235 Montgomery Street, Suite 935, San Francisco, CA 94104-3002
Tel. 415-955-4775, Fax 415-955-4776, www.aspeneg.com

PROJECT MEMORANDUM
SCE EL CASCO SYSTEM PROJECT

To: Lynne Mosley, CPUC
From: Vida Strong, Aspen Project Manager
Date: September 29, 2009
Subject: Report #7: September 13, 2009 – September 26, 2009

CPUC ENVIRONMENTAL MONITOR (EM): Lynn Stafford

CPUC EM Lynn Stafford was on site September 16th, 17th, 22nd, 23rd and 24th, 2009.

The SCE El Casco Project includes the following components:

- Construction of the new El Casco 220/115/12-kilovolt (kV) substation within the Norton Younglove Reserve, Riverside County, California;
- Replacement of approximately 15.4 miles of existing single-circuit 115 kV subtransmission lines with new, higher capacity single-circuit 115 kV subtransmission lines and replacement of support structures within existing SCE ROWs in the Cities of Banning and Beaumont and unincorporated Riverside County;
- Rebuilding 115 kV switchracks within Zanja and Banning Substations in the Cities of Yucaipa and Banning, San Bernardino and Riverside Counties, respectively;
- Installation of telecommunications equipment at the El Casco Substation and at SCE's existing Mill Creek Communication Site, San Bernardino County; and
- Installation of fiber optic cables within public streets and on existing SCE structures between the Cities of Redlands and Banning in San Bernardino and Riverside Counties, respectively.

The following compliance and construction activities occurred during the subject time period:

EL CASCO SUBSTATION

Summary of Activity:
The initial vegetation removal activity at El Casco Substation site and at the new access road was conducted during the week of February 23rd through 27, and was reported in Report #1.

No additional construction occurred at the El Casco Substation site until the subject reporting period.

On May 8, 2009, SCE submitted the Notice to Proceed (NTP) request for the construction of the El Casco Substation and associated HDD bore work and conduit installation under San Timoteo Creek, and construction of three adjacent towers. NTP #5 for the El Casco Substation NTP request was granted by CPUC on August 31, 2009.

The pre-construction clearance biological resource survey at the El Casco Substation was conducted by Natural Resource Consultants (NRC) on August 31 and September 1, 2009, access road, and proposed culvert construction sites and was reported on by September 1, 2009. The CPUC EM conducted and reported on a field validation of the survey on September 3, 2009. A newly discovered stand of California walnut adjacent to the proposed new access road was flagged for avoidance during the subject reporting period.

Construction activity at the culvert relocation site on the access road and at the substation site began during the week of September 14, 2009 in the subject reporting period. Various pieces of equipment and materials were stored onsite.

A temporary parking area was established just inside the entrance gate with a security guard building (see Figure 1).

A silt fence was installed along the north (San Timoteo Creek) side of the access road the entire distance from the entrance gate to the east end of the substation site (see Figure 2). The controlled cultural resource excavation site at the substation site was fenced. The controlled excavation began during the subject reporting period and will continue into the following reporting period. An unanticipated cultural discovery occurred during the subject reporting period and all appropriate protocols were implemented.

A turnabout for heavy equipment was established adjacent to the access road at the east end of the substation site.

The culvert relocation site was prepared with SWPPP protection devices (see Figure 3). On September 25th of the reporting period, concrete slurry was applied to the access road above the existing culvert pipe to provide additional support for heavy equipment.

BANNING SUBSTATION

Summary of Activity:
The NTP for the Banning Substation work was granted by CPUC on August 13, 2009. MOD #1 to NTP #3 for additional work to be conducted at three existing transmission line poles located outside of the substation was approved by CPUC on August 26, 2009.

No work occurred at the substation during the subject reporting period.

ZANJA SUBSTATION

Summary of Activity:
The NTP request was submitted to CPUC by SCE on June 19, 2009 for the Zanja Substation work. The pre-construction compliance processes are currently underway. Pending pre-construction compliance submittals for Zanja Substation include: biological surveys, outstanding hydrology submittals, geotechnical investigation submittals, as well as visual mitigation submittals. Potential EIR Addendum materials for work not previously analyzed in the EIR are also outstanding.

On April 23, a Temporary Extra Workspace (TEWS) was issued by the CPUC EM for storage of fiber optic materials within the existing Zanja Substation, Yucaipa, San Bernardino County. SCE was notified that if they wish to continue to use the Zanja Substation for material storage beyond 60 days that a variance request needs to be approved by CPUC. The approved TEWS area has not been used to date; however, SCE has requested permanent use of the subject area during construction as part of their NTP request for the Zanja Substation.

MILL CREEK COMMUNICATION SITE

Summary of Activity:
The NTP request for the Mill Creek Communication Site was submitted to CPUC by SCE on June 19, 2009. The pre-construction compliance process is currently underway. Pending pre-construction compliance submittals for the Mill Creek element include: biological surveys, regulatory permit submittals, outstanding hydrology submittals, geotechnical investigation submittals, as well as visual mitigation submittals. Potential EIR Addendum materials for work not previously analyzed in the EIR are also outstanding.

FIBER OPTIC CABLE (FOC) INSTALLATION

Summary of Activity:
The NTP request for the entirety of the fiber optic work (not including the HDD bore) was submitted to CPUC by SCE on March 5, 2009. However, on May 15, SCE requested authorization from the CPUC to commence with construction of the underground fiber optic elements in the Cities of Banning and Beaumont.

This separate NTP request was due to pending pavement rehabilitation work in this area by the City of Beaumont. The request was granted as NTP #2 by CPUC on May 22, 2009. NTP #4 for the remainder of construction of the fiber optic elements of the El Casco System Project was approved by CPUC on August 27, 2009.

Construction within the cities of Banning and Beaumont began on June 16 at the western end of the 5000-foot underground conduit system, and was completed in early August. The construction activity consisted of installation of two 5-inch conduits within a 36-inch-deep trench excavated into First Street in Beaumont and Sun Lakes Boulevard (contiguous roadways) in Banning. Seven manholes, for cable pulling purposes, also were installed in 5-foot-deep excavations.

Installation of the FOC segment between the Mentone and Zanja Substations began on September 17, 2009 during the subject reporting period. The pre-construction biological survey by NRC had been completed on September 2 and 3, 2009, and reported on September 4. The CPUC validation was conducted on September 9, and reported on September 10, 2009.

Installation of the framing arms and placement of pulling rope began at the intersection of Colton and Sapphire Streets in Mentone (see Figure 4) and proceeded to the Zanja Substation. Work began on the Zanja Substation Temporary Shoo-fly on Saturday, September 26, 2009. Some sections that will require the presence of law enforcement for traffic control were skipped until a later time. After tree-trimming is completed, the cable will be pulled.

115 kV Sub-Transmission Line Replacement

Summary of Activity:
The NTP request for the 115 kV sub-transmission work was submitted to CPUC by SCE on March 3, 2009. The pre-construction compliance process is currently underway. Pending pre-construction compliance submittals for the sub-transmission element include: regulatory permit submittals, outstanding hydrology submittals, geotechnical investigation submittals, as well as visual mitigation submittals.

The report on the methods, results, and conclusions of the Pre-NTP Survey for Biological Resources on Segment 2 of the proposed Subtransmission Cable Route was submitted to SCE by NRC on July 27, 2009. This report has been field validated by the CPUC EM.

On September 22, 2009 SCE submitted a Variance Request for several geotechnical and hydrological Mitigation Measures related to the 115 kV Subtransmission Line Element. A site visit including SCE and Aspen personnel is scheduled for October 5, 2009 to review the variance request.

Construction Yards & Other Workspace Needs

Variance Request #1 for a laydown yard immediately south of SCE's existing Maraschino Substation in the City of Beaumont, Riverside County, was requested on April 1 and approved by CPUC on April 16, 2009. Construction of the laydown yard began on May 28 and was completed by June 12, 2009. The yard is currently being used for the storage of materials, including transmission towers.

No requests for additional construction yards or other workspace needs have been submitted to date.

Environmental Compliance

- Biological, cultural resource, and other mitigation monitoring was conducted by NRC, LSA, and RMT consultant field monitors at both the El Casco Substation and the FOC work areas. In addition, SCE provided air quality monitoring. Monitors representing pertinent environmental issues were present with each construction crew at all times during construction.
- The controlled excavation of a pre-determined sensitive cultural resource area within the El Casco Substation site began during the subject reporting period. Initially, the area around the planned excavation was fenced for exclusion. Material was scraped two inches at a pass. Cultural resource monitoring

inspected the surface immediately after each pass. The spoils were placed in the area planned to the staging area. During the controlled excavation, a concrete pipe buried a few inches under the surface was uncovered. This is believed to be one of the anomalies discovered during earlier sub-surface remote sensing. According to LSA archeologists, this pipe may date from the mid 1900s, and may have been part of an irrigation system for a nearby ranch. The entire footprint of the pipe within the site footprint will be mapped before it is removed. It is not of historical registry value.

- Silt fencing was erected along the north border of the El Casco Substation access road between the road and San Timoteo Creek during the subject reporting period. During the excavation of a 4-inch deep trench for the fencing, three historical isolate artifacts were found by the accompanying cultural resource monitor. These were a piece of brick, glass, and a ceramic shard. They were collected. The CPUC EM was informed immediately by the LSA lead archeologist.
- The site of the culvert relocation was sandbagged in addition to the silt fencing in preparation for work at that site.
- The small stand of California walnut adjacent to the proposed new access road was fenced for exclusion.
- Dust control was maintained throughout the El Casco Substation and access road sites during the subject reporting period in spite of occasional high winds, low humidity, and high temperatures. One day, work was discontinued early because there was not enough water truck activity to prevent fugitive dust from leaving the site during Santa Ana wind conditions.
- The grading contractor at El Casco Substation site, Cattrac, will submit a plan for hauling water from nearby source by pipe to the site. This will be subject to resource surveying and CPUC approval.
- During the FOC installation work between Mentone and Zanja Substations, linemen climbed the poles in areas too remote for a bucket truck to approach (see Figure 5). Biological Monitors directed the workers through sensitive habitats to the sites to avoid habitat disturbance.

Table 1 provides a summary of the Non-Compliance Reports (NCRs) and Project Memorandum (PM), and other incidents (i.e., spills, etc.) for the SCE El Casco System Project.

TABLE 1
NCRs, PROJECT MEMORANDUM, & OTHER INCIDENTS
(Updated 09-29-09)

Type	Date Issued	Description
PM #1	03/16/09	Failure to comply with Mitigation Measure B-18 before, during and after vegetation clearing at the El Casco Substation site. Construction equipment went outside of approved Project boundaries.
	8/21/09	A SCE internal noncompliance at the Banning Substation was issued for mobilization of the site before environmental training and biological pre-construction sweep were conducted.
PM #2	8/27/09	The initiation of construction activity before CPUC authorization and validation of the biological survey at the site of the NTP #3, MOD #1 pole work in Banning.

NOTICE TO PROCEED (NTP) SUMMARY

Table 2 summarizes the NTPs submitted, reviewed, and issued to date for the SCE El Casco System Project.

TABLE 2
NOTICES TO PROCEED
(Updated 09-29-09)

NTP #	Date Requested	Date Issued	Description
#1	02/20/09	02/23/09	Vegetation clearing activities at the future El Casco Substation Site located in the Norton Younglove Reserve Area in Riverside County.
#2	05/15/09	05/22/09	Construction of the underground fiber optic elements of the El Casco System Project in the Cities of Banning and Beaumont.
#3	04/10/09	08/13/09	Banning Substation
#3 Mod #1	08/21/09	08/26/09	Banning Substation Modification #1
#4	03/05/09	8/27/09	Fiber optic cable installation, remaining (see NTP #2).
#5	05/08/09	8/27/09	El Casco Substation construction
	03/03/09	Under Review[1]	115 kV Sub-transmission lines replacement.
	06/19/09	Under Review[1]	Zanja Substation
	06/19/09	Under Review[1]	Mill Creek Communication Site

1. Compliance submittals pending.

VARIANCE & TEWS REQUEST SUMMARY

Tables 3 and 4 summarize the Variance and Temporary Extra Workspace (TEWS) Requests submitted, reviewed, and issued to date for the SCE El Casco System Project, respectively.

TABLE 3
VARIANCE REQUESTS
(Updated 09-29-09)

Variance #	Date Requested	Date Issued	Description
#1	04/01/09	04/16/09	Usage of an empty fenced lot immediately south of SCE's existing Maraschino Substation, Beaumont, Riverside County, as a laydown yard to support Project construction.
#2	09/22/09	Under Review	SCE has asserted within the variance request that several Geo & Hydro Mitigation Measures should not be required for the 115 kV Subtransmission Line Element. A site visit including SCE and Aspen personnel is scheduled for October 5, 2009.

TABLE 4
TEMPORARY EXTRA WORK SPACE REQUESTS
(Updated 09-29-09)

TEWS #	Date Requested	Date Issued	Description
#1	04/17/09	04/23/09	Fiber Optic material storage at the pre-existing Zanja Substation, Yucaipa, San Bernardino County
#2	07/20/09		Staging area in a vacant lot north of First Street and west of Highland Springs Road.

PROJECT PHOTOGRAPHS

Figure 1: Construction activity at the El Casco Substation site began during the week of September 14, 2009. A temporary parking area was established just inside the entrance gate with a security guard building. The photograph was taken from San Timoteo Road, and faces southward.

Figure 2: A silt fence installation along the north (San Timoteo Creek) side of the access road the entire distance from the entrance gate to the east end of the sub-station site. The photograph faces westward.

Figure 3: The culvert relocation site on the El Casco Substation access road was prepared with silt fence and sandbagging to protect San Timoteo Creek (to the left). The photograph faces eastward.

Figure 4: Installation of the framing arms and placement of pulling rope began at the intersection of Colton and Sapphire Streets in Mentone during the reporting period for the Mentone Substation to Zanja Substation portion of the Fiber Optic Cable installation. The photograph faces southward.

Figure 5: During the FOC installation work between Mentone and Zanja Substations, linemen climbed the poles in areas too remote for a bucket truck to approach. Biological Monitors directed the workers through sensitive habitats to the sites to avoid habitat disturbance. The photograph was taken from Highway 38, and faces southward.