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November 16, 2020

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

Re: Minor Project Refinement No. 12 for the South Orange County Reliability Enhancement Project.

Mr. Barnsdale:

San Diego Gas & Electric (SDG&E) is hereby requesting approval of Minor Project Refinement No. 12 (MPR-12) from the California Public Utilities Commission (CPUC) for the South Orange County Reliability Enhancement Project (SOCRE or Project). Approval of MPR-12 will authorize the use of a temporary work area adjacent to the access road south of Location 30 in the City of San Clemente. The temporary work area would be used to set up stringing equipment for wire pulling activities. The requested additional work area will total 1,200 square feet, or .03 acres. Please refer to **Attachment B, MPR-12 Figure** and **Attachment C, MPR-12 Site Photographs** to view the MPR-12 work area.

Attachment A: SOCRE Minor Project Refinement Form

Attachment B: MPR-12 Figure

Attachment C: MPR-12 Site Photographs

Description of MPR-12 Workspace and Activities

As mentioned above, MPR-12 would authorize SDG&E to use a new temporary work area (approximately 1,200 square-feet) adjacent to the access road south of Location 30. The additional work area is necessary to safely string conductor between Locations 18/19 and 30. After constructability review in the field, it was determined the existing stringing site located south of the MPR-12 stringing site would not be suitable as there would be potential to impact the underlying vegetation during wire pulling which could also present possible safety concerns. No ground disturbance or vegetation removal is anticipated to be required during MPR-12 activities. The proposed work area appears to have been used as a spur road or stringing site by a different Project (See **Attachment B, MPR-12 Site Photographs**). The MPR-12 work area will be utilized during wire stringing activities anticipated to begin immediately following MPR-12 approval for approximately 1 week. To allow for changes in schedule, the site may be active through the end of December 2020.

Preconstruction Requirements and Permit/Approvals

The activities described above will not change the conditions set forth in the CPUC's Notice to Proceed No. 6 (NTP-6) approval letter dated October 30, 2019, nor will it change the type of equipment, number of construction personnel, or the status of any Mitigation Monitoring Compliance and Reporting Plan pre-construction requirements described in NTP-6. No permits are required for activities that will be performed within the MPR-12 work area.

MPR-12 Request for Approval

SDG&E respectfully requests approval of MPR-12 to utilize the new temporary work area as a stringing site, by November 18, 2020 in accordance with NTP-6 Condition of Approval No. 10. The new temporary work area will be used in accordance with conditions outlined in the CPUC's NTP-6 approval letter. Should you have any questions or need additional information, please do not hesitate to contact me at (858) 654-8211 or by email at rquasarano@sdge.com.

Sincerely,



Richard Quasarano
SOCRE Environmental Project Manager

cc: Joe Donaldson, Ecology and Environment, Inc.
Jennifer Kaminsky, SDG&E
Kenda Pollio, KP Environmental

ATTACHMENT A
MPR-12 Form



South Orange County Reliability Enhancement Project CPUC Minor Project Refinement Form

Minor project refinements are strictly limited to changes that will not trigger an additional permit requirement, do not substantially increase the severity of a previously identified significant impact based on criteria used in the FEIR, create a new significant impact, are located within the geographic boundary of the study area of the FEIR, and that don't conflict with any mitigation measure or applicable law or policy.

Date Requested: November 16, 2020

Report No.: 12

Date Approved: November 17, 2020

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The Minor Project Refinement No. 12 (MPR-12) temporary work area is located adjacent to a utility access road that leads to SDG&E's transmission line right-of-way (ROW).

Location/Milepost: The MPR-12 temporary work area is located south of Location 30 and north of Calle Saluda, in the City of San Clemente.

Land Use/Vegetative Cover: The 1,200-square foot MPR-12 work area (0.03-acre) is entirely within disturbed habitat.

Sensitive Resources: There are no sensitive resources in the MPR-12 temporary work area. See resource discussions below.

**Modification
From:**

- Permit Plan/Procedure Specification Drawing
 Mitigation Measure Other:

San Diego Gas and Electric (SDG&E) is requesting approval of MPR-12 for a new temporary work area to be used as a stringing site for the South Orange County Reliability Enhancement Project (SOCRE or Project). The new temporary work area is located adjacent to the access road south of Location 30, previously approved in Notice to Proceed No. 6 (NTP-6). The new MPR-12 work area will be approximately 1,200 square feet (0.03 acre).

The additional work area is necessary to safely string conductor between Locations 18/19 and 30. After constructability review in the field, it was determined the existing stringing site located south of the MPR-12 stringing site would not be suitable as there would be potential to impact the underlying vegetation during wire pulling which could also present possible safety concerns.

No ground disturbance or vegetation removal is anticipated to be required during MPR-12 activities. The proposed work area appears to have been used as a spur road or stringing site by a different Project (See **Attachment B, MPR-12 Site Photographs**). The MPR-12 work area will be utilized during wire stringing activities anticipated to begin immediately following MPR-12 approval for approximately 1 week. To allow for changes in schedule, the site may be active through the end of December 2020. **Attachment B, MPR-12 Figure** shows the location of the MPR-12 temporary work area.

Describe how project refinement deviates from current project. Include photos.

Original Condition: The Project’s Final Environmental Impact Report (FEIR) did not identify the need for a stringing site in the MPR-12 location. However, since the MPR-12 work area is located immediately adjacent to the Project’s approved access road, it is within the geographic study area of the FEIR, and therefore, has been previously analyzed.

Justification for Change: Following constructability review in the field, the construction contractor identified the need to gain access to the MPR-12 work area in order to facilitate stringing activities, as the previously identified stringing site presents possible safety concerns and could result in impacts to vegetation.

Maps & Figures: Refer to **Attachment B, MPR-12 Figure**, for a map of the proposed MPR-12 temporary work area location. Refer to **Attachment C, MPR-12 Site Photographs**, for pictures of the current conditions within the MPR-12 temporary work area.

Environmental Impact: Utilization of the MPR-12 temporary work area as a stringing site would not change the nature or increase the severity of any impacts disclosed within the FEIR; would not result in alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new permits or new regulatory approval. Utilization of the MPR-12 temporary work area is anticipated to increase the total temporary impact area for the Project by approximately 0.03 acre of disturbed habitat that contains no sensitive resources. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): Concurrence is not required as the proposed work area for MPR-12 is located immediately adjacent to the previously approved access road, and the new stringing site is within the geographic study area analyzed in the California Environmental Quality Act (CEQA) review process.

<u>Resources:</u>			
Biological	<input checked="" type="checkbox"/> No Resources Present	<input type="checkbox"/> Resources Present	<input type="checkbox"/> N/A, Change would not affect resources
Previous Biological Survey Report Reference:			
Biological resources along the Project alignment were studied, reviewed, and documented as part of SDG&E’s application for a Certificate of Public Necessity (CPCN) for the SOCRE Project and Proponent’s Environmental Assessment (PEA). Biological Resources were also discussed within the CPUC-conducted CEQA review process. Consistent with Section 4.4 of the FEIR, no sensitive biological resources are present within the MPR-12 work area. A pre-construction survey was conducted for the MPR-12 work area on November 16, 2020. No suitable habitat for special-status species was identified during the survey. The Project			

biologist verified that the current condition of the MPR-12 work area was consistent with the results provided in previous biological studies. The work area is entirely within disturbed habitat.

Cultural No Resources
 Resources Present
 Present
 N/A, changes would not affect
 resources

Previous Cultural Survey Report Reference:

Cultural and paleontological resources within the Project’s study area (including the MPR-12 work area) were studied, reviewed, and documented as part of SDG&E’s application for a CPCN for the Project and PEA. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project’s FEIR, Section 4.5). There are no known sensitive cultural resources within the MPR-12 work area.

Disturbance Acreage Changes: Yes No

Original disturbance acreage: None, the MPR-12 work area was not anticipated to be required for Project construction.

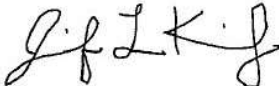

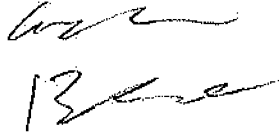
New disturbance acreage: 0.03 acre of temporary disturbance to previously disturbed habitat.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn’t applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, and Seismicity	<input type="checkbox"/> Y	MPR-12 does not involve the installation of any new facilities of performance of any new activities, not are any ground disturbing activities anticipated. Accordingly, utilization of the new temporary work area would not create any new geological related hazard not previously disclosed in the Project’s FEIR, Section 4.6.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary work area would not require agency consultation relating to geology, soils, or seismicity.
	<input checked="" type="checkbox"/> N	
Hazardous Materials and Waste	<input type="checkbox"/> Y	MPR-12 does not involve the installation of any new facilities or performance of any new activities. Accordingly, utilization of the new temporary work area would not require any new potentially hazardous materials to be used, would not create any new hazardous waste, would not expose any sensitive receptors not previously identified, and would not create any new hazard not previously disclosed in the Project’s FEIR, Section 4.8.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The proposed temporary work area would not require agency consultation relating to hazards or hazardous materials.
	<input checked="" type="checkbox"/> N	
Hydrology	<input type="checkbox"/> Y	Utilization of the new temporary work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to hydrology and water quality

	<input checked="" type="checkbox"/> N	that would be different from the impacts assessed in the Project's FEIR, Section 4.9.
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to hydrology or water quality.
	<input checked="" type="checkbox"/> N	
Cultural Resources	<input type="checkbox"/> Y	<p>No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to cultural resources are anticipated to occur as a result of the MPR-12 temporary work area. Review of the Project's previous cultural resources survey reports (prepared for the PEA) confirmed the lack of previously recorded cultural resources in the MPR-12 work area. No ground disturbing activities are proposed and the work area is not within 100 feet of a cultural Environmentally Sensitive Area, therefore cultural monitoring is not required (Refer to Section 6 in the Cultural Resources Construction Monitoring Plan). Impacts would be similar to those disclosed within the Project's FEIR, Section 4.5. Although no new or altered APMs or MMs would be required, the following APMs and MMs would be implemented for MPR-12 work activities:</p> <ul style="list-style-type: none"> • APM CUL-1: Worker Training for Cultural Resources • MM CUL-1: Supplemental Worker Training for Cultural Resources <p>No new significant impacts or a substantial increase in the severity of any previously identified significant impacts to paleontological resources are anticipated to occur as a result of the proposed new temporary work area. No impacts (or potential for impacts) to paleontological resources are anticipated beyond what was disclosed within the Project's FEIR, Section 4.5. There are no ground disturbing activities proposed within the MPR-12 work area, therefore paleontological monitoring will not be required.</p>
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The MPR-12 work area would not require agency or tribal consultation in relation to cultural or paleontological resources.
	<input checked="" type="checkbox"/> N	
Traffic and Circulation	<input type="checkbox"/> Y	<p>Construction activities within the new temporary work area would not substantially affect traffic and circulation in a manner different from the impacts assessed as part of the Project's FEIR, Section 4.15. Public access will be restricted using barricades at ingress points of the access road during wire stringing activities. There would be no additional construction crews or change in equipment utilized for MPR-12, that would not already be accounted for in NTP-6.</p> <p>No new or significant increase to previously identified significant impacts would occur as a result of the MPR-12 activities. No new</p>

	<input checked="" type="checkbox"/> N	<p>or altered APMs or MMs would be required, and the following APM would be implemented for MPR-12 work activities:</p> <ul style="list-style-type: none"> • APM TR-4: Off Peak Deliveries
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to traffic and circulation.
	<input checked="" type="checkbox"/> N	
Air Quality	<input type="checkbox"/> Y	The use of the MPR-12 temporary work area would not result in new significant impacts or a substantial increase in the severity of impacts as analyzed and disclosed within the Project's FEIR, Section 4.3, as there are no new activities or equipment proposed as part of this MPR-12 request.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to air quality.
	<input checked="" type="checkbox"/> N	
Noise and Vibration	<input type="checkbox"/> Y	<p>Utilization of the new temporary work area would not result in new significant impacts or a substantial increase in severity of any previously identified impacts to noise and vibration that were already analyzed in the Project's FEIR, Section 4.11, as there are no new activities proposed as part of this MPR-12 request. No new or altered APMs or MMs would be required, and the following APMs and MMs would be implemented for MPR-12 work activities:</p> <ul style="list-style-type: none"> • APM NOISE-1: Nighttime and Weekend Activities • MM NV-1: Nighttime and Weekend Construction Noise Controls • MM NV-3: Construction Vibration Control Measures
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to noise and vibration.
	<input checked="" type="checkbox"/> N	
Aesthetics/ Visual Resources	<input type="checkbox"/> Y	No permanent change in impacts to aesthetics/visual resources would result from utilization of the MPR-12 work area. The proposed work area appears to have been previously used as a spur road or stringing site by another Project and is disturbed with no vegetation. Therefore, use of the MPR-12 work area would not result in a substantial increase in severity or a new significant impact from those analyzed and disclosed within the Project's FEIR, Section 4.1. APM AES-2: Restoring Disturbed

	<input checked="" type="checkbox"/> N	<p>Areas and MM AES-2: Minimize Clearing and Ground Disturbance and Restore Disturbed Area to Pre-Project Conditions, is not applicable to MPR-12 as there is no ground disturbance or vegetation removal anticipated. No new or altered APMs or MMs would be required, and the following APM would be implemented for MPR-12 work activities:</p> <ul style="list-style-type: none"> • APM AES-1: Clean Work Areas
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to visual resources.
	<input checked="" type="checkbox"/> N	
Vegetation and Wildlife	<input type="checkbox"/> Y	<p>The use of the new temporary work area would not result in any new significant impacts or a substantial increase in severity of any previously identified impacts to biological resources. The proposed work area (1,200 square feet) occurs within disturbed habitat and does not include any sensitive biological resources as described in the Project's FEIR Section 4.4. No tree removal or vegetation removal is proposed as part of MPR-12 activities.</p> <p>Although no direct impacts to sensitive biological resources are anticipated as a result of the use of the MPR-12 work area, any indirect impacts that may occur to sensitive species in the vicinity of the work area will be mitigated in accordance with the MMs listed below:</p> <ul style="list-style-type: none"> • MM BR-1: Limit Construction to Designated Area and Protect Riparian, Aquatic and Wetland Area. • MM BR-2: Biological Monitoring. • MM BR-3: Preconstruction Surveys. • MM BR-4: Limit Removal of Native Vegetation Communities and Trees. • MM BR-6: Migratory Birds and Raptors Impact Reduction Measures. • MM BR-9: Invasive Plant Control Measures.
	<input checked="" type="checkbox"/> N	
Agency Consultation?	<input type="checkbox"/> Y	The new temporary work area would not require agency consultation relating to vegetation and wildlife.
	<input checked="" type="checkbox"/> N	

Approvals	Date	Name (print)	Signature	
San Diego Gas and Electric Project Manager	11/18/20	Jennifer Kaminsky		<input checked="" type="checkbox"/> Reviewed
San Diego Gas and Electric Environmental Project Manager	11/18/20	Richard Quasarano		<input checked="" type="checkbox"/> Reviewed
CPUC Project Manager	11/17/20	Andrew Barnsdale		<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Approved with conditions (see below) <input type="checkbox"/> Denied
For CPUC Compliance Manager Use Only				
<input checked="" type="checkbox"/> Refinement Approved		<input type="checkbox"/> Refinement Denied		<input type="checkbox"/> Beyond Authority

Conditions of Approval or Reason for Denial:

COA-1. The extent of activities for MPR-12 (i.e., a new temporary work area to be used as a stringing site located adjacent to the access road south of Location 30) will be limited to the approximate location shown on the figure titled "SOCRE PROJECT, MPR-12 Location 30".

COA-2. MPR-12 activities will occur only within the SDG&E right-of-way.

COA-3. Work activities for MPR-12 will adhere to all applicable safety requirements for work occurring under and near existing overhead power lines.

COA-4. Work activities for MPR-12 will adhere to all applicable conditions of approval identified for approved project NTPs, inclusive of NTP-6, and all applicable Mitigation Measures and Applicant Proposed Measures identified for the project in the Mitigation, Monitoring, Compliance, and Reporting Program Compliance Plan.

COA-5. The temporary work area described for MPR-12 will be in place until the end of December 2020. If SDG&E determines it is necessary to maintain use of the temporary work area beyond this time, SDG&E will request the extension in writing, including a justification and time limit for such use, and receive written approval of the extension by the CPUC prior to the end of the approved use period.

COA-6. The temporary work area will used only for the purpose identified in this request (i.e., wire stringing activities) and will not be used for other purposes, (e.g., long-term parking of vehicles or equipment, materials laydown, or equipment storage). If SDG&E determines it necessary to use the temporary work area for purposes other than identified herein, SDG&E will request the use in writing, including a justification and time limit for such use, and receive written approval for the use and extension by the CPUC.

COA-7. Although no activities requiring ground disturbance or removal of sensitive vegetation are anticipated to occur, if either of these activities were to occur, SDG&E will initiate restoration/revegetation of the area to pre-Project conditions in compliance with APM AES-2, MM AES-2, and the Project's Storm Water Pollution Prevention Plan immediately following completion of use of the temporary work area.

Prepared by: Joe Donaldson, WSP, CPUC Compliance Manager

Date: November 17, 2020
















ATTACHMENT B
MPR-12 Figure

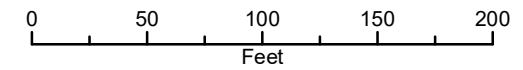
SOCRE PROJECT

MPR-12 Location 30

**San Clemente
Orange County, CA**

LEGEND

-  Interstate
-  State Highway
-  County Boundary
-  Municipal Boundary
-  SDG&E Existing ROW Limits
- MPR-12 Component**
-  Temporary Stringing Site
- NTP-6 Components**
-  New Transmission Cable Pole
-  Remove Existing Structure
-  230 kV Overhead Transmission Line
-  Existing Overhead Transmission Line to be Removed
-  Existing Access Road
-  BMP Feature
-  Work Pad
-  Stringing Site
-  Temporary Work Area



ATTACHMENT C
MPR-12 Site Photographs

MPR-12 Site Photographs



Photo 1: View of proposed MPR-12 stringing site location adjacent to access road, facing S

MPR-12 Site Photographs



Photo 2: View of MPR-12 stringing site location adjacent to access road, facing N