

Quarterly Compliance Report

Quarter 4 2024



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1.0 INTRODUCTION

In accordance with the Mitigation Monitoring, Compliance, and Reporting Program (MMCRP), for the Gates 500 kilovolt (kV) Dynamic Reactive Support Project (Orchard Substation or Project), this Quarterly Compliance Report provides an overview of the construction progress and implementation of Applicant Proposed Measures (APM) and Mitigation Measures (MM), as well as details regarding compliance-related activities conducted by LS Power Grid California, LLC (LSPGC) on the Project during the 4th Quarter of 2024 (October 2024 - December 2024).

To date, LSPGC construction activities have been authorized by the California Public Utilities Commission (CPUC) under Notice to Proceed No. 1 (NTP-1), Minor Project Refinement No. 1 (MPR-1), MPR-2, and MPR-3. The approval of NTP-1 authorized construction of the new Orchard Substation, including the installation of two static synchronous compensator (STATCOM) units, access roads, belowground conductor/cable, telecommunication lines, a stormwater detention basin, and ancillary components. The NTP-1 approval also includes the connection of the Orchard Substation to Pacific Gas and Electric Company's (PG&E) existing Gates Substation, the construction of two single-circuit 500 kilovolt (kV) interconnection transmission lines from the Gates Substation 500 kV bus to the Orchard Substation 500 kV take-off towers, and the utilization of a temporary construction staging and storage area.

2.0 CONSTRUCTION SUMMARY

The following activities were performed during the reporting period:

- Disconnection of the switch gear
- Conduit and jumper installation
- Spreading rock
- Weed abatement
- Circuit breaker work
- General housekeeping
- Site cleanup

Photos of construction activities are included in **Attachment 1, Photo Log**.

2.1 CONSTRUCTION STATUS

During ongoing construction of Project components, LSPGC will continue to implement all applicable APMs and MMs as identified in the Project's MMCRP. The summary of remaining construction activities is included in **Table 1, Construction Status**.

Table 1: Construction Status

Project Activity	Approximate Duration (months) ¹	Anticipated Start Date ²	Approximate Percent Complete
Site Development (includes survey, road work, site and staging yard preparation)	3	May 2023	100
Below-Grade Construction	3	June 2023	100
Above-Grade Construction and Equipment Installation	12	September 2023	99
Commissioning and Testing	6	September 2024	98
¹ Duration is not necessarily continuous.			
² Dates in <i>italics</i> are anticipated dates for activities that have not yet begun.			

2.2 PROJECT MODIFICATIONS AND APPROVALS

Please see **Table 2**, *NTP and MPR Schedule*, for a summary of approved and pending NTPs and MPRs.

Table 2: NTP and MPR Schedule

NTP / MPR	Description	Submittal Date ¹	Requested / Actual Approval Date
NTP-1	NTP-1 approval permitted the construction of the new Orchard Substation that will include two static synchronous compensator (STATCOM) units, access roads, belowground conductor/cable, telecommunication lines, a stormwater detention basin, and ancillary components.	Submitted December 22, 2022	Approved January 10, 2023
MPR-1	MPR-1 authorized the reconfiguration of temporary work areas within the Project site boundary in order accommodate additional space for parking, equipment and materials storage and construction staging activities.	Submitted April 28, 2023 Resubmitted May 3, 2023	Approved May 5, 2023
MPR-2	MPR-2 allowed the expansion of the temporary storage area approved in MPR-1 in order to accommodate additional space for materials storage to facilitate construction of the Orchard Substation.	Submitted June 23, 2023 Resubmitted June 28, 2023	Approved June 30, 2023

NTP / MPR	Description	Submittal Date ¹	Requested / Actual Approval Date
MPR-3	MPR-3 authorized the use of minor equipment components containing a reflective finish that are not commercially available in a neutral gray color (APM AES-2).	Submitted September 11, 2023	Approved September 18, 2023

3.0 ENVIRONMENTAL COMPLIANCE SUMMARY

The Lead Environmental Inspector (LEI) completes a LEI Field Report for each inspection. These reports describe ongoing activities, environmental monitoring, and compliance observations. The LEI Field Reports will be made available to the CPUC upon request.

3.1 AESTHETICS

In compliance with APM AES-1, all active Project work areas were maintained in a clean and orderly state with general housekeeping documented in the weekly LEI Field Reports. Work areas were inspected for cleanliness throughout the quarter. No night work occurred during the reporting period, therefore, no lighting was required nor shields to prevent light spillover effects. No compliance issues were documented during the reporting period.

3.2 AGRICULTURE

In compliance with APM AGR-1, the Williamson Act contract for the 20-acre portion of the Project site was nullified automatically upon LSPGC's purchase of the property after issuance of the Permit to Construct (PTC) pursuant to Title 5, Division 1, Part 1, Chapter 7, Article 6 of the California Government Code. LSPGC has provided evidence of this compliance to the CPUC in accordance with this measure.

3.3 AIR RESOURCES

Off-road diesel-powered equipment used during this quarter's construction activities was tracked on a weekly basis via the Project's diesel equipment usage tracking tool in accordance with APM AQ-1 of the MMCRP. An inventory of all construction equipment associated tier specifications are logged and available to the CPUC upon request. The Project was in compliance with this measure during the quarterly reporting period and met the requirement that at least 50 percent of all diesel-powered equipment use was from equipment that met United States Environmental Protection Agency (USEPA)-certified Tier 4 standards. As of January 5, 2025, the total percentage of Tier-4 diesel-powered equipment use on the Project (tracked as horse-power hours) was 82 percent. LSPGC submitted Monthly Equipment Compliance Reports to the CPUC in accordance with APM AQ-1 during the reporting period. Please see **Attachment 2, Equipment Use Tracking Tool** for the Project's Tier-4 diesel-powered equipment usage as of the end of December 2024.

The Project's Dust Control Plan (DCP) was submitted and approved by the San Joaquin Valley Air Pollution Control District (SJVAPCD) Rule 8021 on December 8, 2022 in compliance with APM AQ-2. All Project activities were in compliance with the Project's DCP during the reporting period. The DCP includes methods for wind erosion control and street sweeping that are implemented daily to alleviate dust nuisance generated by construction activities. Contractor staging occurred in approved areas within Project limits during the reporting period. Water trucks are utilized onsite to water down disturbed areas and stockpiled materials. Street sweeping takes place as needed for track-out control, and reduced speed limits are employed within the Project limits.

Additionally, measures were implemented throughout the reporting period to minimize greenhouse gas emissions from Project areas. Construction personnel were encouraged to carpool to Project areas, and construction equipment was maintained in accordance with manufacturing specifications throughout the reporting period.

In accordance with APM AQ-3, Valley Fever awareness training is incorporated into the Project's overall Worker Environmental Awareness Program (WEAP) training given to all Project personnel that are required to perform work in or near disturbed soils or dust emissions at the Orchard Substation Facilities site. Additional trainings are held for new workers as needed. Please refer to **Section 5.0** *Worker Environmental Awareness Program* for more information.

3.4 BIOLOGICAL RESOURCES COMPLIANCE SUMMARY

In accordance with the Project's MMCRP, all Project activities were conducted in compliance with each biological resource APM and MM during the reporting period. Speed limits of vehicles along access roads and on the Project site were limited to 15 miles per hour during the reporting period. All excavated holes and trenches are securely covered or equipped with wildlife escape ramps at the end of each day to prevent inadvertent entrapment of wildlife species. No outdoor lighting was required throughout the quarter as no night work occurred. There were no compliance issues or concerns related to biological resources during the reporting period, and no special-status species were observed.

In accordance with APM BIO-4 and APM BIO-5, construction during the migratory bird nesting season requires surveys to determine the presence or absence of nesting birds. During the reporting period, there were no active nests onsite.

MM BIO-1 states that pre-construction surveys shall be conducted by a qualified biologist for the presence of San Joaquin kit fox in suitable habitat within 14 days prior to commencement of construction activities pursuant to the USFWS (1999) *Standardized Recommendations for Protection of the San Joaquin Kit Fox*. Areas that have been disked or cultivated within 12 months prior to the start of ground-disturbing activities are not considered suitable habitat. As stated in NTP-1, due to the Project area location within previously cultivated land, no pre-construction surveys were required as no suitable habitat was identified.

3.5 CULTURAL, NATIVE AMERICAN AND PALEONTOLOGICAL RESOURCES

3.5.1 Cultural Resources and Native American Monitoring

Prior to construction, LSPGC consulted with a designated Dumna Wo-Wah tribal representative about mitigation procedures should cultural resources be encountered within the Project boundary. The pre-construction Tribal consultation requirement was completed by LSPGC and documented within the NTP-1 request sent to the CPUC dated January 10, 2023.

All Project activities were conducted in compliance with the measures defined in the Project's MMCRP relating to cultural and tribal resources during the reporting period. Proposed facilities and ground disturbing activities remained within the Project footprint and did not move outside of previously surveyed areas. No prehistoric nor ethnohistoric resources were recovered during the reporting period, thus, the tribal monitoring requirements defined within APM CUL-3, APM CUL-4, and APM CUL-5 were not initiated.

3.5.2 Paleontological Resources

No paleontological resource monitoring took place during the quarterly reporting period as no fossils were unearthed during earthwork activities.

3.6 FIRE PREVENTION AND PROTECTION

All Project activities were in compliance with the Construction Fire Prevention Plan (CFPP) during the reporting period. Construction personnel were observed to have appropriate personal protective equipment (PPE), and all Project vehicles were equipped with appropriate fire-suppression equipment. Vehicles were parked away from dry vegetation. Water tanks, fire extinguishers, and water trucks were available onsite for fire protection during construction during the reporting period. There were no red flag warnings issued for the Project region during the reporting period. No fires occurred on or near the Project during the fourth quarter of 2024.

All personnel carry a laminated card and hard hat sticker at all times that lists pertinent telephone numbers for reporting fires and immediate steps to take should a fire start in accordance with APM HAZ-4. All construction activities are coordinated with local law enforcement and fire protection agencies. In accordance with APM PS-1, emergency service providers have been notified of timing, location, and duration of construction activities. All construction crews and inspectors are provided with radio and cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of potential fires, and are trained in fire-safe actions, initial attack firefighting, and fire reporting. No compliance issues related to fires or fire prevention were recorded throughout the quarter.

3.7 GEOLOGY AND SOILS

Mitigation measures were implemented during construction activities to minimize potential impacts from geological hazards and disturbance to soils in accordance with APM GEO-1. Measures implemented throughout the reporting period included keeping vehicles and construction equipment within Project limits and approved construction work areas and avoiding

construction in areas with saturated soils whenever practicable to reduce impacts to soil structure. No vegetation removal was required during the reporting period. No compliance issues were recorded during the reporting period.

3.8 HAZARDOUS MATERIALS

All Project activities were conducted in compliance with the Spill Prevention, Control, and Countermeasure Plan (SPCCP) and Hazardous Materials Management Plan (HMMP) over the course of construction during the quarter. No soils were suspected of contamination during the reporting period, therefore, the implementation of soil testing procedures was not required. All construction personnel maintained appropriate PPE when working with or around hazardous materials. An adequate number of spill kits were maintained onsite throughout the quarter. There were no hazardous releases that occurred during the reporting period.

3.9 STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

In compliance with APM WQ-1, all Project activities were conducted in compliance with the Project's SWPPP during the reporting period. No groundwater was encountered over the course of the reporting period. No rain events took place during the quarterly reporting period. A Qualified SWPPP Practitioner (QSP) conducted monthly SWPPP inspections to document Best Management Practice (BMP) installation and compliance with the provisions of the SWPPP. Pre-, during-, and post-qualifying rain event inspections did not take place. No SWPPP deficiencies were recorded during the reporting period.

A SWPPP change of information (COI) was filed following the approval of MPR-1. A second COI was filed in July 2023 after the approval of MPR-2. A copy of the Project's SWPPP is maintained on the Project site.

3.10 TRAFFIC AND TRANSPORTATION

In accordance with NTP-1 approval, all Project activities were conducted in compliance with the Project's Traffic Control Plan (TCP) during the reporting period.

4.0 MMCRP COMPLIANCE

There were no impacts to any environmental resources and there were no compliance incidents during the reporting period.

5.0 WORKER ENVIRONMENTAL AWARENESS PROGRAM

In compliance with the MMCRP, APM AQ-3, APM BIO-8, APM CUL-1, and MM GEO-2 and the CFPP Section 8, all Project personnel participated in the WEAP training prior to performing work. During the reporting period, 10 new Project personnel attended the WEAP training. **Attachment 3, WEAP Sign-In Sheets** includes a record for WEAP training conducted during this quarter's reporting period.

ATTACHMENT 1
PHOTOGRAPH LOG

Photo 1. View of pavement apron at access road on Jayne Av.
Direction: Northwest. Date: 10/17/2024

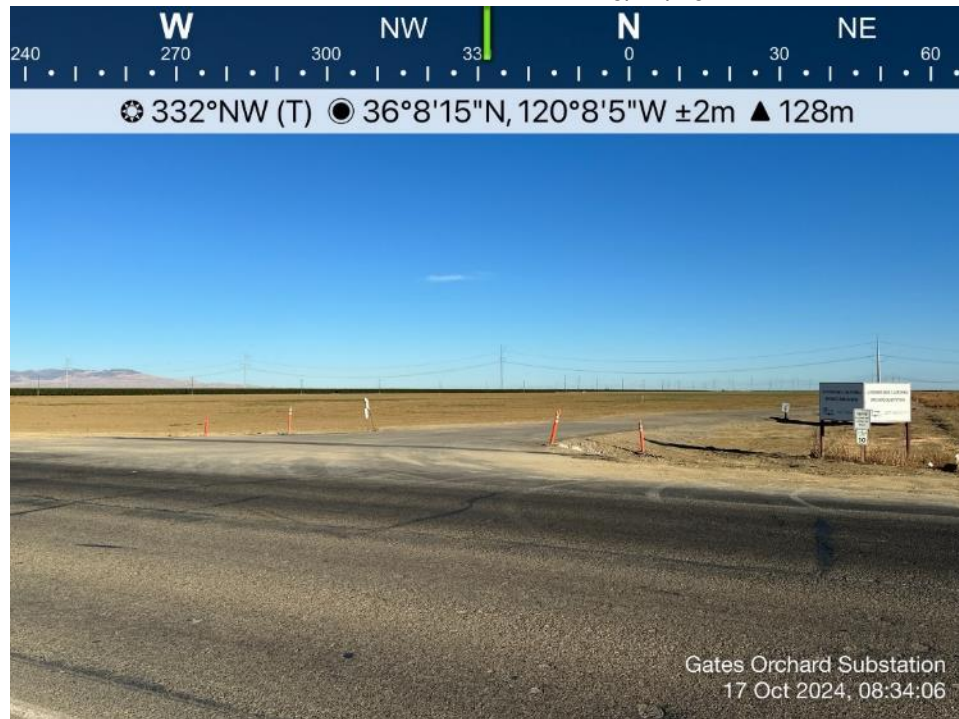


Photo 2. View of retention basin with silt fence.
Direction: Northwest. Date: 10/17/2024



Photo 3. View of portable toilet with secondary containment.
Direction: North. Date: 10/17/2024



Photo 4. View of staged equipment with drip pan.
Direction: West. Date: 10/17/2024



Photo 5. View of staged equipment with drip pan in place.
Direction: North. Date: 10/17/2024



Photo 6. View of trailers in the discontinued laydown yard.
Direction: Northwest. Date: 10/17/2024



Photo 7. View of borrow pit with silt fence on south and east side.
Direction: North. Date: 10/17/2024



Photo 8. View of crews working on switch gear. Direction: Southwest. Date: 10/17/2024



Photo 9. View of crews working on switch gear.
Direction: Northwest. Date: 10/17/2024

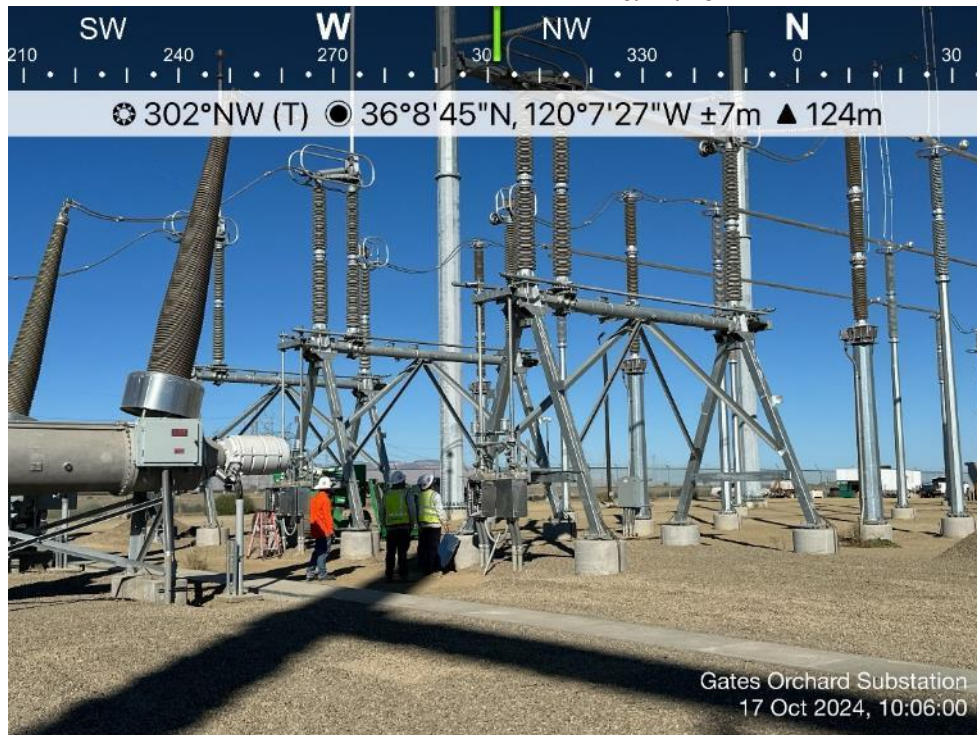


Photo 10. View of the entrance gate with rain gauge attached to keypad pedestal.
Direction: North. Date: 10/17/2024



Photo 11. View of grading inside substation.
Direction: Northwest. Date: 11/19/2024



Photo 12. View of staged equipment with drip pan.
Direction: West. Date: 11/19/2024



Photo 13. View of roller compacting grading inside substation.
Direction: East. Date: 11/19/2024



Photo 14. View of grading inside the substation.
Direction: West. Date: 11/19/2024



Photo 15. View of crew wiring.
Direction: West. Date: 11/19/2024



Photo 16. View of crew spreading soil in borrow pit.
Direction: Northeast. Date: 11/19/2024



Photo 17. View of rock delivery.
Direction: Northeast. Date: 12/4/2024



Photo 18. View of grader spreading rock inside the substation.
Direction: North. Date: 12/4/2024



Photo 19. View of crew compacting base inside the substation.
Direction: South. Date: 12/4/2024

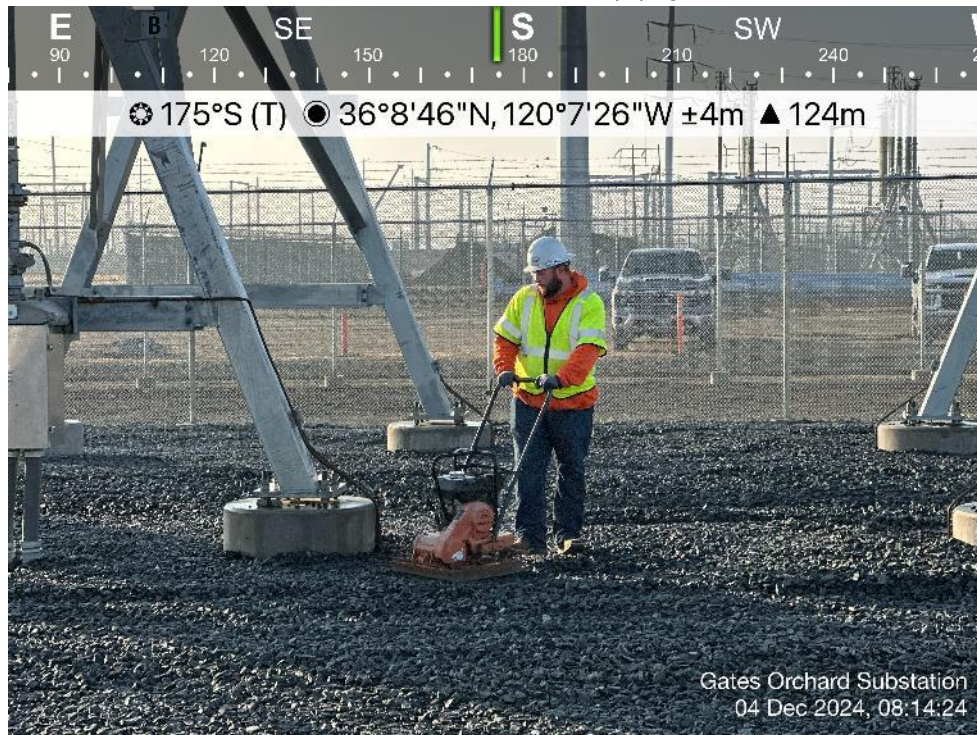


Photo 20. View of crews working on jumpers 97.5kV.
Direction: West. Date: 12/4/2024

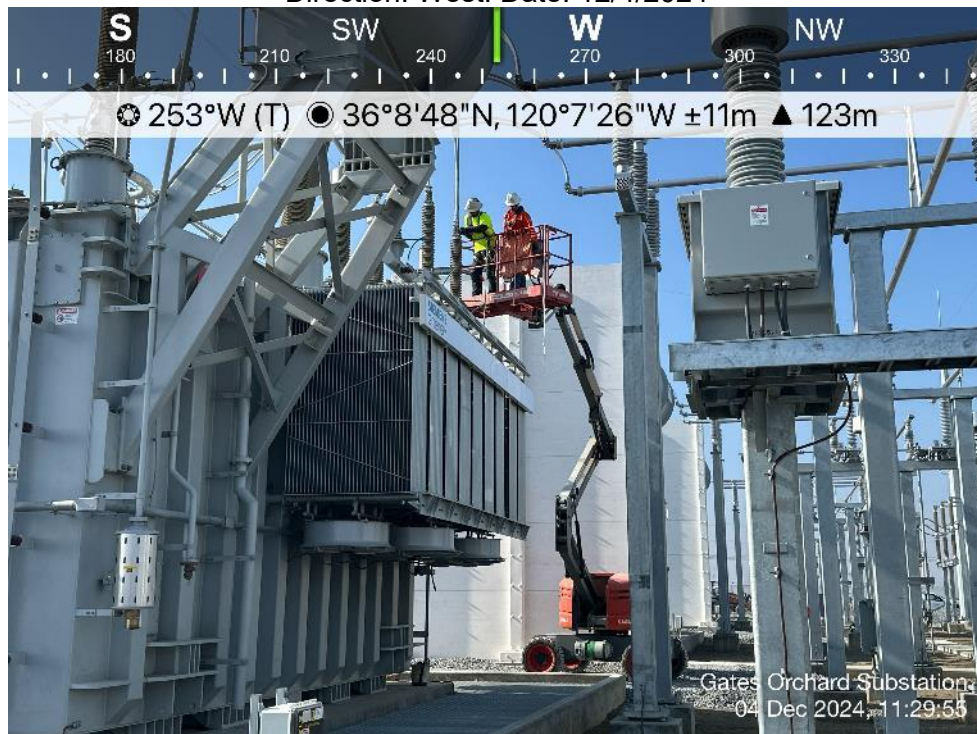


Photo 21. View of water truck performing dust control.
Direction: Northwest. Date: 12/4/2024

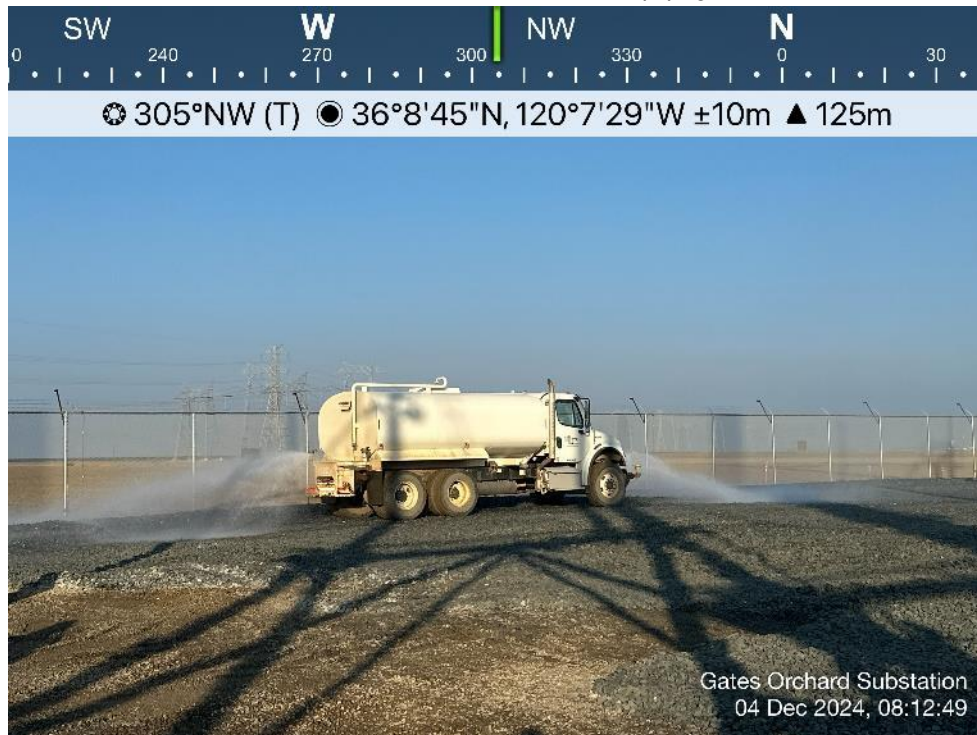


Photo 22. View of manlift being removed from site.
Direction: North. Date: 12/17/2024



Photo 23. View of silt fence on south side of retention basin.
Direction: North. Date: 12/17/2024



Photo 24. View of stage water truck with drip pan.
Direction: North. Date: 12/17/2024



Photo 25. View of Substation.
Direction: Northeast. Date: 12/17/2024

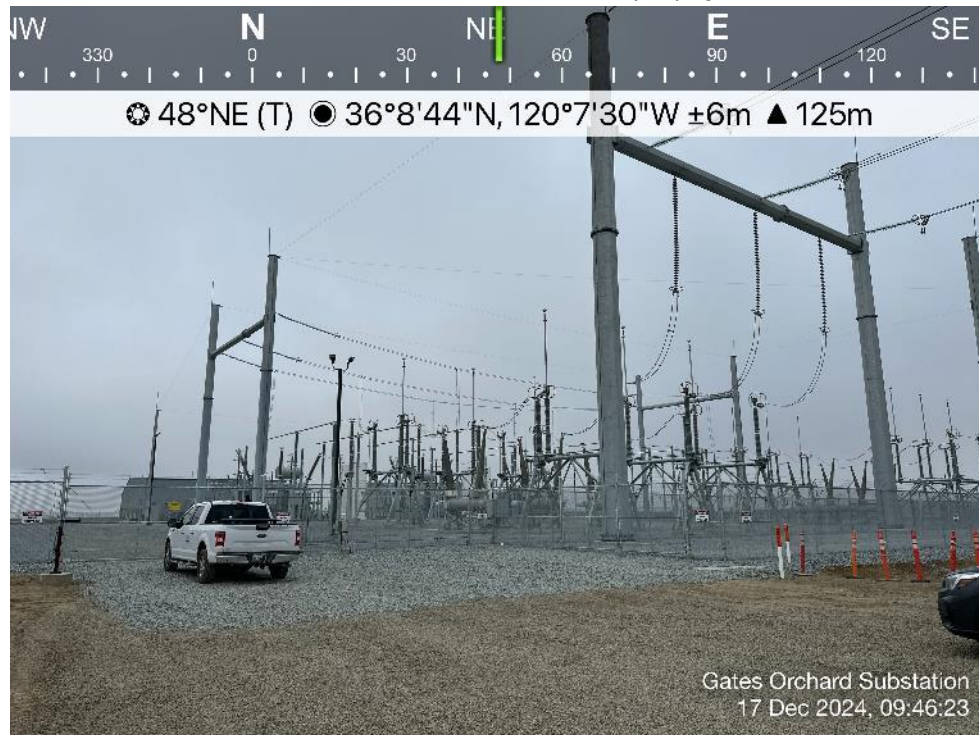


Photo 26. View of Substation.
Direction: Southwest. Date: 12/17/2024



ATTACHMENT 2
EQUIPMENT USE TRACKING TOOL

DIESEL EQUIPMENT USAGE TRACKING TOOL
Orchard Substation

CONSTRUCTION SUMMARY:

Construction activities for December 2024 included installation of conduit, jumper installation, spreading rock, and general housekeeping.

[illegible]

ATTACHMENT 3
WEAP SIGN-IN SHEETS

[illegible]

Name (First, Last)	Company	Phone	Date	Signature	Trainer
Daniel Thomas	TTR	949-303-3421	11-4-24	Daniel Thomas	
Adam Buchnoff	TTR	559-779-2778	11-4-24	[Signature]	
Egoberto Bolanos	TTR	520 313 3981	11/4/24	[Signature]	
Mackensie Irwin	LSPower	946-512 4466 4300	12/4/24	[Signature]	
Ivan Garcia	OEIS	415-860-8140	12/4/24	[Signature]	
Romeo Marroquin	OEIS	279-789-0046	12/4/24	[Signature]	
Babak Kaniani	OEIS	279-789-0475	12/4/24	[Signature]	
Cecilia Yaniz	OEIS	279-220-5673	12/4/24	Cecilia Yaniz	