



March 21, 2022

Michael Rosauer
CPUC Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monthly Report Summary #19 for the Valley-Ivyglen 115-kV Substation (VIG) Project

Dear Mr. Rosauer,

This report summarizes the compliance monitoring activities that occurred during the period from February 1 to 28, 2022, for the Valley-Ivyglen 115-kilovolt (kV) Substation (VIG) Project in Riverside County, California.

The CPUC has issued the following Notices to Proceed (NTPs) for the VIG Project to SCE:

- NTP #1 (July 1, 2020) – Construction on select activities for the VIG Project throughout segments VIG1, VIG2, and VIG3. Construction activities include the following: installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the transmission line to new 115-kV structures or underground positions, and installations of new 115-kV switching and protective equipment at Valley Substation. NTP-1 excludes work at sites requiring jurisdictional water permits.
- NTP #2 (September 8, 2020) – Construction on select activities for the VIG Project throughout segments VIG4, VIG5, VIG6, VIG7, and VIG8. Construction activities include the following: installation of overhead 115-kV subtransmission line and fiber optic line on new structures and in underground trenches, transfer of existing distribution circuits along the subtransmission line to new 115-kV structures or underground positions, and installation of new 115-kV switching and protective equipment at Ivyglen Substation. NTP-2 excludes work at sites requiring jurisdictional water permits.
- NTP #3 (October 29, 2020) – Construction on select activities for the VIG Project throughout segments VIG1, VIG2, VIG3, VIG4, VIG5, VIG6, VIG7, and VIG8 at sites requiring jurisdictional waters permits, NTP-3 would include installation of overhead 115-kV subtransmission line and fiber optic line on new structures, and transfer of existing distribution circuits along the subtransmission line to new 115-kV structures.

Due to limited construction activities for the VIG Project during February 2022, the WSP USA Inc. (WSP) compliance monitoring team did not conduct onsite compliance checks during this reporting period. However, the CPUC/WSP compliance monitoring team ensured the VIG Project site and other project construction areas remained in compliance with, as applicable, mitigation measures (MMs) and project commitments (PCs) and verified through ongoing frequent communication with SCE's environmental team.

Construction and Compliance

Project activities in February 2022 were covered under NTP-1, NTP-2, and NTP-3. Construction activities associated with NTP-1 began on June 30, 2020. Construction activities associated with NTP-2 began on September 8, 2020, and construction activities associated with NTP-3 began on October 29,



2020. The construction activities during February 2022 took place along Segments VIG4, VIG5, VIG6, and VIG8 within Riverside County. A summary list of construction activities completed by Wilson Construction and their subcontractors' during February 2022 is provided below. Construction photographs are provided in Attachment 1.

Staging Yards

- Wilson Construction and their subcontractors utilized the Valley Substation, Concordia, and 74 Central Staging Yards to provide support to all construction activities during February 2022. The 74 Central Yard was being demobilized and the Valley Substation and Concordia Yards were utilized for contractors to meet and used as the designated area for offices, portable toilets, material storage, equipment storage, equipment maintenance, and waste container storage.

Underground Work

- Wilson Construction and their subcontractors completed the following underground work activities: Cable pulling between Vault 1587 to Vault 1590 on VIG8; VIG8 cable splicing at Vault 1591 and TSP Riser 580E; underground telecom punch list items for work between VIG8 Vault 778 to Vault 7927 (Campbell Ranch Road area); installing dewatering pumps in support of VIG4 Vault 2 and Bore Pit; and potholing, excavation, and installing VIG4 Vault 2.

Road and Work Area Set-Up

- Wilson Construction and their subcontractors completed the following road work: Evaluating punch list items on Lake Street.

Structure Construction

- Wilson construction activities included: Completing installation of all lightweight steel (LWS) poles; splicing telecom at 504E, 533E, 566E, 521E, and 495E; and removing capacitor bank from 566E.

Wire Pulling Activities

- Wilson construction and their subcontractors completed the following wire pulling activities: - Distribution cut-over and wire/pole wreckout on VIG5 410E-435E; VIG4 Undergrounding preparation and pulling cable between riser TSP 4765358E and Vault 6001592.

Environmental Compliance

- The Regional Water Resources Control Board has received and processed SCE's Notice of Termination to comply with the General Permit to Discharge Storm Water Associated with Construction Activity. The Regional Water Board had issued SCE a Waste Discharger Identification number covering the Concordia Material Yard and the Valley Substation Yard. The Yard Notice of Termination was approved on 2/18/22.

In addition, SCE conducted routine surveys, inspection, maintenance, and monitoring activities between February 1 and 28, 2022. Preconstruction surveys were conducted as necessary in February 2022. Inspection activities included weekly inspections of the VIG work area boundaries and construction yards for cleanliness and Storm Water Pollution Prevention Plan (SWPPP) inspections at all construction activity areas to ensure there were no best management practice (BMP) deficiencies or potential non-compliance incidents. No deficiencies in SWPPP BMPs were observed or documented during February 2022. SCE conducted monitoring, as applicable, for cultural, paleontological, and biological resources, as well as for Native American concerns.



Project compliance during the February 2022 monitoring period was achieved through regular communication with and reporting by SCE. Communication between the CPUC/WSP compliance team and SCE has been regular and effective. SCE's monthly environmental compliance report for February 2022 provides a compliance summary and includes a description of construction activities, a look-ahead construction schedule, a monthly biological monitoring report, a summary of compliance with PCs (MMs/PCs), a summary of non-compliance incidents and public complaints (as applicable), a record of SCE Project personnel that received safety and environmental awareness training during the reporting month, and a list of upcoming or pending Minor Project Refinements (MPRs) and outstanding agency deliverables.

Overall, the SCE Project has maintained compliance with the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) based on adherence to applicable MMs and PCs and satisfaction of pre-construction requirements and conditions of approval for NTP-1, NTP-2, NTP 3, MPR-1, 2, MPR-3, MPR-4, MPR-5, MPR-6, MPR-7, MPR-8, MPR-9, MPR-10, MPR-11, MPR-12, MPR-13, MPR-14, MPR-15, and MPR-16.

Compliance Incidents

During the February 2022 reporting period, SCE self-reported nine non-project related incidents and two VIG Project related Level 1 compliance incidents. A summary of the incidents observed is listed below.

- On February 2, 2022, the CPUC-approved qualified biologist observed non-VIG related pile of trash that was dumped. A large pile of trash was observed within the temporary limits of the access road between Poles 4765135E to 4765137E. Approximately 85 sq ft was impacted within the access road. The incident was observed and was not in any listed species habitat. The area was surveyed and impacts were documented. This incident conflicts with MM BR-13: Trash Abatement.
- On February 8, 2022, the CPUC-approved qualified biologist observed non-VIG related impacts to sensitive vegetation and rare plants. One set of tire tracks was observed outside the work areas and north of the access road between Poles 4765435E and 4765436E, in an area mapped as disturbed non-native grassland. The incident was observed and was not in any listed species habitat. Approximately 942 sq ft of non-native grassland and three rare plant polygons were impacted: Munz's onion, small-flowered microseris, and Palmer' grapplinghook. The area was surveyed and impacts were documented. This incident conflicts with MM BR-8: Special Status Plant Avoidance and Mitigation. As a result, the VIG team met with the telecom crew to review the project expectations, training, monitoring, and other preconstruction tasks required by the Final EIR and MMCRP. The crew was immediately demobilized from the Project pending WEAP training (this training was scheduled for 2/17).
- On February 9, 2022, the project detected that SCE Transmission Telecom crews conducted construction activities at the Valley Substation prior to completing WEAP training. The incident was detected at the Valley Substation and was not in any listed species habitat. The area affected was surveyed and was completely inside approved disturbance limits and disturbed/developed habitat. All work was contained within the Valley Substation or previously installed underground conduit. ESA signs had been installed correctly. No resources were noticeably impacted by the incident. This incident conflicts with MM BR-18: Implement All Project Commitments. As a result, the VIG team met with the telecom crew to review the project expectations, training, monitoring, and other preconstruction tasks required by the Final EIR and MMCRP. The crew was immediately demobilized from the Project pending WEAP training (this training was scheduled for 2/17).



- On February 9, 2022, the project detected that SCE Transmission Telecom crews conducted construction activities at the Ivyglen Substation prior to completing WEAP training. The incident was detected at the Ivyglen Substation and was not in any listed species habitat. The area affected was surveyed and was completely inside approved disturbance limits and disturbed/developed habitat. All work was contained within the Ivyglen Substation or previously installed underground conduit. ESA signs had been installed correctly. No resources were noticeably impacted by the incident. This incident conflicts with MM BR-18: Implement All Project Commitments. As a result, the crews were stood down and demobilized from the Project.
- On February 10, 2022, the CPUC-approved qualified biologist observed non-VIG related pile of vegetation that was dumped. A large slash pile was observed within a general disturbance work area adjacent to Pole 4765409E on the north side of the access road, just outside the mapped polygon for San Diego ambrosia. Approximately 415 sf of disturbed non-native grassland was impacted within the work area. The incident was observed and was in San Diego ambrosia habitat. The area was surveyed and impacts were documented. This incident conflicts with MM BR-8: Special Status Plant Avoidance and Mitigation.
- On February 11, 2022, the CPUC-approved qualified biologist observed non-VIG related impacts to landscaping along Lake Street. Three *Hesperaloe parviflora* were likely stolen from VIG planting sites at Pole 4765469E. One *Salvia greggii* was destroyed or severely impacted by vehicular traffic at Pole 4765479E, and five tree gator bags were vandalized and punctured at Pole 4765481E. The incident was observed and was not in any listed species habitat. The area was surveyed and impacts were documented. This incident conflicts with MM AES-4: Pole Placement and Landscaping on Lake Street.
- On February 15, 2022, the CPUC-approved qualified biologist observed non-VIG related tree trimming activities on Lake Street. A Mowbray's Tree Service crew was observed cutting eucalyptus trees, using several bucket trucks and a wood chipper on the west side of Lake St, in vegetation mapped as residential/urban/exotic and disturbed non-native grassland. The incident was observed within the work area at Pole 4765456E and was not in any listed species habitat. The area was surveyed and impacts were documented. The hydroseeded area was not impacted at the time of observation and a follow-up incident report will be submitted if impacts are documented. This incident conflicts with MM BR-4: Limit Removal of Native Vegetation Communities and Trees.
- On February 21, 2022, the CPUC-approved qualified biologist observed non-VIG related tree trimming activities along Hostettler Rd. Mowbray's Tree Service crews were observed cutting eucalyptus trees, using several bucket trucks and a few wood chippers on the east side of Hostettler Rd., in vegetation mapped as jurisdictional Southern Cottonwood-Willow Riparian Forest. The incident was observed outside of the work areas near Poles 4765521E to 4765522E and was in least Bell's vireo habitat. The area was surveyed and impacts were documented. This incident conflicts with MM BR-4: Limit Removal of Native Vegetation Communities and Trees.
- On February 22, 2022, the CPUC-approved qualified biologist observed non-VIG related tree trimming activities on Lake Street in jurisdictional riparian habitat. A Mowbray's Tree Service crew was observed cutting eucalyptus trees, using a bucket truck and a wood chipper on the east side of Lake Street, in vegetation mapped as jurisdictional Southern Willow Scrub. The incident was observed within and outside the work area for Pole 4962161E and was in least Bell's vireo habitat. The area was surveyed and impacts were documented. This incident conflicts with MM BR-4: Limit Removal of Native Vegetation Communities and Trees.
- On February 23, 2022, the CPUC-approved qualified biologist observed non-VIG related vehicle



that had been dumped within an access road. An abandoned white pickup truck was observed dumped on the gabion basket, and a large pile of truck parts were observed scattered within the temporary limits of the access road between Poles 4765126E and 4765127E. Approximately 100 sq ft was impacted within the access road. The incident was observed and was not in any listed species habitat. The area was surveyed and impacts were documented. This incident conflicts with MM BR-13: Trash Abatement.

- On February 24, 2022, the CPUC-approved qualified biologist observed non-VIG related impacts to restoration areas that were hydroseeded. Non-project vehicle traffic had driven across restoration areas at Poles 4765120E, 4765125E, 4765127E, 4765128E, 4765129E, 4765133E, and 4765134E (Restoration Site ID S1-R008), which were variously hydroseeded with Riversidean sage scrub, alkali meadow, and native grassland seed mixes. The vehicle tracks also passed through access roads that are not approved for project use between Poles 4765128E and 4765129E. Approximately 500 sq ft of the hydroseeded areas were impacted within the work areas and access roads. The incident was observed and was in California gnatcatcher habitat and jurisdictional riverine non-native grassland. The area was surveyed and impacts were documented. This incident conflicts with MM BR-7: Habitat Restoration and Revegetation Plan Development and Implementation.

Additionally, during the February 2022 reporting period, the CPUC did not report any compliance concerns or issue a Non-Compliance

Public Concerns

SCE received two complaints during the reporting period of February 2022. A summary and status of the complaints are provided below.

- In February 2022, SCE received a complaint from the Temescal Valley Municipal Advisory Council (TV MAC) regarding increased traffic from the VIG Project construction. Primarily, residents notified TV MAC of “construction fatigue” resulting from limited entry points to overpopulated community. SCE’s contractor mitigated this by adding different message boards and making its traffic control locations smaller where possible. The work hours remained unchanged from 9am to 3pm per County guidelines. Additionally, SCE’s local Public Affairs representative notified residents of any upcoming lane closures in advance, thus receiving a sequencing project schedule rather than piecemeal information. Furthermore, the final road paving was completed shortly after that. As of February 28, 2022, the complaint has been resolved, and SCE received no further complaints.
- In February 2022, SCE received a complaint from the Healing Tree business regarding interference of parking lot entrance from the VIG Project construction road closure near 3rd Street and Pasadena St. SCE’s contractor mitigated this by adding additional “business open” signage throughout the construction work areas and ensured that entry to the parking lot was maintained throughout construction activities. As of February 28, 2022, the complaint has been resolved, and SCE received no further complaints.

Minor Approvals

No minor approvals occurred during the reporting period of February 2022. Table 1 summarizes the MPRs for the VIG Project to date.



Table 1 – MPRs

MPR No.	Description	Status
1	Concordia Yard	Issued by CPUC on 8/11/2020
2	Additional NTP-1 Area	Issued by CPUC on 8/14/2020
3	Additional NTP-2 Areas	Issued by CPUC on 11/25/2020
4	VIG7 Shoofly Installation	Issued by CPUC on 10/2/2020
5	Lake Elsinore Underground	Issued by CPUC on 5/3/2021
6	Additional work areas on VIG1 and VIG2	Issued by CPUC on 12/1/2020
7	VIG8 Underground and Lake Elsinore Roads	Issued by CPUC on 12/18/2020
8	Temporary Terra Cotta Line	Issued by CPUC on 1/21/2021
9	VIG1 to VIG8 Misc. Areas	Issued by CPUC on 3/2/2021
10	Terra Cotta Line Extra	Issued by CPUC on 2/8/2021
11	405E and Riverside Baker Anchors	Issued by CPUC on 3/29/2021
12	VIG8 Vault Shift	Issued by CPUC on 3/29/2021
13	Additional Anchors and Poles, VIG5, VIG6, VIG7, VIG8 Duct Bank	Issued by CPUC on 5/24/2021
14	Lake Street Excavation	Issued by CPUC on 6/15/2021
15	Gabion Baskets and Additional Work Areas	Issued by CPUC on 7/17/2021
16	Gabion Baskets and Additional Work Areas	Issued by CPUC on 8/12/2021

Sincerely,

Fernando Guzman
Compliance Manager, WSP

cc:

Michael Bass, SCE
Marcus Obregon, SCE


ATTACHMENT 1

Construction Photographs – February 2022

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG8		SCE splicing cable inside Vault 6001588 along Temescal Canyon Road
VIG Project – Segment VIG4		SCE crew getting set up over Vault 6001593 on Pasadena Street


REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG4		Crew setting up to change a capacitor bank on pole 2357967E along 3rd Street

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG5		Crew working on punch list items at 4765517E

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG5		Crew hydroseeding graded slope on access road at 4765412E for SWPPP stabilization

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG5		Crew hydroseeding graded slopes at 4765421E for SWPPP stabilization

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG4		Road closure (K-rails) installed at Vault 2 (6001594) on 3rd Street

REPRESENTATIVE SITE PHOTOGRAPHS		
Location	Photo	Description
VIG Project – Segment VIG4		Road closure and business signage installed at 3rd Street