

July 23, 2026

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

Re: Second 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 D.25-09-013) for the Manning 500/230 Kilovolt 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). On January 16, 2026, the CPUC approved LSPGC's first Notice to Proceed (NTP-1) for the construction and operation of the new Manning Substation.

LSPGC requests that the CPUC issue a NTP for construction of the remainder of the Project not previously included in NTP-1, including all activities required to construct and operate the new Manning-Tranquillity #3 & #4 230 Kilovolt (kV) Transmission Line (the Transmission Line), as shown in *Attachment A – Project Components Map*. This second NTP request is herein referred to as NTP-2; 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 remaining Project activities, including those required to construct and operate the Transmission Line.

1.0 Location of Project Components

The work activities covered under this NTP-2 request would occur primarily on undeveloped agricultural fields in unincorporated western Fresno County, California. The Transmission Line begins at the Manning Substation 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. From the

Manning Substation, the Transmission Line continues east approximately 11.5 miles until the line terminates at the Tranquillity Switching Station located southeast of the intersection of Manning Avenue and South Ohio Avenue. Please refer to *Attachment A – Project Components Map* to view the requested NTP-2 components and work areas.

2.0 Description of Activities Included within the NTP-2 Request

The Project components included in this NTP-2 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-2 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-2 requests authorization for all construction activities associated with the new Transmission Line (i.e., access roads, below grade construction, above grade construction, testing and commissioning). This second phase of the Project will construct the new Transmission Line within an approximately 100- to 120-foot right-of-way (up to 150 feet at dead end structure's locations). The Transmission Line will be comprised of double circuit tubular steel poles ("TSPs") with a vertical conductor configuration and two overhead optical ground wires, with structure heights consistent with the Final IS/MND. The approximate 11.5-mile Transmission Line is comprised of approximately 50 tangent monopole TSPs, one guyed six-pole dead-end TSP, one tangent two-pole TSP, two running angle monopole TSPs, and four two-pole dead-end TSP. Typical tangent structures will be installed using direct-embed foundations; dead-end and angle structures will be installed on concrete pier foundations with guy wires and anchors, as applicable.

This NTP-2 request also includes the utilization of the temporary construction laydown yards, including the substation yard, described in the Final IS/MND and an additional yard which is approximately 26 acres, and was previously approved in minor project refinement (MPR)-02 on June 23, 2026. A copy of MPR-02 and its approval are attached to this request as *Attachment C - MPR-02 Approval*. The temporary laydown yards 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 laydown yards may be utilized for spreading spoils.

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. Since the Final IS/MND, a new laydown yard was added, shift in structure locations, temporary access roads, and some structure types have changed. LSPGC submitted MPR-02, which described the new laydown yard, and MPR-03 which described a shift in the alignment, temporary access road changes, and structure type changes. MPR-02 was approved on June 23, 2026 and MPR-03 was approved on July 20, 2026. A copy of MPR-02 and MPR-03 and their approvals are attached to this request as *Attachment C - MPR-02 Approval* and *Attachment D - MPR-03 Approval*.

4.0 Construction Schedule and Duration

Construction associated with the NTP-2 activities is anticipated to begin September 2026 and conclude November 2027. 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-2

As outlined within the final Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) (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 Mitigation Measures (MM), 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-2.

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-2 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
 - Helicopter Safety Plan
 - Tier 4 Memorandum

Attachment B – MMCRP Requirements Tracking Table for NTP-2 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 Transmission Line 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-2)* which are applicable to the subject construction area of this NTP-2 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-2*. 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-2 request are anticipated to require the state and local permits listed in *Table 1* below. LSPGC will obtain all necessary permits prior to initiating the specific Project activities that trigger each permit requirement.

Table 1. NTP-2 Required Permits

Agency	Permit	Applicability to Project Component	Status
Fresno County	Encroachment Permit	Aerial transmission line crossings of county owned roads.	Encroachment permits will be obtained by LSPGC prior to stringing the transmission lines across county owned roads.
San Joaquin Valley Air Pollution Control District (SJVAPCD)	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.	The Project's DCP was submitted to the SJVAPCD on 11/12/2025 and approved on December 17, 2025.
	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 SJVAPCD.
Caltrans	Encroachment Permit	Aerial transmission line crossing of a state highway right of way. Construction activities occurring within a state highway right of way.	LSPGC has applied for an encroachment permit for the construction activities and aerial transmission line crossing of I-5. At this time, LSPGC has not yet received the encroachment permit. As such, LSPGC will not perform any construction activities within the State Right of Way until an encroachment permit has been obtained.

Agency	Permit	Applicability to Project Component	Status
Bureau of Reclamation	Encroachment Permit	Aerial transmission line crossing of the California Aqueduct.	LSPGC has applied for an encroachment permit for the construction activities and aerial transmission line crossing of the California Aqueduct. At this time, LSPGC has not yet received the encroachment permit. As such, LSPGC will not perform any construction activities within the California Aqueduct Right of Way until an encroachment permit has been obtained.
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 and the following WDID number was issued: WDID# 5F10C410978.

9.0 Request for Approval

LSPGC respectfully requests this NTP-2 to begin the transmission line work approved in Final Decision D.25-09-013 by August 31, 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
 Senior Environmental Permitting Specialist
 LS Power Grid California



Attachment A: Project Components Map

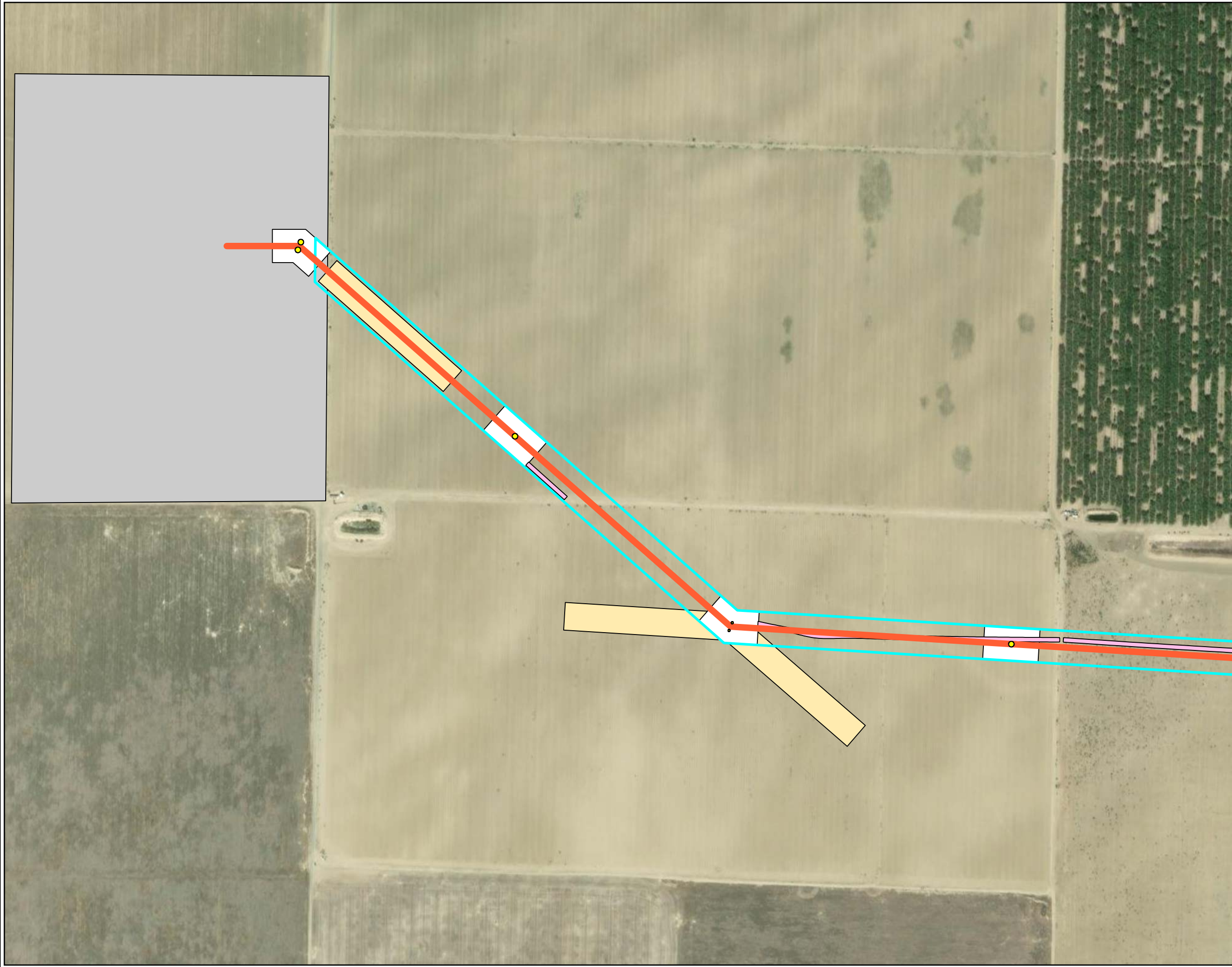
Attachment B: MMCRP Requirements Tracking Table for NTP-2

Attachment C: MPR-02 Approval

Attachment D: MPR-03 Approval

cc: Michelle Wilson, CPUC
George Dix, Ascent
Kari Zajac, Ascent
Douglas Mulvey, LSPGC
Jason Niven, LSPGC
Dustin Joseph, LSPGC
David Wilson, LSPGC
James Schuchard, LSPGC

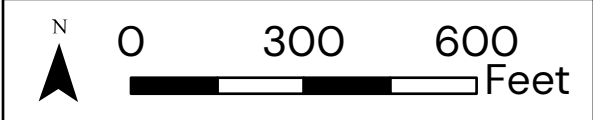
ATTACHMENT A



**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 1 of 14

- Legend**
-  Manning – Tranquillity 230kV Transmission Line
 -  LSPGC Right of Way
 -  Guard Structures
 -  Laydown & Staging Yards
 -  Permanent Access Road
 -  Pulling Site
 -  Structure Permanent Disturbance
 -  Structure Work Area
 -  Temporary Access Road

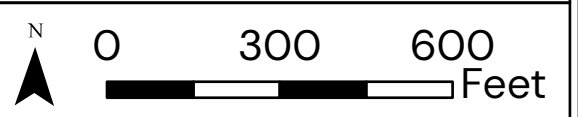




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 2 of 14

- Legend**
-  Manning – Tranquillity 230kV Transmission Line
 -  LSPGC Right of Way
 -  Guard Structures
 -  Laydown & Staging Yards
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 -  Structure Permanent Disturbance
 -  Structure Work Area
 -  Temporary Access Road

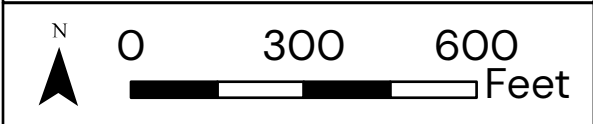




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 3 of 14

- Legend**
-  Manning - Tranquillity 230kV Transmission Line
 -  LSPGC Right of Way
 -  Guard Structures
 -  Laydown & Staging Yards
 -  Permanent Access Road
 -  Pulling Site
 -  Structure Permanent Disturbance
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 -  Temporary Access Road





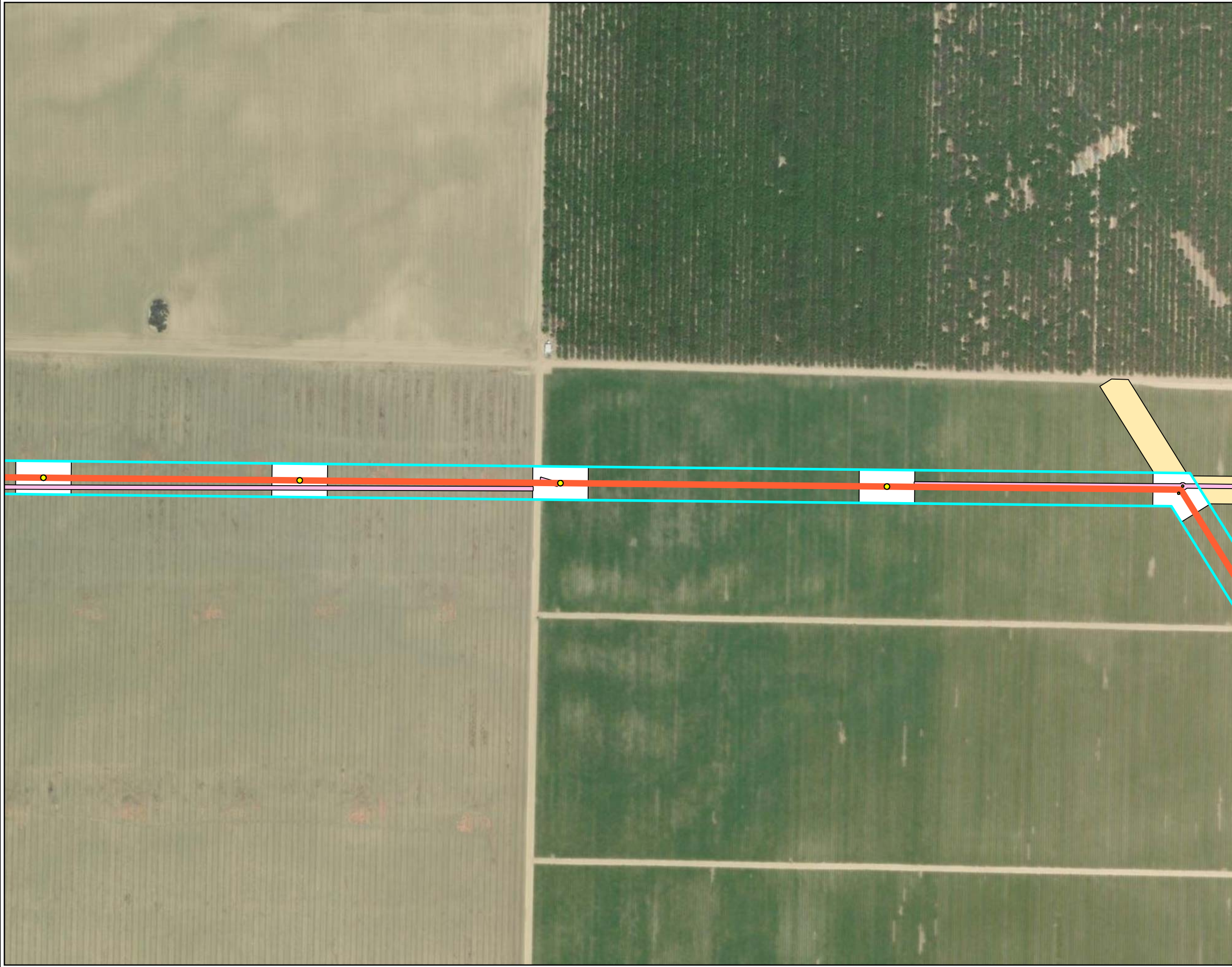
**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 4 of 14

Legend

-  Manning – Tranquillity
230kV Transmission Line
-  LSPGC Right of Way
-  Guard Structures
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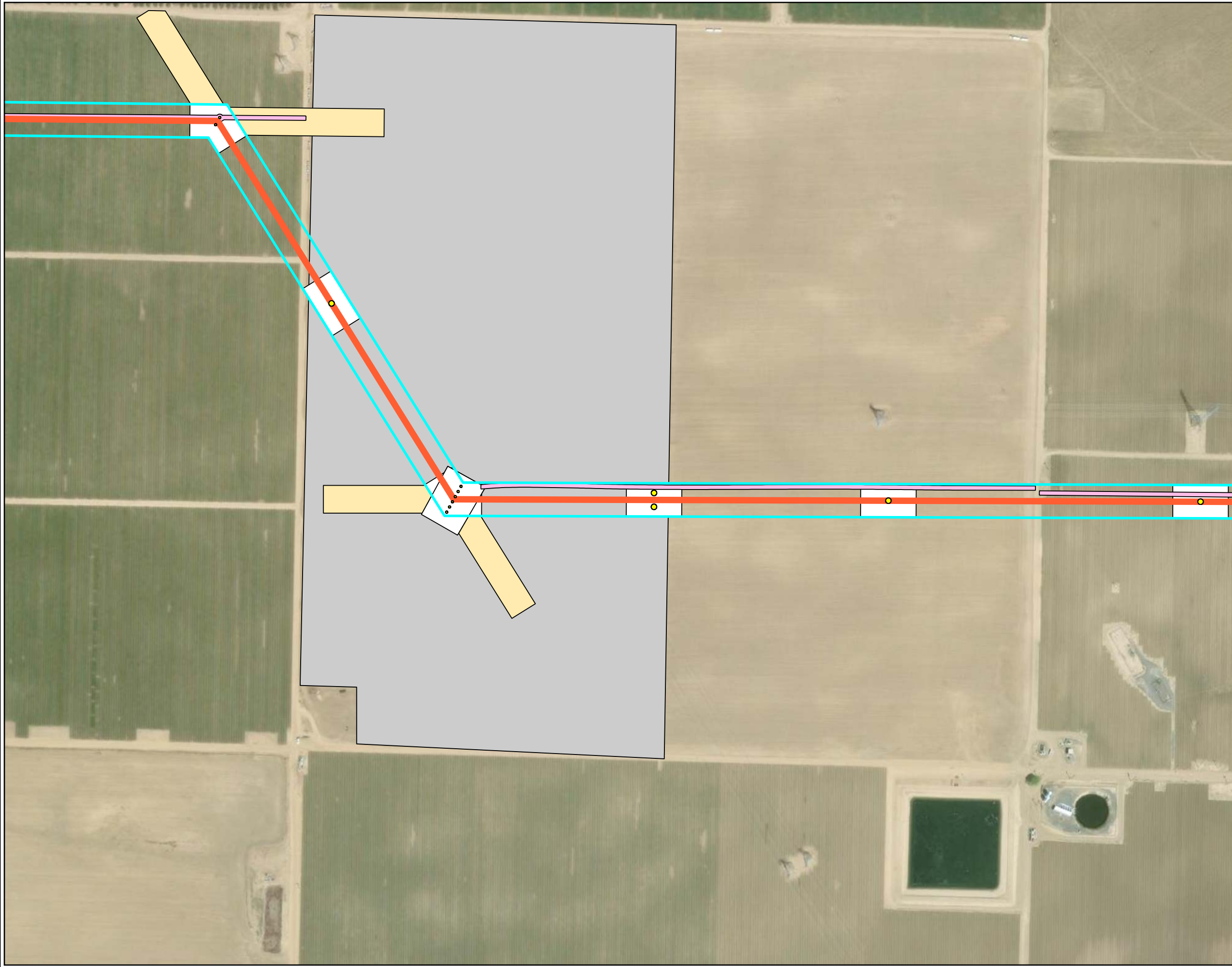
**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 5 of 14

Legend

-  Manning - Tranquillity
230kV Transmission Line
-  LSPGC Right of Way
-  Guard Structures
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Disturbance
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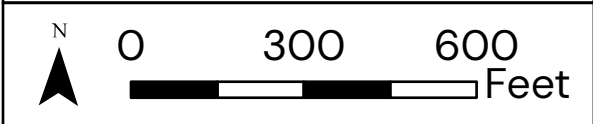




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 6 of 14

- Legend**
- Manning - Tranquillity
230kV Transmission Line
 - LSPGC Right of Way
 - Guard Structures
 - Laydown & Staging Yards
 - Permanent Access Road
 - Pulling Site
 - Structure Permanent
Disturbance
 - Structure Work Area
 - Temporary Access Road





**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 7 of 14

Legend

-  Manning – Tranquillity
230kV Transmission Line
-  LSPGC Right of Way
-  Guard Structures
-  Laydown & Staging Yards
-  Permanent Access Road
-  Pulling Site
-  Structure Permanent
Disturbance
-  Structure Work Area
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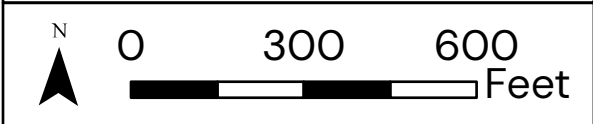




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 8 of 14

- Legend**
-  Manning – Tranquillity 230kV Transmission Line
 -  LSPGC Right of Way
 -  Guard Structures
 -  Laydown & Staging Yards
 -  Permanent Access Road
 -  Pulling Site
 -  Structure Permanent Disturbance
 -  Structure Work Area
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**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 9 of 14

Legend

-  Manning – Tranquillity
230kV Transmission Line
-  LSPGC Right of Way
-  Guard Structures
-  Laydown & Staging Yards
-  Permanent Access Road
-  Pulling Site
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Disturbance
-  Structure Work Area
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**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 10 of 14

Legend

-  Manning – Tranquillity
230kV Transmission Line
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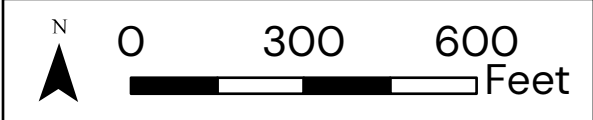




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 11 of 14

- Legend**
- Manning - Tranquillity
230kV Transmission Line
 - LSPGC Right of Way
 - Guard Structures
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Disturbance
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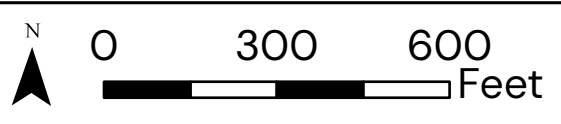




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 12 of 14

- Legend**
-  Manning - Tranquillity
230kV Transmission Line
 -  LSPGC Right of Way
 -  Guard Structures
 -  Laydown & Staging Yards
 -  Permanent Access Road
 -  Pulling Site
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Disturbance
 -  Structure Work Area
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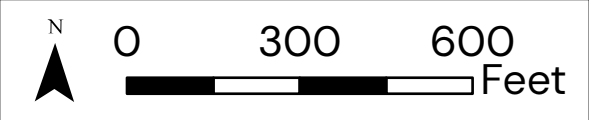


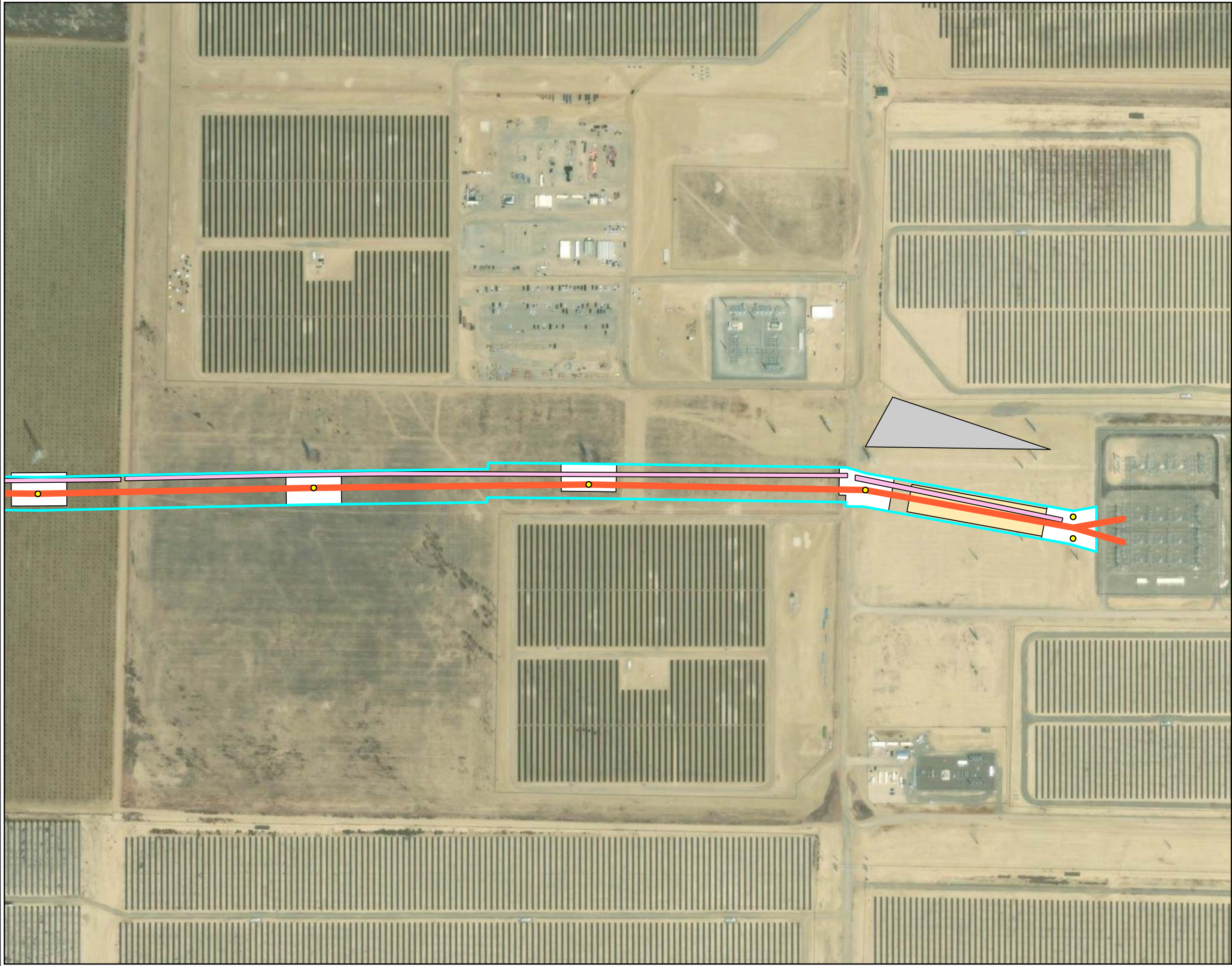


**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 13 of 14

- Legend**
- Manning – Tranquillity
230kV Transmission Line
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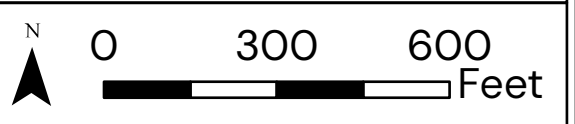




**MANNING 500/230 KV
SUBSTATION PROJECT**

Map 14 of 14

- Legend**
- Manning – Tranquillity
230kV Transmission Line
 - LSPGC Right of Way
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ATTACHMENT B

Attachment B: MMCRP Requirements Tracking Table for NTP-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
Aesthetics				
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	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				
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: □ 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 transmission line construction activities at least 14 days prior to construction activities beginning. LSPGC will provide documentation to the CPUC once available.
Air Quality				
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: 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.	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.
Manning 500/230 kV Substation Project NTP-2 Request July 2026			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-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
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				
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: ▣ 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.	A Dust Control Plan was submitted to the SJVAPCD on November 12, 2025. The Dust Control Plan was approved on December 17, 2025 by the SJVAPCD.
Biological Resources				

Attachment B: MMCRP Requirements Tracking Table for NTP-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
Construction Measure BIO-A [PG&E] / Mitigation Measure BIO-1 [LSPGC]: Conduct Protocol-Level Surveys for Special-Status Plants and Compensate for Impacts 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. 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. 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. 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. 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.	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.

Attachment B: MMCRP Requirements Tracking Table for NTP-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
Construction Measure BIO-B [PG&E] /Mitigation Measure BIO-2 [LSPGC]: Conduct Protocol-Level Surveys for Blunt-Nosed Leopard Lizard and Implement Avoidance Measures 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: □ 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: ▪ 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: ▪ 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. 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. An additional survey for 2026 is currently being completed and the results will be submitted to the CPUC once it is available.

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leopard lizards and potentially occupied habitat. ▣ 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.				
Construction Measure BIO-C [PG&E] / Mitigation Measure BIO-3 [LSPGC]: Conduct Focused Surveys for Special-Status Reptiles and Implement Avoidance Measures ▣ 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 transmission line 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.
Construction Measure BIO-D [PG&E] / Mitigation Measure BIO-4 [LSPGC]: Conduct Focused Surveys for Western Spadefoot Toads and Implement Avoidance Measures 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: ▣ 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.	A preconstruction survey for special-status reptiles will be completed within 48 hours before the initiation of any construction activity for transmission line activities within suitable habitat (i.e., vernal pool, wetland) and within a 860 foot buffer of aquatic habitat. A report summarizing the results of the survey will be provided to the CPUC.

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□ 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. □ 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.				
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 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: □ 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: ▪ 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. □ 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. □ 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. □ Focused surveys for Swainson’s hawk shall follow the protocols found in <i>Recommended Timing and</i>	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 transmission line construction is scheduled to begin outside of the nesting bird season (Feb 1 – Sept 15) a preconstruction nesting bird survey and a preconstruction Swainson Hawk survey is not required before the initiation of any construction activity for transmission line activities. If work is scheduled to begin during the nesting bird season, LSPGC will conduct nesting bird surveys. If work is non-continuous (five day or more lapse) during the nesting bird season, surveys will be performed.

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<i>Methodology for Swainson’s Hawk Nesting Surveys in California’s Central Valley</i> (Swainson’s Hawk Technical Advisory Committee 2000). □ 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.				
Construction Measure BIO-F [PG&E] / Mitigation Measure BIO-6 [LSPGC]: Conduct Protocol-Level Surveys for Burrowing Owl and Implement Avoidance Measures 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. LSPGC and PG&E Construction Activities and LSPGC O&M Operational Activities □ 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.	Pending LSPGC completed the survey(s) detailed in this mitigation measure and is developing the detailed report. The final report will be submitted to the CPUC once it is available, prior to work beginning. A take avoidance survey will also be conducted for the transmission line construction. The survey will be completed within 14 days prior to the beginning of ground disturbing activities associated with
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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. □ 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. ▪ 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. □ PG&E O&M Activities □ 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				transmission line construction.

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of burrowing owls from O&M activities.				
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 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: □ 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. □ 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: ▪ 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.	Since initial ground disturbing activities for transmission line construction will be beginning within the August 15–March 15 timeframe a habitat assessment and focused survey for Crotch’s bumblebee is not required
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original conditions after the temporary disturbance is complete such that habitat for Crotch’s bumble bee would be available. □ 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: ▪ 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). □ 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.				
Construction Measure BIO-1 [PG&E] / Mitigation Measure BIO-8 [LSPGC]: Conduct Focused Surveys for American Badger and Implement Avoidance Measures 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: □ 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. □ For PG&E components, the following measures shall be implemented. ▪ 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 transmission line activities within suitable habitat. A report summarizing the results of the survey will be provided to the CPUC.
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▪ If occupied dens are not found, the qualified biologist shall submit a report summarizing the results of the survey to PG&E and the CPUC, and further mitigation shall not be required. If occupied dens are found, then dens shall be monitored to determine if occupation is by an adult badger only or if it is a natal den. Impacts on 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.				
Construction Measure BIO-J [PG&E] / Mitigation Measure BIO-9 [LSPGC]: Conduct Focused Surveys for San Joaquin Kit Foxes and Implement Avoidance Measures 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: ▫ 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.	A preconstruction San Joaquin kit fox survey will be conducted for the transmission line 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 transmission line 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. LSPGC and its contractors will implement this measure during construction activities.

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▪ 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: ▪ 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: • 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: • Personnel shall immediately report the incident to the project biologist.				

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- 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.				
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 □ 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. ▪ 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. □ 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). □ 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.	LSPGC and PG&E	LSPGC and PG&E to provide survey results. CPUC mitigation monitor to inspect compliance. Coordination with USACE and RWQCB, as applicable, regarding presence of state or federally protected wetlands.	Prior to project construction and during construction.	LSPGC and its contractors will implement this measure during construction activities and delineate the specified areas.

Applicable to NTP – Measure to be implemented during construction/restoration/operation
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Not Applicable to NTP

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Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
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.				
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.	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.
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.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance.	Prior to and during project construction.	All areas of the transmission line 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).
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	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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Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
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.
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: □ 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. The WEAP will be submitted to and approved by the CPUC prior to construction.	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.
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	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.
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Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
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 transmission line 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 transmission line 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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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.	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.
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: □ 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. 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.	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.
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.	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 transmission line 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 transmission line construction is scheduled to begin outside the nesting bird season (Feb 1 – Sept 15) a preconstruction nesting bird survey and a preconstruction Swainson Hawk survey are not required before the initiation of any construction activity for transmission line activities. If work is scheduled to begin during the nesting bird season, a survey would be conducted. If work is non-continuous (five days or more lapse) during the nesting bird season, surveys will be performed.
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	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
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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.				monitor to implement steps to reduce any adverse effects on the occupied nest.
Cultural and Tribal Cultural Resources				
Construction Measure CR-A [PG&E] / Mitigation Measure CR-1 [LSPGC]: Conduct Built Environment Historical Resources Surveys for Built Environment Resources 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: 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.	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. A second report focused on the transmission line corridor was submitted on March 23, 2026.
Construction Measure CR-B [PG&E] / Mitigation Measure CR-2 [LSPGC]: Protect Historical Built Environment Resources 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: ► 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.
Construction Measure CR-C [PG&E] /Mitigation Measure CR-3 [LSPGC]: Conduct Archaeological Resources Surveys and Avoid Archaeological Resources 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: 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	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 construction areas have been surveyed and were documented in the CRTR and subsequent addendums which have been submitted to the CPUC.
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resources surveys for any portion of the project alignment area not yet surveyed (e.g., private properties with access restrictions) within PG&E or LSPGC project component areas. PG&E and LSPGC shall be responsible for ensuring that archeological resources surveys are conducted throughout all portions of their respective project component areas. For the purposes of this mitigation measure, all archaeological resources discovered during surveys shall be assumed to be unique archaeological resources or historical resources as defined by State CEQA Guidelines Section 15064.5 and will be recorded by a qualified archaeologist on a California Department of Parks and Recreation DPR 523 primary form or equivalent documentation. 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. 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.				
APM CUL-1: Cultural Resources Awareness Training. In accordance with this measure, the Proposed Project’s WEAP will include, at a minimum: ▶ 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. 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.	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). 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.
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	LSPGC	LSPGC to provide treatment measures, if applicable. CPUC mitigation monitor to inspect	During project construction.	LSPGC and its contractor will implement this measure during construction activities.

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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 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.		compliance and verify treatment measures.		
Geology and Soils				
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: ▶ 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				

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-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/Verification Requirements	Timing	Status
APM GHG-1: Greenhouse Gas Emissions Reduction During Construction. The following measures will be implemented during construction to minimize greenhouse gas emissions: ▶ 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				
APM HAZ-1: Air Transit Coordination. LSPGC will implement the following protocols related to helicopter use during construction and air traffic: ▶ 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.
Noise and Vibration				
Mitigation Measure N-1 [LSPGC]: Implement Measures to Reduce Exposure of Noise-Sensitive Receptors to Construction-Generated Nighttime Noise 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: ▶ 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.

Attachment B: MMCRP Requirements Tracking Table for NTP-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
▶ 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				
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: ▶ 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. 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.	LSPGC	LSPGC to provide/report evidence of compliance. CPUC mitigation monitor to inspect compliance and verify final engineering and design.	Prior to project construction.	Submitted. Induction studies were submitted to the CPUC on June 5, 2026.
Wildfire				
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: ▶ 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
Manning 500/230 kV Substation Project NTP-2 Request July 2026			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-2

Applicant-Proposed Measures, Construction Measures, and Mitigation Measures	Applicable Party	Monitoring/Reporting/ Verification Requirements	Timing	Status
► Responsibilities and duties; ► Preparedness training and drills; ► Procedures for fire reporting, response, and prevention that include the following: ▪ 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. 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.				November 10, 2025.

ATTACHMENT C



California Public Utilities Commission



June 23, 2026

Clayton Eversen
LS Power Grid California, LLC
Via email: CEversen@lspower.com

Re: CPUC Approval of LSPGC Minor Project Refinement 2 for the Manning 500/230 kV Substation Project

Mr. Eversen,

On June 5, 2026, LS Power Grid California, LLC (LSPGC) requested California Public Utilities Commission (CPUC) approval of LSPGC's Minor Project Refinement 2 (MPR-2) for the Manning 500/230 kV Substation Project (Project). The request was revised and resubmitted on June 22, 2026. Pursuant to CPUC Decision 25-09-013, the CPUC Energy Division may approve requests by LSPGC for minor project refinements so long as such refinements are located within the geographic boundary of the study area of the Final Initial Study/Mitigated Negative Declaration (IS/MND) adopted for the Project and do not: (1) result, without mitigation, in a new significant impact based on the criteria used in the Final IS/MND; (2) substantively conflict with any mitigation measure or applicable law or policy; or (3) trigger an additional discretionary permit requirement.

In the MPR-2 request (see Attachment 1), LSPGC proposes a new laydown yard for use during construction of the LSPGC 230 kV transmission line portion of the Project, including an additional diesel generator and conex box (i.e., shipping container) to be located within the laydown yard. The new laydown yard location is partially within the LSPGC transmission line right-of-way located north of West Dinuba Avenue and is bisected north-to-south by South Douglas Avenue, meaning the site is accessible from a paved road (see MPR Attachment B, Project Change Map).

The use of this laydown yard site would have the potential to impact Aesthetics, Agriculture, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Greenhouse Gas Emissions and Energy, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Transportation, Utilities and Service Systems, and Wildfire. However, these impacts would be consistent with those analyzed in the Final IS/MND, and would be sufficiently addressed by existing measures in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted for the Project. The impacts would not result in a new significant impact based on the criteria used in the Final IS/MND, substantively conflict with any mitigation measure or applicable law or policy, or trigger any new discretionary permit requirement.

Therefore, I approve LSPGC's requested MPR-2, provided that these activities are carried out in accordance with the applicable methods and measures set forth in the Final IS/MND and MMCRP.

Please feel free to contact me at tommy.alexander@cpuc.ca.gov with any questions or concerns regarding this letter.

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California Public Utilities Commission



Thank you,

A handwritten signature in black ink that reads "Tommy Alexander".

Tommy Alexander, Project Manager
California Public Utilities Commission

Attachment:

1. Manning 500/230 kV Substation Project LSPGC MPR-2 Request and Attachments A-C

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California Public Utilities Commission



Attachment 1

Manning 500/230 kV Substation Project LSPGC MPR-2 Request and Attachments A-C

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@CaliforniaPUC



MANNING 500/230 KV SUBSTATION 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, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.

Date Requested: June 5, 2026
(revised June 22, 2026)

Report No.: MPR-2

Date Approved: June 23, 2026

Approval Agency: California Public Utilities
Commission (CPUC)

Property Owner(s): Westlands Water District

Location/Milepost: The requested laydown yard will be partially within the new LS Power Grid California, LLC (LSPGC) 230 kilovolt (kV) transmission line right-of-way (ROW) located north of West Dinuba Avenue and bisected by South Douglas Avenue in a north-to-south direction.

Land Use/Vegetative Cover: The refinement area was mapped in the Final Initial Study/Mitigated Negative Declaration (IS/MND) as agricultural and disturbed land. The current site condition as of May 6, 2026 is a fallow agricultural field.

Sensitive Resources: No sensitive resources are present in the requested refinement area.

Modification From: ☐ Permit ☐ Plan/Procedure ☐ Specification ☒ Drawing
☐ Mitigation Measure ☐ Other:

Proposed Action(s):

LSPGC requests the addition of a new laydown yard to the Manning 500/230 kV Substation Project (Project) for use during construction of the LSPGC 230 kV transmission line. The addition of a laydown yard is being requested as a result of discussions with the transmission line construction contractor, which identified that a laydown yard adjacent to a paved road will improve access for materials and equipment deliveries, especially during the rainy season when transmission line construction is slated to begin. An additional diesel generator and conex box will be located at the laydown yard. The laydown yard will be bisected by South Douglas Avenue.

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

Original Condition: The current site condition of the requested laydown yard consists of agricultural land and disturbed land, as mapped in the Final IS/MND. In the Final IS/MND, the area of the laydown yard was analyzed for the LSPGC 230 kV transmission line, work areas, transmission structures, a temporary access road, and use of existing access roads.

Justification for Change: The transmission line contractor informed LSPGC that a laydown yard adjacent to a paved road will provide better access for materials and equipment deliveries, especially during the rainy season when transmission line construction is slated to begin.

Maps & Figures: The current site conditions are depicted in Attachment A: Photographs, and Attachment B: Project Change Map depicts the requested laydown yard in comparison to the Final IS/MND Project design.

Environmental Impact: The proposed refinement will not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact based on the criteria used in the Final IS/MND.

Concurrence (if appropriate):

<u>Resources:</u>			
Biological	☒ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Biological Survey Report Reference: Insignia Environmental. 2025. Biological Resources Technical Report Addendum.			
Cultural	☒ No Resources Present	☐ Resources Present	☐ N/A, changes would not affect resources
Previous Cultural Survey Report Reference: Chronicle Heritage. 2025. Cultural Resources Technical Report Addendum. Manning 500/230 Kilovolt Substation Project.			
Paleontological	☒ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Paleontological Survey Report Reference: Chronicle Heritage. 2025. Cultural Resources Technical Report Addendum. Manning 500/230 Kilovolt Substation Project.			
<u>Disturbance Acreage Changes:</u> ☒ Yes ☐ No			

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the Final IS/MND as it relates to MPR-2. MPR-2 would have no potential to impact the following environmental resource areas and therefore are not included in the table below: Forestry,

Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Recreation.

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 impact, and avoidance/minimization measures to be taken.
Aesthetics	☒ Y	The requested laydown yard will be partially within the ROW analyzed in the Final IS/MND, and no designated scenic vistas or state scenic highways are located within the vicinity of the Project or requested laydown yard. Viewers of the requested laydown yard will be motorists, workers, and few residents. Viewers may see materials (e.g., a conex box) being delivered and stored at the yard for the duration of the transmission line construction. Motorists will only view this change for a few seconds, and workers are typically focused on their tasks. Three residences—R1, R2, and R3—were identified in the vicinity of the Project in the Final IS/MND. R1 is located over 5 miles northwest of the requested laydown yard, R2 is located approximately 910 feet south of the requested laydown yard, and R3 is located approximately 0.6 mile northwest of the requested laydown yard. Therefore, only R2 is likely to have close-range views of the requested laydown yard. The requested laydown yard will not introduce additional lighting beyond what was analyzed in the Final IS/MND. Glare from construction equipment at the laydown yard could occur depending on the time of day and the position of a viewer relative to the construction equipment; however, such glare will be transient and brief. Additionally, glare is anticipated in the requested refinement area regardless of the requested laydown yard due to glare from construction equipment for transmission line construction which was analyzed in the Final IS/MND. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to aesthetics as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the Minor Project Refinement (MPR) to the CPUC is required.
	☒ N	
Agriculture	☒ Y	The requested laydown yard will result in approximately 25.63 acres of additional temporary impacts and no additional permanent impacts to land that is mapped as Prime Farmland and Important Farmland, zoned for agriculture, and under Williamson Act contract compared to the Final IS/MND design. Topsoil will be salvaged from the requested laydown yard site, and impacted farmland will be restored following the completion of construction. As described in the Final IS/MND, the County of Fresno's agricultural zoning permits electrical transmission infrastructure. Therefore, the temporary
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		requested laydown yard supporting construction of electrical infrastructure will not conflict with zoning. MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to agriculture as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Air Quality	☒ Y	Construction activities associated with the requested laydown yard will include the use of a diesel generator in addition to the construction equipment analyzed in the Final IS/MND. The diesel generator will be used approximately 8 hours a day. In the Final IS/MND, controlled construction emissions were calculated not to exceed the San Joaquin Valley Air Pollution Control District (SJVAPCD) daily maximum threshold of 100 pounds per day (lbs/day) for reactive organic gas (ROG), nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate matter (PM) with a mean diameter of less than 10 microns (PM₁₀), or PM with a mean diameter of less than 2.5 microns (PM_{2.5}). The use of an additional diesel generator will increase the daily maximum construction emissions by 0.16 lb/day of ROG, 1.59 lbs/day of NO_x, 1.75 lbs/day of CO, <0.01 lb/day of SO₂, 0.04 lb/day of PM₁₀, and 0.03 lb/day of PM_{2.5}. Controlled Project construction emissions will be well below the SJVAPCD screening threshold of 100 lbs/day with the use of the additional diesel generator for 8 hours per day. As a result, the use of an additional diesel generator for an estimated 8 hours a day will not result in a substantial increase in emissions analyzed in the Final IS/MND or exceedances of SJVAPCD thresholds. Construction of the laydown yard will result in approximately 25.63 acres of additional ground disturbance. The requested laydown yard will be in use for the entire duration of transmission line construction. The additional laydown yard will be located in high-traffic areas, which will reduce fugitive dust emissions. In addition, dust control measures will be implemented in accordance with Mitigation Measure (MM) AIR-2, such as watering of the laydown yard and maintaining a speed limit of 15 miles per hour. Updates to the Fugitive Dust Control Plan to accommodate the requested laydown yard will be submitted to the SJVAPCD. The laydown yard is not anticipated to increase vehicle miles traveled (VMT) as the laydown yard will result in a redistribution of Project VMT analyzed in the Final
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		IS/MND. As a result, the additional laydown yard will not result in a substantial increase in emissions analyzed in the Final IS/MND. The nearest sensitive receptor to the refinement area is located approximately 910 feet south of the transmission line. Potential air quality impacts to the sensitive receptor were analyzed in the Final IS/MND. As discussed in the Health Risk Assessment developed for the Project, staging areas/laydown yards will not generate high levels of diesel PM or significant loads of toxic air contaminants to create health risk impacts given the types of equipment used. The requested laydown yard will not expose nearby sensitive receptors to substantial pollutant concentrations, which is consistent with the analysis in the Final IS/MND. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Biological Resources	☒ Y	The requested laydown yard was surveyed for sensitive vegetation communities and special-status plant and wildlife species during supplementary Project surveys from March 24 to 27, 2025. The requested laydown yard will result in approximately 25.63 acres of additional temporary impacts compared to the Final IS/MND design. The impact area was mapped as agricultural land and disturbed land in the Final IS/MND. No special-status species or United States (U.S.) Fish and Wildlife Service-designated critical habitat occur within the requested laydown yard. However, the requested laydown yard may be utilized for nesting by some species of migratory birds. All applicable biological MMs and applicant-proposed measures (APMs) defined in the Project's Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), as well as all other permit and plan conditions, will be implemented as applicable to minimize or mitigate for any additional impacts resulting from the use of the requested laydown yard. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required as no sensitive resources are located in the requested laydown yard.
	☒ N	
	☒ Y	

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 impact, and avoidance/minimization measures to be taken.
Cultural and Tribal Cultural Resources	☐ N	A records search of the linear transmission line components was conducted on August 28 and November 13, 2023 through the Southern San Joaquin Valley Information Center. The records search included a 0.5-mile search radius around the transmission line components, which includes the requested laydown yard. No records of cultural or tribal resources were identified in the requested laydown yard. In addition, an intensive pedestrian survey was conducted by Chronicle Heritage between March 24 and April 1, 2025; this included the requested laydown yard. No cultural or tribal cultural resources were identified during the pedestrian survey. All applicable MMs and APMs identified in the MMCRP will be implemented. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to cultural or tribal cultural resources as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required as no sensitive resources are in the requested laydown yard.
	☒ N	
Geology and Soils	☒ Y	The same geological conditions and hazards present throughout the Project alignment will be encountered within the requested laydown yard. No new permanent structures are requested as part of the requested laydown yard, and geologic hazards to the requested laydown yard will be similar to those encountered throughout the Project. In addition, best management practices (BMPs) will be implemented for all activities associated with the requested laydown yard in accordance with the requirements of APM GEO-1. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to geology and soils as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Greenhouse Gas Emissions and Energy	☒ Y	As previously discussed for Air Quality, construction activities associated with the requested laydown yard will include the use of a diesel generator in addition to the construction equipment analyzed in the Final IS/MND. The requested laydown yard will not result in additional VMT beyond what was analyzed in the Final IS/MND. The Final IS/MND found that impacts associated with the Project's greenhouse gas (GHG) emissions will be less than significant based on the statewide emission reduction goals in the California Air Resources Board's
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		2022 Scoping Plan. Use of a diesel generator will result in a nominal increase in GHG emissions for the duration of construction. The addition of the diesel generator during construction does not conflict with the goals of the 2022 Scoping Plan because emissions from the generator would be short-term. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to GHG emissions as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Hazards and Hazardous Materials	☒ Y	The requested laydown yard will have the same level of impact on hazards and hazardous materials as analyzed in the Final IS/MND. Construction of the requested laydown yard will not require hazardous materials beyond what was analyzed in the Final IS/MND. No hazardous sites are located in the requested laydown yard or within 1 mile of the requested laydown yard. As analyzed in the Final IS/MND, the Project will require the use of hazardous materials, such as diesel fuel, gasoline, mineral oil, lubrication oil, hydraulic fluid, antifreeze, transmission fluid, lubricating grease, cement slurry, and chemicals associated with vehicles and construction activities. The requested laydown yard will not introduce additional quantities of hazardous materials beyond what was accounted for in the Final IS/MND or additional types of hazardous materials beyond those typically used during construction activities. Handling, storage, and disposal of hazardous materials at the requested laydown yard will comply with the Project's Hazardous Materials Management Plan, which will reduce risk to the nearest sensitive receptor, human health, and the environment through protocols for safe handling, storage, and disposal of hazardous materials and waste. Therefore, MPR #2 will not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts on hazards and hazardous materials.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Hydrology and Water Quality	☒ Y	The requested laydown yard was surveyed for the presence of waters of the state and/or the U.S. (i.e., jurisdictional wetlands or non-wetland waters) from March 24 to 27, 2025. The requested laydown yard does not contain any waters of the state or the U.S.; therefore, no jurisdictional waters permitting will be required. A Change of Information will be submitted to the Regional
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		Water Quality Control Board for the Project's Storm Water Pollution Prevention Plan (SWPPP) to accommodate the requested laydown yard, and appropriate erosion and sediment control BMPs will be implemented during use of the laydown yard. Hazardous materials required for construction including diesel fuel and anti-freeze will be stored at the requested laydown yard during construction. Storage of hazardous materials will comply with BMPs outlined in the SWPPP such as secondary containment for storage containers/tanks to prevent release of hazardous materials in the event of a leak or accidental spill. As a result, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to hydrology and water quality as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Noise and Vibration	☒ Y	Construction-related noise and vibration will be generated within the requested laydown yard due to site preparation, material loading/unloading, vehicle travel, and operation of the diesel generator. Construction of the requested laydown yard will be consistent with the Fresno County noise standards, which exempt noise sources associated with daytime construction. Nightwork is not anticipated at the requested laydown yard. However, any nighttime activities at the requested laydown yard will comply with MM NOI-1 and will not exceed the Fresno County nighttime noise threshold of 45 dBA between the hours of 9:00 p.m. and 7:00 a.m. The nearest sensitive receptor, R2, is located approximately 910 feet south of the requested laydown yard. The Final IS/MND concluded that structural damage from vibration could occur if construction activities generating vibration were to occur within 12 feet of a sensitive receptor. The Final IS/MND concluded that human annoyance from vibration could occur if activities generating vibration were to occur within 50 feet of a sensitive receptor. As a result, the requested laydown yard will not introduce a vibration impact due to its distance of approximately 910 feet from the nearest sensitive receptor, R2. Construction of the requested laydown yard is anticipated to be no louder than the activities for the installation of structure foundations. After construction of the requested laydown yard has been completed, the yard will be used for approximately 10 months during construction. Daily use of the requested laydown yard is anticipated to generate
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		noise consistent with the levels of noise generated during other construction activities planned in the area. The daytime ambient equivalent continuous sound level, as measured at a location approximately 730 feet west of R2, was 52 A-weighted decibels (dBA). This noise measurement is an approximation for ambient noise levels at R2 based on the rural setting of the noise measurement location and R2, as well as the agricultural land uses in the vicinity of both the noise measurement location and R2. The Final IS/MND used a 10 dBA increase in noise levels as a threshold for significance for noise impacts, as well as a 12-month exposure period as a threshold of significance for human health effects. The requested laydown yard is anticipated to be used for approximately 10 months. Additionally, use of the diesel generator will generate noise. The noise modeling for MPR #2 is included in Attachment C: Noise Calculations. The noise level for use of a diesel generator at the sensitive receptor modeled at 910 feet from R2 is 52.80 dBA, which is an anticipated 0.8 dBA increase in noise compared to the ambient conditions. Diesel generator noise levels will be below the 10 dBA increase threshold. Simultaneous operation of the generator and other heavy machinery within the laydown yard modeled at 910 feet from R2 is 56.30 dBA, which is an anticipated 3.50 dBA increase in noise compared to the ambient noise levels. Noise levels will be well below the 10 dBA increase threshold. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise and vibration as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Transportation	☒ Y	The requested laydown yard will not result in an increase of construction vehicles or VMT. The requested laydown yard will be accessed via the same network of roadways as those identified within the Final IS/MND. As a result, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to transportation as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Utilities and Service Systems	☒ Y	The requested laydown yard will be consistent with the utilities and service systems analysis in the Final IS/MND and will not require new or expanded public facilities or services. Therefore, MPR #2 yard will not
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to utilities and service systems as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Wildfire	☒ Y	The requested laydown yard is not located within a Fire Hazard Severity Zone. The potential risk of wildfire ignition and spread associated with the requested laydown yard will be managed in compliance with the Construction Fire Prevention Plan. Therefore, MPR #2 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to wildfire as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	

Attachment A: Photographs

ATTACHMENT A: PHOTOGRAPHS



Photograph 1:
North-facing
view of the area
of the requested
laydown yard.
Photograph
taken on May 6,
2026.



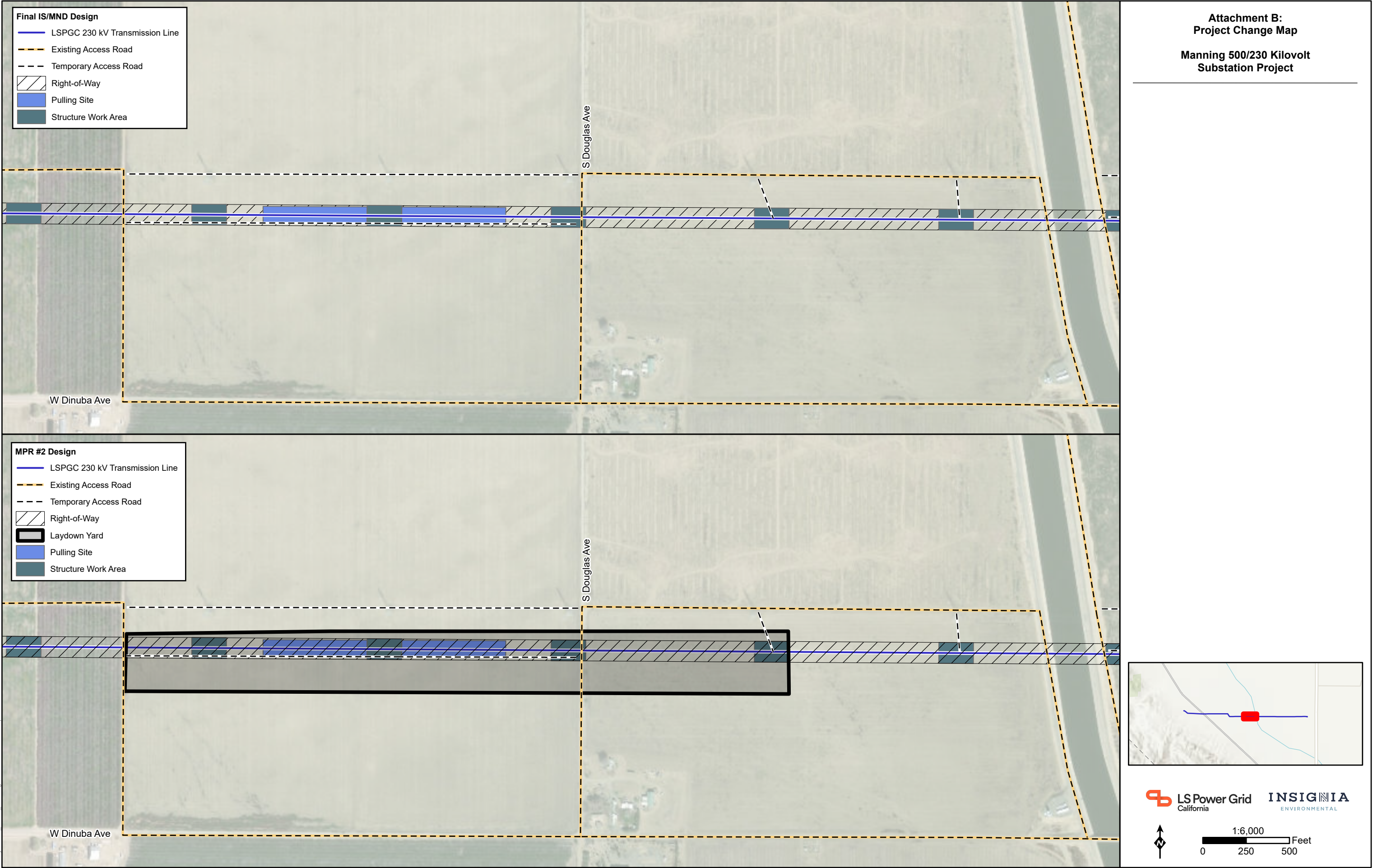
Photograph 2:
West-facing
view of the area
of the requested
laydown yard.
Photograph
taken on May 6,
2026.



Photograph 3:
South-facing
view of the area
of the requested
laydown yard.
Photograph
taken on May 6,
2026.

 A wide-angle photograph showing a flat, open landscape under a clear blue sky. The ground is dry and brown, with sparse, low-lying vegetation. In the distance, a few small structures and utility poles are visible on the horizon.	Photograph 4: East-facing view of the area of the requested laydown yard. Photograph taken on May 6, 2026.
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Attachment B: Project Change Map



Attachment C: Noise Calculations

Table 1: Reference Levels

Noise Category	Impact Device?	Use Factor	Noise Spec	Measured Noise	Sample Count
All Other Equipment > 5 HP	No	50	85	N/A	0
Auger Drill Rig	No	20	85	84	36
Backhoe	No	40	80	78	372
Bar Bender	No	20	80	N/A	0
Blasting	Yes	N/A	94	N/A	0
Boring Jack Power Unit	No	50	80	83	1
Chain Saw	No	20	85	84	46
Clam Shovel (dropping)	Yes	20	93	87	4
Compactor (ground)	No	20	80	83	57
Compressor (air)	No	40	80	78	18
Concrete Batch Plant	No	15	83	N/A	0
Concrete Mixer Truck	No	40	85	79	40
Concrete Pump Truck	No	20	82	81	30
Concrete Saw	No	20	90	90	55
Crane	No	16	85	81	405
Dozer	No	40	85	82	55
Drill Rig Truck	No	20	84	79	22
Drum Mixer	No	50	80	80	1
Dump Truck	No	40	84	76	31
Excavator	No	40	85	81	170
Flat Bed Truck	No	40	84	74	4
Front End Loader	No	40	80	79	96
Generator	No	50	82	81	19
Generator (<25KVA, VMS Signs)	No	50	70	73	74
Gradall	No	40	85	83	70
Grader	No	40	85	N/A	0
Grapple (on backhoe)	No	40	85	87	1
Horizontal Boring Hydraulic Jack	No	25	80	82	6
Hydra Break Ram	Yes	10	90	N/A	0
Impact Pile Driver	Yes	20	95	101	11
Jackhammer	Yes	20	85	89	133
Man Lift	No	20	85	75	23
Mounted Impact Hammer (hoe ram)	Yes	20	90	90	212

Noise Category	Impact Device?	Use Factor	Noise Spec	Measured Noise	Sample Count
Pavement Scarifier	No	20	85	90	2
Paver	No	50	85	77	9
Pickup Truck	No	40	55	75	1
Pneumatic Tools	No	50	85	85	90
Pumps	No	50	77	81	17
Refrigerator Unit	No	100	82	73	3
Rivit Buster/Chipping Gun	Yes	20	85	79	19
Rock Drill	No	20	85	81	3
Roller	No	20	85	80	16
Sand Blasting (single nozzle)	No	20	85	96	9
Scraper	No	40	85	84	12
Sheers (on backhoe)	No	40	85	96	5
Slurry Plant	No	100	78	78	1
Slurry Trenching Machine	No	50	82	80	75
Soil Mix Drill Rig	No	50	80	N/A	0
Tractor	No	40	84	N/A	0
Vacuum Excavator (Vac-Truck)	No	40	85	85	149
Vacuum Street Sweeper	No	10	80	82	19
Ventilation Fan	No	100	85	79	13
Vibrating Hopper	No	50	85	87	1
Vibratory Concrete Mixer	No	20	80	80	1
Vibratory Pile Driver	No	20	95	101	44
Warning Horn	No	5	85	83	12
Welder/Torch	No	40	73	74	5
Helicopter – Heavy Duty (3,200 HP)	No	50	106		
Helicopter – Light Duty (700 HP)	No	50	101		
Bulldozer	No	40	82		
Grader	No	40	85		
Roller	No	20	80		
Loader	No	40	79		
Water Truck	No	40	72		
Dump Truck	No	40	76		
Generator	No	50	82		

Noise Category	Impact Device?	Use Factor	Noise Spec	Measured Noise	Sample Count
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Source: http://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/handbook09.cfm

Table 2: Equipment Categorization

Equipment Name	HP	Noise Category	Noise Level (dBA at 50 feet)	Use Factor
LoDrill	221	Auger Drill Rig	85	20
Crane	231	Crane	85	16
Flatbed Truck	350	Flat Bed Truck	84	40
Concrete Truck	425	Concrete Mixer Truck	85	40
Worker Commute	NA	Pickup Truck	55	40
Haul Truck	425	Dump Truck	84	40
Ready Mix Truck	NA	Concrete Mixer Truck	85	40
Pickup Truck - 1/2 ton	395	Pickup Truck	55	40
Bucket or Boom Truck	402	Man Lift	85	20
Line Truck	402	Man Lift	85	20
Boom Truck	150	Crane	85	16
Bucket Truck	402	Man Lift	85	20
Dump Truck	415	Dump Truck	84	40
Excavator	250	Excavator	85	40
Line Truck with Auger	402	Auger Drill Rig	85	20
V-Groove	172	All Other Equipment > 5 HP	85	50
Tensioner	172	All Other Equipment > 5 HP	85	50
Forklift	100	Front End Loader	80	40
Sagging Cat	97	All Other Equipment > 5 HP	85	50
Water Truck	300	Dump Truck	84	40
Motor Grader	250	Grader	85	40
Skid Steer Loader	74	Front End Loader	80	40
Generator	45	Generator (<25KVA, VMS Sign	70	50
Air Compressor 340/390hp	390	Compressor (air)	80	40
Generator 150-260 kW	260	Generator	82	50
D6 Type Dozer	250	Dozer	85	40
Vibratory Roller	125	Roller	85	20
All other equipment > 5 hp	NA	All other equipment > 5 hp	85	50
Jackhammer	NA	Jackhammer	85	20
Backhoe	150	Backhoe	80	40
Concrete Saw	13	Concrete Saw	90	20
Loader	230	Front End Loader	80	40
Trackhoe	250	Excavator	85	40
Trencher	75	Excavator	85	40
Backhoe	150	Backhoe	80	40
Heavy-Duty Helicopter	3200	Helicopter – Heavy Duty (3,200 H	106	50
Helicopter	700	Helicopter – Light Duty (700 H	101	50
Hydroseed Truck	402	Dump Truck	84	40
Tool - Van/Conex 20'	NA	Pickup Truck	55	40
Excavator	75	Excavator	85	40
Light plant	0	Exempt	0	0
Water holding tanks	0	Exempt	0	0
Fire Deck (5 hp pump)	5	Pumps	77	50

Equipment Name	HP	Noise Category	Noise Level (dBA at 50 feet)	Use Factor
Water Buffalo Deck (5 hp pump)	5	Pumps	77	50
Testing Jack (5 hp pump)	5	Pumps	77	50
Refueler (small fuel transfer station)	5	Pumps	77	50
Grout Plant	5	Pumps	77	50
Arrow Board	0	Exempt	0	0
Bitumen (emulsion) sprayer, tank	0	Exempt	0	0
Excavator	250	Excavator	85	40
Pickup Truck - 1 ton	410	Pickup Truck	55	40
Road Grader	250	Grader	85	40
Mower	48	All Other Equipment > 5 HP	85	50
844 Loader	417	Front End Loader	80	40
Jet Fuel Truck	300	Dump Truck	84	40
Vibrating Plate	14	All Other Equipment > 5 HP	85	50
Micropile Drill Power Unit	310	Auger Drill Rig	85	20
Chipper	50	All Other Equipment > 5 HP	85	50
Wire Puller	250	All Other Equipment > 5 HP	85	50
Wire Trailer/Tensioner	250	All Other Equipment > 5 HP	85	50
Hydraulic Pole Puller	150	All Other Equipment > 5 HP	85	50
Cable Reel	175	All Other Equipment > 5 HP	85	50
Pulling Rig	175	All Other Equipment > 5 HP	85	50
Grinder	15	All Other Equipment > 5 HP	85	50
Excavator - Mini	108	All Other Equipment > 5 HP	85	50
Welding Truck	250	Dump Truck	84	40
Hydroseed Truck	402	Dump Truck	84	40
Forklift - 10k Reach	130	Front End Loader	80	40
Forklift - 15k Reach	130	Front End Loader	80	40
Gang Truck	350	Pickup Truck	55	40
Bulldozer	250	Dozer	85	40
Loader	250	Front End Loader	80	40
Compressor	24	Compressor (air)	80	40
Pressure Digger - Lo-Drill (Tracked)	275	Auger Drill Rig	85	20
Crane - 35 Ton (Manlift)	250	Man Lift	85	20
Rough Terrain Crane	185	Crane	85	16
Crane - 200 Ton	275	Crane	85	16
Generator 25 kW	36	Generator (<25KVA, VMS Sign)	70	50
D8 Sag Dozer	200	Dozer	85	40
Boom truck w/ hydraulic pole	150	Crane	85	16
Foreman Truck	300	Pickup Truck	55	40
A/C Roller 5-7 Ton	74	Roller	85	20
Backhoe - 2x4	68	Backhoe	80	40
120' Manlift	74	Man Lift	85	20

Table 3: Equipment List and Average Power

Activity Index	Activity Name	Equipment Name	HP	Fuel Type	Project Quantity	Days Used	Project Wide Hours per Day	Site Specific Hours Per Day	Site Quantity	Site Hours	Noise Level (Leq at 50 feet)	Use Factor	Total Use Factor	Adjusted Noise Level (Leq at 50 feet)	Average Leq (at 50 feet)	Average Power	Equipment Name and Quantity	Output
L-01	Laydown yard use	Bulldozer	200	Diesel	1	76	4	1	1	1	82	40	0.04	68.0	68.0	6339572.77	Bulldozer (1)	68.0
L-01	Laydown yard use	Grader	250	Diesel	1	76	5	1	1	1	85	40	0.04	71.0	71.0	12649110.64	Grader (1)	71.0
L-01	Laydown yard use	Roller	157	Diesel	2	76	6	1	2	1	85	20	0.02	68.0	71.0	12649110.64	Roller (2)	71.0
L-01	Laydown yard use	Loader	417	Diesel	2	76	6	1	2	1	79	40	0.04	65.0	68.0	6354625.878	Loader (2)	68.0
L-01	Laydown yard use	Water Truck	300	Diesel	2	76	8	1	2	1	84	40	0.04	70.0	73.0	20095091.45	Water Truck (2)	73.0

Table 4: Activity List and Noise Levels

Type	Count	Activity Index	Component	Activity Name	Average Leq (at 50 feet)	Dist to 75 dBA Leq	Dist to 70 dBA Leq	Dist to 65 dBA Leq	Dist to 60 dBA Leq	Dist to 55 dBA Leq	Duration at Each (Days)	Nearest Receptor Distance (feet)	Noise at Nearest Receptor (dBA)
L	1	L-01	General	Laydown yard use	81.5	105.8	188.1	334.6	594.9	1,058.0	76.0	910	56.3
L	2	L-02	General	Generator	78.0	70.8	125.9	223.9	398.1	707.9	76.0	910	52.8

ATTACHMENT D



California Public Utilities Commission



July 20, 2026

Clayton Eversen
LS Power Grid California, LLC
Via email: CEversen@lspower.com

Re: CPUC Approval of LSPGC Minor Project Refinement 3 for the Manning 500/230 kV Substation Project

Mr. Eversen,

On July 10, 2026, LS Power Grid California, LLC (LSPGC) requested California Public Utilities Commission (CPUC) approval of LSPGC's Minor Project Refinement 3 (MPR-3) for the Manning 500/230 kV Substation Project (Project). The request was revised and resubmitted on July 17, 2026. Pursuant to CPUC Decision 25-09-013, the CPUC Energy Division may approve requests by LSPGC for minor project refinements if the refinements are located within the geographic boundary of the study area of the Final Initial Study/Mitigated Negative Declaration (IS/MND) adopted for the Project and do not: (1) result, without mitigation, in a new significant impact based on the criteria used in the Final IS/MND; (2) substantively conflict with any mitigation measure or applicable law or policy; or (3) trigger an additional discretionary permit requirement.

In the MPR-3 request (see Attachment 1), LSPGC proposes the following refinements, resulting in an increase in overall temporary and permanent ground disturbance by approximately 1.1 acres compared to the Final IS/MND design:

- Shifting the 230 kV transmission line alignment north by approximately 60 feet along the eastern portion of the route, including associated changes to the locations of work areas and permanent access roads;
- Adjusting the structure design from six-pole dead-end structures to two-pole dead-end structures at structures 1/3, 5/1, and 7/1, and from a monopole dead-end structure to a two-pole dead-end structure at structure 1/1;
- Relocating temporary access roads to travel within the transmission line right-of-way, and in turn removing certain permanent access roads; and
- Removing two guard structure work areas within the Interstate 5 (I-5) median and refining the guard structure access route options for the I-5 crossing to use existing roads and the I-5 right-of-way.

These refinements would have the potential to impact Aesthetics, Agriculture, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Noise and Vibration, Transportation, Utilities and Service Systems, and Wildfire. However, these impacts would be consistent with those analyzed in the Final IS/MND, and would be sufficiently addressed by existing measures in the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) adopted for the Project. The impacts would not result in a new significant impact based on the criteria used in the Final IS/MND, substantively conflict with any mitigation measure or applicable law or policy, or trigger any new discretionary permit requirement.

Protecting California since 1911

The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



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California Public Utilities Commission



Therefore, I approve LSPGC's requested MPR-3, provided that these activities are carried out in accordance with the applicable methods and measures set forth in the Final IS/MND and MMCPRP.

Please feel free to contact me at tommy.alexander@cpuc.ca.gov with any questions or concerns regarding this letter.

Thank you,

Tommy Alexander, Project Manager
California Public Utilities Commission

Attachment:

1. Manning 500/230 kV Substation Project LSPGC MPR-3 Request

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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



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California Public Utilities Commission



Attachment 1

Manning 500/230 kV Substation Project LSPGC MPR-3 Request

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The CPUC regulates privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.



@CaliforniaPUC



MANNING 500/230 KV SUBSTATION 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, create a new significant impact, would clearly and strictly comply with the intent of the IS/MND mitigation measures, and that don't conflict with any applicable law or policy.

Date Requested: 7/17/2026

Report No.: 3

Date Approved: 7/20/2026

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): LS Power Grid California, LLC (LSPGC)

Location/Milepost: 230 Kilovolt (kV) Transmission Line

Land Use/Vegetative Cover: Mapped in Final Initial Study/Mitigated Negative Declaration (IS/MND) primarily as agricultural, disturbed, and developed lands.

Sensitive Resources: Seasonal stream channel.

Modification From:

☐ Permit	☐ Plan/Procedure	☐ Specification	☒ Drawing
☐ Mitigation Measure	☐ Other:		

Proposed Action(s):

LSPGC requests a slight northern shift of the 230 kV Transmission Line (TL) alignment compared to the TL alignment design in the Final IS/MND for the Manning 500/230 kV Substation Project (Project). The TL alignment will shift north by approximately 60 feet along the eastern portion of the TL alignment compared to the Final IS/MND design. The TL shift will result in minor shifts and changes to workspaces along the entire TL alignment. Minor shifts in the locations of permanent access roads will also occur.

Additionally, LSPGC requests two-pole dead-end structures at structures 1/3, 5/1, and 7/1 rather than the six-pole dead-end structures in the Final IS/MND design. LSPGC requests a two-pole dead-end structure at structure 1/1 rather than a monopole dead-end structure in the Final IS/MND design. LSPGC also requests temporary access roads that primarily travel within the TL right-of-way (ROW), giving flexibility for access during construction, and the removal of certain permanent access roads.

Lastly, LSPGC is requesting refinements to the guard structure work areas and three route options to access guard structures located on Interstate (I-) 5. LSPGC requests the elimination of the two guard structure work areas located in the median of I-5. The first requested route option would be to access the guard structure work areas directly from I-5 by pulling onto the shoulder of I-5 to access the guard structure work areas. This option will also require approval from the California Department of Transportation (Caltrans). The second option involves the use of existing access roads located south of the TL alignment and a short segment of overland travel to access the guard structure work areas. The existing access roads that would be utilized in the second option are outside of the Project's survey area. However, the roads are existing, and no road improvements or ground-disturbing activities will be conducted. A brief section of overland travel would be required to reach the guard structure work areas, and the area of overland travel is located within the Project's survey area. The overland travel would not occur within the nearby stream channel and would primarily extend from the existing access roads into the Caltrans's ROW. The third access option would be using a combination of existing routes approved in the Final IS/MND or requested temporary access within the TL ROW, a short segment of an existing road located west of and parallel to I-5, and a short segment of overland travel to access the guard structure work areas. The existing road located west of and parallel to I-5 has a low water crossing, and Project travel on the existing road would only occur when water is not present. In accordance with the Caltrans encroachment permit for the aerial crossing of I-5, and under Caltrans guidance, a short stint of the ROW fences on each side of the highway would be temporarily opened/removed for access to the guard structure areas. Once the aerial crossing is complete, and the guard structures are removed, the fencing would be returned to pre-construction conditions as required by Caltrans.

The requested refinements will result in an increase in overall temporary and permanent ground disturbance by approximately 1.1 acres compared to the Final IS/MND design.

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

Original Condition: The current site conditions of the requested refinements consist of agricultural, disturbed, and developed lands. In the Final IS/MND, the refinement areas were analyzed for the LSPGC 230 kV transmission line, work areas, pulling sites, transmission structures, permanent access roads, temporary access roads, and the use of existing access roads.

Justification for Change: Discussions with nearby solar developers and ongoing discussions with landowners led to the requested TL alignment shift. The shift will locate the LSPGC ROW closer to the Pacific Gas and Electric Company ROW. Further engineering of the TL led to changes in structure types at some locations. Discussions with the contractor led to refinements to guard structure work areas, refinements to permanent access roads, requests for driving through the ROW, and requests for access options to the guard structure work areas.

Maps & Figures: The current site conditions are depicted in Attachment A: Photographs. Attachment B: Project Change Map depicts the following requested refinements:

- Minor shifts of structure work area locations;
- Minor shifts in the locations of pulling sites;
- Structure design changes from six-pole dead-end structures to two-pole dead-end structures at structures 1/3, 5/1, and 7/1;
- Structure design change from a dead-end monopole to a two-pole dead-end structure at structure 1/1;
- Relocation of temporary access roads to travel within the 230 kV TL ROW;

- Removal of certain permanent access roads and minor shifts in the locations of other permanent access roads;
- Removal of two guard structure work areas; and
- Potential routes for accessing the guard structure work areas using existing roads and the I-5 ROW.

Environmental Impact: The requested refinements will not result in a new significant impact or a substantial increase in the severity of previously identified significant impact based on the criteria used in the Final IS/MND.

Concurrence (if appropriate):

<u>Resources:</u>			
Biological	☒ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Biological Survey Report Reference: Insignia Environmental. 2024. Biological Resources Technical Report. Insignia Environmental. 2025. Biological Resources Technical Report Addendum.			
Cultural	☒ No Resources Present	☐ Resources Present	☐ N/A, changes would not affect resources
Previous Cultural Survey Report Reference: Chronicle Heritage. 2024. Cultural Resource Assessment for the Manning 500/230 kV Substation Project, Fresno County, California. Chronicle Heritage. 2025. Cultural Resources Technical Report Addendum. Manning 500/230 Kilovolt Substation Project. ASM Affiliates. 2026. Cultural Resources Supplemental Survey and Addendum Report for the LSPGC Manning 500/230 kV Substation, Fresno County, California. ASM Affiliates conducted an archaeological survey on June 24, 2026 of the I-5 corridor within the Project area. Findings were negative. An addendum report was submitted to the CPUC on July 8, 2026.			
Paleontological	☒ No Resources Present	☐ Resources Present	☐ N/A, Change would not affect resources
Previous Paleontological Survey Report Reference: Chronicle Heritage. 2024. Cultural Resource Assessment for the Manning 500/230 kV Substation Project, Fresno County, California. Chronicle Heritage. 2025. Cultural Resources Technical Report Addendum. Manning 500/230 Kilovolt Substation Project.			
<u>Disturbance Acreage Changes:</u> ☒ Yes ☐ No			

The following table includes environmental analysis representative of the CEQA Appendix G Checklist Sections addressed in the Final IS/MND as it relates to MPR-3. MPR-3 would have no potential to impact the following environmental resource areas and therefore are not included in the table below: Forestry Resources, Energy, Land Use and Planning, Mineral Resources, Population and Housing, Public Services, and Recreation.

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 impact, and avoidance/minimization measures to be taken.
Aesthetics	☒ Y ☐ N	No designated scenic vistas or state scenic highways are located within the vicinity of the Project analyzed in the Final IS/MND or requested refinements. Viewers of the requested refinements will be the same as those analyzed in the Final IS/MND: motorists, workers, and few residents. The requested change from a six-pole dead-end structure to a two-pole dead-end structure at structures 1/3, 5/1, and 7/1 will reduce the overall structure footprints and eliminate the need for guy wires at those structures. The requested changed from a monopole dead-end structure to a two-pole dead-end structure at structure 1/1 will result in a negligible change in visual impact as the two poles will be located in close proximity to each other. The requested changes in temporary and permanent access roads will not constitute an appreciable change in visual impacts from construction analyzed in the Final IS/MND. Vehicles and equipment will continue to primarily travel in close proximity to the temporary and permanent access roads included in the Final IS/MND design. To access the guard structure work areas, vehicles may travel on the existing roads located south of the TL or on the existing road with the low water crossing (if no water is present) depicted on page 24 of Attachment B: Project Change Map. Such travel will only occur for a few days during installation of guard structures and during stringing activities. The other option to access the guard structure work areas is directly from I-5 (if approved by Caltrans). The guard structure work area access options will create minimal visual impact due to the short duration of guard structure construction activities and because existing roads would be primarily used. The requested minor TL ROW shift and associated shift in structure work areas will not appreciably change visual impacts from construction or operations and maintenance (O&M) of the Project analyzed in the Final IS/MND as the requested work area shifts are minor and the TL is within approximately 60 feet of the TL analyzed in the Final IS/MND. As a result, Minor Project Refinement (MPR) #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to aesthetics as identified in the Final IS/MND.
Agency Consultation?	☐ Y ☒ N	No agency consultation beyond submittal of the MPR to the CPUC is required.

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 impact, and avoidance/minimization measures to be taken.
Agriculture Resources	☒ Y	The requested refinements will increase temporary impacts to designated farmland by approximately 1.8 acres and decrease permanent impacts by approximately 0.4 acre compared to the Final IS/MND design. Topsoil will be salvaged from the refined work areas, and impacted farmland will be restored following the completion of construction. As described in the Final IS/MND, the County of Fresno's agricultural zoning permits electrical transmission infrastructure. Therefore, requested refinements will not conflict with zoning. As a result, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to agriculture as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Air Quality	☒ Y	Construction activities associated with the requested refinements will be consistent with those discussed in the Final IS/MND. The minor shifts in work areas and access roads will not require equipment or operational hours beyond what was analyzed in the Final IS/MND. Access to the guard structure work areas was not mapped in the Final IS/MND. However, the option to use the existing roads located south of the TL or segment of existing road with the low water crossing (if no water is present) as depicted on page 24 of Attachment B: Project Change Map and the option to access the guard structure locations directly from I-5 would not result in additional emissions because the number of vehicles and operating hours would not increase beyond what was analyzed in the Final IS/MND. The overall temporary and permanent disturbance from the Project will increase by approximately 1.1 acres due to the requested refinements. The increase in disturbance will result in a nominal increase in fugitive dust emissions compared to what was analyzed in the Final IS/MND. The construction crews will implement air quality best management practices (BMPs) for the requested refinements in accordance with the requirements of Mitigation Measure (MM) AQ-1 and Applicant-Proposed Measure (APM) AIR-2. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to air quality as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	Revisions to the Dust Control Plan will be submitted to the San Joaquin Valley Air Pollution Control District for approval. No specific agency consultation is required.
	☒ N	

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 impact, and avoidance/minimization measures to be taken.
Biological Resources	☒ Y	The requested refinement areas were surveyed for sensitive vegetation communities, special-status plant and wildlife species, and jurisdictional wetlands and other waters during initial Project surveys on October 17 and 18, from November 6 to 8, and on November 13 in 2023, as well as from March 24 through 27 in 2025. The potential access route to the guard structure work areas using existing roads located south of the TL and depicted on page 24 of Attachment B: Project Change Map was not fully covered by previous survey efforts. However, most of the route consists of existing roads and the short segment of overland travel to reach the guard structure work areas from the existing road will occur on developed land adjacent to I-5. Another access option for the guard structure work areas is to use the existing road located parallel to and west of I-5 with the low water crossing of a stream channel. Access using the existing road with the low water crossing would only occur when water is not present and the stream channel is dry. No overland travel would occur in the stream channel. Work within the requested refinement areas will be conducted near waters of the state and/or waters of the U.S., which is consistent with the analysis in the Final IS/MND Of the requested refinement areas that fall within the Final IS/MND habitat assessment survey area, approximately 86 percent of the requested refinement areas were mapped as agricultural, developed, and disturbed land in the Final IS/MND. The remaining refinement areas that fall within the Final IS/MND habitat assessment survey area consist of the following vegetation communities: <i>Amsinkia (menziesii, tessellate)</i> <i>Phacelia</i> spp. Herbaceous Alliance, <i>Brassica nigra</i> – <i>Centaurea (solstitialis, melitensis)</i> Herbaceous Semi-Natural Alliance, and <i>Bromus rubens</i> – <i>Schismus (arabicus, barbatus)</i> Herbaceous Semi-Natural Alliance. Overall, the requested refinements will result in a net increase of approximately 1.6 acres of temporary ground disturbance impacts and net decrease of approximately 0.4 acre of permanent ground disturbance impacts. Of the requested refinement areas that fall within the Final IS/MND biological resources survey area, no sensitive vegetation communities are present. Additionally, no special-status species or United States (U.S.) Fish and Wildlife Service-designated critical habitat occur within the requested refinement areas that fall within the Final IS/MND biological resources survey area.
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		All applicable BIO MMs and APMs defined in the Project's Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP), as well as all other permit and plan conditions, will be implemented as applicable to minimize or mitigate for any additional impacts resulting from the use of the requested refinement areas. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to biological resources as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required as no sensitive resources are in the requested refinement areas.
	☒ N	
Cultural and Tribal Cultural Resources	☒ Y	A records search was conducted on August 28, 2023 and November 13, 2023 through the Southern San Joaquin Valley Information Center within a 0.5-mile search radius around the linear TL components, which includes the requested refinement areas. No records of cultural or tribal resources were identified in the refinement areas. In addition, intensive pedestrian surveys that included the requested refinement areas were conducted by Chronicle Heritage and ASM Affiliates, Inc. between November 6 and November 28, 2023; from March 24 to April 1, 2025; on April 22 and 23, 2026; and on June 24, 2026. No new cultural or tribal cultural resources were identified during the pedestrian surveys. All applicable MMs and APMs identified in the MMCRP will be implemented. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to cultural or tribal cultural resources as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required as no sensitive resources are in the refinement areas.
	☒ N	
Geology and Soils	☒ Y	The same geological conditions and hazards present throughout the Project alignment will be encountered within the requested refinement areas. No new permanent structures are requested as part of these refinements, and geologic hazards to the refinements will be similar to those encountered throughout the Project. MRP #3 will require more temporary ground disturbance, loosening topsoil and increasing erosion potential. However, BMPs will be implemented for all activities associated with the refinement areas in accordance with the requirements of APM GEO-1. Implementation of BMPs will reduce erosion and loss of topsoil. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		severity of a previously analyzed impact to geology and soils as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Greenhouse Gas Emissions	☒ Y	As previously discussed for air quality, the requested refinements will not result in equipment or operational hours beyond what was analyzed in the Final IS/MND. Access to the guard structure work areas was not mapped in the Final IS/MND, but the number of vehicles and operating hours would not increase beyond what was analyzed in the Final IS/MND. The Final IS/MND found that impacts associated with the Project's greenhouse gas (GHG) emissions will be less than significant based on statewide emission-reduction goals of the 2022 Scoping Plan. The refinements remain consistent with the emission reduction goals of the 2022 Scoping Plan. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to GHG emissions as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Hazards and Hazardous Materials	☒ Y	The requested refinements will have the same level of impact on hazards and hazardous materials as analyzed in the Final IS/MND. Construction and O&M of the requested refinements will not require hazardous materials beyond what was analyzed in the Final IS/MND. The Project alignment and a 1-mile radius of the Project was screened for nearby hazardous sites, which included the majority of the requested refinement areas. No hazardous materials sites were identified. Review of the State Water Resources Control Board's GeoTracker database and the Department of Toxic Substances Control's EnviroStor database did not identify any open or closed hazardous sites within or in the vicinity of the potential access routes to the guard structure work areas depicted on page 24 of Attachment B: Project Change Map. Therefore, MPR #3 will not result in new significant impacts or a substantial increase in the severity of previously analyzed impacts on hazards and hazardous materials.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
	☒ Y	

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 impact, and avoidance/minimization measures to be taken.
Hydrology and Water Quality	☐ N	The potential access route to the guard structure work areas using existing roads located south of the TL and depicted on page 24 of Attachment B: Project Change Map was not fully covered by previous survey efforts. However, most of the potential route consists of existing roads and the short segment of overland travel to reach the guard structure work areas from the existing road will occur on developed land adjacent to I-5. Another access option for the guard structure work areas is to use the existing road located parallel to and west of I-5 with the low water crossing. Access using the existing road with the low water crossing would only occur when water is not present. Because the crossing is existing, and all travel will use the crossing, this access option will not alter drainage patterns. The proposed refinements would increase the amount of temporary ground disturbance during construction. Construction activities, in general, loosen topsoil and create potential for erosion and siltation, adversely impacting water quality. However, the Project Stormwater Pollution Prevention Plan will be updated with the proposed refinement areas once MPR #3 is approved, and appropriate erosion and sediment control BMPs will be implemented during construction activities within the refinement areas. BMPs are designed to prevent soil erosion and siltation of surface waters, as well as other water quality impacts. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to hydrology and water quality as identified in the Final IS/MND.
Agency Consultation?	☐ Y	A Change of Information for the Project's Stormwater Pollution Prevention Plan will be submitted to the Central Valley Regional Water Quality Control Board for approval. No specific agency consultation is required.
	☒ N	
Noise and Vibration	☒ Y	Construction-related noise and vibration will be generated within the requested refinement areas due to equipment mobilization, clearing of access roads, structure assembly, structure installation, site preparation, grading and paving, and foundation excavation and installation. A residence is located at the corner of Manning Avenue and South Hudson Avenue, where vehicles will turn from Manning Avenue onto South Hudson Avenue to follow the access route to the guard structure work areas. Noise from vehicles traveling on Manning Avenue is anticipated to be brief as the vehicles will turn onto South Hudson Avenue. The other requested refinement areas are not located within 100 feet of any sensitive receptors. The nearest sensitive receptor to the 230 kV TL is located
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		approximately 200 feet north of the refinement areas, which is approximately 10 feet farther north than what was analyzed in the Final IS/MND. Use of the refinement areas may result in temporary increases in noise and vibration levels; however, the construction activities will be consistent with those presented in the Final IS/MND and will be short-term and temporary. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to noise and vibration as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
	☐ N	
Transportation	☒ Y	The requested refinements will not result in an increase in vehicle trips and vehicle miles traveled (VMT) compared to the vehicle trips and VMT analyzed in the Final IS/MND. Neither the use of the access routes to the guard structure work areas depicted in Attachment B: Project Change Map nor the access via I-5 are anticipated to result in an increase in the overall Project vehicle trips and VMT because the number of vehicles and operational hours will not increase beyond what was analyzed in the Final IS/MND. While the guard structure access option using existing roads south of the TL is a longer access route than considered in the Final IS/MND, the total length of this option is approximately 5 miles, and this would be traveled only several times for the temporary duration of the guard structures. Therefore, the VMT from this specific access option would not be substantial. The other requested refinements will be accessed via the same network of existing roadways analyzed in the Final IS/MND. The requested refinements to temporary access roads will not affect transportation as the requested refinements to temporary access roads will primarily locate access within the TL ROW. As a result, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously identified impact to transportation as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☒ Y	Approval from Caltrans is required to pull onto the shoulder of I-5 to access the guard structure work areas.
	☐ N	
Utilities and Service Systems	☒ Y	The requested refinements will be consistent with the utilities and service systems analysis in the Final IS/MND and will not require new or expanded public facilities or services. Therefore, MPR #3 will not result in
	☐ N	

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 impact, and avoidance/minimization measures to be taken.
		a new significant impact or a substantial increase in the severity of a previously analyzed impact to utilities and service systems as identified in the Final IS/MND.
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	
Wildfire	☒ Y	A majority of the requested refinements are located in a low Fire Hazard Severity Zone (FHSZ), while the remaining requested refinements, located west of I-5, are located in a moderate FHSZ. Compared to the Final IS/MND, the requested refinements will not result in the construction of additional Project infrastructure in either FHSZ. The requested refinements will not introduce any structures or equipment that may increase the risk of wildfire ignition as analyzed in the Final IS/MND. The potential risk of wildfire ignition and spread will be managed in compliance with the Construction Fire Prevention Plan. Therefore, MPR #3 will not result in a new significant impact or a substantial increase in the severity of a previously analyzed impact to wildfire as identified in the Final IS/MND.
	☐ N	
Agency Consultation?	☐ Y	No agency consultation beyond submittal of the MPR to the CPUC is required.
	☒ N	