

**SCE VALLEY SOUTH SUBTRANSMISSION PROJECT**

**Date:** March 5, 2020  
**To:** Eric Chiang, Project Manager, CPUC  
**From:** Vida Strong, Aspen Project Manager  
**Subject:** Monitoring Report #22: February 16 to February 29, 2020

**Introduction**

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) Valley South Subtransmission Project (VSSP). Project components include:

- Installation and upgrades of the 115 kV subtransmission line
- Modification of some existing 12 kV and 33 kV distribution facilities
- Telecommunication equipment installation and upgrades
- Installation of new components at the Valley Substation

**CPUC Environmental Monitor (EM):** CPUC EM, Rosina Goodman, was onsite February 19 and 25, 2020.

**CPUC Notices to Proceed (NTPs)**

Table 1 summarizes the NTPs issued for VSSP construction. No additional NTPs are required.

**Table 1 - NTPs**

NTP #	Date Requested	Date Issued	Description
NTP #1	12/11/18	01/04/19	Use of 2 Material Yards and Vegetation Management at six locations along the right-of-way.
NTP #2	02/26/19	03/25/19	Construction of Project components not subject to final engineering due to use of required insulated conductor in high fire hazard areas, Segments 1 and 2.
NTP #3	05/16/19	06/07/19	Poles subject to final engineering due to required use of insulated conductor in high fire hazard areas.

**Construction & Compliance**

To date, all pre-compliance materials associated with NTPs #1, #2, and #3 that have been submitted have been approved. Construction activities associated with NTP #1 began on February 4, 2019. Construction activities associated with NTP #2 began on May 6, 2019. Construction activities associated with NTP #3 began on June 18, 2019.

A summary of construction and compliance activities for the subject reporting period is provided below.

### **Summary of Construction Activity**

1. Wilson Construction and their subcontractor KV Structures, are currently using the Valley Substation Contractor Yard for mobile office headquarters and equipment and material storage. Activities associated with the yard included delivery of materials including rebar cages, tubular steel poles (TSPs), and conduit.
2. BMP inspections and maintenance occurred at TSP foundation locations in Segment 1.
3. Wilson construction activities on Segment 1 included: Hauling, framing, and setting wood poles at Construction Areas UNK21 through UNK39, and UNK98 through UNK113 (see Photo 1); distribution wire stringing activities at Construction Areas UNK42 through UNK45 and UNK125 through UNK159; installed anchors from Construction Areas UNK115 through UNK125; distribution work at Construction Areas UNK159, UNK179, and UNK234 (see Photo 2); trenched and installed distribution conduit from Construction Areas UNK44 to UNK45; worked on the distribution riser poles at 4730624E and 4768867E; hung travelers from Construction Areas UNK20 through UNK40; distribution cutover work at Construction Areas UNK155 and UNK189; pulled cable through the distribution riser conduit from Construction Areas UNK222 through UNK226 and removed old distribution poles (see Photo 3); vegetation mowing from Construction Areas UNK71 through UNK95 and poles 4937060E, 4936647E, 4936695E, and 4936661E; hauled wood poles from Construction Areas UNK85 through UNK95, and started framing, digging and setting poles.
4. KV Structures has demobilized from the project until the last remaining foundation is available for construction.
5. Wilson construction activities on Segment 2 included watering restoration sites and punch-list items at poles 4402025E, 4704757E, and 4402067E.
6. SCE self-perform construction activities within the Valley Substation included wiring within the MEER building.

### **Environmental Compliance**

1. Biological and paleontological monitoring occurred during construction activities.
2. There was one SCE self-reported incident and three observations documented throughout the monitoring period. The Level 1 incident was for the distribution riser trenching at Construction Areas UNK44 and UNK45 described below and in the Incident Report issued by the CPUC EM on February 19. Two observations were for non-project related tire tracks and ground disturbance near Construction Areas UNK41 and UNK42. One observation was for one nonsignificant archaeological resource discovered on Segment 1 on February 19. No Environmentally Sensitive Area (ESA) was established and the resource was not collected.
3. On February 19, the CPUC EM observed distribution riser trenching outside of approved project disturbance limits between Construction Areas UNK44 and UNK45 (see Photo 4). Wilson's Environmental Manager was notified of the observation. The CPUC EM issued a Level 1 incident for construction activities outside of the approved project disturbance limits. SCE responded on February 26 that the project management team will ensure a thorough review of any engineering changes to determine if work can occur or if additional areas need to be requested and thorough review of types of approved construction activities for work areas, roads, and overland travel access roads will be conducted with the crews and field monitors. Minor Project Change #7 was submitted on February 27 to address the subject work area (see Table 2 below).

4. As of the end of the monitoring period, there are five active red-tailed hawk nests associated with project activities on Segment 1. Buffers have been established per the Project Nesting Bird Management Plan, which specifies the establishment of buffers and the removal of inactive non-special-status bird species' nests. Three of the red-tailed hawk nests have reduced buffers for wire stringing activities. No nests were removed during the subject reporting period.
5. There were six special-status species observed or identified at locations associated with construction activities during the subject monitoring period. These include American white pelican, ferruginous hawk, northern harrier, white-tailed kite, loggerhead shrike, and several populations of smooth tarplant.
6. Two ephemeral pools suitable for fairy shrimp were identified on Segment 1. ESA staking was established around each pool for avoidance during construction activities.
7. Twenty-two new potential Stephen's kangaroo rat burrows were documented at several Construction Areas on Segment 1 during the monitoring period. An ESA buffer of 10 feet was established at each potential burrow.
8. There were no SCE self-reported SWPPP maintenance items associated with construction activities reported throughout the monitoring period.
9. There were no reportable (> 1 gallon) or non-reportable (< 1gallon) spills associated with construction activities during the monitoring period.

### Temporary Extra Workspaces (TEWS) and Minor Project Changes (MPCs)

No MPCs or TEWS were approved during the subject monitoring period. Table 2 summarizes the TEWS and MPCs for the Valley South Subtransmission Project to date.

**Table 2 – TEWS & MPCs**  
(Updated 03/05/20)

MPC/TEWS No.	Description	Status
<b>MPCs</b>		
1	Leon Road Realignment	Issued by CPUC 01/11/19
2	Laydown area for wood pole storage south of Valley Substation Yard.	Issued by CPUC 07/10/19
3	Additional work areas and access roads on Segment 1 and Segment 2	Issued by CPUC 08/30/19
4	Additional work area adjacent to pole 4402074E on Segment 2.	Issued by CPUC 10/29/19
5	Additional work areas and access roads on Segment 1	Issued by CPUC 12/12/19
6	Additional overland travel access on Segment 1	Issued by CPUC 01/16/20

MPC/TEWS No.	Description	Status
7	Additional disturbance area for distribution riser trenching between Construction Areas UNK44 and UNK45	Returned with questions to SCE on 2/27/20
<b>TEWS</b>		
1	Use of existing access road at Construction Area UNK241 through UNK243	Issued by Aspen 09/12/19

### CPUC Compliance Incidents, Project Memoranda (PMs) and Non-Compliance Reports (NCRs)

One Incident Report and no PMs or NCRs were issued by the CPUC EM during the subject reporting period. Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

**Table 3 - CPUC Incidents, Project Memoranda, and Non-Compliance Reports**  
(Updated 03/05/20)

Incident/PM/NCR	Regulatory Requirement	Date Issued	Segment	Description
Level 1 Incident	NTP requirement	08-20-19	Segment 1	Wood poles staged at Construction Areas not released for construction.
Level 1 Incident	SWPPP/BIO-2/AES-1	09-25-19	Segment 1	Construction equipment without secondary containment, staging area without screening, pipes without capping, and an open trench with gaps in covering.
Level 1 incident	NTP/MMCRP	02-19-20	Segment 1	Distribution riser trenching outside of approved project disturbance limits between Construction Areas UNK44 and UNK45.

## PROJECT PHOTOGRAPHS



Photo 1 – Setting wood pole at Construction Area UNK23 (February 19, 2020).



Photo 2 – Distribution activities at Construction Area UNK159 (February 19, 2020).



Photo 3 – Distribution cutover construction activities at UNK224 (February 25, 2020).



Photo 4 – Trenching outside approved project disturbance area limits between Construction Areas UNK44 and UNK45 (February 19, 2020).