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

May 14, 2026

Thomas Alexander
CEQA Project Manager
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Re: Power the South Bay Project (Application 24-05-014)
Request for Minor Project Refinement No. 2

Mr. Alexander:

LS Power Grid California, LLC (LSPGC) is hereby requesting approval of Minor Project Refinement No. 2 (MPR-2) from the California Public Utilities Commission (CPUC) for the Power the South Bay Project (Project). Approval of MPR-2 would authorize the relocation of an underground transmission line vault (Vault 13) adjacent to the previously approved Project limits of construction. The new location of Vault 13 is immediately adjacent to Los Esteros Road, on developed land owned by the City of San Jose (San Jose-Santa Clara Regional Wastewater Treatment Facility), in the City of San Jose, California. See additional details in **Attachment A, MPR-2 Form** and **Attachment B, MPR-2 Figure.**

The Project's Final Environmental Impact Report (FEIR) identified approximately 20-30 transmission line vaults which would be located along the proposed 230 kilovolt (kV) underground transmission line alignment, typically located within existing paved public roadways. MPR-2 will not change the quantity of transmission line vaults to be constructed for the Project. Due to recently identified existing buried utilities within Los Esteros Road where Vault 13 would have been located, LSPGC is requesting to relocate Vault 13 out of Los Esteros Road to avoid conflicts with those buried utilities. Please refer to **Attachment B, MPR-2 Figure** and **Attachment C, MPR-2 Photograph Log** to view the proposed MPR-2 construction work area and Vault 13 location.

Attachment A: MPR-2 Form
Attachment B: MPR-2 Figure
Attachment C: MPR-2 Photograph Log
Attachment D: MPR-2 Cultural Resources Survey Report

Preconstruction Requirements and Permit/Approvals

Approval of MPR-2 will not change the conditions set forth in the FEIR, nor will it change the type of equipment, number of construction personnel, or the status of any pre-construction or construction requirements set forth in the Project's Mitigation Monitoring, Compliance, and Reporting Plan. LSPGC will obtain an encroachment permit from the City of San Jose to place Vault 13 on City-owned property.

MPR-2 Request for Approval

LSPGC respectfully requests approval of MPR-2, as described herein, by May 22, 2026. Should you have any questions or need additional information, please do not hesitate to contact me at djoseph@lspower.com.

Sincerely,

Dustin Joseph

Dustin Joseph
Director of Environmental Permitting

cc:

Lucy Marton (LSPGC)
Casey Carroll (LSPGC)
Jacob Diermann (LSPGC)
David Wilson (LSPGC)
Michelle Wilson (CPUC)
Vince Molina (ESA)
Phillip Peters (ESA)
Emily Critchfield (KPE)

ATTACHMENT A
MPR-2 Form

Power the South Bay Project
CPUC Minor Project Refinement Form

Minor project refinements *are strictly limited to changes that will not trigger an additional permit requirement (except local government ministerial permits and associated requirements), do not substantially increase the severity of a previously identified significant impact based on criteria used in the EIR, create a new significant impact, are located within the geographic boundary of the study area of the EIR, and that do not conflict with any mitigation measure or applicable law or policy.*

Date Requested: May 14, 2026

Report No.:

Date Approved:

Approval Agency: California Public Utilities Commission (CPUC).

Property Owner(s): The proposed Minor Project Refinement No. 2 (MPR-2) area (Vault 13) is located within property owned by the City of San Jose.

Location/Milepost: The proposed location of Vault 13 is would be adjacent to Los Esteros Road, across from the GreenWaste Renewable Energy Digestions Facility and the San Jose-Santa Clara Regional Wastewater Treatment Facility, in San Jose, California.

Land Use/Vegetative Cover: The Vault 13 construction work area is approximately 1.0 acre in disturbed land. This work area consists of bare ground, maintained grass, and street trees.

Sensitive Resources: There is potential to occur (PTO) for one sensitive wildlife species within the vicinity of the Vault 13 area, and soils classified as having high paleontological potential 7 or more feet below ground surface. See resource discussions below.

Modification From: ☐ **Permit** ☐ **Plan/Procedure** ☐ **Specification** ☐ **Drawing** ☐ **Mitigation Measure** ☒ **Other:**

LS Power Grid California, LLC (LSPGC) is requesting approval of MPR-2 for the relocation of Vault 13 adjacent to the limits of construction approved within the Project's Final Environmental Impact Report (FEIR). It is necessary to relocate Vault 13 outside of the Los Esteros Road right-of-way (ROW) due to conflict with existing underground utilities. Vault 13 will be located approximately 20 feet south of the Los Esteros Road shoulder, on City property that contains the San Jose-Santa Clara Regional Wastewater Treatment Facility (RWF), although a portion of the MPR-2 work area and associated transmission line will remain within the Los Esteros Road ROW as described below and shown in **Attachment B, MPR-2 Figure**. Temporary use of the remaining 0.75-acre MPR-2 work area will be required as a temporary work area for temporary equipment and materials laydown and overland travel access during vault and transmission line installation activities. The MPR-2 work area within the RWF treatment facility appears to be

subject to routine discing, mowing, or other types of vegetation management activities. No ground disturbance is proposed outside of trenching for the transmission line and vault installation as shown in **Attachment B, MPR-2 Figure**. Construction of Vault 13 will require the removal of approximately four street trees from within the MPR-2 work area (i.e., City property), but would be limited to the extent practicable. All removal of street trees would be coordinated with the City of San Jose. The portion of chain-link fencing that runs along the RWF property line within the MPR-2 work area will be removed in order to install Vault 13 and associated transmission line, but will be replaced following completion of MPR-2 construction activities.

Implementation of MPR-2 would expand the Project's limit of disturbance by approximately 1.0 acre. Vault 13 would be constructed of prefabricated (precast) or cast-in-place, steel-reinforced concrete. The vault will have two manhole covers measuring approximately 39 inches in diameter. The vault would be delivered to the construction site utilizing a large flatbed semi-truck/trailer. Installation of the vault will entail excavation, shoring, and leveling of the splice vault pit using crushed gravel or flowable fill; followed by delivery and installation of the vault using a crane; filling, grouting, and compacting the backfill; and repaving the excavated area. Backfill for splice vaults would consist of flowable concrete backfill.

Trenching will be conducted for installation of transmission line duct banks within the MPR-2 work area. As needed, pavement will be cut with a wet saw or asphalt zipper and excavated with an excavator. Jackhammers may be used to break up sections of concrete that the saw-cutting and pavement-breaking machines cannot reach. Excavators will be used to remove all spoils, with the spoils being loaded into dump trucks to be hauled off-site and disposed of in compliance with applicable regulations. The trenches will measure approximately three to six feet wide and eight feet deep on average, including any additional width needed for shoring to meet California Division of Occupational Safety and Health (Cal/OSHA) safety requirements. Trench depths may vary depending on soil stability and existing underground structures. Upon reaching the final trench excavation depth, the trench walls will be secured via shoring. Underground cables will be installed into the duct banks once the duct bank and splice vaults are constructed. Two telecommunications fiber optic cables will be co-located within the transmission line duct bank.

The MPR-2 work area would be accessed via Los Esteros Road as well as a paved access road within the RWF treatment facility. Ornamental vegetation would be removed, as needed, within the MPR-2 work area. See **Attachment B, MPR-2 Figure** for the location of the MPR-2 components.

Stormwater best management practices (BMPs) such as silt fence and straw wattle would be installed within and surrounding the MPR-2 work area in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP).

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

Original Condition: Vault 13 was originally planned to be located entirely within the Los Esteros Road ROW. This portion of Los Esteros Road is paved with one lane of travel in each direction. Conditions within the MPR-2 work area were documented with the FEIR. The MPR-2 area consists of maintained landscape covered by bare ground, non-native grasses, and street trees. Supplemental resource surveys were conducted to verify current conditions as described in the Resources section below. The MPR-2 work area is located within a disturbed, mostly flat area with no native habitat or sensitive aquatic features. Although the MPR-2 work area was not identified for Project use within the Project's FEIR, it is in close proximity to approved Project components and is therefore within the geographic study area analyzed within the FEIR. Further description of current conditions within the MPR-2 work area is provided in the resource discussions herein.

Justification for Change: It is stated in Section 2.8.6.1 of the FEIR that approximately 20 to 30 vaults would be required. Vaults are located along the segments of underground transmission line, generally directly in line with the transmission line alignment. Vault 13 was originally intended to be located within the Los Esteros Road ROW. However, it is necessary to relocate Vault 13 outside of the Los Esteros Road ROW due to conflict with existing underground utilities.

Maps & Figures: Refer to **Attachment B, MPR-2 Figure,** for a map of the proposed relocated Vault 13 and work area. Refer to **Attachment C, MPR-2 Photograph Log**, for pictures of the current conditions within the MPR-2 work area.

Environmental Impact: Relocation of Vault 13 adjacent to Los Esteros Road and use of the RWF facility parcel for equipment storage and access would not change the nature or substantially increase the severity of any impacts disclosed within the FEIR; would not require alteration to Applicant Proposed Measures (APMs) or existing Mitigation Measures (MMs); would not require new mitigation measures; and would not require new regulatory approval. The MPR-2 work area is within disturbed land containing non-native, ornamental vegetation located on the RWF facility parcel owned by the City of San Jose. Specific discussions for each resource area are provided below.

Concurrence (if appropriate): LSPGC will acquire ROW approval via encroachment permit from the City of San Jose for the construction of Vault 13 on City owned property. MPR-2 would not require approval from any agencies not disclosed within the FEIR.

Resources:

Biological	☒	No Resources Present	☐	Resources Present	☐	N/A, Change would not affect resources

Previous Biological Survey Report Reference:
As the proposed new Vault 13 location is adjacent to the disturbance area analyzed in the FEIR, the biological and aquatic resource surveys described in the FEIR covered the MPR-2 area (refer to FEIR Section 3.4, Figure 3.4-1E). The MPR-2 work area is maintained landscape that appears to be subject to routine discing, mowing, or other vegetation management activities. There were no special-status plant or wildlife species identified during the surveys, and no aquatic features (e.g., wetlands or waters) are present within MPR-2 work area. Based on the analysis within the FEIR, one special-status species has the potential to occur within the vicinity of the MPR-2 area. Refer to FEIR Table 3.4-3 and **Table 1** below. PTO for all other plant and wildlife special-status species listed in FEIR Tables 3.4-2 and 3.4-3 is considered Low or None, and there was no PTO for special-status species not disclosed within the FEIR.

Table 1: Special-Status Species PTO for Vault 13

Common Name *Scientific Name*	Status (State/ Federal)	Identification Period	Potential to Occur	Survey Requirements
Birds				
Golden eagle *Aquila chrysaetos*	--/FP	Year-round	**Moderate.** Suitable foraging and nesting habitat for this species occurs in the vicinity of Los Esteros Road and the MPR-2 area. One known nest site is located approximately 0.5 mile south of the MPR-2 area, on the opposite side of the RWF facility.	APM BIO-11, APM BIO-14: Protocol surveys for golden eagle are in progress for this area, and will be completed prior to construction.

Status Code:
Federal: FP = Federally Proposed

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

Previous Cultural Survey Report Reference:
As the MPR-2 work area is not located with the cultural resources area of potential effect (APE) examined in the Project's FEIR, a supplemental cultural resources survey, including a records review and pedestrian survey, was performed for the MPR-2 work area, consistent with APM CUL-4 (see **Attachment D, MPR-2 Cultural Resources Survey Report**). The records search determined a portion of the MPR-2 work area is within 100 feet (30 meters) of site P-43-003879, the RWF Historic District Pump and Engine Building. However, there is no ground disturbance planned within 100 feet of this area, therefore monitoring is not required per the Archaeological Monitoring Plan (AMP). The pedestrian field survey for this area was performed on December 9, 2025. No cultural resources were discovered during the survey.

Paleontological	☐	No Resources Present	☒	Resources Present	☐	N/A, Change would not affect resources

Previous Paleontological Survey Report Reference:
Paleontological resources within one mile of the Project's limits of construction (which includes the MPR-2 work area) were studied, reviewed, and documented as part of the Proponent's Environmental Assessment. These resources were also discussed within the CPUC-conducted CEQA review process (see the Project's FEIR, Section 3.7). No records of paleontological resources were identified within the MPR-2 area in the records search performed by the San Diego Natural History Museum (SDNHM) and the University of California Museum of Paleontology (UCMP). At the MPR-2 work area, the soil strata between the ground surface and a depth of 7 feet below ground surface (bgs) is classified as low paleontological potential, and high paleontological potential at depths greater than 7 feet bgs. Excavation to depths up to 10 feet bgs will be required for construction of Vault 13 and associated transmission line installation activities. Excavation below 7 feet bgs will be monitored in accordance with the Project's Paleontological Mitigation Monitoring Plan.

Disturbance Acreage Changes: ☒ Yes ☐ No

The additional disturbance resulting from the proposed relocation of Vault 13 is approximately 1.0 acre of previously disturbed land. Except for the footprint of the two manholes at Vault 13 (8± square feet per manhole cover), the surface disturbance will be temporary during construction and the work area will be restored to maintained landscape following construction.

The following table includes environmental analysis representative of CEQA Appendix G Checklist Sections addressed in the FEIR as it relates to MPR-2.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Geology, Soils, Seismicity, Paleontological Resources	☒ Y ☐ N	MPR-2 does not propose any new construction activities. The Vault 13 location included in MPR-2 would involve the same construction techniques and equipment as were included in the FEIR for vault and transmission line construction. Accordingly, approval of MPR-2 would not create any new geological related hazard not previously disclosed in the Project's FEIR, Section 3.7. The Project SWPPP includes underground construction along Los Esteros Road, including the relocated Vault 13 work area. All construction activities will adhere to requirements in the SWPPP, including the implementation of

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		erosion control BMPs. In compliance with APM GEO-1 and the Project SWPPP, temporary impact areas included in MPR-2 will be stabilized and returned to approximate pre-construction conditions following use. There are no records of paleontological resources within the MPR-2 area. The potential for discovery of paleontological resources for the relocated Vault 13 would be the same as for the approved Vault 13 location. At the MPR-2 work area, the soil strata between the ground surface and a depth of 7 feet bgs is classified as low paleontological potential, and classified as high paleontological potential at depths greater than 7 feet bgs. Excavation to depths up to 10 feet bgs will be required for construction of Vault 13. Excavation below 7 feet bgs will be monitored in accordance with the Project's Paleontological Resources Mitigation Monitoring Plan (PRMMP) (APM PALEO-1). Any unanticipated discovery of paleontological resources would be addressed according to the Project's PRMMP and APM PALEO-2. For these reasons, impacts to geology, soils, seismicity and paleontological resources would remain similar to those addressed within the Project's FEIR, Section 3.7. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to geology, soils, or paleontological resources.
Hazardous Materials and Waste	☒ Y ☐ N	LSPGC and its contractors would comply with applicable rules and regulations pertaining to hazardous materials during MPR-2 activities to minimize the risk of a significant hazard from material transport, use, storage, and disposal. MPR-2 activities would not result in the performance of any new construction activities, an increase or change in the anticipated amounts or type of hazardous materials, nor create any new hazardous waste that could expose the public to hazards. There are no known soil contaminates within the MPR-2 work area. Hazardous materials such as diesel fuel would be utilized within construction equipment during the installation of the relocated Vault 13. Construction activities at the MPR-2 work area would adhere to requirements within the Project's Hazardous Materials Management Plan (HMMP) (APM HAZ-2), MM 3.9-1b, MM 3.9-1c, and APM WQ-1, as applicable. Therefore, impacts related to hazards and hazardous materials would remain similar to those analyzed within the Project's FEIR, Section 3.9. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	No additional agency consultation is required for MPR-2.
Hydrology/ Water Quality	☒ Y ☐ N	There are no aquatic features within the MPR-2 work area. While MPR-2 will involve the installation of permanent facilities, these would not be different from those included with the approved Project's FEIR. The Project SWPPP

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
		includes the MPR-2 work area, and all MPR-2 construction activities would adhere to requirements and BMPs within the SWPPP. Although impacts to hydrology and water quality are not anticipated, any indirect impacts that might occur would be mitigated with the implementation of APM WQ-1, APM HAZ-2, MM 3.9-1b, MM 3.9-1c, and the Project SWPPP, which contains measures to reduce or eliminate pollutants in storm water discharges from the site during construction that may otherwise violate water quality standards. MPR-2 activities would therefore not impede or redirect flood flow, alter the existing drainage pattern of the area, or otherwise result in hydrology and water quality impacts that would be different from the impacts addressed in the Project's FEIR, Section 3.10. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to hydrology or water quality.
Cultural and Tribal Cultural Resources	☒ Y ☐ N	There is no ground disturbance proposed outside of the "Underground Work Area" portion of the MPR-2 work area as shown in **Attachment B, MPR-2 Figure**. As discussed in the resources section in this MPR-2 request, a portion of the MPR-2 work area is within 100 feet (30 meters) of site P-43-003879, the RWF Historic District Pump and Engine Building. However, there is no ground disturbance planned within 100 feet of this area. The pedestrian field survey for this area was performed on December 9, 2025, and no cultural resources were discovered during the survey. As such, cultural and tribal monitoring is not anticipated to be required for MPR-2 activities. Although no direct impacts to cultural or tribal cultural resources are anticipated as a result of the installation of the relocated Vault 13, any indirect impacts that may occur as a result of an unanticipated discovery of cultural resources would be mitigated through implementation of APM CUL-1, APM CUL-2, APM CUL-3, APM CUL-4, APM CUL-5, and MM 3.5-1 as needed. Therefore, there would be no change in impacts compared to those addressed within the Project's FEIR, Sections 3.5 and 3.18. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to cultural or tribal cultural resources.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Traffic and Circulation	☒ Y ☐ N	The MPR-2 work area will be accessed from Los Esteros Road and from a paved road from the RWF treatment facility. LSPGC is not proposing any new activities or change in the volume of workers or construction-related vehicle trips disclosed in the FEIR, Section 3.17. The relocated Vault 13 is positioned immediately adjacent to the Project limits of construction analyzed within the FEIR. The temporary use of the RWF treatment facility's paved access road to access the MPR-2 work area will not result in new significant impacts, as it is a private road that is not used by the public. Although use of the private road and overland access were not anticipated in the FEIR, access through the private road within the RWF facility would alleviate potential congestion along Los Esteros Road. MPR-2 is not anticipated to require any closure of any sidewalks or trails. Emergency access will be maintained throughout all construction for MPR-2. Any damage to roads or other infrastructure would be repaired per MM 3.17-2b. In addition, there are no bus stops that would be impacted by the construction of Vault 13, and the site is located within an industrial area not frequented by residential motorists. Accordingly, impacts resulting from the relocation of Vault 13 would remain similar to those analyzed within the Project's FEIR, Section 3.17, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require new agency consultation related to traffic and circulation.
Air Quality	☒ Y ☐ N	The relocation of Vault 13 and use of the RWF facility parcel for equipment storage and access would not result in new construction activities that have not been previously analyzed and disclosed within the Project's FEIR. There is no change to the overall construction schedule or equipment used that will result from the relocation of Vault 13. All MPR-2 activities would take place in accordance with MM 3.3-2a, ensuring that at least 75 percent of equipment horsepower hours related to off-road construction equipment includes Tier 4 Final emission controls, and equipment documentation and tracking is performed as needed. In addition, fugitive dust control measures defined in MM 3.3-2b would be followed. Therefore, the relocation of Vault 13 as proposed herein would not result in new significant impacts or a substantial increase in the severity of impacts analyzed and disclosed within the Project's FEIR, Section 3.3, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 would not require agency consultation relating to air quality.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Noise and Vibration	☒ Y ☐ N	There are no sensitive noise receptors within 1,000 feet of the MPR-2 work area, and the Vault 13 site is located in an industrial area. MPR-2 also does not propose the performance of any new activities not disclosed within Section 3.13 of the Project's FEIR. As such, there would be no change to impacts analyzed in the FEIR, Section 3.13, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to noise and vibration.
Aesthetics/ Visual Resources	☒ Y ☐ N	The relocated Vault 13 is located immediately adjacent to the limits of construction analyzed in the FEIR. In addition, installation and operation and maintenance would not result in any visible aboveground structures. Four street trees within the MPR-2 work area will be removed in order to install Vault 13, but will be limited to the extent practicable. In compliance with MM 3.4-5, removal of street trees will be coordinated with the City of San Jose and a street tree removal permit would be obtained. Relocation of Vault 13 and use of the RWF facility parcel for equipment storage and access would not affect any scenic resources identified in the Project's FEIR, and it is located in an industrial area adjacent to Project components analyzed in the FEIR, Section 3.1. Nighttime lighting, if needed, would be used in accordance with APM BIO-10 and MM 3.1-2. Therefore, impacts to aesthetics and visual resources would remain similar to those analyzed within the FEIR, Section 3.1, and no new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to aesthetics or visual resources.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Vegetation and Wildlife	☒ Y ☐ N	MPR-2 would result in a total of approximately 1.0 acre of temporary disturbance to developed land. There are no aquatic features or native vegetation present within the work area. Although there were no sensitive wildlife species observed during biological surveys, the MPR-2 area has a moderate PTO for golden eagle. It is important to note that, due to the documented presence of a golden eagle nest within 1 mile of the Project, the approved Project Vault 13 location (i.e., within the right-of-way of Los Esteros Road) would have the same potential for indirect impacts to golden eagle. Pre-construction surveys for special-status species will take place in accordance with MM 3.4-1d, APM BIO-3, APM BIO-11, and APM BIO-14 prior to the start of construction within the MPR-2 work area, and pre-construction nesting bird surveys will take place prior to the removal of street trees within the MPR-2 work area in accordance with APM BIO-15. Direct impacts to biological resources are not anticipated, but to the extent that any indirect impacts may occur to sensitive species in the vicinity of the MPR-2 work area, those impacts would be mitigated through the implementation of the following APMs and MMs: • APM BIO-3: Preconstruction Sweeps • APM BIO-6: Vehicle Speed Limits • APM BIO-8: Excavation Wildlife Safety Best Management Practices • APM BIO-9: Worker Environmental Awareness Program (WEAP) Training • APM BIO-10: Outdoor Lighting Measures • APM BIO-11: Special-Status Bird Surveys • APM BIO-12: Nesting Bird Protection Measures • APM BIO-13: Raptor Surveys • APM BIO-14: Golden Eagle Protection • APM BIO-15: Nesting Bird Surveys • MM 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction • MM 3.4-1d: Protection of Special-Status Wildlife • MM 3.4-1e: Construction WEAP As such, impacts to biological resources would remain similar to those addressed in the Project's FEIR, Section 3.4. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation relating to biological resources.

CEQA Section	Applicable	(Y) Define potential impact or (N) briefly explain why CEQA section isn't applicable. If (Y), describe original and new level of impact, and avoidance/minimization measures to be taken.
Wildfire	☒ Y ☐ N	The relocated Vault 13 and RWF facility parcel are not located in a high-fire severity zone as determined by the Department of Forestry and Fire Protection (CAL FIRE), nor are they located in an area of elevated or extreme fire-threat as determined by CPUC. The Project's Workers' Environmental Awareness Program training will be provided prior to and throughout construction to educate Project personnel regarding fire safety, prevention, and response procedures. Therefore, potential impacts related to wildfire resulting from MPR-2 would be similar to those disclosed in the FEIR, Section 3.20. No new or altered APMs or MMs would be required.
Agency Consultation?	☐ Y ☒ N	MPR-2 activities would not require agency consultation related to wildfire.

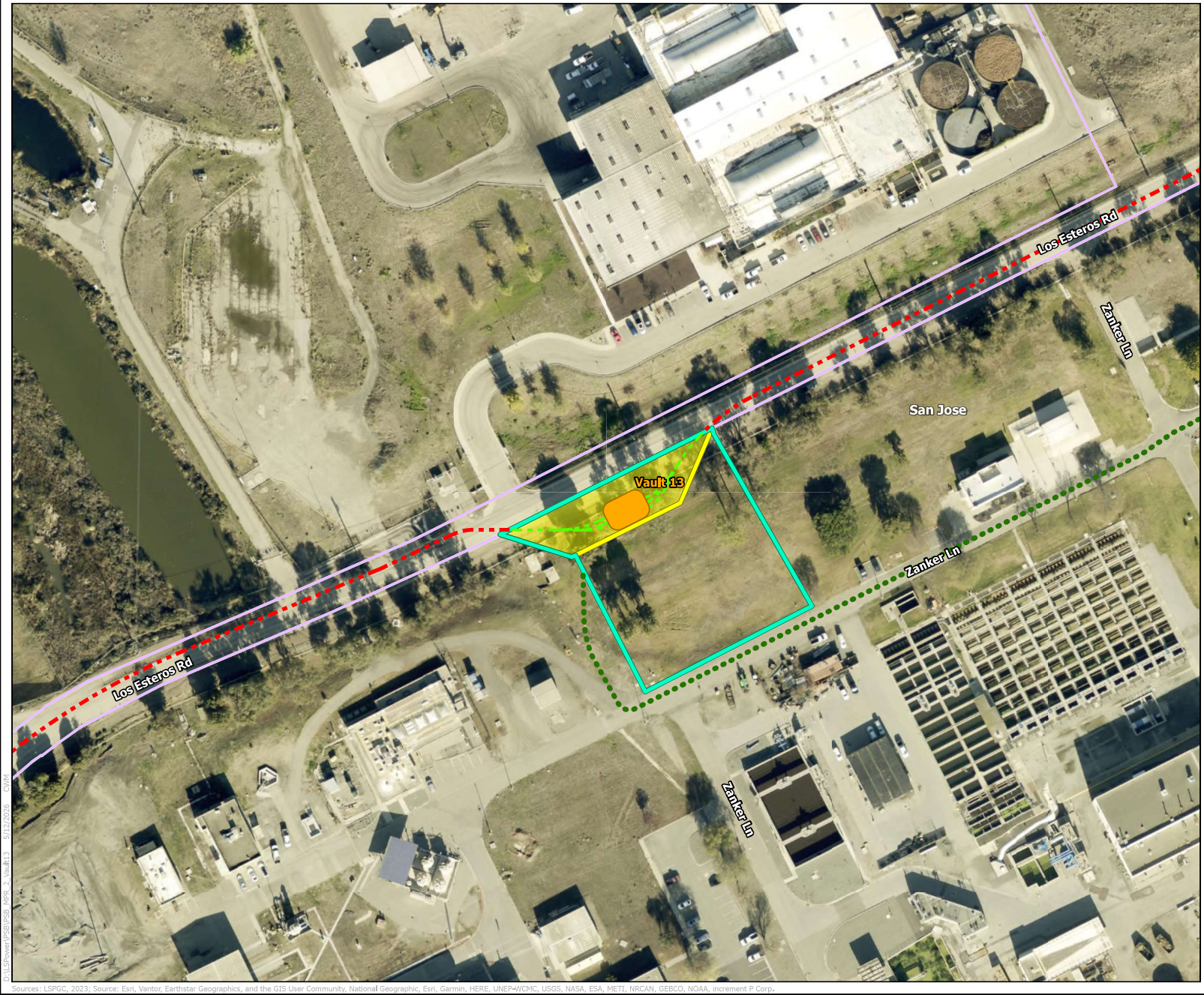
Approvals	Date	Name (print)	Signature	
LSPGC Project Manager		Lucy Marton		☐ Reviewed
LSPGC Environmental Project Manager		Dustin Joseph		☐ Reviewed
CPUC Project Manager				☐ Approved ☐ Approved with conditions (see below) ☐ Denied

For CPUC Compliance Manager Use Only		
☐ **Refinement Approved**	☐ **Refinement Denied**	☐ **Beyond Authority**

Conditions of Approval or Reason for Denial:

Prepared by: **Date:**

ATTACHMENT B
MPR-2 Figure



POWER THE SOUTH BAY PROJECT
MPR-2 Vault 13
City of San Jose, CA

LEGEND

MPR-2 Components

- 230 kV AC Transmission Line (Underground)
- MPR-2 Access
- Vault Location
- Underground Work Area
- MPR-2 Work Area

Project area not included MPR-2

- 230 kV AC Transmission Line (Underground)
- Limits of Construction

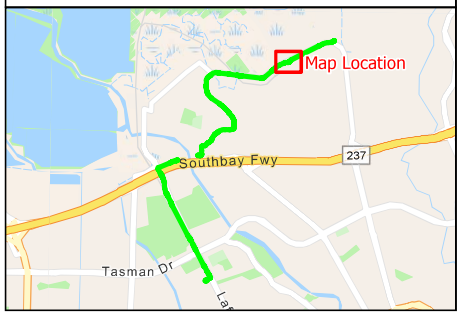
General Features

- Municipal Boundary

N

0 50 100 200

Feet



Sources: LSPGC, 2023; Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp.

ATTACHMENT C
MPR-2 Photograph Log

Power the South Bay
MPR-2 Vault 13 Site Photographs

	**Photograph 1:** View northeast of the MPR-2 work area.
	**Photograph 2:** View southwest of the MPR-2 area from Los Esteros Road shoulder.

ATTACHMENT D
MPR-2 Cultural Resources Survey Report