PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

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| **Incident Date:** | 3/17/21 (for MM HY-1 and MM HY-3) | **Report No.:** | NCR-008 |
| **Date Submitted:** | 7/28/2021 | **Location:** | Inlet located behind the southern boundary wall of the Mesa Substation |
| **Level:** | Level 2 | **Relevant Plan/Measure:** | MM HY-1 (including SWPPP)<br>MM HY-3 |
| **Current Land Use:** | Mesa Substation | **Sensitive Resources:** | Public storm drain system |

**Description of Incident:**

On March 17, 2021, after two sequential rain events on March 9 and 15, 2021, the CPUC Compliance Monitor noted evidence of deficiencies in erosion control best management practices (BMPs) (e.g., runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction behind the southern boundary wall of the Mesa 500-kV Substation (Mesa Substation) Project in Los Angeles County, California. Additionally, use of filter fabric not consistent with Section 3.5.2 of the Stormwater Pollution Prevention Plan (SWPPP) or BMP design referenced in fact sheet SE-10[1] was observed at the drain inlet terminus of a V-ditch construction, located behind the southern boundary wall. Furthermore, potential illicit discharge from Mesa Substation was identified at the channel located outside of the southern boundary wall within the Mesa Substation footprint.

SCE conducted an inspection at Mesa Substation on 3/15/2021 for the following combined criteria:

- Weekly Inspection – Week Ending March 19, 2021
- Post-Storm Inspection - Storm Beginning March 9, 2021; Storm Ending March 12, 2021
- Pre-Storm Inspection - Storm Beginning March 15, 2021; Storm Ending March 15, 2021

In the report from the above-mentioned inspection, SCE stated that due to unsafe conditions, there was no access to the site on March 15, 2021 (Attachment 4, pages 1 and 4). Therefore, no March 15, 2021 Pre-Storm Inspection photographs of the areas of concern exist. Additionally, no photographs of the March 12, 2021 Post-Storm Inspection to observe and evaluate the BMP effectiveness and/or implement corrective actions ahead of the anticipated March 15, 2021 rain event exist. SCE also documented that there was no pre-storm inspection on Sunday March 14, 2021 and no during storm inspection on March 15, 2021 as the storm did not qualify for the inspection. Subsequently, SCE clarified that there was no post-storm inspection on March 15 through March 17, 2021, as the precipitation amount of 0.45 inches did not qualify for the inspection (Attachment 5, page 1).

Due to the inability to access the site to collect stormwater samples for measuring turbidity levels and determining BMP effectiveness, the CPUC Compliance Team took a conservative approach to evaluate BMP effectiveness based on photographic documentation of sequential post rain events on March 17, 2021, and to comply with the Mesa Substation Project's MM HY-1, MM HY-3, and pertinent permit conditions. The CPUC evaluated these observations for compliance with relevant MMs (MM HY-1 including the Mesa Substation SWPPP and MM HY-3), and the terms and conditions of the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction

[1] California Stormwater Quality Association (CASQA) BMP Handbook, Fact Sheet SE-10, Storm Drain Inlet Protection. Access: https://chico.ca.us/sites/main/files/file-attachments/se-10_storm_drain_inlet_protection.pdf?1598484898

and Land Disturbance Activities (CGP), Order No. 2009-0009-DWQ, NPDES No. CAS000002 as amended by Order No. 2010-0014-DWQ and Order No. 2012-0006-DWQ that the Mesa Substation must comply with.

On March 17, the CPUC Compliance Monitor noted the project area received approximately 0.5 inches of rain the week of March 8, and an additional 0.4 inches of rain on Monday March 15th. The CPUC Compliance Monitor did not report seeing rainwater runoff, however, noted muddy areas, mud stains on the V-ditch, and numerous visible erosion rivulets (Attachment 2). Per photographic documentation, hardened sediment along the entire length of the V-ditch running east to west between the boundary wall and the soil stockpile showed that sediment laden stormwater runoff was conveyed from the project site. It was also evident that the drain inlet within this V-ditch had been obstructed with sediment debris creating standing water. To mitigate onsite flooding, the CPUC monitor observed that the gravel bags and filter fabric protecting the drain inlet had been removed and placed near the edge of the V-ditch, thus creating an offsite discharge.

As a result, photographs documented on March 17, 2021 (post rain events) demonstrated lack of BMP effectiveness behind the southern boundary wall and showed signs of sediment laden water runoff into the inlet connected to the public storm drain system.

Background:
On February 4, 2021, the CPUC Compliance Monitors performed stormwater compliance monitoring to ensure that all project-related activities conducted by SCE and their contractors comply with the terms and conditions of the CGP.

During monitoring, the CPUC Compliance Monitors observed deficiencies in erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction behind the southern boundary wall of the Mesa Substation. Additionally, use of filter fabric not consistent with Section 3.5.2 of the Stormwater Pollution Prevention Plan or BMP design referenced in fact sheet SE-10 was observed at the drain inlet terminus of the V-ditch construction, located behind the southern boundary wall. Furthermore, a potential illicit discharge from Mesa Substation was identified at the channel located outside of the southern boundary wall within the Mesa Substation footprint.

A memorandum prepared by WSP USA on February 12, 2021, provided a summary of the stormwater compliance visual monitoring activity that occurred on February 4, 2021 for the Mesa Substation Project in Los Angeles County, California. The memorandum included photographic documentation (with GPS coordinates) and a series of initial required action recommendations to ensure compliance with the CGP and the Mesa Substation Project SWPPP. The memorandum was approved by CPUC for submittal to SCE and was provided on February 19, 2021. On March 18, 2021 SCE responded to the CPUC Compliance Monitoring memorandum and provided photographic documentation of additional BMP implementation on the north and west sides of the soil stockpile locations behind the southern boundary wall. Additionally, SCE provided photographs (dated February 12, 2021 and March 12, 2021) of final BMP installation behind the Mesa Substation boundary wall (i.e., the Mesa Substation Project Area between the Substation, wall/fence, and V-ditch). After reviewing SCEs response and photographs, the CPUC acknowledged SCEs responsiveness and determined that no further action was required (Attachment 1, page 3-4).

Onsite compliance monitoring by the CPUC compliance team includes a focus on spot-checks of ongoing construction activities and BMPs that were being implemented onsite to mitigate offsite stormwater and non-stormwater discharges. The following was noted during the CPUC Compliance Monitoring site visit on March 17, 2021 (post storm events):

- ***Post storm BMP deficiencies behind the southern boundary wall***: The CPUC Compliance Monitor noted the project area received approximately 0.5 inches of rain the week of March 8, and an additional 0.4 inches of rain on Monday March 15th. The CPUC Compliance Monitor did not report seeing stormwater runoff, however, noted muddy areas, mud stains on the V-ditch, and numerous visible erosion rivulets. For example, mud stains behind the gravel bag check dams within the V-ditch running east to west between the boundary wall and the soil stockpile showed

that sediment coming off of the site filled the area behind each of the check dams. (Attachment 2, photo 1).

- It was also evident that the drain inlet within the V-ditch had clogged up creating a large pond. The gravel bags and filter fabric around and over this drain inlet had been pulled out to allow the water to drain out, and the materials were placed near the edge of the v-ditch (Attachment 2, photo 2).
- Stormwater runoff rivulets were noted coming off the top of the soil stockpile (Attachment 2, photo 3) and coming from around the southern side of the soil stockpile (Attachment 2, photo 4)
- Rivulets were noted coming into the BMP area outside of the southern boundary wall (Attachment 2, photo 5).
- Muddy sediment was captured behind all of the gravel bag check dams within the V-ditch running down to the discharge drain inlet (Attachment 2, photos 6 and 7). All of the captured sediment had been dug out of the "V" ditch, but there were obvious signs that a lot of sediment laden stormwater runoff drained offsite via the drain inlet connect to the municipal storm drain system. A construction crew was working on the drain inlet at the end of this V-ditch (Photo 8).

Other CPUC Compliance Monitor Observations:
On March 5, 2021, the CPUC Compliance Monitor noted that the site received about 0.2 inches of rain creating muddy conditions. Outside of the southern boundary wall, the CPUC Compliance Monitor observed gravel bag check dams placed in the newly constructed V-ditch (Attachment 3, photos 1 and 2). Other observations indicate that a minor amount of rain was received given the minimal rills on the soil stockpile and the flow lines through the staging area. Runoff traveling along the southern side of the soil stockpile, however, was still a concern (Attachment 3, photo 3). BMPs were also inspected (Attachment 3, photo 4).

On March 9, 2021 the CPUC Compliance Monitor met with the site QSP and discussed BMP work ahead of the upcoming storm. The CPUC Compliance Monitor expressed concern with stormwater run-on coming down the southern side of the existing soil stockpile and discharging via the riprapped drain inlet (Attachment 3, photo 5). The two discussed directing stormwater run-on into the V-ditch that drains to the detention basin. The BMPs along the outside of the southern boundary wall remained in place (Attachment 3, photo 6).

On March 17, 2021, the CPUC Compliance Monitor noted that the existing BMPs identified on February 4, 2021 (see Attachment 1, page 4) remained at the inlet to the Caltrans channel. Again, the CPUC Compliance Monitor recommended implementation of the required actions referenced in Attachment 1, page 4. Photographic documentation of the March 17, 2021 observation is presented in Attachment 3, photo 7.

On March 24, 2021, the CPUC Compliance Monitor noted an erosion rivulet from the Phase 4 work area indicating stormwater runoff was significant with potential of circumventing BMPs and creating an offsite discharge (Attachment 3, photo 8).

Although the CPUC Compliance Monitors expressed deficiencies of adequate BMP maintenance and Implementation at the Mesa Substation Project area between the Substation, wall/fence and v-ditch behind the southern boundary wall prior to storm events (e.g., stockpile management, erosion control, sediment control and storm drain inlet protection), SCE failed to repair/upgrade the BMPs within 72-hours, per the terms and conditions of the CGP. Additionally, the inlet at the terminus of the v-ditch appeared to have been clogged creating a large pond of sediment laden water. It is evident that adequate BMPs were not implemented prior to forecasted storm events (which was a previous CPUC concern at the Mesa Substation), resulting in the potential to cause water quality and hydrology impacts on the connected municipal storm drain system and receiving waters.

Based on the descriptions above, the CPUC has determined that these incidents warrant a Level 2 Non-Compliance. Photographs documenting the incident are provided in Attachment 2.

**Pertinent Plans/Permits/Mitigation Measures:**

The Mitigation, Monitoring, Compliance, and Reporting Program (MMCRP) was created based on the Final Environmental Impact Report and serves as a working guide for maintaining environmental compliance for the Mesa Substation Project. The mitigation measures (MMs) and applicant proposed measures within the MMCRP are required to be followed by SCE, including the following, which are relevant to this non-compliance incident. Relevant portions of MMs and associated applicable plans and permits (SWPPP and CGP) are provided below (with underlines) for reference.

**MM HY-1: Stormwater Pollution Prevention Plan.** The applicant will obtain coverage for the project under the Construction General Permit (Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ). The applicant will prepare a SWPPP to reduce the potential for water pollution and sedimentation from construction. BMPs to be included in the SWPPP that must be submitted to the SWRCB shall include, but are not limited to, the following:

- Runoff, sedimentation, and erosion would be minimized through the use of BMPs such as water bars, silt fences, staked straw bales, wattles, and mulching and seeding of all disturbed areas. These measures will be designed to minimize ponding, eliminate flood hazards, and avoid erosion and siltation into any creeks, streams, rivers, or bodies of water, and to preserve roadways and adjacent properties. BMPs would be included for areas where helicopters would be landed, fueled, and serviced or used for construction activities.
- Implement measures such as silt screens, cleanup of spills of hazardous materials, cleanup of sediment, secondary containment for hazardous materials, and avoidance of activities that disturb sediment or have a high potential for hazardous materials spills immediately before or during rain to prevent polluted (with sediment or hazardous materials) runoff from staging areas from draining into water ways such as washes, drainages, and ditches and from entering municipal storm drain systems.

Verification of Construction General Permit coverage approval and the approved SWPPP(s) will be provided to the California Public Utilities Commission (CPUC) at least 30 days prior to start of construction. Updated SWPPPs will be provided to the CPUC on request during construction.

**Relevant Sections of the Storm Water Pollution Prevention Plan, per California 2009-0009-DWQ, as Amended by 2010-0014-DWQ and 2012-0006-DWQ**

- Mesa Substation SWPPP, Section 4.1.1 Visual Inspections: If deficiencies are identified during BMP inspections, repairs or design changes shall be initiated within 72 hours of identification.
- Mesa Substation SWPPP, Section 4.1.5 Maintenance and Repair: The QSP and/or delegated personnel shall begin implementing repairs or design changes to BMPs within 72 hours of identification of BMPs that:
  - Need Maintenance to operate effectively
  - Have failed; or
  - Could fail to operate as intended.

  If the problem warrants an amendment (e.g. a new procedure or BMP that needs to be implemented) the QSD shall be notified.

**Relevant Sections of the Construction General Permit Order No. 2009-0009-DWQ, as Amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ**

- Construction General Permit, page 48, Section M, Storm Water Pollution Prevention Plans: The SWPPP must be implemented at the appropriate level to protect water quality at all times throughout the life of the project. A SWPPP must be appropriate for the type and complexity of a project and will be developed and implemented to address

project specific conditions.

**MM HY-3: Construction Drainage Plan.** SCE shall prepare and implement a Drainage Plan or incorporate the requirements of this mitigation measure into the SWPPP, which ensures runoff during construction activities at the Mesa Substation site will not exceed drainage capacity of the storm water system and other drainage facilities. Measures that can be employed can include:

- Constructing the detention basin earlier in construction.
- Constructing temporary detention basins on site.
- Creating infiltration areas to limit runoff that enters the storm water system.

If the SWPPP is not used to satisfy the conditions of this mitigation measure, SCE shall submit the plan to Monterey Park and CPUC for review and approval prior to beginning construction activities at the substation site.

**On February 3, 2017, SCE submitted request for CPUC approval for compliance with Mitigation Measure HY-3. The CPUC agreed that the SWPPP would satisfy the conditions of this mitigation measure.**

**Proposed Resolution:**

The CPUC requests that SCE develop and implement a strategy to allow for site access for non-qualifying and qualifying storm events (including pre-storm, during storm, and post-storm) for effective and safe environmental monitoring, inspection, and evaluation. This strategy shall be reviewed by the CPUC Compliance Team prior to implementation. Furthermore, a similar strategy shall be utilized to ensure that stormwater samples are collected by the Contractor's QSP or SCE during storm events at the Mesa Substation's designated sampling locations. Sampling protocols and designated locations shall be submitted to CPUC for review prior to implementation of the strategy.

It is the CPUC understanding that site access can be granted with some modification to ensure safety, such as via the Markland entrance and utilizing the paved access roads, or along with the site representative. In accordance with the Mesa Substation SWPPP, sections 7.3.2 and 7.3.3 effluent sampling locations and effluent sampling procedures are required. Sampling locations shall be designated in safe and accessible areas on site, to facilitate effluent sampling collection during qualifying storm events.

BMPs must be inspected and maintained in accordance with Construction General Permit Order No. 2009-0009-DWQ, as Amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ for the associated Mesa Substation Project risk level. It is recommended that at the minimum, storm drain inlets be inspected weekly, prior to forecasted rain events, daily during extended rain events, and after the conclusion of rain events. Specifically, checking inlet and outlet structures for any damage or obstructions, and repair damage and remove obstructions as needed. In addition, checking the inlet and outlet areas for erosion and stabilize upland areas if required. Furthermore, to maintain the effectiveness of the V-ditch, sediment that accumulates in the V-ditch must be periodically removed.

Furthermore, the CPUC requests that SCE ensure that if deficiencies are identified during BMP inspections, repairs or design changes shall be initiated within 72 hours of identification. The QSP and/or delegated personnel shall begin implementing repairs or design changes to BMPs within 72 hours of identification of BMPs that require maintenance to operate effectively, have failed, or could fail to operate as intended (in accordance with SWPPP for the Mesa 500-kV Substation Project, Section 4.1.1 and 4.1.5). Photographic evidence of such repairs or design changes should be submitted to the CPUC Compliance Team within 7 days of implementation.

To support compliance with pertinent permits, plans, and mitigation measures, CPUC requests that SCE inspection reports are incorporated in the SWPPP on-site binders and uploaded on SCE's Field Reporting Environmental Database (FRED),

immediately following the inspections. If SCE discovers a non-compliance incident of any magnitude (including but not limited to identifying the same deficiencies noted in consecutive BMP weekly inspection reports), they must notify the CPUC Compliance Monitoring within 7 days of the incident (self-report) and ensure that corrective repairs or design changes are completed within 72 hours of identification.

Repeated compliance incidents resulting from the same action or individual may result in elevating the non-compliance level.

**Recommended Timeline for Follow-up:**

The CPUC requests that SCE develop and incorporate a strategy to ensure that they allow site access for non-qualifying and qualifying storm events (including pre-storm, during storm, and post-storm) for an effective and safe environmental monitoring, inspection, and evaluation. This strategy shall be developed and sent to the CPUC for review by October 1, 2021. Once approved by the CPUC Compliance Team, the strategy shall be incorporated into SCE's stormwater pollution prevention and control protocols by no later than November 1, 2021.

Additionally, CPUC requests that SCE implement a strategy to ensure the stormwater samples are collected by the Contractor's QSP or SCE during qualifying storm events (i.e., qualifying rain events) at the Mesa Substation's designated sampling locations. Discharge from the project site includes overland or via the storm drain connections. This strategy shall be developed and sent to the CPUC for review by October 1, 2021. Once approved by the CPUC Compliance Team, the stormwater sampling strategy shall be incorporated into SCE's stormwater pollution prevention and control protocols by no later than November 1, 2021.

Furthermore, the CPUC requests that SCE implement an effective strategy to ensure the deficiencies identified in SCE's BMP Weekly Inspections are repaired or re-designed within 72-hours in accordance with pertinent plans, permits, and mitigation measures for the Mesa 500-kV Substation Project. Photographic evidence of repairs or re-design shall be notified to CPUC within 7 days of the incident.

The CPUC Compliance Monitoring team welcomes a meeting with the Contractor's QSP to discuss the strategies mentioned above and coordinate actions for implementation prior to October 1, 2021. To expedite the review process and facilitate team discussions, the CPUC recommends SCE to submit proposed implementation strategies within 7 days prior to coordination meetings.

| Approvals | Date | Name (print) | Signature | Comments |
|---|---|---|---|---|
| CPUC Compliance Manager | 8/5/2021 | Fernando Guzman |  | |
| CPUC Compliance Monitor (if applicable) | | | | |
| CPUC Project Manager (if applicable) | 8/5/2021 | Connie Chen | Connie Chen | |
| SCE Environmental Project Manager (if applicable | | | | |

**Prepared by:** Fernando Guzman, Silvia Yanez **Date:** 8/5/2021

| Non-compliance Level | Example |
|---|---|
| A Level 1 non-compliance incident is an action that deviates from project requirements or results in the partial implementation of the mitigation measures, but has not caused, nor has the potential to cause impacts on environmental resources. | i. Failure to implement adequate dust control measures resulting in no impact on resources;<br>ii. Improperly installed, repaired, or maintained erosion or sediment control devices (with no resultant harm to sensitive resources or release of sediment to waters);<br>iii. Inadvertent minor incursion into exclusion area resulting in no harm to sensitive biological or cultural resources;<br>iv. Work outside the approved work limits where the incident is within a previously disturbed area, such as a gravel lot |
| A Level 2 non-compliance incident is an action that deviates from project requirements or mitigation measures and has caused, or has the potential to cause minor impacts on environmental resources. | i. Work without appropriate permit(s) or approval;<br>ii. Failure to properly maintain an erosion or sediment control structure, but the structure remains functional, and results in minor impacts on resources (e.g. water courses);<br>iii. Working outside of approved hours;<br>iv. Repeated documentation of Level 1 incidents |
| A Level 3 non-compliance incident is an action that deviates from project requirements and has caused, or has the potential to cause major impacts on environmental resources. These actions are not in compliance with the APMs, mitigation measures, permit conditions, approval requirements (e.g. minor project changes, notice to proceed), and/or violates local, state, or federal law. | i. Construction activities occurring in an exclusion zone with direct impacts to sensitive or endangered species, cultural resources, human remains, or an archaeological site;<br>ii. Eminent danger or documented impact to a sensitive or T&E species;<br>iii. Repeated deviations from required mitigation measures/requirements that have been documented as Level 2 (Minor Incidents);<br>iv. Improper installation of erosion or sediment control structures resulting in substantial sedimentation or impacts to water quality or putting sensitive resources at risk |

# Attachment 1

Observations and Required Actions (from February 12, 2021 Memorandum)

*Table 1. Observations and Required Actions*

| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
|---|---|---|---|---|
|  <br>The slope (aka Market Place Stockpile) and the open space downgradient from the slope lack sediment control and erosion control BMPs. | Per Risk Level 2 requirements, Attachment D:<br><br>Section D.2: *Risk Level 2 dischargers shall provide effective soil cover for inactive areas and all finished slopes, open space, utility backfill and completed lots.*<br><br>**Required Action:** Plastic sheeting is only applied on one area of slope. Install soil stabilization BMPs on entire face of slope and in the open space downgradient from slope.<br><br>Section E.3: *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.*<br><br>**Required Action:** Install sediment control BMPs on face, toe and at grade breaks on slope.<br><br>Per Risk Level 2 requirements, Attachment D, Section E.4: *Risk Level 2 dischargers shall apply linear sediment controls along the toe of the slope, face of the slope, and at the grade breaks of exposed slopes to comply with sheet flow lengths in accordance with Table 1.*<br><br>**Required Action:** Install linear Sediment Control BMPs at grade breaks on slope. | Per CASQA guidelines, BMPs were installed on the Mt. Mesa stockpile, temporary perimeter sediment barrier BMPs and track walking was performed on the stockpile prior to the precipitation event. Furthermore, additional BMPs were added to the area later that same afternoon to include additional fiber rolls and gravel bag berms. Cover is not advised due to proximity of energized areas and possibility of wind driven entanglement.<br><br>The "Market Place" stockpile (located in the far East corner of the project site) is an active stockpile , with work performed as recent as early March, and the "Mt. Mesa" stockpile (located West of the Marketplace stockpile) is also an active stockpile with work performed as recent as Monday March 8, 2021. As active stockpiles, they do not have the same stabilization requirements as inactive stockpiles.<br><br>For the soil amendment/binder application for the March 9, 2021 storm event, the first indication that this would be a qualifying storm event did not happen until Saturday, March 6, 2021 - at that time there was a 56% chance of rain. The first available workday to respond to the predicted event would have been Monday, March 8, 2021. *(BMP install halted 3/9/21 due to nesting CA gnatcatcher)* | • Plastic sheeting removed per CPUC Monitor<br>• Per CASQA BMP Fact Sheet EC-15, soil roughening or track walking isn't considered ***effective cover*** per CGP and CASQA BMP fact sheet EC-15.<br>  ○ Have Mesa Substation QSD evaluate the applicability of applying an eco-safe, biodegradable, liquid polymer soil binder for erosion control.<br>• Per the CASQA BMP Fact Sheet EC-1 Scheduling - When rainfall is predicted, adjust the construction schedule to allow the implementation of soil stabilization and sediment treatment controls on all disturbed areas prior to the onset of rain.<br>  ○ Mesa Substation Contractor and their QSP shall effectively coordinate disturbed soil stabilization prior to forecasted events<br>• CPUC Monitor observed soil binder application on 3/24/21 on Mt. Mesa Stockpile | 3/17/21<br>CPUC Monitor observed signs of visible sediment discharge: *Muddy sediment was captured behind all gravel bag check dams within the "V" ditch running down to the offsite drain inlet (Photos 12 & 13). All captured sediment had been dug out of the "V" ditch, but it was obvious that a lot of sediment laden runoff drained offsite via the drain inlet or the Caltrans channel. A Power Grade crew was working on the drain inlet at the end of this "V" ditch (Photo 14).*<br><br>  <br><br>  <br><br>***Given that samples cannot be collected due to safety exemptions, to keep the Mesa Substation Project in compliance with the CGP, a notice of discharge must be filed on SMARTS and with the Los Angeles RWQCB.*** |

*Table 1. Observations and Required Actions*

| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
|---|---|---|---|---|
|  <br>Open space area lacks erosion and sediment control as well as run-off management. Area conveys flow off site | Per Risk Level 2 requirements, Attachment D:<br><br>Section D.2: *Risk Level 2 dischargers shall provide effective soil cover for inactive areas and all finished slopes, open space, utility backfill and completed lots.*<br><br>**<u>Required Action:</u>** Apply soil stabilization and sediment control BMPs to this open space area.<br><br>*Section F. Run-on and Run-off Controls: Risk Level 2 dischargers shall effectively manage all run-on, all run-off within the site and all runoff that discharges offsite.*<br><br>**<u>Required Action:</u>** Manage runoff from this area to prevent offsite sediment discharges. | No response regarding stabilization of this open space area provided by SCE.<br><br>**Document in Annual Report as follows:**<br><br>**Question F.1: Were required erosion controls fully implemented on your site?**<br><br>**Response: No**<br><br>**Question H.1: Was all site run-on and run-off effectively managed?**<br><br>**Response: No** | Lack of implementing erosion control BMPs in this open space area contributed to offsite sediment discharges when the project received approximately 0.5-inches of rain during the week of 8 March 2021 and another 0.4-inches on Monday March 15, 2021.<br><br>***Given that samples cannot be collected due to safety exemptions, the only way to determine BMP effectiveness is based on post-storm inspections. Given the CPUC Monitor's photo documentation indicates evidence of a sediment discharge from disturbed areas, the sediment control and erosion control strategy needs to be modified to prevent offsite sediment discharges from the Mesa Substation Project and a report notifying the State Water Board was required on SMARTS no later than 10 days after the conclusion of the storm event.*** |  <br>  <br>***Per CGP, Section III, Discharge Prohibitions, all discharges are prohibited except for the storm water and non-stormwater discharges specifically authorized by the CGP or another NPDES permit.***<br><br>***Per Attachment D, Section 15, in the event that any sample exceeds an applicable NAL, Risk Level 2 dischargers shall electronically submit all storm event sampling results to the State Water Board no later than 10 days after the conclusion of the storm event. Although sample results are not available, photo documentation establishes that the turbidity NAL was exceeded. To keep the project in compliance, notification to the State Water Board is required.*** |

*Table 1. Observations and Required Actions*

| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
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|  <br>V-ditch construction outside of southern boundary wall. | Section E.3: *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.*<br><br>**<u>Required Action:</u>** Install temporary erosion and sediment control BMPs to exposed soil area. |  <br>16 Feb - 10 March 2021: Rolled erosion control blanket, fiber roll and hydraulic mulch applied. | No further action. | |
|  <br>Drain inlet at terminus of v-ditch construction area covered with fabric. | Use of filter fabric cover is not consistent with Section 3.5.2 of SWPPP or BMP design referenced in fact sheet SE-10.<br><br>**<u>Required Action:</u>** Install storm drain inlet protection BMP per specifications in BMP factsheet SE-10. |  <br>16 Feb - 10 March 2021: Rolled erosion control blanket, fiber roll and hydraulic mulch applied. | No further action. | |

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| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
|---|---|---|---|---|
|  | Section E.3: *Risk Level 2 dischargers shall implement appropriate erosion control BMPs (runoff control and soil stabilization) in conjunction with sediment control BMPs for areas under active construction.*<br><br>**<u>Required Action:</u>** Install temporary erosion and sediment control BMPs to exposed soil area. |  <br><br>16 Feb - 10 March 2021: Rolled erosion control blanket, fiber roll and hydraulic mulch applied. | No further action required. | |
|  <br><br>PVC pipe installed at channel located outside of the southern boundary wall. | **<u>Required Action:</u>** Potential illicit discharge from Mesa Substation site. Ensure pipe is abandoned; remove pipe and all temporary BMPs. Stabilize area to pre-construction conditions. | No response received from SCE. | BMP repair and site restoration not implemented within 72 hours.<br><br>Document on Annual Report:<br><br>**Question J.6: If BMP maintenance/repair or design change was needed, did implementation begin within 72 hours?**<br><br>**Response: No** |  <br><br>17 March 2021 |

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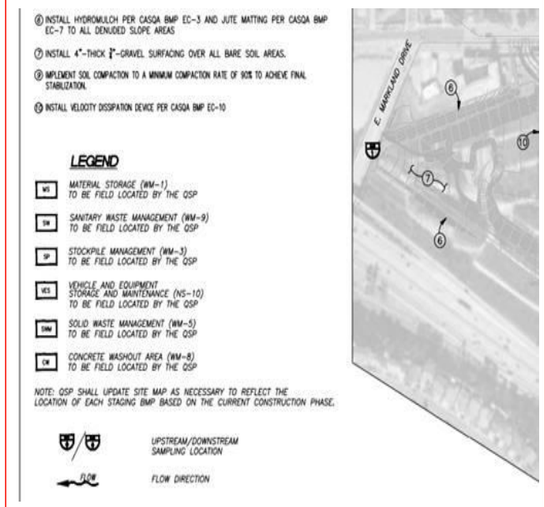
| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
|---|---|---|---|---|
|  <br>Sampling location, D/S 1 at Markland Drive. | Attachment D.5 *Risk Level 2 dischargers shall collect effluent samples at all points where storm water is discharged off-site.*<br><br>**Required Action**: Discharge location is at Markland Drive. Access from locked gate on Markland Drive is feasible and area surrounding sampling point is completely paved. At a minimum, per Attachment D.4, *Risk Level 2 dischargers shall collect 3 samples per day of the qualifying event.*<br><br>From this area, sampler can begin walking into project area to collect samples representing flow from disturbed soil areas. | **Storm Water Drainage and Potential Sampling Locations**<br><br>For the Mesa Substation location, the design of the entire site is for storm water to drain either overland or through storm drain infrastructure to the downstream basin. Therefore, the storm water discharge is not going offsite but to the constructed and operational LID post-construction water quality treatment basins. With the completion of the v-ditch systems that include additional BMPs, on both the north and west sides of the stockpile locations as well as along the Caltrans Right of Way locations, the flows are directed and discharged to the water quality basin. | *The Markland Drive inlet is designated as a sampling point in the SWPPP Site Map. If this is no longer a designated sampling point, please provide a revised Site Map that displays the current sampling points.* |  |
|  <br>Far west basin at Markland Drive | Drawdown time for detained stormwater runoff exceeds 96 hours creating a potential vector concern.<br>The Contractor's QSP has indicated in the Pre-Storm report, dated 1/22/21 that the basin requires BMP maintenance.<br><br>Per Attachment D, Section G.3: *Upon identifying failures or other shortcomings, as directed by the QSP, Risk Level 2 dischargers shall begin implementing repairs or design changes to BMPs within 72 hours of identification and complete the changes as soon as possible.*<br><br>**Required Action:** Evaluate outlet design to ensure basin empties within a maximum of 96 hours. Determine if sediment from erosion-prone cut slopes of offsite areas has contributed to reduced infiltration capacity. The basin | | Approximately on 15 March 2021, this basin was dewatered, treated, and conveyed to the onsite detention basin.<br><br>No further action required. |  <br>17 March 2021 |

*Table 1. Observations and Required Actions*

| *Photographic Documentation 4 February 2021* | *Initial Required Action* | *Mesa Substation Corrective Action* | *CPUC Follow-up Comments/ Required Action* | *CPUC Photographic Documentation* |
|---|---|---|---|---|
| | may require either more frequent cleaning, a sediment trap or forebay. | | | |
|  <br>Temporary fiber rolls – part of the Contractor's sediment control material stock | The Rain Event Action Plan dated 12/27/2020 indicates the erosion and sediment control material stock was checked and there were no deficiencies noted.<br>**Required Action:** Contractor shall ensure that there is an adequate inventory of erosion control BMPs to stabilize disturbed soil areas prior to a likely rain event. | No response in email dated 10 March 2021 | | |

# Attachment 2

Site Photographs (from March 17, 2021)

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/17/21 | Mesa substation |  | Photo 1 – "V" ditch between the southern boundary wall and the soil stockpile. Photo facing east. |
| 3/17/21 | Mesa Substation |  | Photo 2 – "V" ditch drain inlet area at the western end of the soil stockpile. Photo facing north. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/17/21 | Mesa substation |  | Photo 3 – Erosion rills coming off of the soil stockpile. Photo facing north. |
| 3/17/21 | Mesa substation |  | Photo 4 – Rainwater runoff from south of the soil stockpile. Photo facing north. |
| 3/17/21 | Mesa substation |  | Photo 5 – Rainwater runoff rivulets heading down into the BMP area. Photo facing southwest. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/17/21 | Mesa substation |  | Photo 6 – Mud captured in the "V" ditch. Photo facing west. |
| 3/17/21 | Mesa substation |  | Photo 7 – "V" ditch coming down to the offsite drain inlet. Photo facing east. |
| 3/17/21 | Mesa substation |  | Photo 8 – Work on the drain inlet outside of the southern boundary wall. Photo facing west. |

# Attachment 3

Supplemental CPUC Compliance Monitor Observations (during March 2021)

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/5/2021 | Mesa substation |  | Photo 1 – Stockpiled soil and the new v-ditch with check dams. Photo facing east. |
| 3/5/21 | Mesa Substation |  | Photo 2 – v-ditch drain inlet with BMPs. Photo facing north |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/5/21 | Mesa Substation |  | Photo 3 – Soil stockpile with one straw wattle near the riprapped drain inlet. Photo facing east. |
| 3/5/21 | Mesa Substation |  | Photo 4 – Rainwater runoff from south of the soil stockpile. Photo facing north. |
| 3/9/21 | Mesa Substation |  | Photo 5 – Stockpiled soil and the drainage corridor along the southern side of the stockpile. Photo facing east. |

| REPRESENTATIVE SITE PHOTOGRAPHS | | | |
|---|---|---|---|
| **Date** | **Location** | **Photo** | **Description** |
| 3/9/21 | Mesa Substation |  | Photo 6 – BMPs installed along the outside of the southern boundary wall. Photo facing west. |
| 3/17/21 | Mesa Substation |  | Photo 7 – Existing BMPs needed to be removed and the area restored. Photo facing west. |
| 3/24/21 | Mesa Substation |  | Photo 8 – Stormwater runoff rivulets flowing through the Phase 4 work area. Photo facing east. |

**Note**: Additional photos documented on 3/17/21 are shown in NCR-08 Attachment 2.

# Attachment 4

SCE Inspection for the Mesa Substation on March 15, 2021

SOUTHERN CALIFORNIA EDISON®

# Edison Inspection Report

## General Site Information

| | | | |
|---|---|---|---|
| **Date of Inspection** | 03-15-2021 | **Time of Inspection** | 10:15 AM |
| **Project Name** | Mesa 500kV Substation Project | **Project Level / Type** | Risk Level 2 |
| **Stage of Construction** | Grading and Land Development | **WDID #** | 4 19C377959 |
| **Approximate area of site exposed** | 88.3 | | |
| **Inspection Type** | ☒ Weekly ☐ Bi-Weekly ☐ Monthly ☒ Pre-Storm ☐ During Storm ☒ Post Storm ☐ Contained Stormwater Release ☐ Quarterly Visual Observations | | |
| **Is there any reason a visual inspection cannot be performed at this time?** | No | | |
| **Were photos taken?** | Yes | | |
| **Inspector Name** | Kate Norgard-casc | | |
| **Signature** | K Norgard | **Date and Time Signed** | 03-19-2021 6:34 PM |

## Site Weather Information

| | | | |
|---|---|---|---|
| **Current Conditions** | Cloudy | **Chance of Rain Today** | 83% |
| **Chance of Rain Tomorrow** | 1% | **Chance of Rain in 2 Days** | None Predicted |
| **Chance of Rain in 3 Days** | None Predicted | | |
| **Last Storm** | Start and End Date and Time: Mar 9 2021 9:00 PM - Mar 12 2021 3:00 AM | | |
| **Current Storm** | Start and End Date and Time: Mar 15 2021 8:44 AM | | |
| **Upcoming Storm** | Start and End Date and Time: None predicted | | |
| Amount of Precipitation: | 1.17 | Total Rainfall: | 0.39 |
| Estimated Amount of Rainfall: | None predicted | | |

## Deficiencies

## General Comments

The overall project includes: - Redevelopment of the existing Mesa Substation - Removal, relocation and modification, and/or construction of transmission, subtransmission, distribution, and telecommunications structures - Conversion of street light sources lines from overhead to underground - Installation of a temporary 220 kV line loop-in at Goodrich Substation - Additional minor modifications within several existing substations. No project access to active construction areas due to unsafe weather conditions.

# Compliance Checklist

| *Erosion and Sediment Control* | *Y / N / NA* | *Comments* |
|---|---|---|
| Do non-vegetated areas have properly installed erosion controls? | Y | |
| Do seeded or landscaped areas have sufficient maintenance irrigation, fertilization or mulching? | NA | |
| Are all Erosion Control BMPs properly maintained? | Y | |
| Are temporary sediment controls functional, maintained properly & installed in accordance with the details and/or the SWPPP Map? | Y | |
| Are all Sediment Control BMPs properly maintained? | Y | |
| Are silt fences placed on level contours? | NA | |

| *General Housekeeping* | *Y / N / NA* | *Comments* |
|---|---|---|
| Are vehicle and equipment storage areas free of spills, leaks or any other deleterious materials? | Y | |
| Is vehicle and equipment fueling performed on an impermeable surface in dedicated areas or using containment, drip pans or absorbent pads and located at least 50 feet away from downstream drainage facilities and watercourses? | Y | |
| Are stored chemicals in watertight containers (with appropriate secondary containment to prevent any spillage or leakage) or in a storage shed (completely enclosed)? Are secondary containment BMPs free of litter and/or rainwater build-up? | Y | |
| Are temporary concrete washout facilities self-contained (covered prior to rain events) and emptied at 75% capacity? | Y | Reminder to cover prior to precipitation events and empty at 75% capacity. |
| Are portable toilets placed with containment to prevent the discharge (leaking) of pollutants? | Y | Reminder during service to empty overflow containment trays for portable toilets as needed. |
| Are trash receptacles provided and is the site free of litter? | Y | Reminder to cover at the end of each work shift and prior to predicted rain events. |
| Are dedicated storage areas located at least 50 feet away from downstream drainage facilities and watercourses? | Y | |
| Are waste management containers and dumpsters covered at end of work shift and before predicted rain event? | Y | |
| Are there proper spill cleanup materials and posted spill reporting procedures for hazardous materials and waste in open and accessible locations? | Y | |
| If there has been a spill, has it been contained, cleaned up and documented in the SWPPP? | NA | |

| *SWPPP Update* | *Y / N / NA* | *Comments* |
|---|---|---|
| Does the SWPPP adequately reflect the current site conditions and contractor operations? | Y | |
| Is the SWPPP on-site where it is accessible to others? | Y | SWPPP is located in the project construction trailer. |
| Is the NOI posted on-site or included in SWPPP? | Y | |

| *Storm Drain Inlet Protection* | *Y / N / NA* | *Comments* |
|---|---|---|
| Are storm drain inlet BMPs installed and maintained properly? | Y | |

| *Stockpiles* | *Y / N / NA* | *Comments* |
|---|---|---|
| Are stockpiles covered and protected from run-on, run-off from adjacent areas and from winds? | Y | Stockpiles remain active, wind erosion control is being implemented with a water truck. Relocated Stockpile Location - Cover not advised due to proximity of energized areas and possibility of wind driven entanglement. Prior to precipitation events, recommend an erosion control BMP, such as spraying or matting, that work in combination with linear slope controls and perimeter controls that should be installed as well as check dam sediment control BMPs. |
| Are stockpiles located at least 50 feet from concentrated flows, downstream drainage courses and storm drain inlets? | Y | |

| | | |
|---|---|---|
| Have soil stockpiles that will sit for over 14 days been stabilized? | NA | |

| *Concentrated Flows* | *Y / N / NA* | *Comments* |
|---|---|---|
| Are concentrated flow paths free of visible erosion? | Y | |

| *Tracking Control* | *Y / N / NA* | *Comments* |
|---|---|---|
| Does the project have a stabilized construction site entrance/exit and is it installed correctly according to the SWPPP? | Y | |
| Are points of ingress/egress to public/private roads inspected, swept, and maintained according to the SWPPP? | Y | |

| *Wind Erosion Control* | *Y / N / NA* | *Comments* |
|---|---|---|
| Is dust control implemented? | Y | Water truck on site controlling dust throughout the day. |

| *Dewatering Operations* | *Y / N / NA* | *Comments* |
|---|---|---|
| Is dewatering handled in conformance with the SWPPP or dewatering permit issued by the RWQCB? | Y | Pumping water from vegetated swale area to Post Construction Water Quality Basin. |

| *Non-Storm Water Discharges* | *Y / N / NA* | *Comments* |
|---|---|---|
| Is the site clear of any evidence of illicit discharge or illegal dumping on the project? | Y | |
| If there has been an unauthorized or non-storm water discharge, has it been contained and mitigated per the SWPPP? | NA | |

| *Storm Water Monitoring* | *Y / N / NA* | *Comments* |
|---|---|---|
| As required (greater than 50% chance of precipitation), has a REAP been developed for Risk Level 2 or 3 projects? | Y | |
| Is rain gauge on site and precipitation amounts documented? | Y | Rain gauge 0.17” |
| Are discharge points and discharge flows free from noticeable pollutants? | Y | |
| Are discharge points free of any significant erosion and deposition? | Y | |

## General Photos

**Comments:** No project access to active construction areas due to unsafe weather conditions.


03-15-2021 10:19 AM

# NOAA Weather Forecast Table for 91754

**Data For: 03/15/2021**

**Forecast Created at:** Mar 15, 2021 03:16 PM PDT

| | Mon Mar 15 | | | | Tue Mar 16 | | | | Wed Mar 17 | | | | Thu Mar 18 | | | | Fri Mar 19 | | | | Sat Mar 20 | | | | Sun Mar 21 | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM |
| Temp (high) | | 57° | | | | 61° | | | | 66° | | | | 70° | | | | 70° | | | | 66° | | | | 67° | | |
| Temp (low) | | 40° | | | | 44° | | | | 47° | | | | 49° | | | | 50° | | | | 47° | | | | | | |
| Chance of Precip | 0% | 82% | | 8% | 8% | 1% | | 0% | 0% | 0% | | 0% | 0% | 0% | | 1% | 1% | 2% | | 4% | 4% | 3% | | 4% | 4% | 4% | | 0% |
| Precip Amount | | | 0.02" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | | | | | | | | | | | | | | | | | |
| Snow Amount | | | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | 0.00" | | | | | | | | | | | | | | | | | |
| | Mon Mar 15 | | | | Tue Mar 16 | | | | Wed Mar 17 | | | | Thu Mar 18 | | | | Fri Mar 19 | | | | Sat Mar 20 | | | | Sun Mar 21 | | | |
| | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM | 3 AM | 9 AM | 3 PM | 9 PM |
| Temperature | | 57° | | 40° | 40° | 61° | | 44° | 44° | 66° | | 47° | 47° | 70° | | 49° | 49° | 70° | | 50° | 50° | 66° | | 47° | 47° | 67° | | |
| Dewpoint | | | | 33° | 33° | 33° | 33° | 40° | 42° | 42° | 41° | 41° | 46° | 45° | 47° | 43° | 47° | 46° | 48° | 49° | 51° | 50° | 48° | 43° | 46° | 44° | 40° | |
| Humidity | | | | 58% | 68% | 70% | 35% | 66% | 82% | 86% | 40% | 43% | 80% | 90% | 54% | 42% | 75% | 86% | 56% | 52% | 86% | 96% | 60% | 46% | 80% | 86% | 46% | |
| Wind Speed (kn.) | | | | 13 | 11 | 5 | 7 | 6 | 4 | 5 | 7 | 8 | 3 | 3 | 4 | 11 | 4 | 3 | 5 | 13 | 5 | 4 | 7 | 13 | 7 | 6 | 9 | |
| Wind Direction | | | | 300° | 300° | 40° | 210° | 200° | 110° | 50° | 220° | 230° | 230° | 10° | 190° | 240° | 200° | 60° | 200° | 240° | 220° | 110° | 170° | 230° | 230° | 0° | 290° | |

# Attachment 5

Email Correspondence dated June 8, 2021

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**From:** Lori Rangel <Lori.Rangel@sce.com>
**Sent:** Tuesday, June 8, 2021 7:24 PM
**To:** Guzman, Fernando <Fernando.Guzman@wsp.com>
**Cc:** Chen, Connie <Connie.Chen@cpuc.ca.gov>; Yanez, Silvia <Silvia.Yanez@wsp.com>; Don Dow <Don.Dow@sce.com>; Elizabeth Webb <Elizabeth.Webb@sce.com>; Jack Horne <Jack.Horne@sce.com>
**Subject:** RE: (External):RE: (External):Mesa SWPPP concerns URGENT (Email 3 of 3)

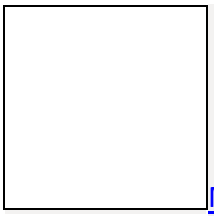
Fernando,

The inspection for the Mesa Substation on 03-15-2021 was for the following combined criteria:

- Weekly Inspection - Week Ending 03-19-2021
- Post-Storm Inspection - Storm Beginning 03-09-2021 Storm Ending 03-12-2021
- Pre-Storm Inspection - Storm Beginning 03-15-2021 Storm Ending 03-15-2021

**Due to unsafe conditions, there was no access to the site on 03-15-2021.** Photos of the site entrance and rain gauge are attached.

There was no pre-storm inspection on Sunday, 03-14-2021. There was no during storm inspection on 03-15-2021 as the storm duration did not qualify for the inspection.
There was no post-storm inspection on 03-15-2021 through 03-17-2021, as the precipitation amount of 0.45" does not qualify for the inspection.

There was a site visit 03-17-21, see photos:  Mesa Photos 03-17-21

Let me know if you have any questions.

Thank you.

**Lori Iles-Rangel**
Project Manager, Environmental
Project Execution, Major Environmental Projects
Environmental Services Department
M. 626-476-6253

2244 Walnut Grove Avenue, Rosemead, CA 91770

**From:** Guzman, Fernando <Fernando.Guzman@wsp.com>
**Sent:** Tuesday, May 25, 2021 6:33 PM
**To:** Lori Rangel <Lori.Rangel@sce.com>
**Cc:** Chen, Connie <Connie.Chen@cpuc.ca.gov>; Yanez, Silvia <Silvia.Yanez@wsp.com>; Don Dow <Don.Dow@sce.com>; Elizabeth Webb <Elizabeth.Webb@sce.com>; Jack Horne <Jack.Horne@sce.com>
**Subject:** RE: (External):RE: (External):Mesa SWPPP concerns URGENT (Email 3 of 3)

Good afternoon Lori,

The CPUC team acknowledges receipt of SCEs responses to Table 1 in addition to photograph documentation sent on May 12, 2021 via email. In response, the CPUC team request the following:

- Please provide photos for the 3/15/21 rain event along with pre-storm inspection on 3/14/21 and a post-storm inspection report on 3/15/21.

Let me know if you have any questions.

Thank you.
Fernando