

November 10, 2017

Andrew Barnsdale Project Manager California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102

Re: Monthly Report Summary #38 for Aliso Canyon Turbine Replacement Project

Dear Mr. Barnsdale:

This report provides a summary of the compliance monitoring activities that occurred during the period from **July 1 to September 30, 2017**, for the Aliso Canyon Turbine Replacement (ACTR) Project (Aliso) in California. Compliance monitoring was performed to ensure that all project-related activities conducted by Southern California Gas Company (SCG), Southern California Edison (SCE), and their contractors are in compliance with the requirements of the Final Environmental Impact Report (Final EIR) for Aliso, as adopted by the California Public Utilities Commission (CPUC) on November 14, 2013, and as further modified in the Addendum to the Final EIR, as approved by the CPUC on December 18, 2014.

The CPUC has issued the following Notices to Proceed (NTPs) for the project to SCG and SCE:

- NTP #1 (February 25, 2014): The Guard House and road widening component.
- NTP #2 (May 27, 2014): Construction of new administrative buildings, removal of old buildings, and development of Fill Sites P-41 and P-43.
- NTP #3 (July 18, 2014): Construction of the Central Compressor Station (CCS), grading for the Natural Substation, and installation of five tubular steel poles (TSPs) and stringing conductor.
- NTP-A (October 28, 2014): Construction associated with the Natural-Newhall-San Fernando and MacNeil-Newhall-San Fernando 66-kilovolt (kV) subtransmission lines, and work at the San Fernando, Newhall, Chatsworth, Sunshine, and MacNeil substations.
- NTP-B (February 24, 2015): Construction of a portion of Telecommunications Route 3 from the San Fernando Substation to the temporary San Fernando Substation Tap.
- NTP-C (April 14, 2015): Construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines.
- NTP-D (June 8, 2015): Additional construction and telecommunication installation associated with the MacNeil-Newhall-San Fernando and Natural-Newhall-San Fernando 66-kV subtransmission lines, and construction of the Natural Substation.
- NTP-E (September 21, 2015): Additional construction and telecommunication installation on Telecommunications Routes 1, 2, and 3.

Onsite compliance monitoring by the Ecology and Environment, Inc. (E & E) compliance team during this reporting period focused on spot-checks of ongoing construction and restoration activities. Compliance Monitor Vince Semonsen visited the Aliso construction and restoration sites on July 25, 2017. A site inspection report that summarizes observed construction and restoration activities and compliance events and verifies mitigation measures (MMs)/applicant proposed measures (APMs) was completed for the site visit. The report is attached below (Attachment 1).

Overall, the ACTR Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program's (MMCRP's) Compliance Plan. Communication between the CPUC/E & E compliance team, SCG, and SCE has been regular and generally effective; correspondence discussed and documented compliance events, upcoming compliance-related surveys and deliverables, and the construction schedule. Agency calls between CPUC/E & E, SCG, and SCE, along with weekly email updates from SCG, provided additional compliance information and construction summaries. Furthermore, SCG's monthly compliance status reports for July, August, and September 2017 provided a compliance summary and included: a description of construction activities from July 1 to 31, 2017, August 1 to 31, 2017, and September 1 to 30, 2017; a detailed look-ahead construction schedule; a summary of compliance with project commitments (MMs/APMs) for air quality, biological resources, cultural and paleontological resources, the Storm Water Pollution Prevention Plan (SWPPP), noise, and the Worker Environmental Awareness Training Program (WEAP); a summary of non-compliance incidents; and a list of recent ACTR Project approvals.

In July, August, and September 2017, SCE did not conduct any construction activities beyond restoration and weed abatement. SCE has minor outstanding construction components to complete and will notify CPUC/E & E when these activities are scheduled. SCE is no longer required to provide monthly compliance status reports or weekly email updates to the CPUC.

Non-Compliance Issued by the CPUC

There were no compliance incidents during July, August, and September 2017.

Special Status Species Observations

No live or dead California newts, a California Department of Fish and Wildlife (CDFW)-designated Species of Special Concern, were observed by SCG or SCE during July, August, and September 2017.

Public Concerns

There were no public concerns during July, August, and September 2017.

Minor Approvals

During July, August, and September 2017, one Minor Project Refinement (MPR) was approved (see Table 1).

Table 1: Minor Approvals for July, August, and September 2017

Description	Approval Date
MPR 11 included leaving project trailers for permanent storage field use. (SCG)	July 18, 2017

Sincerely,

Jenny Vick Project Manager, Ecology and Environment, Inc.

cc: Derek Rodgers, SCG Chris May, SCE

ATTACHMENT 1

CPUC Site Inspection Report July 25, 2017



Aliso Canyon Turbine Replacement Project CPUC Site Inspection Form

Project	Aliso Canyon Turbine Replacement	Date:	July 25, 2017
Project Proponent	Southern California Gas Company and Southern California Edison	Report #:	VS135
Lead Agency:	California Public Utilities Commission	Monitor(s):	Vince Semonsen
CPUC PM:	Andrew Barnsdale, Energy Division	AM/PM Weather:	Partly cloudy and warm with a slight breeze
E&ECM:	Lara Rachowicz	Start/End time:	1000 to 1130 at SCG
Project NTP(s): Central Compressor Site (CCS) (NTP-3), 12-kilovolt (kV) power line (NTP-			ower line (NTP-3), and PS-42 Fill Site.

SITE INSPECTION CHECKLIST

WEATP Training	Yes	No	N/A
Has WEATP training been completed by all new hires (construction and monitors)?	Х		
Erosion and Dust Control (Air and Water Quality)			
Have temporary erosion and sediment control measures been installed?	Х		
Are erosion and sediment control measures properly installed and functioning?	Х		
Is mud tracked onto paved public roadways cleaned up in accordance with the project's SWPPP?	Х		
Is dust control being implemented (i.e., access roads watered, haul trucks covered, streets cleaned on a regular basis)?	Х		
Are work areas being effectively watered prior to excavation or grading?	Х		
Is excessive fugitive dust leaving the work area?		Х	
Equipment			
Are all vehicles observed maintaining a speed limit of 15 mph on unpaved roads?	Х		
Are all vehicles/equipment observed arriving onsite clean of sediment or plant debris?	Х		
Are vehicles/equipment turned off when not in use?	Х		
Work Areas			
Is vegetation disturbance within work areas minimized?	Х		
Is exclusionary fencing or flagging in place to protect sensitive biological or cultural resources?	Х		
Are vehicles, equipment, and construction personnel staying within approved work areas and on approved roads?	Х		
Are all excavations and trenches covered at the end of the day?	Х		
Are ramps installed at 100-foot intervals with ramps not exceeding 2:1 slopes?	Х		
Biology			
Have preconstruction surveys been completed for biological (wildlife, nesting birds, gnatcatcher,	Х		

least Bell's vireo) resources as appropriate?			
Are biological monitors present onsite?	Х		
Are appropriate measures in place to protect sensitive habitat and/or drainages (i.e., flagging, signage, exclusion fencing, biological monitor, appropriate buffer distance enacted)?	Х		
Have wildlife been relocated from work areas?		Х	
Have impacts occurred to adjacent habitat (sensitive or non-sensitive)?		Х	
Did you observe any threatened or endangered species? List		Х	
Are there wetlands or water bodies present near construction activities?	Х		
Have there been any work stoppages for biological resources?		Х	
Cultural and Paleontological Resources			
Are identified cultural/paleo resources that will not be relocated/salvaged clearly marked for exclusion?			Х
Are archaeological and paleontological monitors onsite if needed?	Х		
Are appropriate buffers maintained around sensitive resources (e.g. cultural sites)?			Х
Have there been any work stoppages for cultural/paleo resources?		Х	
Hazardous Materials			
Are hazardous materials stored appropriately?	Х		
Are procedures in place to prevent spills and accidental releases?	Х		
Are appropriate fire prevention and control measures in place?	Х		
Is contaminated soil properly handled or disposed of, if applicable?	Х		
Work Hours and Noise			
Are night lighting reduction measures in place, as needed?	Х		
Is construction occurring within approved hours (7am-5pm, M-F)?	Х		
Are noise control measures in place within 100 feet of sensitive receptors as needed?			Х

AREAS MONITORED (i.e., structure numbers, yards, or substations)

CCS, PS-42 Fill Site, 12 kV A2 access road, and Oak Tree Mitigation Site.

DESCRIPTION OF OBSERVED ACTIVITIES (i.e., mitigation measures of particular focus or concern, construction activity, any discussions with first-party monitors or construction crews)

According to SCG's Aliso Canyon Turbine Replacement (ACTR Project) weekly status update in the weeks prior to this site visit, a Henkels & McCoy (H&M) crew was onsite "pulling" line for the 12 kV power plant line (PPL) – New All-Dielectric Self-Supporting (ADSS) Inset Pole. The site inspection focused on the 12 kV PPL poles, but stops were made at the PS-42 Fill Site and the Oak Tree Mitigation Site.

Upon driving into the Aliso Canyon Natural Gas Storage Field (Aliso Storage Field) facility, I noted that nest buffer signs were no longer in place near the red-tailed hawk nest. I did not observe any birds in proximity to the nest.

The PS-42 Fill Site appeared to be completed and stable (Photo 1). There were large quantities of mustard growing within the cleared and otherwise undisturbed portions of the PS-42 Fill Site.

At the A1 pole site near the Natural Substation, no construction activities were observed; however, a man-lift was parked near the base of the poles (Photo 2). Leftover stakes and construction fencing were visible immediately downslope from the poles (Photo 3).

The oak seedlings/saplings within the Oak Tree Mitigation Site appeared to be healthy, with some growing out of the top of the cages. The area had been mowed and the cages were well maintained (Photo 4).

At the 12 kV PPL poles, some orange construction fencing remained around the New ADSS Inset Pole (Photo 5).

At the A2 pole crane pad and access road, the best management practices (BMPs) required maintenance/repair. Degraded straw wattle had slid into the road shoulder and was wrapped around an oak sapling (Photo 6). At several locations, oak and willow branches were growing through orange construction fencing (Photo 7). During removal of the fencing, care should be taken to minimize the damage to the tree branches.

MITIGATION MEASURES VERIFIED (Refer to MMCRP, e.g., MM BR-5. Report only on MMs pertinent to your observations today)

Newt crossing signs were still in place where needed.

RECOMMENDED FOLLOW-UP (i.e., items to check on next visit, minor issues to resolve)

Check the oak swale erosion repairs.

COMPLIANCE SUGGESTIONS OR ADDITIONAL OBSERVATIONS (i.e., suggestions to improve compliance on-site, environmental observations of note)

COMPLIANCE SUMMARY

Below please describe any non-compliance issues or new biological/cultural discoveries (compliance level 0) that have occurred since your last visit. If you observe a non-compliance issue in the field, please note this on the monitoring datasheet, and for non-compliance Level 2 or 3 fill out and submit a separate Non-Compliance Report Form to E & E Compliance M anager. Inform E & E CM of any non-compliance incidents.

Compliance Level 0: New biological or cultural discovery requiring compliance with mitigation measures, permit conditions, etc. If checked, please describe discovery and documentation/verification below.

	Non-Compliance Level 1: Violates the project's environmental requirements but does not immediately put environmental resources at risk. Applicant will need to correct the action and/or prevent repeat incidents of the same issue. If you checked this box, describe the incident below and follow-up to ensure correction.
	Non-Compliance Level 2: (Minor Incident) Level 2 should be those actions that have the potential to cause or cause immediate, minor risk to environmental resources such as activities that result in a deviation from the mitigation measure requirements that result in minor, short-term impact to resources. A non-compliance Level 2 situation may occur when Level 1 incidents are repeated, and show a trend toward placing resources at unnecessary risk. If you checked this box, please fill out a Non-Compliance Report.
	Non-Compliance Level 3: (Major Incident) Level 3 are those actions that have the potential to cause or cause immediate, major risk to environmental resources such as: major environmental incident that is not in compliance with the applicant mitigation measures, mitigation measures, permit condition, approval (e.g., variances, addendums) requirements, and/or environmental construction specifications; violation of the law; or documented repetitive occurrences of Level 2 Minor Incident events. If you checked this box, please fill out a Non-Compliance Report.
	Non-compliance issues reported by SoCalGas or SCE: Were there any new non-compliance issues reported by SoCalGas or SCE monitors since your last visit? If so, describe issues and resolution and include SoCalGas or SCE report identification number.

Date	Non-compliance issue and resolution	Relevant Mitigation Measure	NC Report #

PREVIOUS NON-COM PLIANCE ITEM S REQUIRING FOLLOW-UP OR RESOLVED TODAY:

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REPRESEN	ITATIVE SITE PHO	DTOGRAPHS	
Date	Location	Photo	Description
7/25/17	PS-42 Fill Site		Photo 1 – The PS- 42 Fill Site appeared to be completed and stable.
7/25/17	A1 Pole Site and Natural Substation	<image/>	Photo 2 – A man-lift was parked below the poles.

REPRESE	NTATIVE SITE PHO	DTOGRAPHS	
Date	Location	Photo	Description
7/25/17	Slope Below the A1 Poles		Photo 3 – A piece of leftover orange construction fencing is visible immediately downslope from the Natural Substation.
7/25/17	Oak Tree Mitigation Site		Photo 4 – Oak trees appeared to be in good condition; the area had been mowed and the cages were in good repair.
7/25/17	12 kV Poles		Photo 5 – Looking up the hill towards the new ADSS Inset Pole from the new Admin/IM Building.

REPRESE	NTATIVE SITE PH	IOTOGRAPHS	
Date	Location	Photo	Description
7/25/17	A2 Access Road		Photo 6 – BMPs had slid into the road shoulder and were wrapped around an oak sapling.
7/25/17	A2 Pole Site		Photo 7 – Construction fencing had oak tree branches growing through it.
7/25/17	CCS	<image/>	Photo 8 – Overview of the CCS; there was minimal activity during the site visit.