

Attachment F

Communication Protocol

Devers-Palo Verde No. 2 Transmission Project Mitigation Monitoring, Compliance, and Reporting Program



California Public Utilities Commission
and
Bureau of Land Management
U.S. Department of Interior

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Communication Protocol Summary

Southern California Edison

Devers-Palo Verde No. 2 Transmission Line Project

In order to ensure that the CPUC Environmental Monitors (EMs) can get accurate information on ongoing surveys, construction work, and schedules, and that SCE management is kept in the loop, the following protocols have been formulated (see also Section 3.3 of the MMCRP):

- The CPUC EMs' primary point of contact will be SCE's FLs. If the FL is not available, the FM will be the point of contact. If issues can't be resolved at the FL or FM level, the issue will be elevated to the CPUC EM Project Manager/SCE SME and EC via e-mail or telephone.
- SCE (FLs) will inform CPUC EMs of all current and planned survey and construction activity, including status of permits and activity locations, in a timely manner. Timely notification of activity is that which allows reasonable response time for agency monitors to be present for that activity. Notification will correspond to organization and roles for each entity as identified in Section 2.1.
- The CPUC LEM and other designated agency representatives or staff can talk to anyone on the construction site to ask questions about their activity, but the construction personnel may opt to refer him/her to the CWPM or CSM. The SCE CSM and CWPM are the appropriate contacts for information on construction activity schedules or construction practices.
- SCE will provide a list of all construction monitoring personnel and managers, identified by work package or component, title, and contact information for each person, to the CPUC LEM. Updated lists will be distributed to keep all parties informed of monitor and staff additions/changes, as well as construction scheduling changes. This list of personnel, subsequent updates, and construction scheduling changes will be distributed to all persons on the list throughout the construction process.
- CPUC EMs will continue to report compliance concerns first to SCE FLs and SCE FMs and give them time to contact resource agencies and/or resolve compliance issues. FLs may coordinate with the SCE SMEs in resolving issues in accordance with SCE's monitoring procedures. Documentation of each of these communication efforts, along with documentation of subsequent actions to achieve compliance, will be reported. Because SCE is the permit holder with jurisdictional agencies, the SCE SMEs will consult with applicable resource agencies. However, if the CPUC EMs have an ongoing unresolved concern about a mitigation measure that could affect a permit condition or could result in resource endangerment, the SCE SME, in the presence of CPUC EMs, will call the appropriate resource agency to discuss the issue. The SCE SME will take the lead in the coordination effort and in resolving the issue.
- The resource agencies will be notified immediately by the SCE SME of any substantive issues (e.g., non-compliant events and special-status species sightings) regarding their respective resources and activities taken to resolve the issue, consistent with permit requirements. In addition, the CPUC EM will receive immediate notification if they are not already aware of the issue or are not at the specific location.
- Prior or subsequent to immediate agency notification, SCE SMEs will develop a plan to resolve the issue and will follow up with the respective agencies to explain their strategy and receive agency approval.
- If "take" is imminent or if there is a danger/hazard, the CPUC EM can request that work be stopped in that area immediately (as long as it can be done safely); this request should be made to the CSM, CWPM, SCE FL, or SCE FM. At any time, anyone can order an activity to be halted temporarily if take or a hazard is imminent.
- Weekly conference calls will include a discussion of construction and compliance activities, with CPUC EMs, SCE FLs, and agency staff participating.