as needed within the MPR-15 temporary work areas. Erosion control BMPs will be installed in accordance with the SWPPP. Accordingly, utilization of the new temporary work areas would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 4.6.
Agency Consultation?	□ Y☑ N	The proposed temporary work areas would not require agency consultation relating to geology, soils, or seismicity.
Hazardous Materials and Waste	□ Y ⊠ N	MPR-15 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work areas would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed in the Project's FEIR, Section 4.8.
Agency Consultation?	□ Y⊠ N	The proposed temporary work areas would not require agency consultation relating to hazards or hazardous materials.

Hydrology and Water Quality	□ Y ⊠ N	There are no jurisdictional or non-jurisdictional drainages that would be affected by the use of the MPR-15 work areas. MPR-15 activities would therefore not impede or redirect flood flow, alter the existing drainage pattern of the area, or otherwise result in impacts to hydrology and water quality that would be different from the impacts assessed in the Project's FEIR, Section 4.9.				
Agency Consultation?	□ Y	The new temporary work areas would not require agency consultation relating to hydrology or water quality.				
Cultural Resources	N Y Y N N N N N N N N N N N N N N N N N	No new significant impacts or a substantial increase in the severity of any previously identified impacts to cultural resources are anticipated to occur as a result of the MPR-15 temporary work areas. Although review of the Project's previous cultural resources survey reports (prepared for the PEA) determined there were no archaeological sites or cultural ESAs within 100 feet of the MPR-15 work areas, there are some isolated cultural finds that have been recorded in the vicinity. Therefore, cultural monitoring will take place for ground disturbing activities (Z100153 pole removal) within the eastern MPR-15 work area. Impacts would be similar to those disclosed within the Project's FEIR, Section 4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-15 work activities: • APM CUL-1: Worker Training for Cultural Resources • APM CUL-3: Avoid Known Cultural Resources • APM CUL-3: Avoid Known Cultural Resources • APM CUL-3: Avoid Known Cultural Finds • APM CUL-3: Avoid Known Cultural Resources • APM CUL-6: Archaeological Monitoring Results Report • APM CUL-7: Monitoring by Native Americans • MM CUL-7: Monitoring by Native Americans • MM CUL-7: Supplemental Worker Training for Cultural Resources • MM CUL-3: Qualified Cultural Resources Consultants • MM CUL-3: Qualified Cultural Resources Consultants • MM CUL-5: Native American Consultation and Participation Planning No new significant impacts or a substantial increase in the severity of any previously identified impacts to paleontological resources are anticipated to occur as a result of the proposed new temporary work areas. The MPR-15 work areas are located in an area with undetermined paleontological potential that requires adaptive monitoring for ground disturbing activities per the PMTP. Paleontological monitoring would therefore take place for the pole removal activities (RFS pole Z100153) in the eastern MPR-15 work area. There are no other ground disturbing activities anticipated within the MPR-1				

		MMs would be required, the following APMs and MMs would be		
		implemented for MPR-15 work activities:		
		APM CUL-8: Paleontological Monitoring		
		APM CUL-9: Discovery of Fossils		
		MM CUL-6: Qualified Paleontological Consultants		
		MM CUL-7: Paleontological Monitoring and Treatment Plan		
Agency	⊠ Y	Use of the MPR-15 work areas would not require agency or tribal		
Consultation?	□N	consultation in relation to cultural or paleontological resources.		
		However, if cultural resources are discovered within the MPR-15		
		work areas (or anywhere on MCBCP), SDG&E will notify MCBCP		
Traffic and		as required by the REIR.		
Circulation		There would be no additional construction crews or change in equipment utilized for MPR-15 that would not already be accounted		
Circulation		for in NTP-7. There are no traffic control permits required for the use		
		of the MPR-15 work areas, nor are they located adjacent to any public		
		roads. Accordingly, traffic and circulation impacts resulting from the		
		use of the MPR-15 work areas would be similar to those disclosed in		
		the FEIR, Section 4.15. No new or altered APMs or MMs would be		
		required, and the following APM would be implemented for MPR-15		
	\boxtimes N	work activities:		
		ADM TD 4. Off Dools Delivering		
		APM TR-4: Off Peak Deliveries		
Agency	□ Y	The new temporary work areas would not require agency		
Consultation?		consultation relating to traffic and circulation.		
	⊠ N			
Air Quality	□ Y	The use of the MPR-15 temporary work areas would not result in new		
	□ N	significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as		
		there are no new activities or equipment proposed as part of this		
		MPR-15 request.		
Agency	ПΥ	The new temporary work areas would not require agency		
Consultation?		consultation relating to air quality.		
	⊠ N			
Noise and		The MPR-15 work areas are not in proximity to any sensitive		
Vibration		receptors (nearest sensitive receptor is over 1,100 feet away). In		
	⊠ N	addition, MPR-15 does not involve the installation of any new facilities, the performance of any new activities or the use of any new		
		equipment. Therefore, utilization of the MPR-15 temporary work		
		areas would not result in new significant impacts or a substantial		
		increase in severity of any previously identified impacts to noise and		
		vibration that were already analyzed in the Project's FEIR, Section		
		4.11.		
A man 511		The new temperature week areas would not require		
Agency Consultation?	☐ Y	The new temporary work areas would not require agen consultation relating to noise and vibration.		
	\boxtimes N	osticulation rolating to note and vibration.		

Aesthetics/ Visual Resources	□ Y □ N	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-15 work areas. The proposed temporary work areas do not contain any native vegetation or aesthetic resources, and the areas would be revegetated in accordance with the SWPPP and APM AES-2 following construction. The work areas also cannot be readily viewed from any public viewpoints. Therefore, use of the MPR-15 work areas would not result in a substantial increase in severity or a new significant impact beyond what was analyzed and disclosed within the Project's FEIR, Section 4.1. No new or altered APMs or MMs would be required, and the following APMs and MM would be implemented for MPR-15 work activities: • APM AES-1: Clean Work Areas • APM AES-2: Restoring Disturbed Areas • MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions
Agency Consultation?	□ Y	The new temporary work areas would not require agency consultation relating to visual resources.
Consultations	⊠ N	Consultation relating to visual resources.
Vegetation and Wildlife	□ Y⊠ N	The use of the new temporary work areas would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed work areas occur within disturbed habitat dominated by black mustard (<i>Brassica nigra</i>) and bromes (<i>Bromus sp.</i>). The proposed work areas do not contain any sensitive biological resources consistent with the Project's FEIR Section 4.4.
		Vegetation trimming will take place as needed within the work areas. The vegetation that exists within the work areas has a high concentration of non-native, invasive species and does not contain any sensitive species. Pre-construction nesting bird surveys will be conducted by an Avian Biologist no more than 7 days prior to vegetation trimming and pole removal activities in the eastern MPR-15 work area during the nesting season (January 1 – September 15) per the Nesting Bird Management Plan (NBMP).
		Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-15 work areas, any indirect impacts that may occur to sensitive species in the vicinity of the work areas will be mitigated in accordance with the MMs listed below:
		 MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area. MM BR-2: Biological Monitoring. MM BR-3: Preconstruction Surveys. MM BR-4: Limit Removal of Native Vegetation Communities and Trees.

		 MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. MM BR-8: Western Burrowing Owl Impacts Reduction Measures MM BR-9: Invasive Plant Control Measures.
Agency Consultation?	⊠ Y □ N	Use of the new temporary work areas would not require agency consultation relating to vegetation and wildlife. However, if there are any special-status species identified within the MPR-15 work areas (or anywhere on MCBCP), SDG&E will notify MCBCP in accordance with requirements in the REIR.
Wildfire	N N N	The area in which the MPR-15 work areas are located is within a CPUC Tier 2 High Fire Threat District (HFTD). SDG&E and its contractors will conduct all activities in accordance with the Project's Construction Fire Prevention and Emergency Response Plan (CFPERP) requirements including but not limited to; • Requirements for equipping diesel and gasoline operated engines with spark arrestors, • Carrying emergency fire suppression equipment, • Furnishing a water truck on or immediately adjacent to the proposed project work area, • Restricting smoking and vehicle idling, • Construction restrictions during elevated Red Flag Warning periods (as applicable) and elevated and extreme conditions; and • Conducting pre-activity tailgate meetings that include fire safety discussions. All MPR-15 activities would be performed in compliance with the CFPERP and SDG&E's Electric Standard Practice 113.3. Therefore, the proposed MPR-15 work areas would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts related to fires and wildfires that were analyzed in the FEIR, Section 4.8.
Agency Consultation?	⊠ Y □ N	SDG&E will coordinate with local emergency response agencies such as fire departments (including MCBCP fire departments) and police during NTP-7 construction, including the use of the MPR-15 work areas. Emergency access will be maintained throughout construction.

Approvals Date Name (print) Signature

San Diego Gas and Electric Project Manager		Omar Miranda			Reviewed
San Diego Gas and Electric Environmental Project Manager		Richard Quasarano			Reviewed
CPUC Project Manager		Louis Torres			Approved Approved with conditions (see below) Denied
For CPUC Compliance Manager Use Only					
Refinement Appro	ved	Refinement Denied		☐ Beyond A	Authority

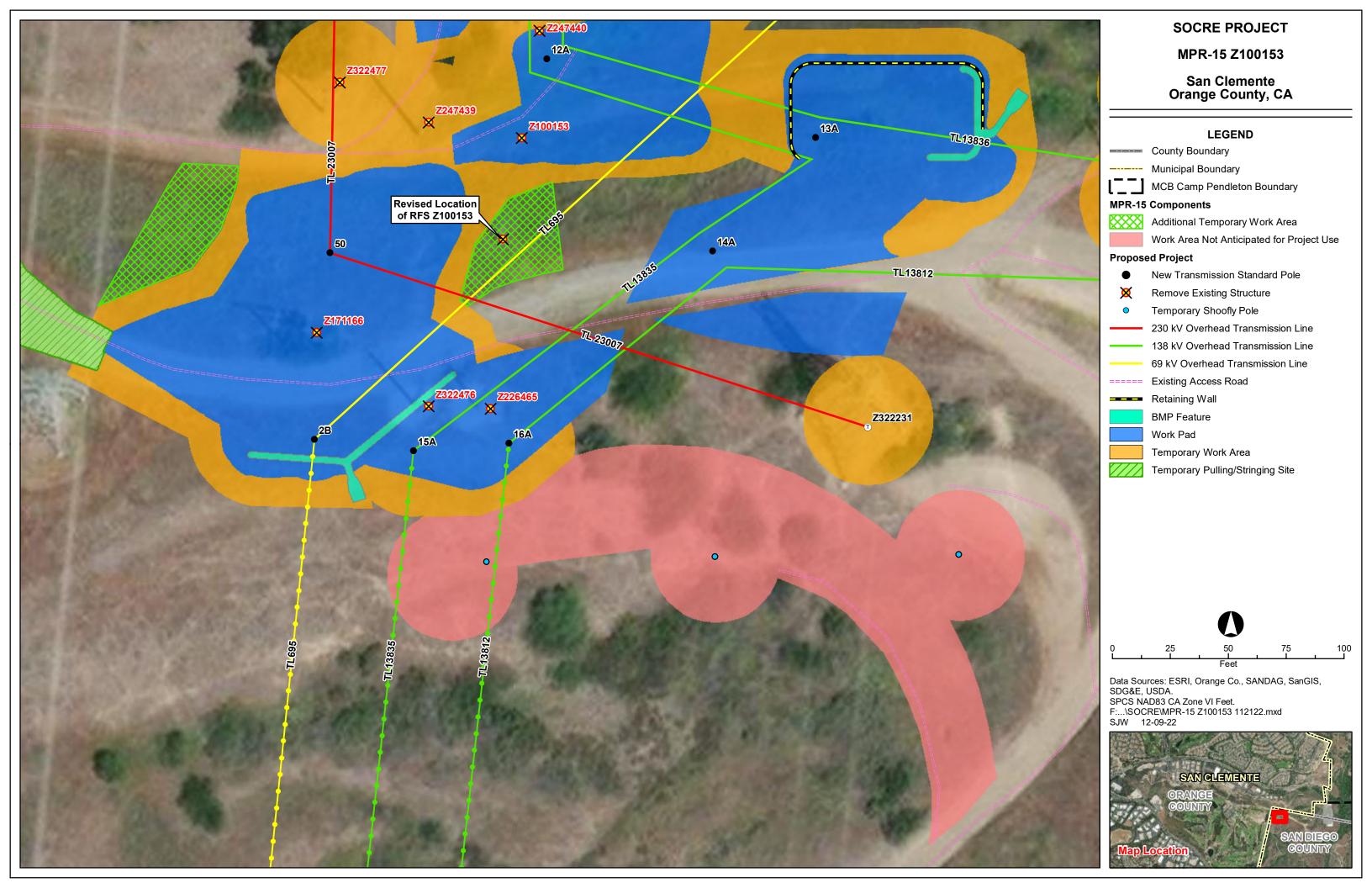
Conditions of Approval or Reason for Denial:

- COA-1. The extent of the MPR-15 disturbance areas will be limited to the areas shown on the figure titled "SOCRE PROJECT MPR-15 Z100153" and will be used for project construction staging and related activities only during the period of project construction and restoration (anticipated to be approximately through the end of 2024).
- COA-2. Copies of all relevant permits, compliance plans, and this MPR, shall be available on site for the duration of construction activities.
- COA-3. All activities (e.g., stabilizing construction entrance/ ground surface, fence repair, etc.) shall be monitored by CPUC-approved monitors in accordance with the MMCRP, where applicable.
- COA-4. In the event that MPR-15 activities require additional road improvements/design, SDG&E shall meet and confer with appropriate agencies and/or local jurisdictions as needed and notify the CPUC for concurrence and approval. Additionally, pre-construction nesting bird surveys shall be conducted by an Avian Biologist no more than 7 days prior to vegetation trimming and pole removal activities in the eastern MPR-15 work area during the nesting season (January 1 September 15) per the SOCRE Project Nesting Bird Management Plan (NBMP).
- COA-5. SDG&E shall ensure that construction equipment at the proposed work areas will have adequate and properly placed secondary containment to avoid and minimize potential leaks or spills.
- COA-6. The Project Stormwater Pollution and Prevention Plan (SWPPP) shall be updated as necessary to cover MPR-15 work area and activities. The Qualified SWPPP Developer (QSD) must prepare and certify each SWPPP amendment and a copy of the revised SWPPP shall be provided to the CPUC.
- COA-7. The work associated with MPR-15 shall occur within approved project workdays and hours. In the event that staging area use necessitates work outside of the hours permitted under local noise ordinances, SDG&E shall meet and confer with the local jurisdictions as needed and notify the CPUC for concurrence.
- COA-8. Prior to the start of MPR-14 activities, SDG&E shall ensure that all SOCRE Project personnel have received SEAP training in accordance with the MMCRP to maintain awareness of safety and environmental sensitivities and requirements.
- COA-9. Any anticipated access road closures or partial closures shall be communicated to the public in advance. Signage will remain at worksite entrances notifying the public of possible access restrictions. As always, spotter and qualified safety personnel will be present to manage any ingress or egress of pedestrians through the access road.
- COA-10. All complaints related to MPR-15 activities received by SDG&E shall be logged and reported immediately to the CPUC. This includes complaints relevant to traffic, as well as lighting, noise, vibrations, dust, etc. Where feasible, complaints shall be resolved, depending on the nature of the complaint, through construction site or activity modifications. Complaints or disputes that cannot be modified through construction site or activity modifications shall be resolved through the dispute resolution communications processes described in the MMCRP.
- COA-11. Use of the MPR-15 work areas will adhere to all applicable conditions of approval identified for approved project NTPs and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan. Some measures have on-going/time-sensitive requirements and shall be implemented prior to and during construction, where applicable.

COA-12. SDG&E shall notify the CPUC/WSP at least one week prior to beginning MPR-15 work activities and after completing MPR-15 associated activities including use of staging area access roads and temporary work areas, and provide photos of the restored additional work disturbance areas. In addition, in the event that new disturbance is foreseen, for maintenance or other activities, SDG&E shall notify CPUC for evaluation and approval.

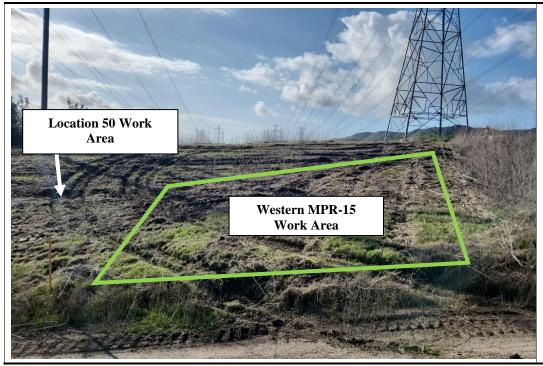
Prepared by: Fernando Guzman, WSP, CPUC Compliance Manager Date: January 26, 2023

ATTACHMENT B MPR-15 Figure



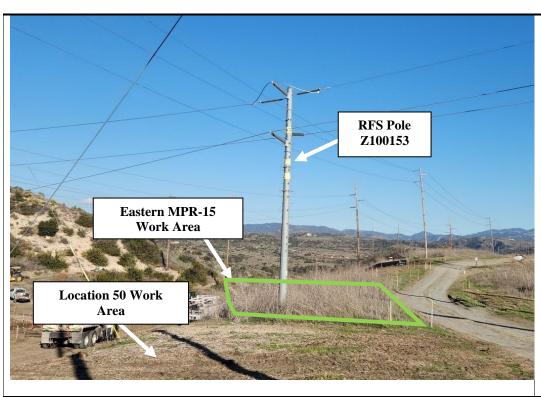
ATTACHMENT C MPR-15 Site Photographs

MPR-15 PHOTO LOG



Photograph 1:

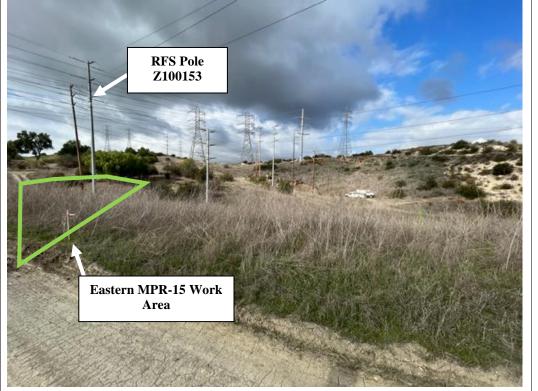
View of the western MPR-15 work area. This area is not anticipated for Project use but is being included as part of the corrective action for the compliance incident from November 29, 2022 where this area was mowed outside of work limits. Facing: South



Photograph 2:

View of RFS Pole Z100153 and the eastern MPR-15 temporary work area. This additional work area will be needed to remove Z100153 since it was relocated outside of approved work limits in a non-Project related action. Facing: East

MPR-15 PHOTO LOG



Photograph 3:

View of RFS Pole Z100153 and the eastern MPR-15 temporary work area.

Facing: Northwest