

SCE VALLEY SOUTH SUBTRANSMISSION PROJECT

Date: March 19, 2020
To: Eric Chiang, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Subject: Monitoring Report #23: February 30 to March 14, 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 March 3 and 10, 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 4937060E, 4937061E, 4936665E, 4936657E, 4936659E, 4936661E, 4936667E, 4782356E, UNK80 through UNK95, UNK107, UNK109, UNK113, UNK117, and UNK123 (see Photo 1); installed snub poles at 4936665E, 4936667E, and 4737057E; installing anchors and guy wires at Construction Areas UNK06, UNK93, UNK94, UNK116 through UNK119, UNK140, and UNK180; distribution wire wreck-out at Construction Areas UNK155 through UNK189; distribution wire reconductoring from UNK151 to pole 4732045E and UNK180 to pole 4163134E (see Photo 2); riser and vault work at Construction Areas UNK155 through UNK189 (see Photo 3); and punch-list items at Construction Areas UNK125 through UNK154.
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 at poles 4402023E, 4402024E, 4402027E, 4402028E, 4402043E, 4402061E, and 4402062E.
6. SCE self-perform construction activities within the Valley Substation included wiring within the MEER building and preparing for vault work.

Environmental Compliance

1. Biological, paleontological, cultural, and Native American monitoring occurred during construction activities.
2. There were no SCE self-reported incident or observations documented throughout the monitoring period.
3. On March 5, the CPUC EM issued an Incident Report for weekly and daily reporting not adhering to the specific criterion stated in the MMCRP. The CPUC EMs documented several instances where SCE either failed to report construction activities accurately, include resources found during the subject monitoring period, or reporting on compliance incidents within one business day. SCE responded by changing the format of the weekly construction reporting section to more accurately capture construction activities.
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 was one special-status species, smooth tarplant, observed or identified at locations associated with construction activities during the subject monitoring period.

6. Two ephemeral pools suitable for fairy shrimp were identified on Segment 1 (see Photo 4). Environmentally Sensitive Area (ESA) staking was established around each pool for avoidance during construction activities.
7. Eight 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)

One MPC and no 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 03/19/20)

MPC/TEWS No.	Description	Status
MPCs		
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
7	Change overhead distribution work to underground and associated workspace on Segment 1 between Construction Areas UNK44 and UNK45	Issued by CPUC 03/13/20
TEWS		
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 03/19/20)

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.
Level 1 incident	NTP/MMCRP	03-05-20	All	Weekly and daily reporting not adhering to the criterion stated in the MMCRP.

PROJECT PHOTOGRAPHS



Photo 1 – Excavating to set wood pole at Construction Area UNK86 (March 10, 2020).



Photo 2 – Distribution reconductoring and wreck-out at Construction Area UNK180 and pole 4163134E (March 4, 2020).



Photo 3 – Vault work at Construction Area UNK188 (March 8, 2020) (Photo courtesy of SCE).



Photo 4 – Potential fairy shrimp ephemeral pool ESA on Segment 1 (March 11, 2020) (Photo courtesy of SCE).