

Quarterly Compliance Report

Quarter 1 2025



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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 will serve as the Project's final compliance report providing 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 1st Quarter of 2025 (January 2025 - March 2025) and throughout the life of the Project.

LSPGC construction activities were 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 included 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 final quarterly reporting period:

- Silt fence installation
- Installation and removal of cell STATCOM
- Bus and jumper installation
- Cooling system work
- General housekeeping
- Site cleanup
- Demobilization

Photos of construction activities are included in **Attachment 3, Photograph Log**.

2.1 CONSTRUCTION STATUS

Project construction began in May 2023 and concluded in March 2025. Equipment has since been demobilized and all temporarily disturbed areas have been restored to pre-construction contours. All applicable APMs and MMs were implemented by LSPGC as identified in the Project's MMCRP throughout construction of Project components. All construction for site development, below-grade construction, above-grade construction, and commissioning and testing have been completed as shown below in **Table 1, Construction Status**.

Table 1: Construction Status

Project Activity	Approximate Duration (months)	Start Date	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	100
Commissioning and Testing	6	September 2024	100

2.2 PROJECT MODIFICATIONS AND APPROVALS

Please see **Table 2**, *NTP and MPR Schedule*, for the summary of approved NTPs and MPRs throughout the Project.

Table 2: NTP and MPR Schedule

NTP / MPR	Description	Submittal Date	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	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 MMCRP Requirements Tracking Table included in **Attachment 2** provides a summary of the final compliance status and resolution for each of the APMs and MMs for the Project.

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 throughout construction activities. Work areas were regularly inspected for cleanliness, and shielding for lighting for occasional night work was utilized as necessary to prevent light spillover effects. No night work was required in the Project's final quarter. Compliance with APMs pertaining to aesthetics during active construction were documented in LEI reports that were summarized in each Quarterly Report that was submitted to the CPUC.

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 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 were logged throughout the Project and made available to the CPUC upon request. The Project was in compliance with this measure during the final quarterly reporting period. Each quarterly reporting period showed that the Project 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 March 2, 2025, the final 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 throughout the life of the Project. Please see **Attachment 1, Final Monthly Equipment Compliance Report** for the Project's Tier-4 diesel-powered equipment usage as of the end of construction (March 2025).

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 each quarterly reporting period. The DCP included methods for wind erosion control and street sweeping that were implemented daily to alleviate dust nuisance generated by construction activities. Contractor staging occurred in approved areas within Project limits, and water trucks were utilized onsite to water down disturbed areas and stockpiled materials. Street sweeping took place as needed for track-out control, and reduced speed limits were employed within the Project limits.

Measures were implemented throughout each 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 each reporting period.

In accordance with APM AQ-3, Valley Fever awareness training was incorporated into the Project's overall Worker Environmental Awareness Program (WEAP) training given to all Project personnel that were required to perform work in or near disturbed soils or dust emissions at the Orchard Substation Facilities site. Additional trainings were held for new workers as needed. Please refer to **Section 5.0 Worker Environmental Awareness Program** for more information. Compliance with each measure pertaining to air resources was documented in LEI reports which were summarized within the Project's Quarterly Compliance Reports that were submitted to the CPUC.

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 each quarterly reporting period. Speed limits of vehicles along access roads and on the Project site were limited to 15 miles per hour throughout construction. All excavated holes and trenches were 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 final quarterly 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 required surveys to determine the presence or absence of nesting birds. During the final quarterly reporting period, there were no active nests onsite. Please see **Table 3, Nest Log** for details regarding the one active nest observed during Project construction and its outcome description.

Table 3: Nest Log

Nest ID	Species	Standard Buffer	Reduced Buffer	Project Location	Outcome
20230510_AMKE_Road_01	American kestrel (<i>Falco sparverius</i>)	500 feet	25 feet	Access Road	6/28/23: Inactive (failed)

One American kestrel nest was identified within 500 feet of Project components during Quarter 2 of 2023 within an existing tubular steel pole approximately 25 feet west of the Project access road. In compliance with APM BIO-4, the Project Biologist identified that the no-work buffer could be reduced to 25 feet so that grading of the access road within the standard buffer could proceed. Monitoring for the nest took place until the nest was deemed inactive. No signs of disturbance to the nest were reported throughout monitoring. The nest was reported to have failed possibly due to predation, however, the reason for the nest failure was not known with certainty. No impacts occurred to the nest as a result of construction activities, as the nest remained active with multiple incubation visits recorded within the Project's LEI Reports and the Project's Quarterly Compliance Report for Quarter 2 of 2023.

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.

Compliance with APMs and MMs pertaining to biological resources were documented in LEI Reports which were summarized within the Project's Quarterly Compliance Reports that were submitted to the CPUC throughout construction.

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 applicable measures defined in the Project's MMCRP relating to cultural and tribal resources during the final quarterly 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 throughout construction, thus, the tribal monitoring requirements defined within APM CUL-3, APM CUL-4, and APM CUL-5 were not applicable. Compliance with APMs pertaining to cultural resources was documented within LEI Reports which were summarized in the Project's Quarterly Compliance Reports that were submitted to the CPUC.

3.5.2 Paleontological Resources

No paleontological resource monitoring took place during the final quarterly reporting period as no fossils were unearthed during earthwork activities. No fossils nor compliance issues related to paleontological resources were recorded throughout the entirety of the Project.

3.6 FIRE PREVENTION AND PROTECTION

All Project activities were in compliance with the Construction Fire Prevention Plan (CFPP) during the final quarterly 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. There were no red flag warnings issued for the Project region during the final quarterly reporting period. No fires occurred on or near the Project during the Project's final quarter.

Throughout the entirety of construction, all personnel were equipped with a laminated card and hard hat sticker at all times that listed pertinent telephone numbers for reporting fires and immediate steps to take should a fire start in accordance with APM HAZ-4. All construction activities were coordinated with local law enforcement and fire protection agencies. In accordance with APM PS-1, emergency service providers were notified of timing, location, and duration of construction activities. All construction crews and inspectors were provided with radio and cellular telephone access that is operational in all work areas and access routes that would 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 final quarterly reporting period.

3.7 GEOLOGY AND SOILS

Mitigation measures were implemented throughout construction activities to minimize potential impacts from geological hazards and disturbance to soils in accordance with APM GEO-1. Measures implemented throughout construction 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 final reporting period, and no compliance issues were recorded.

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) throughout construction. HMMP Monthly Inspection forms were maintained as part of the Project record. No soils were suspected of contamination at any point during construction, 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 construction. There were no hazardous releases that occurred during the final quarterly 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 throughout the entirety of construction. No groundwater was encountered over the course of the final reporting period. Rain events took place from February 5 through

February 7, February 13 through February 15, March 3, March 6 through March 7, March 13 through 15, and March 18 with approximately 1.15 inches of precipitation recorded in February and approximately 2.39 inches of precipitation recorded in March. 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 took place during the final quarterly reporting period as needed. No SWPPP deficiencies were recorded during the final reporting period or throughout the entirety of the Project.

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 was maintained on the Project site. A Notice of Termination (NOT) under the Construction General Permit for the Project SWPPP (WDID NO. 5F10C399233) has been submitted to the Stormwater Multiple Application and Report Tracking System (SMARTS) for approval by the Regional Water Quality Control Board.

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 final reporting period and throughout the life of the Project.

4.0 MMCRP COMPLIANCE

There were no impacts to any environmental resources and there were no compliance incidents during the final reporting period or throughout the life of the Project.

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. There were no new Project personnel who attended the WEAP training during the final quarterly reporting period. WEAP sign-in sheets were included as an attachment to each Quarterly Compliance Report submitted to the CPUC.

ATTACHMENT 1
FINAL MONTHLY EQUIPMENT COMPLIANCE REPORT



Dustin Joseph
Director of Environmental Permitting
LS Power Grid California, LLC
DJoseph@lspower.com

April 10th, 2025

Boris Sanchez
Project Manager
California Public Utilities Commission
505 Van Ness Avenue, 4th floor
San Francisco, CA 94102

Re: Final Monthly Equipment Compliance Report for the Gates 500 kV Dynamic Reactive Support Project – March 2025

Mr. Sanchez:

LS Power Grid California, LLC (LSPGC) is hereby submitting this final Monthly Equipment Compliance Report to the California Public Utilities Commission (CPUC) for the Gates 500 kilovolt (kV) Dynamic Reactive Support Project (Orchard Substation or Project) in compliance with Applicant Proposed Measure (APM) AQ-1 of the Mitigation Monitoring, Compliance and Reporting Program (MMCRP). Please refer to **Attachment A, Orchard Substation Diesel Equipment Use Tracking Tool** to view the documented engine tier and daily equipment use hours of all off-road diesel-powered equipment for the month of March 2025.

In accordance with APM AQ-1 of the MMCRP, the Orchard Substation Diesel Equipment Use Tracking Tool has been developed to document engine tier and daily equipment use hours of all off-road diesel-powered equipment, and it is to be submitted to the CPUC on a monthly basis to track the Project's compliance. As stated in the Air Quality Emissions Analysis Letter dated November 17, 2022, the Orchard Substation Facilities portion of the Project will ensure that at least 50 percent of all diesel-powered equipment use is from equipment that meets the United States Environmental Protection Agency (USEPA)-certified Tier 4 standards, the highest USEPA-certified tiered emission standards. This Monthly Equipment Compliance Report will serve as the final monthly tracking update submission to the CPUC, as the last piece of diesel-powered equipment was demobilized from the Project site on March 2nd, 2025.

Environmental Compliance Summary

Off-road diesel-powered equipment used during this month's construction activities was tracked in accordance with APM AQ-1. An inventory of all construction equipment and associated certified tier specifications are logged and available to the CPUC upon request. The Project was in compliance with this measure for the month of March 2025 and met the requirement that at least 50 percent of all diesel-powered equipment use was from equipment that met USEPA-certified

Tier 4 standards. As of the final demobilization efforts completed on March 2nd, 2025, the total percentage of Tier-4 diesel-powered equipment use on the Project (tracked as horsepower-hours) was 82 percent.

Should you have any questions or need additional information, please do not hesitate to contact me at DJoseph@lspower.com.

Sincerely,

Dustin Joseph
Director of Environmental Permitting

cc: Matthew Fagundes, ESA
Maria Hensel, ESA
David Wilson, LSPGC
Mark Milburn, LSPGC
Emily Critchfield, KP

ATTACHMENT A
Orchard Substation Diesel Equipment Use
Tracking Tool

DIESEL EQUIPMENT USAGE TRACKING TOOL

CONSTRUCTION SUMMARY:
Construction activities were completed for March 2025.

Construction activities were completed for March 2025.

Equipment Identification Number (CARB EIN)	Equipment Type Description (e.g., loader, excavator, grader) & Manufacturer	Engine Model & Engine Year	Engine Family	Horse Power Rating	Engine Tier Level	Week Number	89	90	91	92	93	94	95	96	97	
						Week Start (Mon)	12/30/2024	1/6/2025	1/13/2025	1/20/2025	1/27/2025	2/3/2025	2/10/2025	2/17/2025	2/24/2025	
						Week End (Sun)	1/5/2025	1/12/2025	1/19/2025	1/26/2025	2/2/2025	2/9/2025	2/16/2025	2/23/2025	3/2/2025	
						Hours	HP-Hours	Hours	HP-Hours	Hours	HP-Hours	Hours	HP-Hours	Hours	HP-Hours	
NX3X38	TELESCOPIC HANDLER	2023		75	Tier 4			5.1	383	3.9	293	0	0	4.9	368	
XRM339	GENIE	2018		75	Tier 4			2.6	195	2.5	188	0.9	68	1	75	
PX9S89	BOOM	2019		49	Tier 4					3.8	188	0	0	1	49	
UP4E45	AERIAL LIFT	2024		49	Tier 4									6.2	303	
														6.3	308	
														0	0	
														0	0	
														0	0	
CA 06320M1	WATER TRUCK	2014		310	Tier 4											
						Total Weekly - ALL EQUIPMENT	0.0	0.0	7.7	577.5	11.0	916.1	0.9	67.5	2.0	124.5
						Total Weekly - Tier 4	0.0	0.0	7.7	577.5	11.0	916.1	0.9	67.5	2.0	124.5
						Total Weekly Other	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
						Total Weekly % of HP-hours Tier 4			#DIV/0!	100%		100%		100%		100%
						Running total HP-Hours		1537977.22		1538554.72		1539470.78		15399538.28		1539662.77
						Running Total HP-Hours Tier 4		1258788.22		1259365.72		1260281.78		1260349.28		1260473.77
						Minimum HP-Hours Tier 4:	50%									
						Project Running Total HP-Hours Tier 4		82%		82%		82%		82%		82%

ATTACHMENT 2
MMCRP REQUIREMENTS TRACKING TABLE

ATTACHMENT 1: MMC RP REQUIREMENTS TRACKING TABLE

APPLICANT PROPOSED MEASURE (APM) OR MITIGATION MEASURE (MM)	TIMING	STATUS
APM AE-1: All Orchard Substation Facilities sites would be maintained in a clean and orderly state. Construction staging areas would be sited away from public view where possible. Nighttime lighting would be directed away from residential areas and have shields to prevent light spillover effects. Upon completion of project construction, project staging and temporary work areas would be returned to pre-project conditions, including re-grading of the site and re-vegetation or re-paving of disturbed areas to match pre-existing contours and conditions.	During construction.	Complete. LS Power Grid California (LSPGC) and its contractors implemented this measure during construction activities. Compliance with this measure was monitored via inspections from the California Public Utilities Commission (CPUC) compliance monitor and was documented in the Project's Lead Environmental Inspector (LEI) reports which were summarized in Quarterly Environmental Compliance Reports submitted to the CPUC.
APM AE-2: Structures and equipment at the proposed Orchard Substation would be a non-reflective finish and neutral gray color.	During all phases of the Project.	Complete. All structures and equipment at the Orchard Substation had a non-reflective finish and natural gray color. For cases regarding the use of equipment components with a reflective finish not commercially available in a neutral gray color, Minor Project Refinement-3 (MPR-3) was submitted on 9/11/23 and approved by the CPUC on 9/18/23 allowing the use of those select components. Compliance with this measure was monitored via monthly inspections from the CPUC.
APM AGR-1: Prior to commencing construction of the Orchard Substation Facilities, LSPGC must ensure that the Williamson Act contract for the 20-acre portion of the Project site impacted by the Project is: - Cancelled pursuant to Title 5, Division 1, Part 1, Chapter 7, Article 5 of the California Government Code; - Determined by Fresno County to be consistent with the Proposed Project; or - Nullified via eminent domain or purchase in lieu of eminent domain pursuant to Title 5, Division 1, Part 1, Chapter 7, Article 6 of the California Government Code.	Prior to construction.	Complete. Pursuant to Title 5, Division 1, Part 1, Chapter 7, Article 6 of the California Government Code, the Williamson Act on the property is nullified automatically upon LSPGC's purchase of the property after issuance of the PTC.
APM AQ-1: The Orchard Substation Facilities portion of the Project would ensure that at least 32 percent of all diesel-powered equipment use (tracked as horse-power hours) during construction year 2022 is from equipment that meet USEPA-certified Tier 4 standards, the highest USEPA-certified tiered emission standards. Prior to the commencement of construction, LSPGC shall develop a diesel-powered equipment use hours tracking tool and procedure. The tracking tool shall be utilized by the Project to keep track of the certified engine tier and daily equipment use hours of all off-road diesel-powered equipment. If all diesel-powered equipment is certified Tier 4, the tracking tool would not be required; however, the Orchard Substation Facilities portion of the Project would be required to verify, record, and track the engine tier of all equipment. The tracking tool shall be maintained by the Project and tracking updates shall be submitted to the CPUC on a monthly basis to track the Project's compliance. Records of the engine tier of all equipment	Prior to and during construction.	Complete. The Project's diesel-powered equipment tracking tool was documented within Monthly Equipment Compliance Reports that were submitted to the CPUC. Engine tier status for each diesel-powered vehicle was recorded as part of the Project record and is available to the CPUC upon request. The equipment use tracking tool for each quarter was additionally included as an attachment to the Project's Quarterly Compliance Reports that were submitted to the CPUC.

Gates 500 kV Dynamic Reactive Support Project – Orchard Substation
 Final Quarterly Compliance Report
 April 2025

Not Applicable to NTP – Measure Not Required During Construction

Applicable to NTP – Pre-Construction Status Complete/Approved

ATTACHMENT 1: MMCRP REQUIREMENTS TRACKING TABLE

shall be kept onsite and made available to the CPUC upon request.		
APM AQ-2: The Orchard Substation Facilities portion of the Project would comply with SJVAPCD Rule 8021 and would prepare and implement a Dust Control Plan for approval by the SJVAPCD Air Pollution Control Officer (APCO). The Dust Control Plan would include specific dust control measures as prescribed within Rule 8021, or as otherwise requested by the APCO. This plan would be submitted and approved prior to construction.	Prior to and during construction.	Complete. The Project's Dust Control Plan (DCP) was approved by the San Joaquin Valley Air Pollution Control District (SJVAPCD) on 12/08/2022. The DCP was prepared in accordance with APM AQ-2 and was implemented throughout construction. Compliance with the DCP was recorded within the Project's LEI reports which were summarized in Quarterly Environmental Compliance Reports that were submitted to the CPUC.
APM AQ-3: The Orchard Substation portion of the Project would comply with AB 203 and provide Valley fever awareness training to all construction workers, inspectors, monitors, and any other project personnel that are required to perform work in or near disturbed soils or dust emissions at the Orchard Substation Facilities site. The Valley fever awareness training materials would be prepared by a qualified professional, adapted from agency published trainings (CDPH, CDC, etc.), or otherwise produced by a qualified source. The Valley fever awareness training would be incorporated into the Project's overall Worker Environmental Awareness Program (WEAP) training.	Prior to and during construction. To be repeated for all new personnel.	Complete. A Worker Environmental Awareness Program (WEAP) was developed to include Valley fever awareness training. The final version of the WEAP was submitted to the CPUC on 12/16/2022. Additional trainings were held for new workers as needed throughout construction. All WEAP sign-in sheets were recorded within the Quarterly Environmental Compliance Reports that were submitted to the CPUC.
APM BIO-1: Speed of vehicles driving along proposed access roads and on the Project site during construction and O&M would be limited to 15 mph. In addition, construction and maintenance employees would be advised that care should be exercised when commuting to and from the Proposed Project area to reduce accidents and animal road mortality.	During construction.	Complete. LSPGC and its contractors implemented this measure during construction activities. Compliance with this measure was documented in LEI reports which were summarized in Quarterly Environmental Compliance Reports submitted to the CPUC.
APM BIO-2: Conductors and ground wires would be spaced sufficiently apart so that raptors cannot contact two conductors or one conductor and a ground wire causing electrocution (APLIC 2006), or raptor protection would be installed subject to PG&E consent for application of such measures to its components of the Project, such as distribution lines.	During all phases of the project.	Complete. Conductors and ground wires for the Project were designed and constructed in accordance with this specification.
APM BIO-3: Appropriate methods to reduce the risks of avian collisions would be incorporated into the Project's design (APLIC 2012), subject to PG&E consent for application of such measures to its components of the Project, such as distribution lines.	Prior to construction.	Complete. Methods to reduce risk of avian collisions were incorporated into the Project design.

ATTACHMENT 1: MMRP REQUIREMENTS TRACKING TABLE

APM BIO-4: If feasible, the Applicant would avoid construction during the migratory bird nesting or breeding season. When it is not feasible to avoid construction during the nesting or breeding season, the Applicant would perform a survey in the area where the work is to occur. This survey would be performed to determine the presence or absence of nesting birds. If an active nest (i.e., containing eggs or young) is identified, a suitable construction buffer would be implemented to ensure that the nesting or breeding activities are not substantially adversely affected. If the nesting or breeding activities are being conducted by a federal- or state-listed species, the Applicant would consult with the USFWS and CDFW as necessary. Monitoring of the nest would continue until the birds have fledged or construction is no longer occurring on the site. If an inactive nest is identified, careful nest removal under the supervision and direction of qualified biologists would occur wherever feasible.	Prior to and during construction.	Complete. For construction activities that took place during the nesting season, surveys were performed in areas where work was scheduled to occur. Regarding the one American kestrel (AMKE) nest observed within an existing tubular steel pole during Project construction, the Project Biologist identified that the no-work buffer could be reduced to 25 feet so that access road grading could proceed. Subsequent monitoring took place until the nest was deemed inactive, with reporting observations documenting no signs of disturbance as a result of Project activities. As no special status species were observed onsite, consultation with USFWS and CDFW was not required for Project construction activities. Compliance with this measure was documented within LEI reports and the Project Nest Log submitted within the Project's Quarterly Environmental Compliance Reports to the CPUC.
APM BIO-5: If a raptor nest is observed during pre-construction surveys, a qualified biologist would determine if it is active. If the nest is determined to be active, the biological monitor would monitor the nest to ensure that nesting or breeding activities are not substantially adversely affected. If the biological monitor determines that activities associated with the Project are disturbing or disrupting nesting or breeding activities, the monitor would make recommendations to reduce noise or disturbance in the vicinity of the nest.	Prior to and during construction.	Complete. Active raptor nests identified during construction were monitored by a qualified biologist. Recommendations and suitable construction buffers for the one AMKE nest observed during Project construction were provided by the qualified biologist were implemented throughout construction activities. Compliance with this measure was documented within LEI reports and the Project Nest Log submitted within the Project's Quarterly Environmental Compliance Reports to the CPUC.
APM BIO-6: All excavated holes or trenches that are not filled at the end of a workday would be covered, or a wildlife escape ramp would be installed to prevent the inadvertent entrapment of wildlife species.	During construction.	Complete. LSPGC and its contractors implemented this measure during construction activities. Compliance with this measure was documented within LEI reports which were summarized in Quarterly Environmental Compliance Reports submitted to the CPUC.

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APM BIO-7: The use of outdoor lighting during construction and O&M of the Orchard Substation would be minimized whenever practicable.	During all phases of the project.	Complete. LSPGC and its contractors implemented this measure during construction and O&M activities. Compliance with this measure was documented within LEI reports which were summarized in Quarterly Environmental Compliance Reports submitted to the CPUC.
APM BIO-8: A WEAP would be implemented to educate all construction and O&M workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction or O&M activities.	Prior to and during construction. To be repeated for all new personnel.	Complete. A WEAP was developed to educate all construction and O&M workers on site-specific biological and non-biological resources. The final version of the WEAP was submitted to the CPUC on 12/16/2022. WEAP sign-in sheets were kept as part of the Project record and were provided to the CPUC within the Project's Quarterly Environmental Compliance Reports.
Mitigation Measure BIO-1: Protection of Kit Fox During Construction. Preconstruction surveys shall be conducted by a qualified biologist for the presence of San Joaquin kit fox within 14 days prior to commencement of construction activities pursuant to the USFWS (1999) <i>Standardized Recommendations for Protection of the San Joaquin Kit Fox</i>. The surveys shall be conducted in areas of suitable habitat for 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. Surveys need not be conducted for all areas of suitable habitat at one time; they may be phased so that surveys occur within 14 days prior to disturbance within active portions of the site. If no potential San Joaquin kit fox dens are identified, no further mitigation is required. If potential kit fox dens are observed and avoidance is determined to be feasible (as defined in CEQA Guidelines §15364 consistent with the USFWS [1999] <i>Standardized Recommendations for Protection of the San Joaquin Kit Fox</i>) by a qualified biologist in consultation with the Project owner and the County, buffer distances shall be established prior to construction activities. If avoidance of the potential dens is not feasible, the following measures shall be implemented to avoid potential adverse effects to the San Joaquin kit fox: If the qualified biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel to prevent foxes from using them during construction. If the qualified biologist determines that a potential non-natal kit fox den may be active, an onsite passive relocation program shall be implemented with prior approval from the USFWS. This program shall consist of excluding San Joaquin kit foxes from occupied burrows by installation of one-way doors at burrow entrances, monitoring of the burrow for 72 hours to confirm usage has been discontinued, and excavation and collapse of the burrow to prevent reoccupation. After the qualified biologist determines that the San Joaquin kit foxes have stopped using active dens within the Project boundary, the dens shall be hand-excavated, as	Prior to and during construction.	Complete. Preconstruction surveys for San Joaquin kit fox were not required under this measure since the Project site was cultivated within the previous 12 months (i.e., during the 2022 growing season).

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stated above for inactive dens.		
APM CUL-1 (Development and Implementation of a Worker Environmental Awareness Program): LSPGC would design and implement a Worker Environmental Awareness Program (WEAP) that would be provided to all Project personnel who may encounter and/or alter historical resources or unique archaeological properties, including construction supervisors and field personnel. The WEAP would be submitted and approved by the CPUC prior to construction. No construction worker would be involved in ground disturbing activities without having participated in the WEAP. The WEAP would include, at a minimum: • Training on how to identify potential cultural resources and human remains during the construction process; • A review of applicable local, state and federal ordinances, laws and regulations pertaining to historic preservation; • A discussion of procedures to be followed in the event that unanticipated cultural resources are discovered during implementation of the Proposed Project; • A discussion of disciplinary and other actions that could be taken against persons violating historic preservation laws and LSPGC policies; and • A statement by the construction company or applicable employer agreeing to abide by the WEAP, LSPGC policies and other applicable laws and regulations. The WEAP may be conducted in concert with other environmental or safety awareness and education programs for the Project, provided that the program elements pertaining to cultural resources are provided by a qualified archaeologist.	Prior to and during construction. To be repeated for all new personnel.	Complete. A WEAP was developed to include cultural resources awareness training. The final version of the WEAP was submitted to the CPUC on 12/16/2022. WEAP sign-in sheets that include a statement by contractors agreeing to abide by the WEAP were kept as part of the Project record and were provided to the CPUC within the Project's Quarterly Environmental Compliance Reports.
APM CUL-2 (Cultural Resources Inventory): If proposed facilities and ground-disturbing activities move outside the previously surveyed footprint, those areas would be subjected to a cultural resources inventory to ensure that any newly identified cultural resources are avoided by ground disturbing activities.	During construction.	Not Applicable. The preparation of a cultural resources inventory was not required as facilities and ground disturbing activities did not move outside the previously surveyed area throughout construction activities.
APM CUL-3 (Archaeological and Native American Monitoring): If subsurface prehistoric or ethnohistoric resources are encountered during construction, archaeological and Native American monitoring is recommended during all excavation associated with the Project. A qualified archaeologist and a member of the Dumna Wo-Wah Tribal Government shall be retained by LSPGC to monitor excavation associated with the Proposed Project to ensure that there is no impact to any significant unanticipated cultural resource. Prior to construction, LSPGC would consult with a designated representative of the Dumna Wo-Wah Tribal Government on the appropriate course of action to be taken should unanticipated cultural materials, and specifically human remains, be discovered during construction.	Prior to and during construction.	Complete. Consultation with the Dumna Wo-Wah Tribal Government on the appropriate course of action to take should unanticipated cultural materials, and specifically human remains, be discovered during construction was completed. No subsurface prehistoric or ethnohistoric resources were encountered throughout construction, therefore the protocols within APM CUL-3 were not triggered.

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APM CUL-4 (Unanticipated Discovery of Potentially Significant Prehistoric and Historic Resources): In the event that previously unidentified cultural resources are uncovered during implementation of the Project, all work within 100 feet (30 meters) of the discovery would be halted and redirected to another location. LSPGC's qualified archaeologist would inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts would occur, the resource would be documented on State of California Department of Parks and Recreation cultural resource records and no further effort would be required. If the resource cannot be avoided and may be subject to further impact, LSPGC would evaluate the significance and CRHR eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Preservation in place shall be the preferred means to avoid impacts to significant historical resources. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot feasibly be avoided, LSPGC's qualified archaeologist, in consultation with the CPUC and, if the unearthed resource is prehistoric or Native American in nature, the Native American monitor, shall develop additional treatment measures, such as data recovery consistent with CEQA Guidelines Sections 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility.	During construction	Not Applicable. There were no previously unidentified cultural resources that were uncovered during Project construction, therefore the protocols within APM CUL-4 were not triggered.
APM CUL-5 (Unanticipated Discovery of Human Remains): Avoidance and protection of inadvertent discoveries that contain human remains shall be the preferred protection strategy where feasible and otherwise managed pursuant to the standards of CEQA Guidelines Sections 15064.5(d) and (e). If human remains are discovered during construction or O&M activities, all work shall be diverted from the area of the discovery, and the CPUC shall be informed immediately. The Applicant shall contact the County Coroner to determine whether or not the remains are Native American. If the remains are determined to be Native American, the Coroner would contact the NAHC. The NAHC would then identify the person or persons it believes to be the most likely descendant of the deceased Native American, who in turn would make recommendations for the appropriate means of treating the human remains and any associated funerary objects. No part of the Project is located on federal land.	During construction.	Not Applicable. There were no human remains encountered during construction and operation of the Project, therefore the protocols within APM CUL-5 were not triggered.
APM GEO-1: The following measures would be implemented during construction to minimize impacts from geological hazards and disturbance to soils: • Keep vehicle and construction equipment within the limits of the Project and in approved construction work areas to reduce disturbance to topsoil; • Prior to grading, salvage topsoil to a depth of six inches or to actual depth if shallower (as identified in site-specific geotechnical investigation report) to avoid mixing of soil horizons; • Avoid construction in areas with saturated soils, whenever practical, to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure; Keep topsoil material on-site in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporary disturbed areas. Temporary disturbance areas would be re-contoured following construction to match pre-construction grades. Areas would be allowed to re-vegetate naturally or would be reseeded with a native seed mix from a local source if necessary. On-site material	During construction.	Complete. LSPGC and its contractors implemented this measure throughout construction activities. Compliance with the protocols in this measure were documented in LEI reports that were summarized and submitted in the Project's Quarterly Environmental Reports to the CPUC.

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storage would be sited and managed in accordance with all required permits and approvals; and Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Removed vegetation would be disposed of off-site to an appropriate licensed facility or can be chipped on-site to be used as mulch during restoration.		
APM GEO-2: The structural requirements of the California Building Code (CBC) are applicable to certain structural components of the Project, including the control enclosures. LSPGC and/or its contractors would design such structures to comply with such CBC standards and shall adhere to and implement all design recommendations and parameters established in the Project's Supplemental Geotechnical Engineering Report to be prepared and submitted to the CPUC upon completion.	Prior to construction.	Complete. LSPGC provided the CPUC a copy of the final geotechnical engineering report on August 30, 2022.
Mitigation Measure GEO-1: Fault Study. In order to account for any effects related to strong seismic ground shaking due to the presence of the Great Valley thrust fault system, the required supplemental geotechnical report for the Orchard Substation Facilities shall account for the presence of the Great Valley thrust fault system. The report shall be prepared by a qualified geotechnical engineer licensed by the State of California. The report shall include an analysis of the presence of the Great Valley thrust fault system and how its proximity to the Project would inform the seismic design of the Project components.	Prior to construction.	Complete. LSPGC provided the CPUC a copy of the final geotechnical engineering report (including fault study) on August 30, 2022.
Mitigation Measure GEO-2: Worker Awareness Training and Monitoring Protocols. Prior to the start of any ground-disturbing activity, the project owner shall retain a qualified paleontologist (meeting the standards set by the Society of Vertebrate Paleontology [SVP]) to prepare paleontological resources sensitivity training materials for use during a Project-wide Worker Environmental Awareness Training (WEAP), or equivalent. The WEAP shall be conducted by a qualified environmental trainer working under the supervision of the qualified paleontologist. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project site and the procedures to be followed if they are found. The project owner and/or their contractors shall retain Documentation demonstrating that all construction personnel attended the training prior to the start of work on the site and shall provide the documentation to the CPUC Project Manager upon request.	Prior to and during construction. To be repeated for all new personnel.	Complete. A WEAP was developed to include paleontological resources awareness training. The final version of the WEAP was submitted to the CPUC on 12/16/2022. WEAP sign-in sheets were kept as part of the Project record and were submitted to the CPUC within the Project's Quarterly Environmental Compliance Reports. Additional trainings will be held for new workers as needed throughout construction.
Mitigation Measure GEO-3: Paleontological Resource Monitoring, Salvage, and Treatment Protocols. In the event of a discovery during ground disturbance, the procedures described in APM PALEO-1 shall be followed; if significant paleontological resources are encountered, the qualified paleontologist (meeting the standards set by the Society of Vertebrate Paleontology [SVP]) may recommend paleontological resource monitoring. In the event that monitoring is deemed necessary, the qualified paleontologist shall prepare and the project owner and/or their contractors shall implement, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP), the details of which would be decided based on the significance of the discovery. The plan shall be submitted to the CPUC Project Manager for review and approval before continuing construction activities in the area of the find. This plan	During construction.	Not Applicable. There were no significant paleontological resources encountered during Project construction, therefore, a PRMMP was not required and the protocols within MM GEO-3 were not triggered.

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shall address specifics of monitoring and mitigation and comply with the recommendations of the SVP (2010), as follows. • The qualified paleontologist shall identify, and the project owner and/or its contractor(s) shall retain, qualified paleontological resource monitors (qualified monitors) meeting the SVP standards (2010). • The qualified paleontologist and/or the qualified monitors under the direction of the qualified paleontologist shall conduct paleontological resources monitoring at a frequency and level to be decided based on the significance of the discovery. The PRMMP shall clearly set the parameters of the monitoring. • Monitors shall have the authority to temporarily halt or divert work away from exposed fossils in order to evaluate and recover the fossil specimens, establishing a 50-foot buffer. • If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location and regardless of whether the site is being monitored, work at the discovery location shall cease in a 50-foot radius of the discovery until the qualified paleontologist has assessed the discovery and made recommendations as to the appropriate treatment. • Monitors shall prepare daily logs detailing the types of activities and soils observed, and any discoveries. The qualified paleontologist shall prepare a final monitoring and mitigation report to document the results of the monitoring effort and any curation of fossils. The project owner shall provide the daily logs to the CPUC Project Manager upon request, and shall provide the final report to the CPUC Project Manager upon completion. The qualified paleontologist shall determine the significance of any fossils discovered, and shall determine the appropriate treatment for significant fossils in accordance with the SVP standards. This would be in line with APM PALEO-2, which gives specific details for fossil treatment.		
APM PALEO-1: In the unlikely event that fossils are unearthed during earthwork activities (i.e., an inadvertent discovery), earthwork within the vicinity of the discovery shall immediately halt, and a qualified paleontologist should evaluate the discovery. Earthwork shall be diverted until the significance of the fossil discovery can be assessed by the qualified paleontologist. If the fossil discovery is deemed significant, the fossil shall be recovered using appropriate recovery techniques based on the type, size, and mode of preservation of the unearthed fossil. Earthwork may resume in the area of the fossil discovery once the fossil has been recovered and the qualified paleontologist deems the site has been mitigated to the extent necessary. Additional earthwork following the fossil discovery may be monitored for paleontological resources on an as-needed basis, at the discretion of the qualified paleontologist.	During Construction.	Not Applicable. There were no fossils that were unearthed during earthwork activities throughout Project construction, therefore the protocols within APM PALEO-1 were not triggered.

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APM PALEO-2: Recovered fossils shall be prepared, identified, catalogued, and stored in a recognized professional repository (e.g., the SDNHM, the University of California Museum of Paleontology) along with associated field notes, photographs, and compiled fossil locality data. Donation of the fossils should be accompanied by financial support for initial specimen curation and storage. A final summary report should be completed that outlines the results of the mitigation program. This report should include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. This report shall be submitted to appropriate agencies, as well as to the designated repository.	During construction.	Not Applicable. As no fossils were encountered during earthwork activities, the protocols within APM PALEO-2 were not triggered.
APM GHG-1: The following measures shall be implemented to minimize greenhouse gas emissions from all construction sites: • If suitable park-and-ride facilities are available in the Project vicinity, construction workers shall be encouraged to carpool to the job site. • Demolition debris shall be recycled for reuse to the extent feasible. • The contractor shall use line power instead of diesel generators at all construction sites where line power is available. The contractor shall maintain construction equipment per manufacturing specifications.	During construction.	Complete. LSPGC and its contractors implemented this measure during construction. Compliance with this measure was documented in the Project's Quarterly Environmental Compliance Reports that were submitted to the CPUC.
APM HAZ-1: A site-specific Spill Prevention, Control, and Countermeasure Plan (SPCCP) would be prepared prior to the initiation of construction. In the event of an accidental spill, the Project would be equipped with secondary containment that meets SPCCP Guidelines. The secondary containment would be sufficiently sized to accommodate accidental spills.	Prior to and during construction.	Complete for Construction. LSPGC submitted a copy of the Spill Prevention, Control, and Countermeasure Plan (SPCCP) to the CPUC. LSPGC and its implemented the SPCCP during construction. LSPGC will prepare a separate SPCCP for the operations and maintenance of the Orchard Substation.
APM HAZ-2: A Hazardous Materials Management Plan (HMMP) would be prepared and implemented for the Project. The plan would be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). The plan would include the following information related to hazardous materials and waste, as applicable: • A list of hazardous materials present on-site during construction and O&M to be updated as needed along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements; • A Hazardous Materials Communication (i.e., HAZCOM) Plan; • Assignments and responsibilities of Project health and safety roles; • Standards for any secondary containment and countermeasures required for hazardous materials; • Spill response procedures based on product and quantity. The procedures would include materials to be used, location of such materials within the Project area, and disposal protocols; and • Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This	Prior to and during construction.	Complete. LSPGC provided CPUC a copy of the Hazardous Materials Management Plan (HMMP). LSPGC and its contractors implemented the HMMP during construction.

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would include termination of work within the area of suspected contamination sampling by an OSHA trained individual and testing at a certified laboratory. The Project would also be equipped with lead-acid batteries to provide backup power for monitoring, alarm, protective relaying, instrumentation and control, and emergency lighting during power outages. Secondary containment would be constructed around and under the battery racks, and the HMMP would address containment from a battery leak. The plan would be provided to the CPUC prior to construction for recordkeeping. Plan updates would be made and submitted as needed if construction activities change whereas the existing plan does not adequately address the Project.		
APM HAZ-3: In the event that soils suspected of being contaminated (on the basis of visual, olfactory, or other evidence) are removed during site grading activities or excavation activities, the excavated soil shall be tested, and if contaminated above hazardous waste levels, shall be contained and disposed of at a licensed waste facility. The presence of known or suspected contaminated soil shall require testing and investigation procedures to be supervised by a qualified person, as appropriate, to meet state and federal regulations.	During construction.	Complete. LSPGC and its contractors implemented this measure as necessary throughout construction activities. Compliance with this measure was documented in the Monthly Inspection Forms as required by the Project's HMMP, which are available to the CPUC upon request. These reports were summarized and submitted to the CPUC within the Project's Quarterly Environmental Compliance Reports.
APM HAZ-4: LSPGC shall implement ongoing fire patrols during the fire season as defined each year by local, state, and federal fire agencies. These dates vary from year to year, generally occurring from late spring through dry winter periods. During Red Flag Warning events, as issued daily by the National Weather Service, all construction/maintenance activities shall cease, with an exception for transmission line testing, repairs, unfinished work, or other specific activities which may be allowed if the facility/equipment poses a greater fire risk if left in its current state. Although the Project area is not located within an area designated as a Very High or High Fire Hazard Severity Zone, LSPGC will prepare a Construction Fire Prevention Plan prior to construction. All construction/maintenance crews and inspectors shall be provided with radio and cellular telephone access that is operational in all work areas and access routes to allow for immediate reporting of fires. Communication pathways and equipment shall be tested and confirmed operational each day prior to initiating construction/maintenance activities at each work site. All fires shall be reported to the fire agencies with jurisdiction in the area immediately upon discovery of the ignition. All construction/maintenance personnel shall be trained in fire-safe actions, initial attack firefighting, and fire reporting. All construction/maintenance personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats. All construction/maintenance personnel shall carry at all times a laminated card and be provided a hard hat sticker that list pertinent telephone numbers for reporting fires and defining immediate steps to take if a fire starts. Information on laminated contact cards and hard hat stickers shall be updated and redistributed to all construction/maintenance personnel and outdated cards and hard hat stickers shall be destroyed prior to the initiation of construction/maintenance activities on the day the information change goes into effect.	Prior to and during construction.	Completed. LSPGC provided CPUC a copy of the Construction Fire Prevention Plan (CFPP). LSPGC and its contractors implemented the CFPP throughout construction activities. Compliance with this measure was documented in the Project's Quarterly Environmental Compliance Reports that were submitted to the CPUC.

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Construction/maintenance personnel shall have fire suppression equipment on all construction vehicles. Construction/maintenance personnel shall be required to park vehicles away from dry vegetation. Water tanks, fire extinguishers, and/or water trucks shall be sited or available at active project sites for fire protection during construction. The Applicant shall coordinate with applicable local fire departments prior to construction/maintenance activities to determine the appropriate amounts of fire equipment to be carried on vehicles and, should a fire occur, to coordinate fire suppression activities.		
APM WQ-1: Because the Project involves more than an acre of soil disturbance, a SWPPP would be prepared as required by the state NPDES General Permit for Discharges of Stormwater Associated with Construction Activity. This plan would be prepared in accordance with the Water Board guidelines and other applicable erosion and sediment control BMPs. Implementation of the plan would help stabilize disturbed areas and would reduce erosion and sedimentation. The SWPPP would designate BMPs that would be followed during and after construction of the Project, examples of which may include the following erosion-minimizing measures: • Using drainage control structures (e.g., straw wattles or silt fencing) to direct surface runoff away from disturbed areas; • Strictly controlling vehicular traffic; • Implementing a dust-control program during construction; • Restricting access to sensitive areas; • Using vehicle mats in wet areas; or • Revegetating disturbed areas, where applicable, following construction. In areas where soils are to be temporarily stockpiled, soils would be placed in a controlled area and would be managed with similar erosion control techniques. Where construction activities occur near a surface waterbody or drainage channel and drainage from these areas flows towards a waterbody or wetland, stockpiles would be placed at least 100 feet from the waterbody or would be properly contained (such as beaming or covering to minimize risk of sediment transport to the drainage). Mulching or other suitable stabilization measures would be used to protect exposed areas during and after construction activities. Erosion-control measures would be installed, as necessary, before any clearing during the wet season and before the onset of winter rains. Temporary measures, such as silt fences or wattles intended to minimize erosion from temporarily disturbed areas, would remain in place until disturbed areas have stabilized.	Prior to and during construction.	Complete. The Stormwater Pollution Prevention Plan (SWPPP) was submitted to CPUC for review and submitted to the State Water Resources Control Board on 11/30/2022. The Project was assigned WDID: 5F10C399233.
APM WQ-2: Groundwater encountered during construction would be handled and discharged in accordance with all state and federal regulations including the following: • Recovered groundwater would be contained on site and tested prior to discharge; • If testing determines water is suitable for land application, discharge may be applied to flat, vegetated, upland areas, used for dust control, or used in other suitable construction operations (e.g., concrete mixing); • Land application would be made in a manner that discharge does not result in substantial erosion and would not be made directly to receiving waters or storm drains;	During construction.	Complete. LSPGC and its contractors implemented this measure as necessary throughout construction. Compliance with this measure was documented within the monthly inspection forms as required by the Project SWPPP, and are available to the CPUC upon request. These reports were summarized and submitted to the CPUC within the Project's Quarterly Environmental Compliance Reports.

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Water unsuitable for land application would be disposed of at an appropriately permitted facility; and Discharge to surface waters or storm drains may occur only if permitted by the agency(ies) with jurisdiction over the resource (e.g., USACE [U.S. Army Corps of Engineers], RWQCB, and/or CDFW [California Department of Fish and Wildlife], as applicable).		
APM PS-1: LSPGC would coordinate construction activities with local law enforcement and fire protection agencies. Emergency service providers would be notified of the timing, location, and duration of construction activities.	Prior to construction.	Complete. Prior to the start of construction. LSPGC notified law enforcement and fire protection agencies regarding the timing, location, and duration of construction activities.
APM TRA-1: LSPGC would prepare a Traffic Control Plan to describe measures to be taken to guide traffic (such as signs and workers directing traffic), safeguard construction workers, provide safe passage, and minimize traffic impacts. LSPGC would follow its standard safety practices as needed, including installing appropriate barriers between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. LSPGC would follow the recommendations in this manual regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the California Vehicle Code. If required for obtaining a local encroachment permit, LSPGC would establish a Traffic Management Plan (TMP) to address haul routes, timing of heavy equipment and building material deliveries, potential street and/or lane closures, signing, lighting, and traffic control device placement. Construction activities would be coordinated with local law enforcement and fire protection agencies. Emergency service providers would be notified as required by the local permit of the timing, location, and duration of construction activities.	Prior to and during construction.	Complete. LSPGC provided CPUC a copy of the Traffic Control Plan (TCP) and implemented the TCP throughout construction as necessary. Compliance with this measure was summarized within the Project's Quarterly Environmental Compliance Reports that were submitted to the CPUC.
APM UTIL-1: The Applicant shall notify all utility companies with utilities located within or crossing the Orchard Substation Facilities' Rights-of-Way (ROW) to locate and mark existing underground utilities along the entire length of the Orchard Substation Facilities at least 14 days prior to construction. No subsurface work shall be conducted that would conflict with (i.e., directly impact or compromise the integrity of) a buried utility. In the event of a conflict, areas of subsurface excavation or pole installation shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering. In instances where separation between third-party utilities and underground excavations is less than 5 feet, the Applicant shall submit the intended construction methodology to the owner of the third-party utility for review and approval at least 30 days prior to construction. Construction methods shall be adjusted as necessary to assure that the integrity of existing utility lines is not compromised.	Prior to and during construction.	Complete. Prior to the start of construction. LSPGC notified all utilities located within or crossing the Orchard Substation Facilities to mark and locate existing underground utilities.

ATTACHMENT 3
PHOTOGRAPH LOG

Photo 1. View of pavement apron at access road on Jayne Av.
Direction: Northwest. Date: 1/21/2025

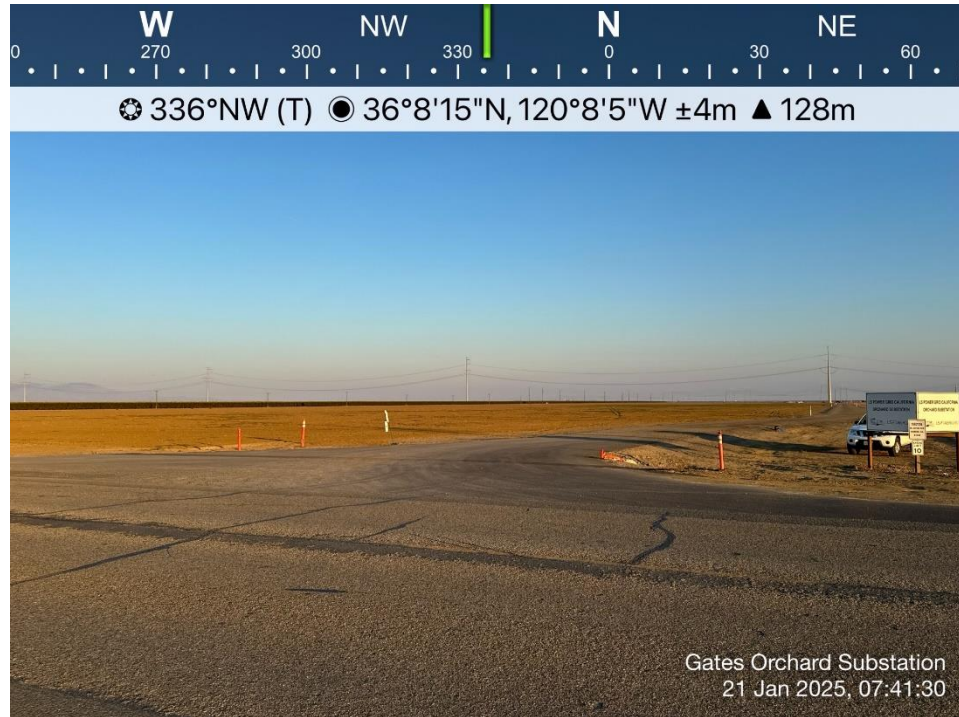


Photo 2. View of staged equipment with drip pans inside substation.
Direction: Northeast. Date: 1/21/2025

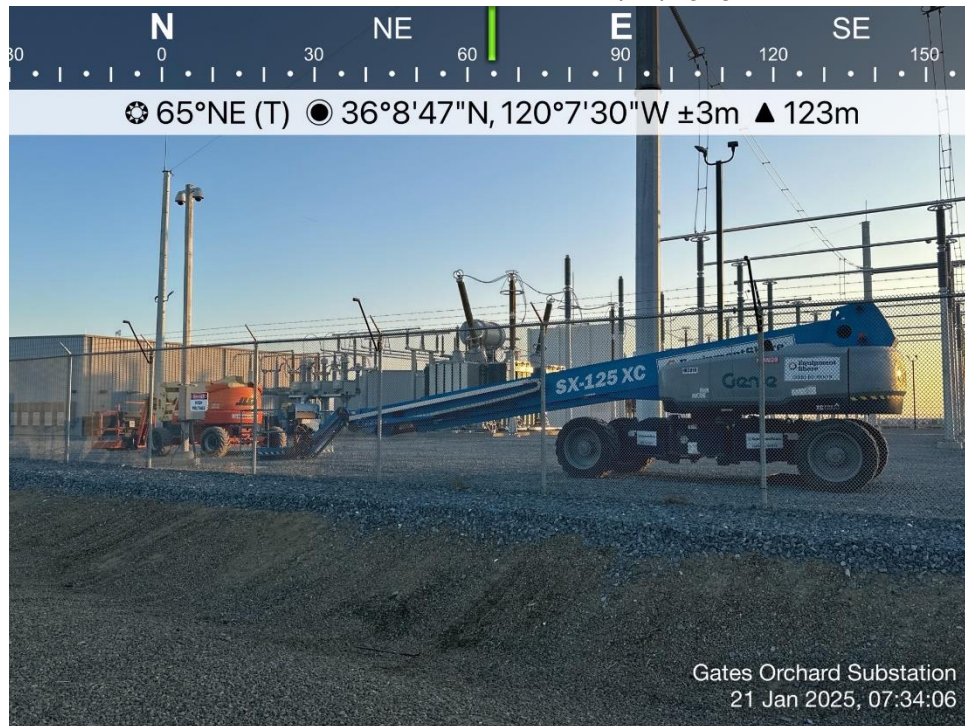


Photo 3. View of typical portable toilets with secondary containment and covered trash can.
Direction: East. Date: 1/21/2025

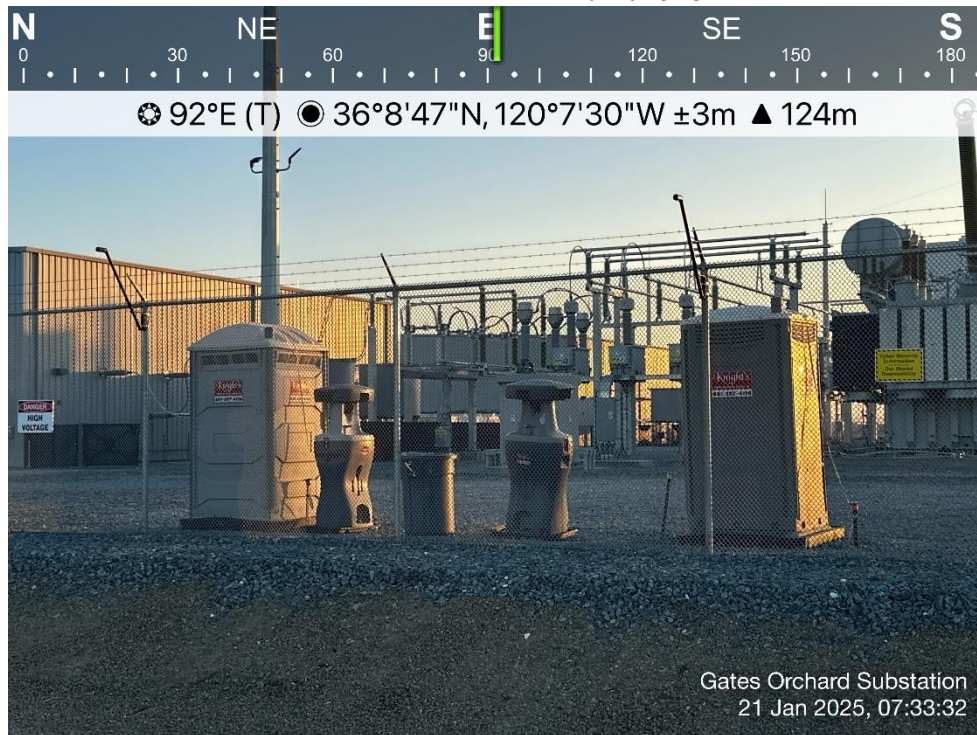


Photo 4. View of staged water truck with drip pan.
Direction: North. Date: 1/21/2025

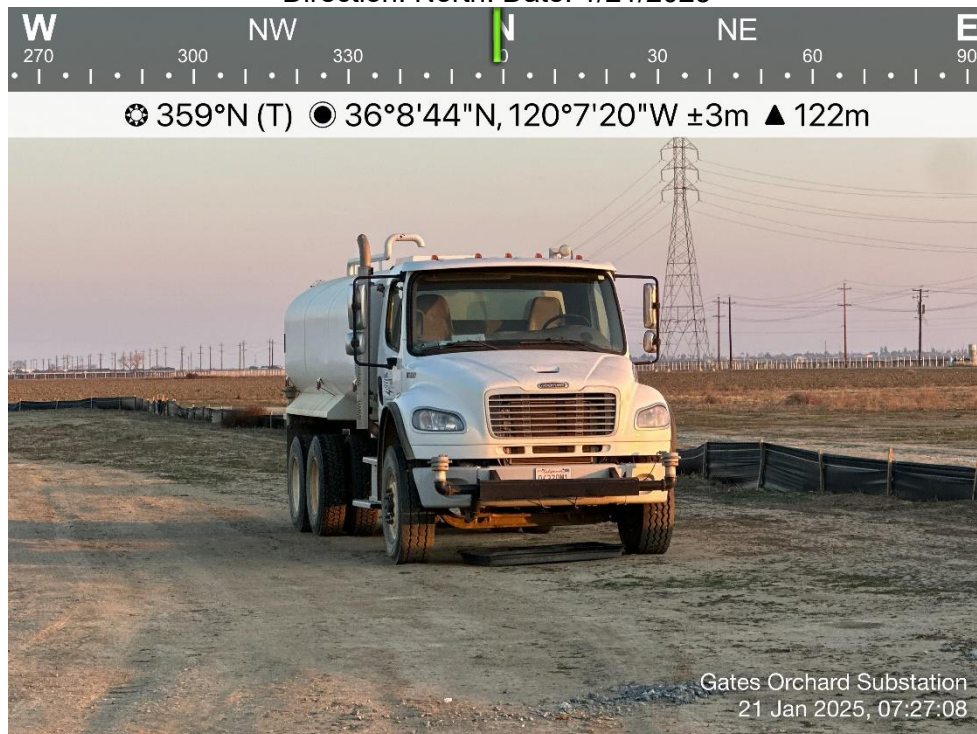


Photo 5. View of silt fence on south and east side of borrow pit.
Direction: South. Date: 1/21/2025



Photo 6. View of crews demobilizing material in laydown yard.
Direction: South. Date: 1/21/2025

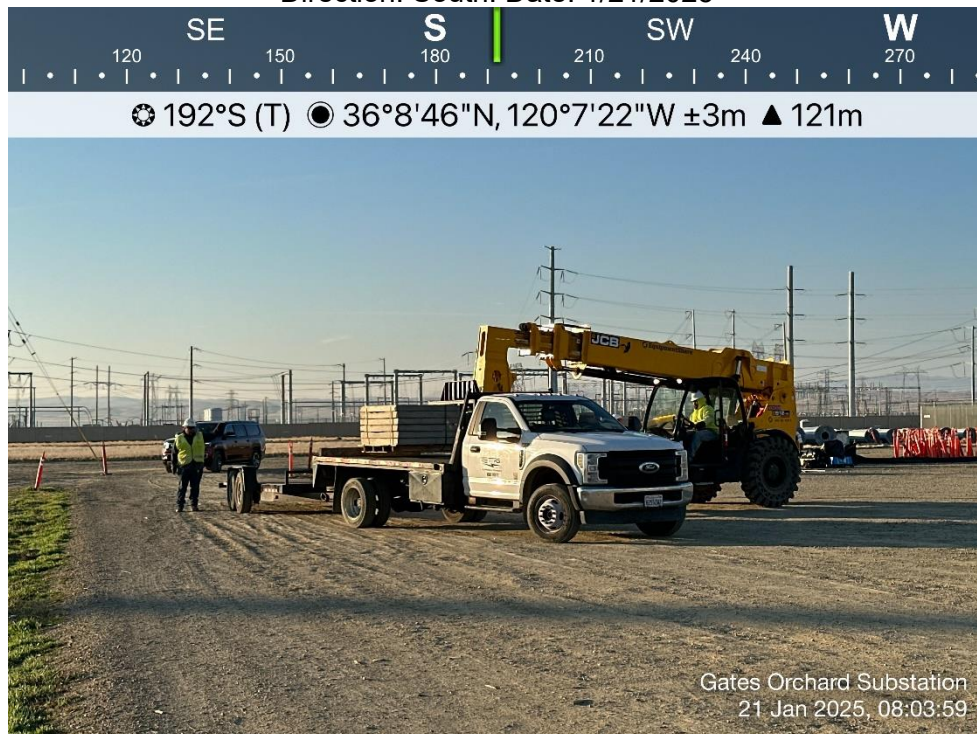


Photo 7. View of dust control with water buffalo.
Direction: Northwest. Date: 1/21/2025



Photo 8. View of laydown yard and substation.
Direction: West. Date: 1/21/2025



Photo 9. View of the staged equipment with drip pans inside substation.
Direction: East. Date: 2/18/2025

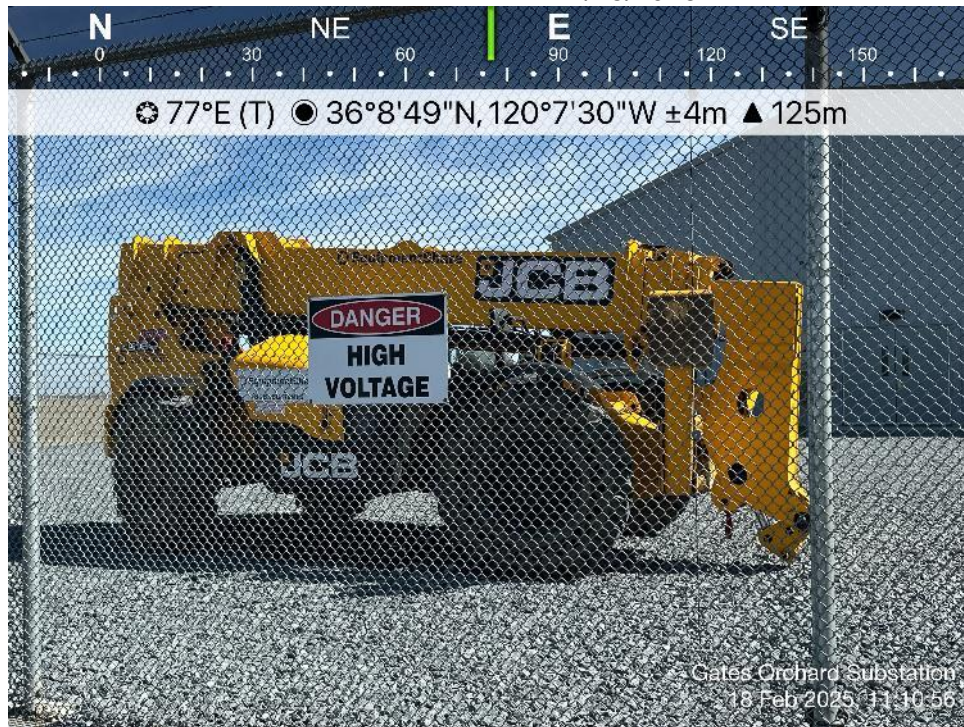


Photo 10. View of crews working on jumpers.
Direction: East. Date: 2/18/2025



Photo 11. View of crews working inside substation.
Direction: East. Date: 2/18/2025



Photo 12. View of north side of substation.
Direction: East. Date: 2/18/2025



Photo 13. View of substation borrow pit and laydown yard.
Direction: West. Date: 2/18/2025

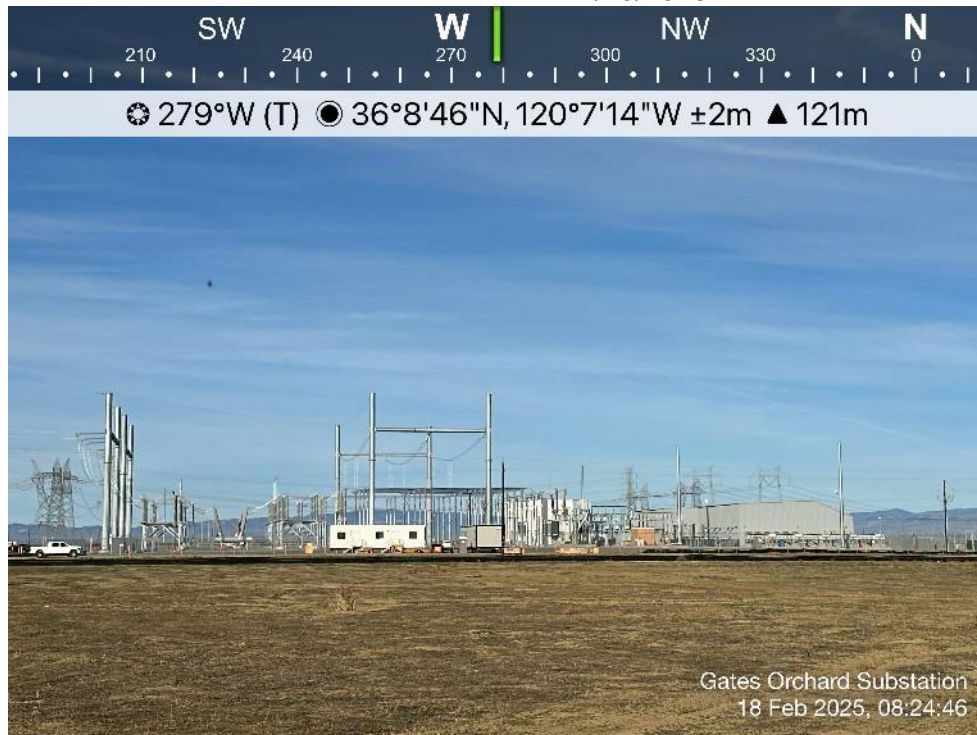


Photo 14. View of drainage ditch on east side of substation.
Direction: North. Date: 3/25/2025



Photo 15. View of drainage ditch on west side of substation.
Direction: North. Date: 3/25/2025



Photo 16. View of substation.
Direction: Northeast. Date: 3/25/2025

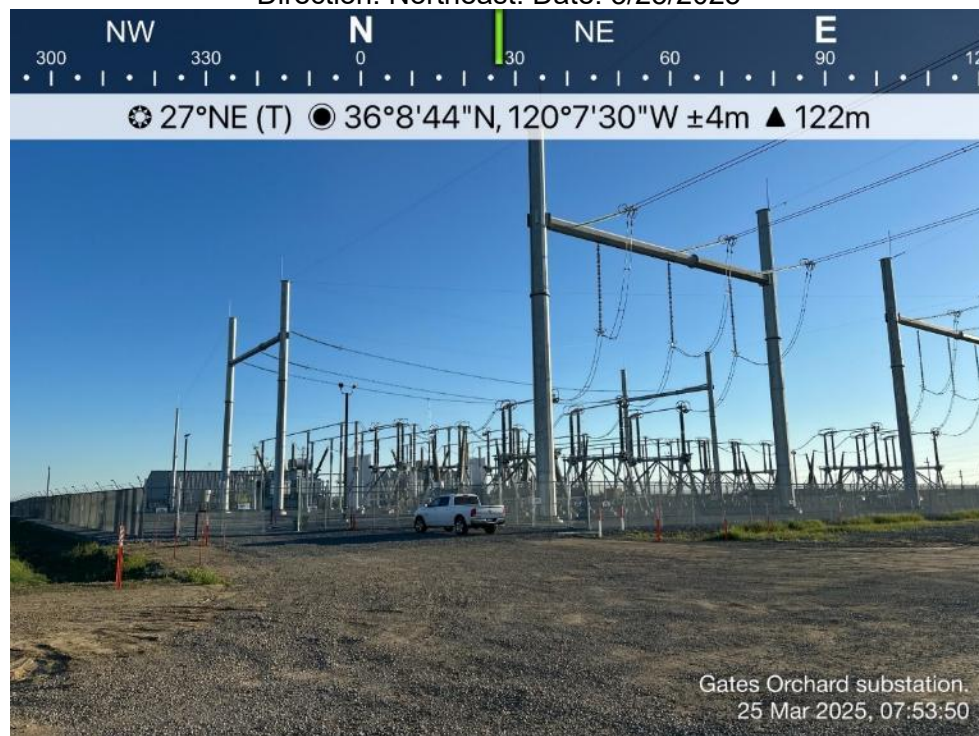


Photo 17. View of retention basin.
Direction: Southwest. Date: 3/25/2025

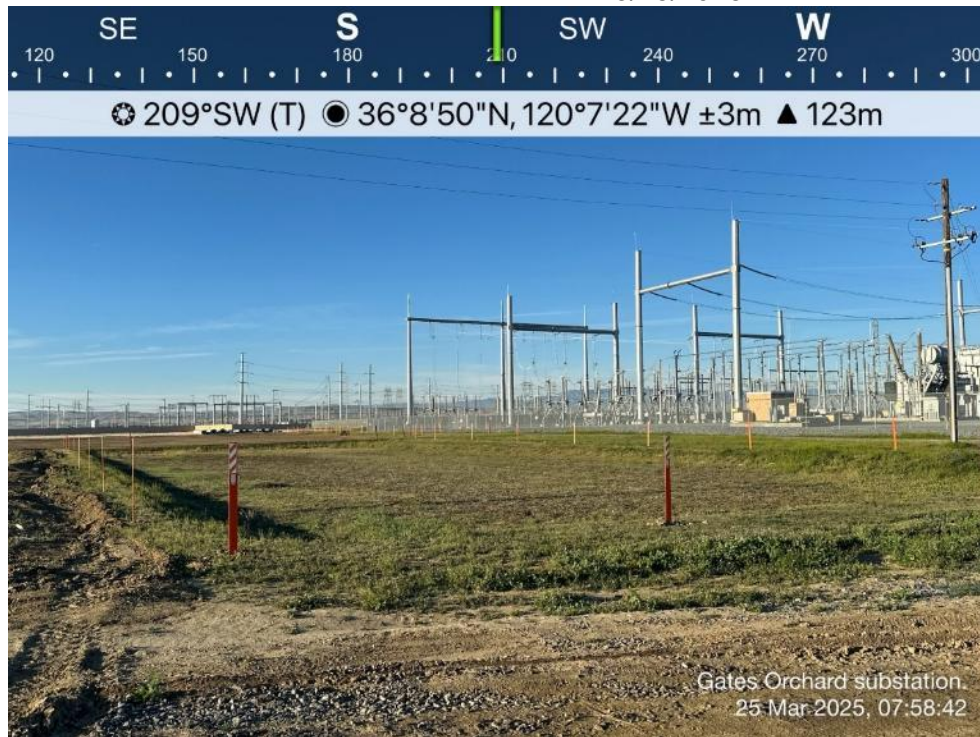


Photo 18. View of borrow pit area.
Direction: North. Date: 3/25/2025

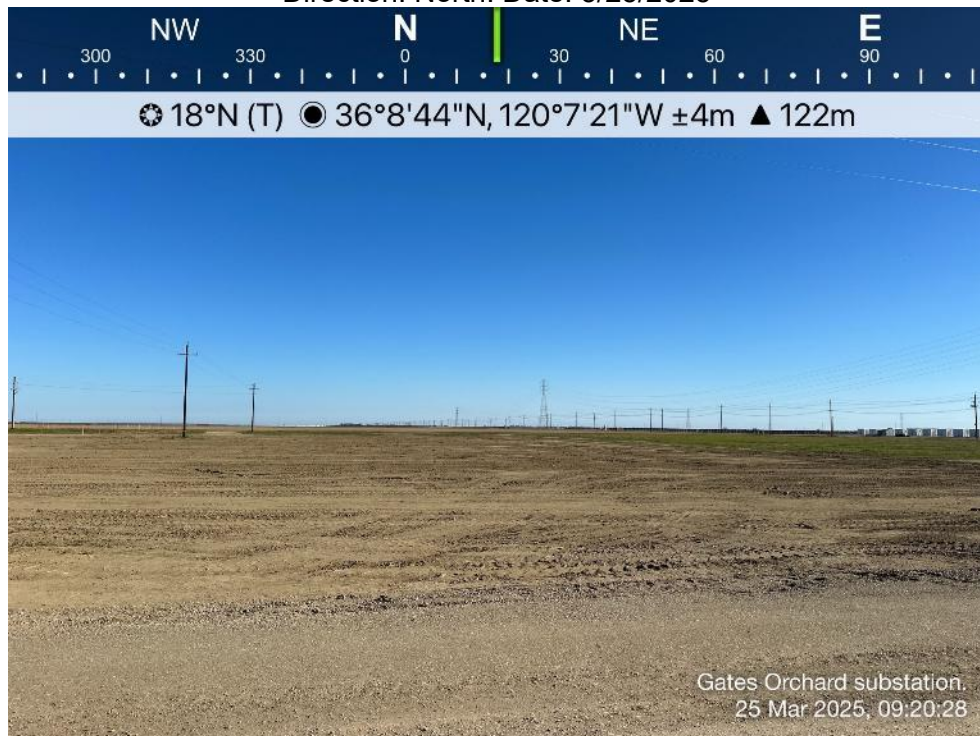


Photo 19. View of substation from east side of property.
Direction: West. Date: 3/25/2025



Photo 20. View of drainage ditch on south side of substation.
Direction: West. Date: 3/25/2025

