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PROJECT MEMORANDUM
SCE WEST OF DEVERS UPGRADE PROJECT

To: John Forsythe, Project Manager, CPUC
From: Vida Strong, Aspen Project Manager
Date: June 20, 2019
Subject: Monitoring Report #68: June 9 to June 15, 2019

Introduction

This report provides a summary of the construction and compliance activities associated with Southern California Edison’s (SCE) West of Devers (WOD) Upgrade Project. SCE self-performed work (NTPs #2 and #3) is essentially complete with the exception of substation equipment upgrades and minor telecom tie-ins. 220 kV work (NTPs #4 and #5) is approximately 29% complete.

CPUC Environmental Monitor (EM): CPUC EM, Rosina Goodman, was onsite June 10 through 12. CPUC EM, Brady Daniels, was onsite June 13 and 14.

CPUC Notices to Proceed (NTPs)

Table 1 summarizes the NTPs with construction for the WOD Upgrade Project.

Table 1 - NTPs
(Updated 06/20/19)

| NTP # | Date Requested | Date Issued | Phase | Description |
|--------|----------------|-------------|--|--|
| NTP #1 | 04/04/17 | 06/29/17 | Material Yards | Construction or use of 10 Material Yards |
| NTP #2 | 05/18/17 | 06/29/17 | Substation Upgrades | Upgrades to 5 existing Substations |
| NTP #3 | 06/05/17 | 08/10/17 | Distribution, Subtransmission, and Telecom | Construction of the Distribution, Subtransmission, and Telecommunication portions of the Project |
| NTP #4 | 07/13/17 | 09/05/17 | Transmission | Transmission Line Construction on private lands |
| NTP #5 | 08/07/17 | 03/29/18 | Construction on BLM lands | Transmission Line construction on BLM lands |

Construction & Compliance

A summary of construction and compliance activities is provided below by NTP.

Material Yards (NTP #1)

As defined in NTP #1, Project material yards (MY) include:

- Mountain View #1 MY
- Lugonia MY
- Grand Terrace MY
- Poultry MY

- San Timoteo MY
- Beaumont #1 MY
- Beaumont #2 MY
- Matich MY
- Hathaway #2 MY
- Devers MY

To date, all material yard pre-compliance materials associated with NTP #1 that have been submitted have been approved.

Summary of Construction Activity

1. For the currently approved MYs, all activities are being performed by the contractor operating out of each respective yard. No MY construction activities were conducted during the subject reporting period.
2. The Poultry MY is being utilized by Barnard Construction and Power Grade Incorporated as their primary base of operations and material/equipment storage location. Work associated with the Poultry MY included material/equipment deliveries and general yard maintenance throughout the monitoring period. No helicopter operations out of Poultry MY occurred during the monitoring period.
3. The Matich MY is being utilized by Barnard Construction primarily for tubular steel pole (TSP) storage. Work associated with the Matich MY included material/equipment deliveries and tying rebar throughout the monitoring period.
4. The Mountain View #1 MY is being utilized by Abercrombie Services as their primary base of operations and materials/equipment storage location.
5. The Beaumont #2 MY is being utilized by CJ/Aldridge Drilling as their primary base of operations and material/equipment storage location. Material/equipment deliveries and general yard maintenance occurred at the Beaumont #2 MY throughout the monitoring period.
6. The Grand Terrace MY will be used primarily as a show-up location for project construction crews.
7. The Devers Yard is being utilized by CJ/Aldridge and Power Grade for construction activities on Segment 6. Material/equipment deliveries and general yard maintenance occurred throughout the monitoring period.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #1 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #1 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #1.
3. There were no reportable (> 1 gallon) or non-reportable (< 1 gallon) spills associated with NTP #1 identified during the monitoring period.
4. No new nests were reported at locations associated with NTP #1 during the monitoring period. As of the end of the monitoring, there are no active nests at locations associated with NTP #1. If required, management, including the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project Nesting Bird Management Plan (NBMP). No nests were removed during the subject reporting period.

5. No special-status species were observed or identified at locations associated with NTP #1 during the monitoring period.

Substations (NTP #2)

Five substations are identified for improvements in NTP #2. These include:

- Etiwanda Substation
- San Bernardino Substation
- Vista Substation
- El Casco Substation
- Devers Substation

To date, all pre-compliance materials associated with NTP #2 that have been submitted have been approved.

Summary of Construction Activity

1. For the currently approved substation components, all work is being managed by Circle Wood Services with construction support from TTR Substations and SCE crews. Wire stringing connections and wreck-out activities between the project alignment and locations within the substations are being performed by Abercrombie Services.
2. Work activities at the Devers Substation included cable trenching outside of the MEER building and wiring work within the MEER building.
3. No construction activities associated with the other substations (San Bernardino, El Caso, Vista, and Etiwanda) occurred throughout the monitoring period.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #2 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #2 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #2.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #2 identified during the monitoring period.
4. As of the end of the monitoring period, there were two active nests (red-shouldered hawk and Cassin's kingbird) located within work areas associated with NTP #2 and the required buffers have been implemented. If required, management, including the removal of inactive non-special-status bird species' nests, is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
5. No new special status species were observed or identified at locations associated with NTP #2 during the monitoring period.

Distribution, Subtransmission, and Telecommunication Work (NTP #3)

NTP #3 included distribution, subtransmission, and telecommunication improvements as presented below. These construction activities have been essentially completed, with minor follow up required in response to Project activities.

Distribution improvements included the following:

- Dental 12-kV Distribution Circuit (Dental Circuit)
- Intern 12-kV Distribution Circuit Underbuild (Intern Circuit)
- Reconductor on Juanita Street (Juanita Reconductor)

Subtransmission improvements included the following:

- Removal of San Bernardino–Redlands-Timoteo and the San Bernardino–Redlands-Tennessee 66-kV Lines (Timoteo-Tennessee Removal)
- Relocation of San Bernardino–Redlands-Timoteo 66-kV Lines (Timoteo Relocation)
- Relocation of San Bernardino–Redlands-Tennessee 66-kV Lines (Tennessee Relocation)

Telecommunication improvements included the following:

- San Bernardino Substation Connection to Redlands Inland Empire District Office (San Bernardino Connection)
- Timoteo-Redlands District Office Fiber Optic Cable Connection (Timoteo-Redlands Connection)
- El Casco Substation Connection to Vista Moreno OPGW (El Casco Connection)
- Maraschino Substation Connection to Devers-Valley OPGW (Maraschino Connection)
- El Casco–Banning Connection to Devers-Vista Skywrap (El Casco–Banning Connection)
- Banning Substation Connection to Devers-Valley OPGW (Banning Connection)

Summary of Construction Activity

1. For the currently approved subtransmission and distribution components, construction activities are being performed by Abercrombie Services and SCE crews. No construction activities occurred during the subject monitoring period.
2. As of the closing of this monitoring period, the construction progress of components associated with NTP #3 is as follows:
 - For distribution components, all 19 12-kV poles have been framed, all 12 12-kV underground vaults have been installed, and 7,430 feet of 12-kV duct bank (conduit) and 10,760 feet of 12-kV conductor wire has been installed.
 - For subtransmission components, 119 of 119 66-kV light-weight TSPs have been erected, 19 of 19 TSPs have been erected, and 25,610 feet of 66-kV wire has been installed. Both the Timoteo and Tennessee circuits have been energized. Wreck-out of the existing subtransmission infrastructure is underway.

Environmental Compliance

1. There were no SCE self-reported or CPUC incidents documented for construction activities associated with NTP #3 throughout the monitoring period.
2. There were no SWPPP maintenance items or corrective actions associated with NTP #3 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #3.
3. There were no reportable (>1 gallon) or non-reportable (<1 gallon) spills associated with NTP #3 identified during the monitoring period.

4. No new nests were reported at locations associated with NTP #3 during the monitoring period. As of the end of the monitoring period, there are no active nests located within work areas associated with NTP #3. If required, management, including the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
5. No special-status species were observed or identified at locations associated with NTP #3 during the monitoring period.

Transmission Work (NTP #4)

NTP #4 includes six transmission line segments, identified as Segments 1 through 6, generally moving from west to east.

To date, pre-compliance materials associated with NTP #4, Segments 1 through 6, have been submitted and approved.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
2. Work associated with Segment 1 during the monitoring period included: Tower assembly at Construction Areas 1X04, 1X10, 1X13, 1X15, 1X17, 1X18, and 1X19 (see Photo 1); tower wreck-out at Construction Areas 1X21 through 1X24; irrigation repair at Construction Area 1X13 (see Photo 2); and punch-list verification at Construction Areas 1X11, 1X12, 1X16, and 1X26.
3. Work associated with Segment 2 included: Clearing, grubbing, grading, and soil export at Construction Areas 2X18, 2X25 and 2X26; grading, soil import, and soldier pile wall installation at Construction Area 2X32; foundation work at Construction Areas 2X07, 2X10, 2X11, and 2X15 (see Photo 3); BMP installation and maintenance at Construction Areas 2X22, 2X25, 2X26, 2X28, 2X29, and 2N30; and access road maintenance from Construction Areas 2X10 to 2X32.
4. Work associated with Segment 3 included: Clearing, grubbing and Hilfiker wall installation at Construction Area 3X37; soil cement installation at Construction Area 3X33; grading and soil exporting at Construction Area 3X64 (see Photo 4); soil export at Construction Area 3X31; and berm repair at Construction Area 3X48.
5. Work activities associated with Segment 4 included: BMP installation at Construction Areas M23-T2, 4X32, PP123311, 4X34, PP123310, 4X35, TWA-4-S35X-1, 4X36, PP123307, 4X37, PP123305, 4X38, PP123305, 3X39, 3X40, 4X41, 4X42, 4X43, 4X44; and BMP maintenance and hydroseed watering at Construction Areas 4N59, 4N60, 4N61, and 4N63.
6. Work associated with Segment 5 (which includes sites within Morongo lands along Segment 5 as reported by SCE) included: Foundation work at Construction Areas 5X28, 5X29, 5X52 and 5X54 (see Photo 5); and BMP maintenance at Construction Area 5X28.
7. Work associated with Segment 6 (non-BLM lands) included: Grading and rock export at Construction Areas 6S28A, 6S30, and 6S30A (see Photo 6); foundation work at Construction Areas 6N15, 6S15, 6N16, 6N17, 6S17, 6N18, 6S18, 6X19, 6N20, 6N21, 6N22, and 6N23; BMP installation at Construction Areas 6N38, 6N39, 6S39, 6N40, 6S40, 6S41, 6X42, 6X46, 6X47, and 6X48; access road maintenance from Construction Areas 6S28 to 6N30; and guard structure installation at Construction Area T259.

8. Construction updates from SCE will be provided on a bi-weekly basis. The next update will be provided on July 2. As of June 18, construction progress associated with NTP #4 is as follows:
 - 6 miles of minor road maintenance were completed in Segments 1, 2 and 6.
 - Grading for foundation installation has been completed at 276 sites.
 - Foundations are completed for 162 of 386 lattice towers and 61 of 83 TSPs.
 - Erection of 88 of 386 lattice towers and 15 of 83 TSPs have been completed.
 - Erection of 51 temporary shoofly locations has been completed.
 - Stringing of approximately 3.7 of 8.0 circuit miles of shoofly conductor, 23.55 of 184.0 circuit miles of mainline conductor, and 11.42 of 99.0 circuit miles of OPGW fiber has been completed.
 - Demolition of 78 of 602 existing structures and 75 of 415 existing foundations has been completed.
 - Wire wreck-out has been completed along 17.50 circuit miles.
9. The first required outages (Project Move 1 and Project Move 2) were completed in 2018. Project Move 3 in Segment 3 was completed May 10, 2019. Move 4 in Segment 1 started May 13, 2019.

Environmental Compliance

1. On June 12, the CPUC EM observed a project vehicle parked on the side of an access road outside of any approved disturbance areas near Construction Area 6S29. The CPUC EM notified the Biological Monitor onsite at Construction Area 6S30. The Biological Monitor stated he would have them move their vehicle to an approved disturbance area or road. The issue was also discussed with SCE during a bi-weekly conference call on June 13.
2. There were four SCE self-reported observations during the monitoring period on Segments 2 and 5 for cultural and paleontological resources. The resources on Segment 2 temporarily halted work while collection occurred. The resources were documented and sent for further evaluation. ESAs were established for resources discovered on Segment 5.
3. During the previous monitoring period, on June 8 (Saturday), crews conducted foundation work at Construction Area 1W15. Per City of Loma Linda requirements, advanced notice to the City is required for Saturday construction work north of Beaumont Avenue. Advanced notice of Saturday construction work to the City of Loma Linda was not provided by Project personnel, resulting in the issuance of a Level 1 non-compliance of Mitigation Measure N-1a by SCE.
4. On May 22, SCE received a Cease and Desist Letter from the Morongo Reservation to stop construction activities on tribal land. During the monitoring period SCE received approval to begin working on some sites on tribal land and start delivering and installing TSPs.
5. SCE installed new desert tortoise access road speed limit signs at entrances to the right-of-way in Segment 6 reminding Project personnel of the 15 MPH speed limit (see Photo 7).
6. There were no SWPPP maintenance items or corrective actions associated with NTP #4 recorded during the monitoring period. To date, there are no open SWPPP maintenance items or corrective actions associated with NTP #4.
7. Two small spills (<1 gallon) was identified in Segments 5 and 6 during the monitoring period. The contaminated soil was collected and disposed of in accordance with the approved methods. No other spills (reportable >1 gallon or non-reportable <1 gallon) associated with NTP #4 were identified during the monitoring period.

8. Meetings to review helicopter flight tracks with SCE are occurring every two weeks. Flight tracks are reviewed to monitor compliance with local jurisdiction construction work hours and sensitive receptor avoidance, including residences, schools, and nesting bird avoidance areas. Tracks were reviewed on June 13. There were only two days of flights on June 1 and June 2. No nest buffer incursions or early/late start times were noted. The next flight track review will take place on June 27.
10. As of the end of the monitoring period, there are 73 active nests at locations associated with NTP #4 during the monitoring period. Nests include: Anna's hummingbird, black-chinned hummingbird, burrowing owl, bushtit, cactus wren, hooded oriole, Nuttall's woodpecker, acorn woodpecker, northern mockingbird, common raven, least Bell's vireo, black-tailed gnatcatcher, western kingbird, lesser goldfinch, American goldfinch, black phoebe, Lawrence's goldfinch, phainopepla, barn owl, California towhee, greater roadrunner, Brewer's blackbird, Bewick's wren, horned lark, yellow warbler, and red-tailed hawk. Buffers have been established per the Project NBMP. If required, management, including the removal of inactive non-special-status bird species' nests is being implemented per the requirements of the Project NBMP. No nests were removed during the subject reporting period.
9. There were four special-status species observed or identified at locations associated with NTP #4 during the monitoring period. These included a loggerhead shrike, Cooper's hawk, red-diamondback rattlesnake, and orange-throated whiptail.
10. SCE provided documentation of FAA filings for the Project on September 17 and September 26; FAA concurrence will be required prior to tower installation where applicable. Additional information was provided February 11, 2019. FAA recommended marker balls have been installed on the shoofly spans near El Casco Substation.

Transmission Work BLM Lands (NTP #5)

NTP #5 includes the portion of one transmission line segment, identified as Segment 6, which traverses properties managed by the Bureau of Land Management (BLM). NTP #5 was approved by BLM on March 29, 2018. The preconstruction compliance package for BLM lands was deemed acceptable by BLM on February 5, 2019.

Summary of Construction Activity

1. For the currently approved transmission components, Power Grade Incorporated is conducting access road maintenance/stabilization, BMP installation, vegetation removal, and site grading. CJ/Aldridge Drilling is performing foundation work. Abercrombie Services is assembling and erecting new towers, and conducting wire operations with support from Summit Helicopters. Cunningham Davis Corporation is removing existing towers and foundations.
2. Work associated with Segment 6 (BLM lands) during the monitoring period included: Grading and rock export at Construction Areas 6S29, 6S30, and 6S30A; foundation work at Construction Areas 6N21 and 6X24; and access road maintenance from Construction Area 6N28 to 6S30.

Environmental Compliance

See NTP #4 discussion above for environmental compliance activities.

Temporary Extra Workspaces (TEWS) and Minor Project Refinements (MPRs)

No TEWS or MPRs were approved during the subject monitoring period. Table 2 summarizes the TEWS and MPRs for the WOD Upgrade Project to date.

Table 2 - TEWS & MPRs
(Updated 06/20/19)

| TEWS / MPR | Date Requested | Date Issued | Phase | Description |
|--|-----------------------|--------------------|------------------------------|--|
| Temporary Extra Workspaces (TEWS) | | | | |
| TEWS #1 | 10-12-17 | 10-19-17 | Maraschino Connection | Access to Beaumont Cherry Valley District water hydrant meter located near the intersection of Highland Springs Avenue and Crooked Creek, Beaumont. |
| TEWS #2 | 11-13-17 | 11-21-17 | El Casco– Banning Connection | Water source on Oak Valley Boulevard. |
| TEWS #3 | 12-15-17 | 12-15-17 | Banning Connection | Access to existing poles off of Lincoln Street. |
| TEWS #4 | 12-18-17 | 12-18-17 | Banning Connection | Access to existing poles off of Wesley Street. |
| TEWS #5 | 12-20-17 | 12-21-17 | Banning Connection | Access to existing poles at intersection of Wesley Street and Old Idyllwild Road |
| TEWS #6 | 6-13-18 | 6-13-18 | Timoteo Relocation | Extra workspace to facilitate erection of TSP #4696058 at intersection of Redlands Boulevard and Bryn Mawr Street |
| TEWS #7 | 7-27-18 | 7-30-18 | Timoteo Relocation | Extra workspace to facilitate wire pulling activities along Research Drive and Almond Avenue |
| TEWS #8 | 8-27-18 | 8-28-18 | Dental/Intern Circuits | DENIED AND RESCINDED – Extra workspace to facilitate construction along Mission Road |
| TEWS #9 | 10-18-18 | 10-19-18 | Timoteo Relocation | Extra workspace for walking path at Bryn Mawr and I-10 |
| TEWS #10 | 11-05-18 | 11-05-18 | Timoteo Relocation | Extra workspace along Barton and Mountain View Roads for cutover operations. |
| TEWS #11 | 01-30-19 | 01-31-19 | Timoteo Relocation | Extra workspace to facilitate the removal of fiber optic cable from overhead poles north along Mountain View Avenue and east along Redlands Boulevard. |
| TEWS #12 | 02-06-19 | 02-07-19 | Timoteo Relocation | Extra workspace along Mountain View Avenue for subtransmission pole removal. |
| TEWS #13 | 02-26-19 | 02-26-19 | Segment 3 | Temporary access road detour for vehicle and equipment travel to/from San Timoteo Canyon Road and Tower Site 3X41. |
| TEWS #14 | 05-13-19 | 05-14-19 | Banning Connection | Extra workspace along the east side of south Alola Street, City of Banning. |
| TEWS #15 | 05-16-19 | 05-17-19 | Segment 1 | HLZ and temporary staging area for construction vehicles, materials, and equipment. |

| TEWS / MPR | Date Requested | Date Issued | Phase | Description |
|---|----------------|-------------|---|--|
| Minor Project Refinements (MPRs) | | | | |
| MPR #1 | 11-17-17 | 11-22-17 | Maraschino Connection | Revisions to the amount of new underground telecom construction. |
| MPR #2 | 12-13-17 | 12-15-17 | Maraschino Connection | Addition of two vault work areas on Highland Springs Road. |
| MPR #3 | 12-21-17 | 12-28-17 | El Casco–Banning Connection | Adjustments to alignment along Oak Valley Parkway |
| MPR #4 | 12-27-17 | 1-3-18 | Maraschino/El Casco–Banning Connections | Continued use of two fire hydrants previously approved as TEWS #1 and TEWS #2 |
| MPR #5 | 1-16-18 | 1-22-18 | Banning Connection | Continued use of access routes described in TEWS #3, 4, and 5 and temporary access paths through private property along Coyote Trail |
| MPR #6 | 2-8-18 | 2-12-18 | Project-wide | Use of 10 water sources to support construction activities |
| MPR #7 | 2-23-18 | 2-28-18 | Poultry MY | Temporary water and electrical supply to yard |
| MPR #8 | 2-27-18 | 3-2-18 | El Casco Connection/Segment 1 | New telecom splice location and single new steel pole installation |
| MPR #9 | 3-26-18 | 3-27-18 | El Casco Connection | Telecom work areas along El Casco Substation access road |
| MPR #10 | 4-6-18 | 4-9-18 | Mountain View #1 MY/All subtrans | Additional work spaces at Mountain View #1 MY entry and at subtransmission improvements work areas |
| MPR #11 | 5-4-18 | 5-8-18 | Tennessee Relocation | Relocation of 5 subtransmission structures from the east side to the west side of Nevada Street |
| MPR #12 | 5-14-18 | 5-16-18 | Timoteo Relocation | Additional work space for TSP erection at Bryn Mawr Avenue and Interstate 10. |
| MPR #13 | 5-23-18 | 5-25-18 | Project-wide | Addition of encased fire hose to O’Grady Court water source and use of 17 water sources to support construction activities |
| MPR #14 | 5-24-18 | 5-31-18 | Timoteo/Tennessee Relocations | Location shift of 3 TSPs and 1 vault location |
| MPR #15 | 5-31-18 | 6-4-18 | Poultry MY | Paving of access road and trailer complex area |
| MPR #16 | 6-11-18 | 6-13-18 | Banning Connection | Shift of horizontal directional drilling (HDD) alignment through Smith Creek and addition of walking paths along Coyote Trail |

| TEWS / MPR | Date Requested | Date Issued | Phase | Description |
|------------|----------------|-------------|---|---|
| MPR #17 | 6-20-18 | 6-22-18 | Dental Circuit/ Tennessee Relocation | Additional work space along Mission Road, Lugonia Avenue, and Nevada Street |
| MPR #18 | 8-3-18 | 8-7-18 | Timoteo Relocation/ Beaumont #2 MY | Expansion of vault installation work area off Mountain View Avenue and new water source near Beaumont #2 MY |
| MPR #19 | 8-13-18 | 8-20-18 | Segment 4 | Additional work space requests at Sites 4N58, 4N59, and 4N64 |
| MPR #20 | 8-21-18 | 8-27-18 | Banning Connection | Use of unpaved access road west of Smith Creek |
| MPR #21 | 10-4-18 | 10-10-18 | Project-wide/ Segments 3&4 | Use of 6 water sources, installation of water tank, use of access road, and expansion of WSS |
| MPR #22 | 11-19-18 | 11-20-18 | Subtrans and Telecom | Pole replacement, switch replacement, and shift in underground telecom route. |
| MPR #23 | 12-11-18 | 12-21-18 | Transmission | Site 3N32 and Move 3 work areas. |
| MPR #24 | 01-15-19 | 01-28-19 | Transmission | Additional Wire Stringing Site in Segment 1. |
| MPR #25 | 03-11-19 | 03-14-10 | Transmission | Additional work area west of Supersite 3X55, Segment 3. |
| MPR #26 | 04-02-19 | 04-04-19 | Transmission | Use of Prado Lane access road (Segment 2) and two existing hydrants (Segment 6). |
| MPR #27 | 04-30-10 | 05-01-19 | Transmission | Use of two existing hydrants (Segment 1), water tank (Segment 2), and helicopter work area (Segment 3). |
| MPR #28 | 05-31-19 | 06-06-19 | Transmission | Extra work space areas, including helicopter landing zones and access roads, on Segments 1, 2, and 6. |

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

Table 3 summarizes the CPUC Incidents, PMs, and NCRs issued to date.

Table 3
CPUC Incidents, Project Memoranda, and Non-Compliance Reports
(Updated 06/20/19)

| Incident/ PM/NCR | Regulatory Requirement | Date Issued | Phase | Description |
|------------------|------------------------|-------------|--------------------|--|
| Level 1 Incident | Traffic Control Plan | 01-30-18 | Banning Connection | Traffic control was set up in such a way that diverted flow into active work area and deviated from approved Traffic Control Plan. |

| Incident/ PM/NCR | Regulatory Requirement | Date Issued | Phase | Description |
|-----------------------------|-----------------------------------|------------------------|-------------------------------------|--|
| Level 1 Incident | MM WIL-1b | 04-19-18 | Timoteo/ Tennessee Relocation | A portable water tank was observed uncovered for four consecutive days. |
| Level 1 Incident | MM VEG-1a | 5-24-18 | El Casco Substation | Equipment was staged outside of approved disturbance limits for at least 1-2 days. |
| Level 1 Incident | MM AQ-1a | 8-15-18 | Banning Connection | Fugitive dust observed from construction activities. |
| Level 1 Incident | MM WIL-1b | 8-15-18 | Banning Connection | Use of unapproved access road. |
| Level 1 Incident | MM WIL-1b | 8-15-18 | Banning Connection | Use of unapproved staging area. |
| Level 1 Incident | Fire Management Plan | 9-18-18 | Segment 4 | Lack of adequate fire abatement equipment at 3 locations. |
| Level 1 Incident | Fire Management Plan | 9-20-18 | Segment 4 | Lack of adequate fire abatement equipment |
| Level 1 Incident | HH-1a | 10-17-18 | Segment 4 | Lack of proper secondary containment for 4 pieces of equipment. |
| Level 1 Incident | N-1a | 10-17-18 | Segment 4 | Work outside of approved hours |
| Level 1 Incident | WIL-1b | 10-18-18 | Grand Terrace MY | Lack of proper covering for pipes between 1.5" to 4" |
| Level 1 Incident | N-1a | 10-18-18 | Segment 4 | Work outside of approved hours |
| Level 1 Incident | AQ-1a | 10-30-18 | Grand Terrace MY | Fugitive Dust Emissions Outside of Property Boundaries at the Grand Terrace Yard. |
| Level 1 Incident | WIL-1b | 01-24-19 | Segment 3 | Pipes/tubing left open at Sites 3X08 and 3X10. |
| Level 1 Incident | AQ-1a | 02-13-19 | Segment 3 | Fugitive dust along Segment 3 access road to 3X06. |
| Level 2 Incident | VEG-3a | 02-13-19 | Segment 3 | Offsite sediment discharge from access road into JD ID 3054. |

PROJECT PHOTOGRAPHS



Photo 1 – Tower assembly activities on Segment 1 (June 12, 2019).



Photo 2 – irrigation repair on Segment 1 (June 12, 2019).



Photo 3 – Foundation activities on Segment 2 (June 11, 2019).



Photo 4 – Soil export preparation on Segment 3 (June 11, 2019).



Photo 5 – Foundation activities on Segment 5 (June 12, 2019).



Photo 6 – Grading activities on Segment 6 (June 12, 2019).



Photo 7 – New Desert Tortoise speed limit signs on Segment 6 (June 10, 2019).