April 13, 2026

Dustin Joseph
LS Power Grid California
16450 Main Circle Drive, Suite 310
Chesterfield, MO 63107

RE: Revised Notice to Proceed Request No. 3 for the Power Santa Clara Valley Project (A.24-04-017)

Dear Mr. Joseph:

On March 19, 2026, the California Public Utilities Commission (CPUC) adopted the Final Environmental Impact Report (FEIR) for the Power Santa Clara Valley Project (Project) and selected Alternative Combination 1 (AC-1)[1] for approval (Application 24-04-017). The CPUC, in Decision (D.) 26-03-042, granted LS Power Grid California (LSPGC) a Certificate of Public Convenience and Necessity (CPCN) and approved the Project conditionally with the implementation of Applicant Proposed Measures, Mitigation Measures, and Pacific Gas and Electric Company (PG&E) best management practices and field protocols adopted in the Construction Mitigation Monitoring, Compliance, and Reporting Program (Construction MMCRP).

On March 27, 2026, LSPGC submitted Notice to Proceed Request No. 3 (NTPR-3) to the CPUC seeking the authority to proceed with the construction of the Grove high-voltage direct current (HVDC) Terminal (Grove Terminal), including use of Staging Area 2 (Grove Terminal Staging Yard), as described for AC-1 in the Final Environmental Impact Report (FEIR) certified with the CPCN granted for the Project.

This letter documents the CPUC's thorough evaluation of all activities covered in NTPR-3. The evaluation process ensures that all mitigation measures applicable to the location and activities covered in the Notice to Proceed are implemented as required in the CPUC's D. 26-03-042. The CPUC approved NTPR-3 on April 10, 2026. This revised letter clarifies one (1) compliance action from Table 3 of the April 10, 2026 approval letter to LSPGC. This letter revises the compliance action for Applicant Proposed Measure (APM) AES-2: Site Design and Landscape Management Plan in Table 3 and requires LSPGC to provide the Site Design and Landscape Plan required per APM AES-2 prior to the start of landscaping onsite.

Project Updates

Grove Terminal Alternative 3 (see Figure 4-4a in the FEIR) was approved by the CPUC as the final Grove Terminal site and part of AC-1, per CPUC D. 26-03-042. Thus, the Grove Terminal site referred to in this document is described as Grove Terminal Alternative 3 in the FEIR. Staging Area 2 (see Figures 2-10d and 4-4b in the FEIR) was also approved by the CPUC, but is now referred to in this document as the Grove Terminal Staging Yard. Thus, the Grove Terminal Staging Yard referred to in this document is described as Staging Area 2 in the FEIR. In addition, the CPUC acknowledges that the NTPR-3 submittal reflects a difference of 0.3 acres in the Grove Terminal site temporary and permanent disturbance areas with respect to the preliminary acreage described in the FEIR for the Grove Terminal Alternative 3. LSPGC has clarified that the acreages described in the FEIR were approximate and based on preliminary designs and that NTPR-3 is based on the final design of the project. Based on review of the information provided, the CPUC finds that these modifications remain within the scope of

[1] The "project" selected for approval is AC-1, which is hereby described as the "Project."

the project as analyzed in the FEIR, and do not require the submittal of a Minor Project Refinement or additional environmental review under CEQA.

Activities Covered by NTPR-3

Grove Terminal

The Grove Terminal site is a developed area adjacent to the existing PG&E Metcalf Substation that is being used by PG&E for crew operations and maintenance activities including office, staging, and storage facilities. The Grove Terminal site (limits of construction) is approximately 7.4 acres; the permanent footprint of the Grove Terminal (including perimeter fence or wall) is approximately 5.8 acres, and the remaining approximately 1.6 acres will be used for staging of terminal components, equipment, materials, and vehicles during terminal construction. The Grove Terminal will be accessed via a new paved driveway off Coyote Ranch Road.

Site development will involve demolition of existing infrastructure, including removal of existing structures, utilities, and pavement as well as the removal of the existing ornamental trees and landscaped vegetation. The site will be graded, including import of fill for much of the site. Specifically, the base of the terminal enclosures will be raised above the base flood elevation. A new construction access with a security gate will be installed off Coyote Ranch Road. The existing stormwater culvert that leaves the Grove Terminal site will remain in place, and new stormwater basins will be installed with conveyance into the existing culvert.

The Grove Terminal will convert alternating current (AC) power to direct current (DC) power at the sending terminal and convert DC power back to AC power at the receiving terminal. The Grove Terminal site will include various equipment, including but not limited to: voltage source converter HVDC equipment, three single-phase converter transformers with an on-site spare, AC circuit breakers, disconnect switches, current transformers, voltage transformers, termination/riser structures, and associated bus work. In addition, the aboveground facilities will be supported by a combination of foundation systems, such as reinforced concrete slab-on-grade elements, spread footings with pedestals, drilled shaft foundations, equipment pads, and below-grade structural vaults integral to equipment support in accordance with applicable structural and seismic design standards. NTPR-3 activities will also include construction of LSPGC's steel H-frame (i.e., dead-end structure) for the PG&E-owned Metcalf to Grove 500 kilovolt (kV) AC transmission line. The new dead-end structure will be approximately 100 feet tall. The transmission line will connect the Grove Terminal to the PG&E Metcalf Substation and will be located entirely within the terminal site and substation boundaries. Lighting will be installed for security purposes and will include up to 100-foot-tall lightning shield masts.

Temporary security fencing may be installed around the outer limits of the terminal site during construction, or existing fencing may also be utilized. Temporary construction power will be provided via existing distribution lines near the terminal site. Temporary generators would be a contingency if distribution power is unavailable at the site. Hazardous materials such as diesel fuel may be stored as needed within the site during construction in accordance with the Project's Hazardous Materials Management Plan (HMMP) and Spill Prevention, Control, and Countermeasure Plan (SPCCP).

Stormwater Best Management Practices (BMPs) will be installed and maintained within and surrounding the NTPR-3 Grove Terminal site in accordance with the Project's Stormwater Pollution Prevention Plan (SWPPP). Following completion of Project construction, the Grove Terminal site will be stabilized in accordance with the SWPPP.

Grove Terminal Staging Yard

The Grove Terminal Staging Yard is approximately 10 acres of mainly disturbed land. Much of the Grove Terminal Staging Yard was previously graveled and used for equipment storage and vehicle parking. The remainder of the proposed staging yard is bare ground or grass, with scattered patches of shrubs and trees. Some of the bare ground/grass portion of the site was historically used as pasture and more recently for equipment storage and vehicle parking. The Grove Terminal Staging Yard site preparation may require limited grading, as needed, to establish a flat, stable working surface. Gravel will be placed as needed to create stable surface conditions and prevent unnecessary sediment transport off-site. Vegetation trimming or removal will occur as needed to prepare the site for staging activities. Existing trees within the Grove Terminal Staging Yard may be trimmed, but removal is not anticipated. The staging yard may be used for activities such as assemblage; for storage of materials and equipment, storage containers, construction trailers, portable restrooms; as a refueling area for vehicles and construction equipment; as an equipment wash station; and for parking and lighting. Construction materials required for the Project, such as conduit, cables, HVDC equipment, riser structures, bus, and rebar will be received and temporarily stored at the staging yard as needed before installation.

Water trucks will bring water on-site as needed. Construction workers will typically meet at the staging yard each morning and park their vehicles. Construction equipment and vehicles associated with Project construction will generally be parked within the staging yard while inactive. The Grove Terminal Staging Yard will be accessed via driveways/access roads off Coyote Ranch Road. Construction activities may result in wear or damage to Coyote Ranch Road associated with construction traffic. Any such damage will be repaired in coordination with the applicable jurisdiction and restored to preconstruction conditions or better, consistent with APM TRA-3 (Repair Infrastructure) and applicable permit requirements. Temporary perimeter security fencing may be installed or supplemented around the outer limits of the staging yard. Temporary lighting may also be installed for security purposes. Temporary construction power will be provided via existing distribution lines near the staging yard. Temporary generators would be a contingency if distribution power is unavailable at the staging yard. Hazardous materials such as diesel fuel may be stored as needed within the site during construction in accordance with the Project's Hazardous Materials Management Plan (HMMP) and Spill Prevention, Control, and Countermeasure Plan (SPCCP).

Stormwater BMPs will be installed and maintained within and surrounding the Grove Terminal Staging Yard in accordance with the Project's SWPPP. The Grove Terminal Staging Yard will be a temporary disturbance area and will be stabilized as needed in accordance with the SWPPP following the completion of Project construction.

Other Project Components Not Covered by NTPR-3

Other LSPGC Project components described in the FEIR as part of AC-1, such as construction of the new approximately 12-mile 320 kV HVDC underground transmission line, will be included in separate Notice to Proceed (NTP) Requests. NTPR-3 does not include any work to be performed by PG&E, such as expansion or modifications of the San Jose B or Metcalf Substations, or the installation of the Metcalf to Grove 500 kV transmission line.

Permits and Approvals

LSPGC will obtain all necessary permits prior to initiating the specific Project activities that trigger each permit requirement. In accordance with the Construction MMCRP, all permits acquired by LSPGC for the Project will be submitted to the CPUC for our records prior to commencing the activity for which the permits and approvals were obtained. Construction activities covered by NTPR-3 are anticipated to require the following State and local permits:

Agency	Permit	Applicability to Project Component	Status
State Water Resources Control Board (SWRCB)	National Pollutant Discharge Elimination System (NPDES) General Permit for Discharge of Construction Related Stormwater	SWPPPs are required for stormwater discharges associated with construction activities that disturb more than 1 acre of land	LSPGC has prepared a Notice of Intent (NOI) for use of the 2022 Construction General Permit (SWRCB Order WQ 2022-0057-DWQ), which includes the Grove Terminal. LSPGC has provided CPUC with a copy of the SWPPP (WDID# 243C411669). The SWPPP is currently being updated to include the Grove Terminal Staging Yard and updated SWPPP will be provided prior to the start of NTPR-3 construction activities.
California Department of Transportation (Caltrans)	Transportation Permit	Required for the hauling of oversize/overweight equipment or materials	LSPGC will obtain transportation permits prior to hauling of oversize/overweight equipment or materials on Caltrans roads as part of NTPR-3 construction activities.
Santa Clara County	Oversize/Overweight Transportation Permit	Required for the hauling of oversize/overweight equipment or materials	LSPGC will obtain transportation permits prior to hauling of oversize/overweight equipment or materials on Santa Clara County roads as part of NTPR-3 construction activities.
City of San Jose	Transportation Permit	Required for the hauling of oversize/overweight equipment or materials	LSPGC will obtain transportation permits prior to hauling of oversize/overweight equipment or materials on City of San Jose roads as part of NTPR-3 construction activities.
Santa Clara County	Stormwater Treatment Permit	Grading within terminal site	LSPGC will obtain a stormwater treatment permit prior to installation of the building as part of NTPR-3 construction activities.
Santa Clara County	Building Permit	Construction of terminal electrical enclosures and installation of temporary trailers	If determined to be required, LSPGC will obtain a building permit prior to installation of the electrical enclosures as part of NTPR-3 construction activities and prior to occupancy of temporary construction trailers at the Grove Terminal Staging Yard.
Santa Clara County	Fire Protection System Permit	Required for the installation, modification, or repair of fire protection systems	LSPGC will obtain a fire protection system permit prior to installation of fire protection systems as part of NTPR-3 construction activities.
Santa Clara County	Hazardous Materials Permit	Required before installing or modifying hazardous materials storage or handling systems	LSPGC will obtain approval prior to storing hazardous materials over applicable thresholds during NTPR-3 construction activities.
City of San Jose	Encroachment Permit	Required for minor grading within Metcalf Road ROW	LSPGC will obtain an encroachment permit for minor grading work within the City of San Jose's Metcalf Road ROW as part of NTPR-3 construction activities.

Construction MMCRP Measures and Conditions

The table below identifies all Applicant Proposed Measures (APMs), Mitigation Measures (MMs), and any applicable regulatory agency conditions described in the Construction MMCRP along with the status of compliance for actions proposed under NTPR-3:[2]

[2] The table is color-coded as follows:

Measure Not Applicable to NTPR-3
Applicable to NTPR-3 – Measure to be Implemented During Construction/Restoration/Operation
Applicable to NTPR-3 – Preconstruction Status Pending/Ongoing
Applicable to NTPR-3 – Preconstruction Status Complete/Approved

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM AES-1: Maintenance of Construction Areas All Project construction sites shall be maintained in a clean and orderly state. Temporary construction and permanent security nighttime lighting shall be directed away from residential areas and have shields to prevent light spillover effects. Upon completion of Project construction, staging and temporary work areas shall 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.	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-3 construction activities.
APM AES-2: Site Design and Landscape Management Plan A Site Design and Landscape Management Plan shall be developed for the Skyline and Grove terminals and could include, but not be limited to, the following requirements: • Structures and equipment at the proposed HVDC terminals shall have a non-reflective finish and a beige, grayish hue, or neutral earth-tone colors to the extent practicable. • Existing vegetation along the proposed Grove terminal western site boundary shall remain and be maintained unless safety and security would be compromised. Consideration of local guidance documents, where applicable, such as the City of San Jose Guadalupe River Park & Gardens Urban Design Guidelines (2003), unless safety and security would be compromised, or if it would interfere with the future operations and maintenance of the facility.	Applicable	**Pending.** Equipment and structures within the Grove Terminal have been designed to have a non-reflective finish and a beige, grayish hue, or neutral earth-tone colors to the extent practicable. APM AES-2 remains applicable to the approved Project. The approved Grove Terminal location has recreational and aesthetics impacts implications given its proximity to the Metcalf Park (directly to the north) and Coyote Creek Trail (directly to the west). LSPGC shall develop the Site Design and Landscape Plan in consultation with the Santa Clara County Parks and Recreation Department, the City of Santa Jose, and other interested stakeholders. This Plan will be finalized and provided to the CPUC for review prior to the start of landscaping onsite.
LSPGC Mitigation Measure 3.1-2: Minimize Fugitive Light from Temporary Sources Used for Construction The use of outdoor lighting shall be minimized during construction, operation, and maintenance. Photocell and motion detection-controlled lighting shall be provided, to the maximum extent feasible, at a level sufficient to provide safe entry and exit to the Project work sites and to ensure the security of the sites. All lighting shall be selectively placed, shielded, and directed to minimize fugitive light. Portable lights shall be operated at the lowest feasible wattage and height. The number of nighttime lights used shall be limited to those necessary to accomplish the task completely and safely. All lighting near sensitive species habitat shall be directed away from these areas where feasible.	Applicable	LSPGC and its contractors will implement this measure as needed during NTPR-3 construction activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM AQ-1: Construction Fleet Minimum Requirements and Tracking LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 interim or Tier 4 final emissions controls. An initial listing that identifies each off-road unit's certified tier specification to be operated on the Project shall be submitted to the CPUC before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to the CPUC. As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier before their use on Project sites. Before the start of construction, LSPGC shall develop a diesel-powered equipment-use hours tracking tool and procedure. The tracking tool shall be utilized by LSPGC 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 Tier 4 certified, the tracking tool is not required. The tracking tool shall be maintained by LSPGC, and tracking updates shall be submitted to the CPUC on a monthly basis to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the tenth day of the following month.	Not Applicable (*measure superseded by MM 3.3-2a*)	See MM 3.3-2a
APM AQ-2: Dust Control Best Management Practices (BMPs) LSPGC shall implement the following measures, as needed, to control fugitive dust during construction activities: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. The watering regiment may be adjusted during rain events as needed. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt tracked out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. • Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off or otherwise cleaned prior to leaving the site. • Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.	Not Applicable (*measure superseded by MM 3.3-2c*)	See MM 3.3-2c

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM AQ-3: Naturally Occurring Asbestos Compliance LSPGC shall ensure that construction activities comply with existing regulations pertaining to naturally occurring asbestos (NOA), including the CARB Airborne Toxic Control Measures (ACTMs) for NOA, when construction activities have the potential to encounter NOA. ACTM for NOAs include dust control measures consistent with APM AQ-2.	Not Applicable	The Grove Terminal and Grove Terminal Staging Yard sites are not within an area with known NOA.
LSPGC Mitigation Measure 3.3-2a: Construction Fleet Minimum Requirements and Tracking – LSPGC Tier 4 Final Emissions Controls LSPGC shall ensure that at least 75 percent of equipment horsepower hours related to off-road construction equipment include Tier 4 Final emissions controls for all construction locations except the Grove and Skyline HVDC terminals. LSPGC shall ensure that 100 percent of all off-road construction equipment used at the terminal sites is Tier 4 Final compliant. An initial listing that identifies each off-road unit's certified tier specification to be operated for the Project shall be submitted to the CPUC for review and approval before the start of construction activities. Construction activities shall not begin until the equipment listing has been submitted to and approved by the CPUC. As LSPGC requires new or replacement construction equipment on the Project, LSPGC shall document verification of the certified engine tier and provide such documentation to CPUC as a component of the tracking tool to be submitted on a monthly basis. Before the start of construction, LSPGC shall develop an off-road construction equipment-use hours tracking tool and procedure. Construction activities shall not begin until the tracking tool and procedure have been submitted to and approved by the CPUC. The tracking tool shall be utilized by LSPGC to keep track of the certified engine tier and daily equipment use hours of all off-road diesel-powered equipment. If all off-road construction equipment is Tier 4 Final certified, the tracking tool is not required. The tracking tool shall be maintained by LSPGC, and tracking updates shall be submitted to the CPUC monthly to track the Project's compliance. The updated tracking tool shall be submitted to the CPUC no later than the 10th day of the following month.	Applicable	LSPGC submitted the initial equipment listing to CPUC in compliance with this measure on March 23, 2026. Since all equipment at the Grove Terminal site for NTPR-3 activities is required to be Tier 4 Final, the tracking tool and monthly reporting are not required for activities at that site. If any equipment used at the Grove Terminal Staging Yard is not Tier 4 Final compliant, use of the tracking tool and monthly reporting will be required for work at that site. LSPGC and its contractors will verify and document the certified engine tier before any new equipment is used for NTPR-3 activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
LSPGC Mitigation Measure 3.3-2c: Use Best Management Practices for Construction-Related Fugitive Dust Emissions LSPGC shall implement all of the following best management practices, which would reduce fugitive PM_{10} and $PM_{2.5}$ emissions: • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day unless exposed surfaces are saturated from a rain event. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • All trucks and equipment, including their tires, shall be washed off prior to leaving an unpaved site. • Unpaved roads providing access to sites located 100 feet or farther from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. • Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints at all active construction sites. This person shall respond and take corrective action within 48 hours of receiving a complaint. BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. • Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities. • Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction at the terminal sites and staging areas. Wind breaks should have a maximum of 50 percent air porosity. • Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and water appropriately until vegetation is established. • Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Minimize the amount of excavated material or waste materials stored at the site. • Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.	Applicable	LSPGC and its contractors will implement the best management practices related to fugitive dust emissions in this measure prior to and during NTPR-3 construction activities as needed.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM BIO-1: Restoration of Disturbed Areas Once construction is complete in a given area, natural vegetation areas that are temporarily disturbed by Project activities shall be restored to approximate preconstruction conditions. Areas that are temporarily disturbed by grading, augering, or equipment movement shall be restored to their original contours and drainage patterns. Work areas shall be decompacted, and salvaged topsoil materials shall be respread following recontouring to aid in restoration of temporary disturbed areas. Revegetation activities shall be conducted in accordance with the Project SWPPP and APMs. Restoration could include recontouring, reseeding, and planting replacement of natural vegetation, as appropriate. Temporarily disturbed natural vegetation areas shall be revegetated with appropriate weed-free native seed mixes or species that are characteristic of the plant community that was disturbed.	Not Applicable	There are no natural vegetation areas within the Grove Terminal or Grove Terminal Staging Yard sites; therefore, this measure is not applicable to NTPR-3.
APM BIO-2: Rare Plant Surveys Protocol surveys and preconstruction surveys shall be conducted within all Project impact areas, and suitable buffers shall be established within suitable habitat areas for special-status plants. In the event of the discovery of a special-status plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall consult with the USFWS and/or CDFW for ITPs. Preconstruction surveys shall be conducted within Project impact areas 14 to 30 days prior to the start of construction for any rare plants that are identified during the focused surveys. Construction activities that may impact rare plants, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Upon the discovery of sensitive plants, the qualified biologist shall have the authority to stop work activities and, following the identification and implementation of steps required to avoid or minimize impacts to sensitive plants, direct construction work to commence once more.	Not Applicable	The Grove Terminal site is developed with no natural or sensitive vegetation. The Grove Terminal Staging Yard site is previously disturbed with minor vegetation growing through previously disturbed areas.
APM BIO-3: Preconstruction Sweeps Prior to initial vegetation clearance and ground-disturbing activities, a qualified biologist shall conduct preconstruction survey sweeps of the Project work area for special-status wildlife and plants in areas that contain potentially suitable habitats. In the event of the discovery of a special-status plant, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, LSPGC shall seek coverage from the Santa Clara Valley HCP or shall consult with the USFWS and/or CDFW for ITPs. Any other construction activities that may impact sensitive biological resources, including movement of construction equipment and other activities outside of the fenced/paved areas within wildlife habitat, shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of sensitive biological resources and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.	Applicable	**Pending.** The Grove Terminal and Grove Terminal Staging Yard sites are located in the vicinity of suitable habitat and potentially suitable habitat for special-status wildlife species. As such, a preconstruction sweep for special-status wildlife species will take place prior to NTPR-3 activities.
APM BIO-4: Sensitive Area Demarcation All sensitive biological areas (including creeks, rivers, wetlands, riparian areas, and special-status species habitats) within the Project work area shall be clearly marked prior to construction commencement to restrict construction activities and equipment from entering these areas, except as necessary for construction activities. These markings shall be inspected regularly to ensure that they remain in place.	Not Applicable	No sensitive biological areas are present within the Grove Terminal or Grove Terminal Staging Yard sites; therefore, demarcation of sensitive biological areas is not required for NTPR-3. Limits of disturbance will be clearly marked and/or fenced to ensure that construction crews do impact any resources located outside of the Grove Terminal site and Grove Terminal Staging Yard.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM BIO-5: Vehicle Cleaning Prior to Entering Natural Areas Vehicles and equipment shall be cleaned prior to use in native habitat on the Project areas to avoid the spread of noxious weeds and nonnative invasive plant species.	Not Applicable	There is no native habitat present within the Grove Terminal or Grove Terminal Staging Yard sites; therefore, vehicle cleaning is not required for NTPR-3 activities.
APM BIO-6: Vehicle Speed Limits Speed of vehicles driving along proposed access roads and on the Project site during construction and operation shall be limited to 15 mph, except in the case of legal roadgoing vehicles traveling on portions of the Project site that are public roadways which shall be limited to posted speed limits. In addition, construction and maintenance employees shall be required to stay on established and clearly marked and existing roads, except when not feasible due to physical or safety constraints and shall be advised that care should be exercised when commuting to and from the Project area to reduce accidents and animal road mortality.	Applicable	LSPGC and its contractors will implement this measure during NTPR-3 construction activities.
APM BIO-7: Outdoor Lighting Measures The use of outdoor lighting during construction and O&M shall be minimized whenever practicable. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to the Project terminals and control enclosures and for security purposes. All lighting shall be selectively placed, shielded, and directed downward to the extent practicable. Night work shall be avoided as practicable; however, given the large amount of construction proposed within existing roads, local municipalities may dictate that transmission line construction occurs at nighttime within certain areas of the Project. The most likely areas for nighttime construction are within commercial and industrial areas and not residential or potentially sensitive biological areas.	Applicable	LSPGC and its construction contractors will implement this measure as needed during NTPR-3 construction activities. Photocell and motion detection-controlled lighting shall be provided at a level sufficient to provide safe entry and exit to and from the Grove Terminal and control enclosures for security purposes. All lighting shall be selectively placed, shielded, and directed downward to the extent practicable.
APM BIO-8: Worker Environmental Awareness Program (WEAP) Training A WEAP shall be developed and implemented to educate all on-site construction workers on site-specific biological and non-biological resources and proper work practices to avoid harming wildlife during construction activities. This WEAP shall include measures to reduce trash buildup during construction.	Applicable	**Ongoing.** The Project WEAP training presentation was submitted to the CPUC March 20, 2026. The WEAP includes protocols to avoid harming wildlife and reduce trash buildup during construction. All personnel will be WEAP-trained prior to performing work on the Project. WEAP sign-in sheets will be submitted with compliance reports to the CPUC.
APM BIO-9: Nesting Bird and Roosting Bats Protection If feasible, LSPGC shall avoid certain construction activities such as vegetation trimming/removal during the migratory bird nesting and breeding and roosting bat seasons. When it is not feasible to avoid construction during these seasons, LSPGC shall perform a nesting bird and roosting bat survey in the area where the work is to occur. This survey shall be performed to determine the presence or absence of nesting birds and roosting bats. If roosting bats or active nests (i.e., containing eggs or young) are identified, a suitable construction buffer shall 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, LSPGC shall consult with the USFWS and CDFW as necessary. A qualified biologist shall monitor the nest until the birds have fledged or construction is no longer occurring on the site.	Applicable	**Pending.** Preconstruction nesting bird surveys will be conducted prior to NTPR-3 construction activities. There is no suitable habitat for roosting bats at or adjacent to the Grove Terminal site or Grove Terminal Staging Yard; therefore, roosting bat surveys are not required.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM BIO-10: San Joaquin Kit Fox Surveys Protocol surveys and preconstruction survey sweeps shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for San Joaquin kit fox (SJKF). In the event of the discovery of occupied burrows and/or SJKF individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted. Any other construction activities that may impact SJKF, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, would be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of suitable burrows or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to SJKF.	Not Applicable	There is no suitable habitat for SJKF at the Grove Terminal or Grove Terminal Staging Yard sites; therefore, protocol surveys and preconstruction sweeps for SJKF are not required for NTPR-3 activities.
APM BIO-11: Excavation Wildlife Safety BMPs Excavated holes/trenches that are not within areas that have wildlife exclusion fencing or that are not filled at the end of the workday shall be covered, or a wildlife escape ramp shall be installed to prevent the inadvertent entrapment of wildlife species.	Applicable	LSPGC and its contractors will implement this measure during NTPR-3 construction activities as needed.
APM BIO-12: Special-Status Bird Surveys Protocol surveys shall be conducted for Swainson's hawk and bald eagle; focused surveys shall be conducted for tricolored blackbird and other raptors; and preconstruction survey sweeps shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for Swainson's hawk, tricolored blackbird, bald eagle, burrowing owl, and other raptors. In the event of the discovery of suitable habitats, nests, or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW would be consulted. Tricolored blackbird is a covered species under the Santa Clara Valley HCP; if impacts are identified during species-specific surveys, the take for this species shall be covered either under the HCP or covered under a State ITP in consultation with CDFW. If impacts are identified during species-specific surveys for the other State-listed bird species that are not covered under the Santa Clara Valley HCP (Swainson's hawk, bald eagle, and any other bird species that are identified), the take shall be covered under a State ITP in consultation with CDFW. Any other construction activities that may impact special-status birds, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Additionally, qualified biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive birds.	Applicable	**Pending.** Suitable habitat for special-status bird species exists in the vicinity of the Grove Terminal and Grove Terminal Staging Yard sites near Coyote Creek, as well as nearby ponds and annual grasslands. Protocol surveys for Swainson's hawk and bald eagle will take place prior to the start of NTPR-3 construction activities for suitable nesting habitat within 0.5 mile. Focused surveys for tri-colored blackbird and burrowing owl will take place prior to the start of NTPR-3 construction activities. LSPGC and its contractors will implement this measure prior to and during NTPR-3 activities as appropriate.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM BIO-13: Raptor Surveys If a raptor nest is observed within 500 feet of the Project during protocol or preconstruction surveys, a qualified biologist shall determine if it is active. If the nest is determined to be active, the qualified biologist shall establish an appropriately sized no construction buffer around the nest and shall 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 shall make recommendations to reduce noise or disturbance in the vicinity of the nest. If the nest is determined to be inactive, the nest shall be removed under direct supervision of the qualified biologist.	Applicable	**Pending.** Raptor surveys will be conducted for the Grove Terminal and Grove Terminal Staging Yard sites prior to the start of NTPR-3 construction activities.
APM BIO-14: Nesting Bird Surveys Preconstruction nest surveys shall be conducted within all proposed impact areas and suitable buffers within suitable habitat areas for Migratory Bird Treatment Act (MBTA)-protected birds. In the event of the discovery of an active nest, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted. Any other construction activities that may impact nesting birds, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat, shall be monitored by a qualified biologist. Additionally, biologists shall monitor all active nests to ensure that construction activities are not disturbing the nest. The monitor/ inspector shall have the authority to stop work activities upon the discovery of nests or live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to nesting birds.	Applicable	**Pending.** Preconstruction nesting bird surveys will be conducted for the Grove Terminal and Grove Terminal Staging Yard sites prior to the start of NTPR-3 construction activities.
APM BIO-15: Special-Status Invertebrate Surveys Protocol surveys following standard guidelines and during appropriate seasons shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for bay checkerspot butterfly, monarch butterfly, and Crotch's bumblebee. In the event of the discovery of suitable habitat, host plants, or individuals of these special-status invertebrates, the area shall be marked as a sensitive area and shall be avoided to the extent practicable. Bay checkerspot butterfly is a covered species under the Santa Clara Valley HCP. If avoidance of the bay checkerspot butterfly is not possible, the take for this species shall be covered under the Santa Clara Valley HCP or under a Federal ITP in consultation with the USFWS. If impacts are identified during species-specific surveys for Monarch butterflies or Crotch's bumblebee which are not covered under the Santa Clara Valley HCP, the take shall be covered under a Federal ITP (monarch butterfly; Federal candidate species) or State ITP (Crotch's bumblebee; State candidate species) in consultation with CDFW or USFWS. Any other construction activities that may impact special-status invertebrates or their habitats, including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of individuals or host plants and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive invertebrates.	Not Applicable	Protocol surveys for special-status invertebrate species are not required for the Grove Terminal or Grove Terminal Staging Yard sites due to lack of suitable habitat for these species within the sites.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM BIO-16: Special-Status Amphibian Surveys Protocol surveys shall be conducted for California tiger salamander and California red-legged frog; focused surveys shall be conducted for foothill yellow-legged frog; and preconstruction surveys shall be conducted within all proposed impact areas and suitable buffers within potentially suitable habitat areas for California tiger salamander, California red-legged frog, and foothill yellow-legged frog. In the event of the discovery of suitable habitats or live individuals, the area and a suitable buffer shall be marked as a sensitive area and shall be avoided to the extent practicable. If avoidance is not possible, USFWS and/or CDFW shall be consulted. Any other construction activities that may impact special-status amphibians including movement of construction equipment and other activities outside of the fenced/paved areas within suitable habitat shall be monitored by a qualified biologist. The qualified biologist shall have the authority to stop work activities upon the discovery of live individuals and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive amphibians.	Not Applicable	Protocol surveys for special-status amphibian species are not required for the Grove Terminal or Grove Terminal Staging Yard sites due to lack of suitable habitat for these species within the sites.
LSPGC Mitigation Measure 3.4-1: Avoid Impacts to Rare Plants Rare plant surveys conducted under APM BIO-2 shall be floristic in nature and shall be conducted by a qualified botanist according to procedures outlined in the CDFW publication *Protocols for Surveying and Evaluating Impacts to Special-status Native Plant Populations and Natural Communities* (CDFW 2018b). The survey(s) shall be conducted in early, mid-, or late spring, in conjunction with the blooming seasons of all rare plants with potential to occur in the survey area. If no special-status plants are observed during appropriately timed surveys conducted by a qualified botanist, it shall be assumed that the construction activity will have no impact on special-status plants and no further action is required. If special-status plants are identified within the survey area, the individuals or populations shall be mapped and quantified and reported to the CNDDB, and the project manager shall be notified so that potential impacts on these known occurrences will be avoided or minimized. Coordination with CDFW and/or USFWS staff shall be conducted to establish appropriate avoidance and minimization measures if the species is federally or State listed. Avoidance and minimization measures may include: (1) No-disturbance buffers. The size of the buffer would typically be 25–50 feet but may be increased or decreased by the biologist depending on the plant species and surroundings. (2) Work windows for low-impact activities that are compatible with the dormant phase of a special-status plant life cycle but that may kill living plants or severely alter their ability to reproduce. (3) Silt fencing or construction fencing to prevent vehicles, equipment, and personnel from accessing the occupied habitat. (4) Erosion control BMPs such as straw wattles made of rice straw, erosion control blankets, or hydroseeding with a native plant seed mix to prevent sedimentation from upslope construction activities. (5) In consultation with and as authorized by CDFW or USFWS, collection and spreading of seeds or relocation of plants to appropriate locations by a qualified botanist.	Not Applicable	The Grove Terminal site is a developed area with no sensitive vegetation. The Grove Terminal Staging Yard site is previously disturbed with no sensitive vegetation. Therefore, rare plant surveys are not required for NTPR-3.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
LSPGC Mitigation Measure 3.4-2: Protection of Special-status Wildlife To supplement the protective actions provided in the APMs and PG&E BMPs and FPs for special-status wildlife species, including, but not limited to, terrestrial mammals, reptiles and amphibians, and roosting bats, this measure includes specific criteria regarding preconstruction survey timing, buffer demarcation, and steps to follow in the event a special-status species is found. Preconstruction clearance surveys within suitable habitat for special-status species that are known to be present or have at least a moderate potential to occur shall be conducted by a qualified biologist within 7 days of the start of construction activities. Nesting bird surveys shall only be required between February 1 and August 31. If a special-status wildlife species or nesting birds are found, the qualified biologist shall clearly mark avoidance buffers for protection of biological resources using flagging or other high-visibility material. Avoidance buffers shall be 50 feet for songbirds and non-raptor nests and 500 feet for raptor nests and other large species; buffer sizes may be increased or decreased by the qualified biologist, depending on species and site location. USFWS and/or CDFW shall be notified in the event a federally listed or State-listed species is found. A qualified biologist shall be on-site to conduct daily pre-activity surveys and monitoring during all ground-disturbing and vegetation removal activities in suitable habitat for special-status species. The qualified biologist shall conduct daily clearance surveys of all equipment, vehicles, and stockpiled materials at the beginning of each day, and regularly throughout the workday. If a special-status species is observed in a work area, the qualified biologist shall clearly mark the area using flagging or other high-visibility material for avoidance for the duration of work in the vicinity. If avoidance is not possible, work activities shall cease until the species has left the area on its own or is relocated by a qualified biologist in accordance with the Santa Clara Valley HCP or a species-specific ITP, in coordination with USFWS and/or CDFW. If relocation of the special-status species is not allowed, an avoidance buffer shall be established at 25 feet to 250 feet, depending on the species and location, and as USFWS and/or CDFW recommends. Protective actions under the Santa Clara Valley HCP or species-specific ITP may include seasonal avoidance of sensitive habitat areas, monitoring requirements and reporting, and mitigation for permanent loss of habitat.	Applicable	**Pending.** The Grove Terminal and Grove Terminal Staging Yard sites are in the vicinity of the Coyote Creek corridor, which could provide suitable habitat for special-status wildlife species. As such, a preconstruction clearance survey for special-status wildlife species will be conducted for NTPR-3 construction activities. A preconstruction nesting bird survey will also take place prior to the start of NTPR-3 construction activities. If any special-status wildlife species are observed near the sites during required preconstruction surveys or during construction, applicable avoidance protocols will be implemented in accordance with this measure as needed.
LSPGC Mitigation Measure 3.4-3: Compensatory Mitigation Permanent loss of riparian acreage shall be mitigated in accordance with the specifications of applicable regulatory agency permits. These permits may include a U.S. Army Corps of Engineers Clean Water Act Section 404 permit, a Regional Water Quality Control Board Clean Water Act Section 401 permit, and/or a CDFW Section 1600 Lake and Streambed Alteration Agreement. Specific compensatory mitigation, if required, shall include replacement of like habitat on- or off-site, at a 1:1 ratio, or as otherwise specified by the applicable resource agency permit(s).	Not Applicable	No riparian habitat exists within the Grove Terminal or Grove Terminal Staging Yard sites. Therefore, compensatory mitigation is not required for NTPR-3.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
LSPGC Mitigation Measure 3.4-4: Habitat Restoration and Monitoring Before construction in areas containing waters of the U.S. and/or State, the Applicant shall obtain all required environmental permits, including Clean Water Act water quality certification for federal and State jurisdictional wetlands (Section 401), permits for federal jurisdictional wetlands (Section 404), and CDFW Lake and Streambed Alteration Agreement (Section 1600). The Applicant shall adhere to the conditions of each permit. Before construction activities within waters of the U.S. and/or State conclude, the Applicant shall submit a restoration plan to CDFW for review and written approval. No restoration activities shall commence until the restoration plan has been approved by CDFW in writing. The plan shall detail compensation for permanent impacts on riparian and wetland habitat in the form of restoration or enhancement of habitat on-site, or off-site as close to the Project site as feasibly possible. The plan shall also describe the on-site restoration of temporary impacts on riparian and wetland habitat, as applicable, and shall include monitoring requirements and success criteria. The restoration plan shall be implemented within the same calendar year as the completion of Project activities unless otherwise approved in writing by CDFW. More than one plan may be necessary for restoration activities in different locations. Restoration and monitoring shall be guided by a qualified biologist experienced in wetland habitat restoration. Restoration shall include protocols for the replanting of native vegetation removed before or during construction, and for management and monitoring of the plants to ensure replanting success. The following measures shall apply to site restoration: • Areas affected by construction-related activity shall be replanted or reseeded with locally collected and grown native shrubs and herbaceous species suitable for riparian and wetland locations, under guidance from a qualified restoration biologist. • To ensure a successful revegetation effort in the temporarily disturbed areas, all planting areas shall be monitored and maintained annually by a qualified biologist as necessary for 5 years. At the end of the 5 years of monitoring, with at least 3 years without supplemental irrigation, successful restoration of each category of plantings (e.g., herbs, shrubs) will include at least 85 percent survival at the end of the minimum monitoring period and plantings shall attain 70 percent relative cover after 3 years and 75 percent relative cover after 5 years, unless otherwise approved in writing by CDFW. Survival and cover criteria shall both be required, unless the herbaceous or spreading plants cannot be differentiated by individual, in which case only cover success criteria would be required.	Not Applicable	No wetlands or waters will be impacted by the NTPR-3 activities.
LSPGC Mitigation Measure 3.4-5: Compliance with Local Tree Ordinances All removal of street trees within the jurisdictional limits of the City of San José and Santa Clara County shall be coordinated with the responsible department in each jurisdiction (see Section 3.4.3) to obtain any necessary ministerial tree removal permits. LSPGC shall comply with all permit conditions, including tree replanting and monitoring to ensure successful replanting. LSPGC shall provide copies of the approved permits from the applicable jurisdictions before the start of construction.	Not Applicable	No street trees are proposed for removal as part of NTPR-3 activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM CUL-1: WEAP Training LSPGC shall obtain a qualified archaeologist to design the cultural resources component of a WEAP that shall 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 shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. The WEAP shall 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 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 designed by a qualified archaeologist, which is defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archaeology (36 CFR Part 61).	Applicable	**Ongoing.** A qualified archaeologist prepared the cultural resources training included in the WEAP. LSPGC and its contractors will implement this measure throughout construction. WEAP sign-ins will be attached to the compliance reports provided to the CPUC.
APM CUL-2: Cultural Resources Monitoring Archaeological and Native American Monitoring. Archaeological and Native American monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, ethnohistoric resources or after unanticipated discovery of same. Archaeological monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded historic-period resources, or after unanticipated discovery of the same. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the Sacred Lands File (SLF) search and Tribal outreach indicates that lands sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, the Tamien Nation, and the Amah Mutsun Tribal Band are present within the Project search area. In addition, historic era archaeological sites have been recorded within the Project area. A qualified archaeologist shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated historical resource. A qualified archaeologist and a Native American monitor determined during Tribal consultation shall be retained by LSPGC to monitor excavation in each work area for the Project in accordance with the above monitoring criteria to ensure that there is no impact to any significant unanticipated cultural resource. Procedures to be followed in the event that a Native American monitor is not available shall be determined during Tribal consultation. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and Tribal organizations as part of the AB 52 process or otherwise.	Applicable	Cultural resources and Native American monitoring will take place at the Grove Terminal site during ground disturbing activities within 100 feet of previously recorded resources or unanticipated discoveries in accordance with this measure and the Cultural Resources Management Plan, as needed. Initial site preparation activities with ground disturbance at the Grove Terminal Staging Yard site will also be monitored by Cultural Resource and Native American Monitors.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM CUL-3: 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 m) of the discovery shall be halted and redirected to another location. LSPGC's qualified archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on State of California Department of Parks and Recreation (DPR) cultural resource records, and no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, LSPGC's qualified archaeologist shall evaluate the significance and California Register of Historic Resources (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 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility or transferred to the appropriate Tribal organization.	Applicable	In the event that previously unidentified cultural resources are uncovered during NTPR-3 construction activities, this measure will be implemented as appropriate.
APM CUL-4: Cultural Resources Inventory The temporary construction staging areas shall be surveyed prior to construction. If additional proposed facilities and ground-disturbing activities move outside the previously surveyed acreage, the new areas shall be subjected to a cultural resources inventory to ensure that any newly identified cultural resources are either avoided by project redesign or evaluated and treated. Cultural resource inventory of temporary construction staging areas and/or new areas shall consist of a pedestrian archaeological survey conducted at 10-meter or less transects. If cultural resources are encountered, LS Power's qualified archaeologist shall inspect the discovery and determine whether further investigation is required. If the discovery can be avoided and no further impacts shall occur, the resource shall be documented on State of California Department of Parks and Recreation cultural resource records, and no further effort shall be required. If the resource cannot be avoided and may be subject to further impact, LS Power's qualified archaeologist shall evaluate the significance and CRHR eligibility of the resources and, in consultation with the CPUC, determine appropriate treatment measures. Consistent with CEQA Section 15126.4(b)(3), if it is demonstrated that resources cannot be feasibly avoided, LS Power's qualified archaeologist, in consultation with the CPUC and, if the resource is prehistoric or Native American in nature, the Tribal representative, shall develop additional treatment measures, such as data recovery consistent with CEQA Guidelines 15126.4(b)(3)(C)-(D). Archaeological materials recovered during any investigation shall be curated at an accredited curation facility or transferred to the appropriate Tribal organization.	Applicable	**Complete.** Portions of the Grove Terminal and Grove Terminal Staging Yard sites were previously surveyed in 2024 as part of the environmental review performed for preparation of the Proponent's Environmental Assessment (PEA) and documented in the FEIR. The portions of the sites that were unable to be surveyed during the 2024 surveys for the PEA were surveyed in October 2025 and February 2026 by a qualified archaeologist. The survey report will be provided directly to the CPUC's designated archaeologist.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
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 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. LSPGC's qualified archaeologist shall contact the appropriate County Coroner to determine whether or not the remains are Native American. If the remains are determined to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC). The NAHC shall then identify the person or persons it believes to be the most likely descendant of the deceased Native American, who in turn shall 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 and no federal monies are involved; therefore, the Project is not subject to the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990.	Applicable	In the event there is an unanticipated discovery of human remains during NTPR-3 construction activities, this measure will be implemented.
LSPGC Mitigation Measure 3.5-1: Cultural Resources Management Plan (CRMP) • The CPUC, LSPGC, consulting Native American representative(s), and a Secretary of the Interior–qualified archaeologist shall determine whether preservation in place of significant cultural resources is feasible. Consistent with CEQA Guidelines Section 15126.4(b)(3), this may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If the parties determine that preservation in place is not feasible, data recovery through archaeological investigations shall be completed. • LSPGC shall retain a Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), to prepare and implement a Cultural Resources Management Plan (CRMP). The CRMP shall include a treatment program to define the research themes and data requirements, define treatment locations, and determine whether cultural materials can address the questions associated with research themes. The Secretary of the Interior–qualified archaeologist, in consultation with consulting Native American representative(s), shall conduct a data recovery program as outlined in the CRMP. The CRMP will include how the data recovery program would preserve the significant information the resource is expected to contain. Treatment would consist of (but would not be limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim of targeting the recovery of important data contained in the portion of the significant resource to be affected by the Project. The CRMP shall include provisions for analysis of data in a regional context; reporting of results within a timely manner and subject to review and comments by the consulting Native American representative(s); disposition of resources acceptable to the consulting Native American representative(s) and in accordance with all applicable laws; and dissemination of final confidential reports to the Northwest Information Center of the California Historical Resources Information System.	Applicable	**Pending.** The CRMP was submitted to the CPUC for review on March 20, 2026, and submitted to the interested tribes for review on March 9, 2026. No comments have been received from the tribes as of March 20, 2026. The CPUC provided comments on the CRMP on March 20, 2026, and the revised plan was submitted on March 27. In accordance with APM CUL-2 and the CRMP, cultural and Native American monitoring will be conducted for any excavation activities within 100 feet of the documented cultural resources in the vicinity of the Grove Terminal site, and during initial site preparation of the Grove Terminal Staging Yard.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
• The LSPGC CRMP will also include a monitoring plan. The monitoring plan will include specifically where monitoring will be completed and under what circumstances based on soil types, geology, distance to known sites, and other factors; the person(s) responsible for conducting monitoring activities, including consulting Native American representative(s); how the monitoring shall be conducted and the required format and content of monitoring reports; schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; protocol for notifications in case of encountering cultural resources, as well as methods of dealing with the encountered resources (e.g., collection, identification, curation); and the methods to ensure security of cultural resources sites. During the course of the monitoring, the archaeologist and consulting Native American representative(s) may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to impact resources, with approval of the CPUC. • The LSPGC CRMP will be submitted to the CPUC for approval prior to implementation as well as all subsequent reports, plans, and resource documentation resulting from implementation of the CRMP.		
APM GEO-1: Geotechnical Studies and Geologic Hazard Reduction Measures The following measures shall 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; • Geotechnical studies shall be completed to evaluate the risk of geologic hazards associated with the Project. The geotechnical studies shall provide geotechnical engineering recommendations relative to subsurface soil and rock conditions, groundwater conditions, lateral earth pressures, and seismic classifications of the Project area. Recommendations from the geotechnical studies shall be considered in the final design; • 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 shall be re-contoured following construction to match pre- construction grades. Areas shall be allowed to re-vegetate naturally or be reseeded with a native seed mix from a local source if necessary. On-site material storage shall 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 shall be disposed of off-site to an appropriate licensed facility or can be chipped on-site to be used as mulch during restoration.	Applicable	LSPGC and its contractors will implement this measure during NTPR-3 construction. Geotechnical studies have been conducted on the Grove Terminal site and results are being considered in the final design.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM PALEO-1: Paleontological Mitigation Monitoring Plan (PRMMP) Prior to the issuance of grading permits, a qualified paleontologist shall be retained to prepare and oversee the PRMMP for the Project. The PRMMP shall contain monitoring procedures, define areas and types of earthwork to be monitored, and provide methods for determining the significance of fossil discoveries. The PRMMP shall direct that a qualified paleontological monitor (working under the supervision of the qualified paleontologist) shall monitor all excavations or grading at depths exceeding seven feet below ground surface where potentially fossil-bearing alluvial deposits of Pleistocene age may be present. The duration and timing of paleontological monitoring shall be determined by the qualified paleontologist based on the grading plans and construction schedule and may be modified based on the initial results of monitoring. The PRMMP shall state that any fossils that are collected shall be prepared to the point of curation, identified to the lowest reasonable taxonomic level, and curated into a recognized professional repository (e.g., San Diego Natural History Museum [SDNHM], University of California Museum of Paleontology [UCMP]), along with associated field notes, photographs, and compiled fossil locality data. The repository shall be contracted prior to the start of earthwork to curate and store any discovered and recovered fossils. Such an institution shall be a recognized paleontological specimen repository with a permanent curator, such as a museum or university. Donation of the fossils shall be accompanied by financial support for initial specimen curation and storage. Following the completion of the above tasks, the qualified paleontologist shall prepare a final mitigation report that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils. The report shall be submitted to appropriate agencies, as well as to the designated repository.	Applicable	**Complete.** A qualified paleontologist has prepared the PRMMP for the Project. The PRMMP was submitted to the CPUC on March 20, 2026. Paleontological monitoring is anticipated to be required for foundation excavations below 7 feet bgs for NTPR-3 per the PRMMP, with monitoring subject to adjustment based on field observations.
APM PALEO-2: Paleontological Resources Findings If paleontological resources are encountered during ground disturbing activities when the qualified paleontologist or paleontological monitor is not on-site (an inadvertent discovery), earthwork within the vicinity of the discovery shall immediately halt, and the qualified paleontologist shall evaluate the significance of the fossil discovery. 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 discovery site has been mitigated to the extent necessary.	Applicable	LSPGC and its contractors will adhere to this measure in the event paleontological resources are discovered during NTPR-3 construction activities.
APM HAZ-1: Site-Specific Spill Prevention, Control, and Countermeasure Plan (SPCCP) A site-specific SPCCP shall be prepared prior to the initiation of storage of hazardous liquids on the Project site in excess of the appropriate regulatory thresholds. In the event of an accidental spill, the Project shall be equipped with secondary containment that meets SPCCP guidelines. The secondary containment shall be sufficiently sized to accommodate accidental spills. The plan shall be provided to the CPUC prior to construction for recordkeeping.	Applicable	**Complete.** The SPCC Plan for the Grove Terminal and the Grove Terminal Staging Yard sites was prepared and submitted to the CPUC on March 23, 2026. NTPR-3 construction activities will be conducted in accordance with this SPCC Plan.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM HAZ-2: Hazardous Materials Management Plan (HMMP) A HMMP shall be prepared and implemented for the Project. The plan shall be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). The plan shall 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 shall 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 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 have lead-acid batteries to provide backup power for monitoring, alarm, protective relaying, instrumentation and control, and emergency lighting during power outages. Secondary containment shall be constructed around and under the battery racks, and the HMMP shall address containment from a battery leak. The plan shall be provided to the CPUC prior to construction for recordkeeping. Plan updates shall be made and submitted as needed if construction activities change such that the existing plan does not adequately address the Project.	Applicable	**Complete.** The HMMP was submitted to the CPUC on March 23, 2026. The HMMP will be implemented as required during NTPR-3 construction activities.

APM HAZ-3: Skyline Terminal Soil and Groundwater Contamination Management
• Construction activities at the Skyline terminal (within the College Park Parcel 2 site) shall comply with the SMP that was prepared as part of the Covenant for the Skyline terminal property. This includes, but is not necessarily limited to:
  ○ Soil sampling before construction begins shall be conducted to identify the presence of contamination and specific contaminants.
  ○ Impacted soils, if encountered, shall be stockpiled on-site in approximate 100 to 250 CY volumes. The soil stockpiles shall be covered with 10-mil plastic sheeting and secured to prevent dust or runoff during storm events. All appropriate dust control and stormwater BMPs shall be implemented during the soil mitigation activities.
  ○ Upon completion of excavation work and confirmation sampling, the excavation shall be backfilled with the excavated soil or clean import fill. Import fill shall be tested in general accordance with DTSC requirements, prior to acceptance. Imported soil shall be placed in accordance with the Project's geotechnical engineer's recommendations.
	Not Applicable	The NTPR-3 activities do not involve work at the College Park Parcel 2 site.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
In addition to adherence to the SMP, LSPGC shall implement measures to address potentially contaminated groundwater, if encountered. If groundwater is encountered during construction at the proposed Skyline terminal site, it shall be sampled prior to disposal. If dewatering must occur, groundwater shall be pumped directly to baker tanks (or similar) portable storage tanks. The groundwater shall not be transported or disposed of until it has been tested for possible contamination. All groundwater extracted from the Skyline terminal site shall be handled, transported, and disposed according to applicable laws and regulations.		
APM HAZ-4: Soil Management Plan A Soil Management Plan shall be prepared prior to construction that identifies specific steps necessary to properly identify, handle, treat, and dispose of potentially contaminated soils throughout the Project area where known contamination occurs in close proximity to project-related ground disturbance. The Soil Management Plan shall include, but not be limited to, the following requirements: • Prior to commencement of construction activities within the 12 contaminated sites discussed above3, the soil along the path of the underground alignment shall be sampled to identify any potential contaminants. The soil sampling shall include testing for specific contaminants identified in agency records. • If sampling identifies soil contaminated above hazardous waste levels, the soil 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. • 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.	Not Applicable	There are no known areas of soil contamination within the Grove Terminal or Grove Terminal Staging Yard sites according to the DTSC EnviroStor database and the SWRCB GeoTracker database (both accessed 3/25/2026). LSPGC's construction contractor for the two terminals prepared a "Contaminated Soils Management Plan" for construction activities at the terminal sites. This plan identifies specific steps to properly identify, handle, test for, and dispose of contaminated soils, if they should be encountered during construction of the terminals.
APM HAZ-5: Final Induction Study and Utility Coordination Design and construction of the proposed transmission lines shall be coordinated with existing utility owners (as applicable) to ensure that operation of the new transmission lines shall not cause unsafe electromagnetic induction effects on any existing metallic utilities located in close proximity to the proposed transmission lines. LSPGC shall conduct a detailed induction study for all existing metallic utilities in close proximity to proposed transmission line alignments. Where potential adverse effects are identified by the Final Induction Study, LSPGC shall coordinate with the applicable utility owner to develop appropriate mitigation measures. Final designs and mitigation strategies, if required, shall be submitted to the CPUC prior to commencement of construction of the transmission lines.	Not Applicable	NTPR-3 activities include construction of an overhead transmission line that will connect the Grove Terminal to the Metcalf Substation. LSPGC has coordinated with PG&E regarding the transmission line, and it will be entirely located within the boundaries of the Grove Terminal and Metcalf Substation. This transmission line will not result in any unsafe electromagnetic induction effects.

[3] See **Section 5.9**, *Hazards, Hazardous Materials, and Public Safety*, **Table 5.9-1:** *Contaminated Sites*, of the Proponent's Environmental Assessment.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM WQ-1: Groundwater Dewatering and Discharge Measures Groundwater, if encountered during construction, shall be handled and discharged in accordance with all state and federal regulations including the following: • Recovered groundwater shall be tested prior to discharge; • When 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; • Land application shall be made in a manner that discharge does not result in substantial erosion; • Water unsuitable for land application shall 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, RWQCB, and/or CDFW, as applicable).	Applicable	This measure will be implemented by LSPGC and its contractors during NTPR-3 construction activities. In addition, dewatering that may occur in other areas of Project construction may be used for dust control within the Grove Terminal and Grove Terminal Staging Yard sites if suitable for land application.

APM NOI-1: Vibration Monitoring for High Vibratory Equipment Contingency Plan
Once the final design and alignment are determined for the proposed Grove to Skyline 320 kV DC transmission line, a site survey would be conducted along segments of the proposed transmission line alignment where construction may occur within 25 feet of existing structures to determine if any vibration sensitive structures are located within 25 feet of vibration-inducing construction activities. Vibration sensitive structures are those structures at least 50 years old, or generally constructed before approximately 1974. If construction with high vibratory equipment occurs within 25 feet of such structures, a Vibration Monitoring for High-vibratory Equipment Contingency Plan would be implemented. The Vibration Monitoring for High- vibratory Equipment Contingency Plan would be implemented to include the following, as necessary, to prevent vibration damage to vibration sensitive structures:
• Identification of vibration-sensitive structures within 25 feet of the final transmission line alignment where high vibratory equipment is planned to be used.
• Where such structures are identified, LSPGC would attempt to use the following measures as necessary to avoid construction vibration impacts:
  ○ Place operating equipment on the construction site as far as feasible from vibration-sensitive receptors.
  ○ Use smaller equipment to minimize vibration levels below the limits.
  ○ Avoid using vibratory rollers and tampers near sensitive areas.
  ○ Select demolition methods not involving impact tools.
• If the above reduction measures do not lower anticipated vibration levels below loaded truck levels or are not feasible, a technical vibration study would be prepared by a qualified professional who verifies that there would be virtually no risk of cosmetic or structural damage.
• Based on the results of vibration study, identify where vibration monitoring would be conducted, establish a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, elevation, and crack surveys to document before and after construction conditions.
	Not Applicable	This APM applies to certain activities required to construct the Grove to Skyline transmission line, not the terminal sites. Further, NTPR-3 activities do not include operation of high vibratory equipment within 25 feet of an offsite vibration sensitive structure.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
• Construction contingencies would be identified for when vibration levels approach the limits identified by vibration study. Construction contingencies may include procedures such as use of alternative construction equipment or construction phasing that would reduce potential damage to affected structures. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person would be clearly posted at the construction site. The results of all vibration monitoring would be summarized and submitted in a report shortly after substantial completion of construction that occurs within 25 feet of vibration-sensitive structures. The report would include a description of measurement methods, equipment used, calibration certificates, and graphics as required to clearly identify vibration-monitoring locations. An explanation of all events that exceeded vibration limits would be included together with documentation supporting any such claims.		
LSPGC Mitigation Measure 3.13-1a: Nighttime Construction Noise Plan LSPGC and/or its contractors shall develop and implement a nighttime construction noise plan specific to each occurrence of nighttime construction activities proposed to occur within 500 feet of residences. For the purposes of implementation of this measure, "nighttime" means between the hours of 7:00 p.m. and 7:00 a.m. Each plan shall describe the proposed nighttime construction activities in detail and explain why such activities cannot be conducted during daytime hours and shall be submitted to CPUC for review and approval. CPUC approval must be granted before the start of the subject nighttime construction activities. A plan shall not be required for emergency situations where stopping construction activities would result in hazardous conditions for workers or the public. Each plan shall include but not be limited to the following requirements for nighttime construction activities: • The plan shall include documentation that approval from the applicable local jurisdiction (i.e., the City of San José or Santa Clara County) has been received.to the extent applicable or required. • Activities shall be planned to minimize the amount of nighttime construction. • Impact tools (e.g., jackhammers, pavement breakers) and pile drivers shall be prohibited during nighttime hours. • When nighttime construction activities take place within 200 feet of noise-sensitive receptors, portable construction noise barriers, such as paneled noise shields, barriers, enclosures, or sound curtains, shall be used adjacent to or around loud stationary equipment. Noise control shields shall be made featuring a solid panel and a weather-protected, sound-absorptive material on the construction-activity side of the noise shield. • A notice shall be distributed by mail, personal visit, door hanger, or email to the potentially affected residences and other sensitive receptors within 200 feet of the nighttime construction activities, describing where and when nighttime construction activities will occur.	Not Applicable	The NTPR-3 construction activities will not take place within 500 feet of a residence or other type of noise-sensitive receptor.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
LSPGC Mitigation Measure 3.13-3: Vibration Monitoring for High Vibratory Equipment Contingency Plan LSPGC and/or its construction contractors shall conduct a site survey along segments of the proposed transmission line alignments where trenchless construction techniques that involve vibratory or impact pile driving activities may occur within 50 feet of existing structures. If construction with high vibratory equipment (i.e. vibratory pile drivers or impact pile drivers) occurs within 50 feet of structures, a vibration monitoring for high-vibratory equipment contingency plan shall be implemented. The plan shall include the following measures, as necessary, to prevent vibration damage to vibration-sensitive structures: • LSPGC and/or its construction contractors shall identify vibration-sensitive structures within 50 feet of the final transmission line alignments where high vibratory equipment is planned to be used. • Where such structures are identified, LSPGC shall implement the following measures as necessary to avoid construction vibration impacts: o Place operating equipment on the construction site as far as feasible from vibration-sensitive receptors. o Use smaller equipment to minimize vibration levels below the limits. o Avoid using vibratory rollers and tampers near sensitive areas. o Select construction methods that do not involve impact/vibratory tools (e.g., drilling) where feasible. • If the above reduction measures do not lower anticipated vibration levels below loaded truck levels or are not feasible, a qualified professional shall prepare a technical vibration study that verifies that there would be no risk of cosmetic or structural damage. • Based on the results of the vibration study, LSPGC and/or its construction contractors shall identify where vibration monitoring is to be conducted; establish a vibration monitoring schedule; define structure-specific vibration limits; and address the need to conduct photo, elevation, and crack surveys to document before- and after-construction conditions. • Construction contingencies shall be identified for when vibration levels approach the limits identified by the vibration study. Construction contingencies may include procedures such as the use of alternative construction equipment or construction phasing that would reduce potential damage to affected structures. • LSPGC shall designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted at the construction site. The results of all vibration monitoring shall be summarized and submitted in a report shortly after substantial completion of trenchless construction that involves vibratory or impact pile driving activity that occurs within 50 feet of structures. The report shall describe measurement methods and equipment used and include calibration certificates and graphics as required to clearly identify vibration-monitoring locations. An explanation of all events that exceeded vibration limits shall be included together with documentation supporting any such claims.	Not Applicable	Trenchless construction techniques or use of high vibratory equipment are not required for NTPR-3 activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM REC-1: Trail Management Plan LSPGC shall coordinate with the City of San José, Santa Clara County, and the National Park Service for the preparation of the Project's TMP. The TMP shall identify if a detour route(s) is required, as well as provide trail-specific traffic control and safety measures for pedestrians, trail users, and motorists.	Applicable	**Complete.** A TMP was submitted to the CPUC on March 23, 2026. The TMP will be implemented during NTPR-3 construction activities.
APM REC-2: Trail Safety Crossing Measures If Coyote Creek Trail from Metcalf Road to Bailey Avenue is not already closed by Santa Clara County Parks due to flooding of low water trail crossings of Coyote Creek, LSPGC's construction contractor shall provide a crossing guard, as needed during periods of active construction along the approximately 0.8-mile portion of Coyote Creek Trail that would be directly impacted by construction of the Project. Alternatively, if use of a crossing guard is not practical during certain construction activities (i.e., a trail closure is required), the Coyote Creek Trail detour route identified in the TMP shall be implemented. Signage and flagging may be used to help direct trail users and provide safety for both trail users and construction crews.	Applicable	Impacts to the use of the Coyote Creek Trail are not anticipated as a result of the NTPR-3 construction activities. However, if temporary closure of a segment of the Coyote Creek Trail is required to complete the NTPR-3 construction work, LSPGC and its contractors would implement this measure. Due to the use of the Grove Terminal site, only a small segment of the Coyote Creek Trail adjacent to the site will be temporarily affected during construction of the segment of the Grove to Skyline transmission line between Monterey Road and the Grove Terminal, which is not part of NTPR-3.
APM REC-3: Trail Restoration Areas of Coyote Creek Trail that are temporarily disturbed by the Project activities shall be restored to approximate preconstruction conditions.	Applicable	LSPGC and its contractors will implement this measure if the Coyote Creek Trail is disturbed during NTPR-3 construction activities, which is not anticipated.
APM TRA-1: Traffic Control Plan LSPGC shall prepare a TCP to describe measures to guide traffic (such as signs and workers directing traffic), safeguard construction workers, provide safe passage, and minimize traffic impacts. LSPGC shall follow its standard safety practices, including installing appropriate barriers between work zones and transportation facilities, posting adequate signs, and using proper construction techniques. LSPGC shall follow the recommendations regarding basic standards for the safe movement of traffic on highways and streets in accordance with Section 21400 of the California Vehicle Code. As required for obtaining a local encroachment permit, LSPGC shall provide a TCP to the applicable local jurisdictions which shall comply with the U.S. Department of Transportation's (DOT) Manual on Uniform Traffic Control Devices (MUTCD). Construction activities shall be coordinated with local law enforcement and fire protection agencies, as required. Emergency service providers shall be notified, as required by the local permit, of the timing, location, and duration of construction activities.	Applicable	If needed for NTPR-3 construction activities, a Traffic Control Plan will be approved by the applicable jurisdiction and will be submitted to the CPUC prior to the start of traffic control activities.
APM TRA-2: Coordinate Bus Stop Closures with Santa Clara VTA If required during construction, LSPGC shall coordinate any bus stop closures with the Santa Clara VTA in advance to minimize disruptions to service. Where disruptions to service are anticipated, advanced notice shall be given to allow transit users on affected routes to identify and locate a temporary interim bus stop(s). Measures that may be implemented to give advanced notice of disruptions to service may include, but not necessarily be limited to, posting signage at bus stops with planned closures and posting notices for anticipated route detours and bus stop closures on the Santa Clara VTA website. Identification and implementation of specific measures shall be implemented in coordination with Santa Clara VTA.	Not Applicable	NTPR-3 construction activities are not anticipated to require bus stop closures.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM TRA-3: Repair Infrastructure LSPGC shall oversee all aspects of construction and shall ensure that contractors repair any damage caused by construction activities. LSPGC shall confer with local agencies as needed to ensure repairs are sufficient and consistent with preconstruction conditions.	Applicable	LSPGC and its contractors will implement this measure during NTPR-3 construction activities.
LSPGC Mitigation Measure 3.17-1a: Implement Coordinated Traffic Control Plan LSPGC shall coordinate with Project proponents, contractors, and local agencies, as applicable, for other construction projects in the Project vicinity that may temporally overlap with Project construction, such as projects identified as potentially contributing to cumulative effects. LSPGC shall prepare and implement a traffic control plan for roadways adjacent to and directly affected by the Project. The traffic control plan shall address the transportation impact(s) of the temporally overlapping construction projects within the Project vicinity. The traffic control plan shall include, but not be limited to, the following requirements: • Coordination of individual traffic control plans for the Project with nearby projects. As available, the individual traffic controls plans shall be appended to the Project's traffic control plan. • Coordination between LSPGC, Project proponents, contractors, and State and local agencies, including court facilities, in developing circulation and detour plans that include safety features (e.g., signage and flaggers). The circulation and detour plans shall address the following: o Full and partial roadway closures. o The use of signage and flagging to guide vehicles through or around the construction zone and any temporary traffic control devices. o Bicycle or pedestrian detour plans, where applicable. o Parking along public roadways and in the proximity of court facilities. o Haul routes for construction trucks and staging areas for instances when multiple trucks arrive at the work sites. o Protocols for updating the traffic control plan to account for delays or changes in the schedules of individual projects. o LSPGC's traffic control plan, with proof of coordination, shall be submitted to the CPUC before the start of applicable construction activities.	Applicable	If needed for NTPR-3 construction activities, a Traffic Control Plan will be approved by the applicable jurisdiction. Coordination described in this measure will occur during the traffic permitting process, and the approved Traffic Control Plan will be submitted to the CPUC prior to the start of traffic control activities.
LSPGC Mitigation Measure 3.17-1b: Infrastructure Repair Reporting Prior to the start of construction, LSPGC shall document existing conditions of all facilities that are potentially impacted by the project. After completion of the repair of any damaged roads, sidewalks, trails, and bicycle facilities resulting from Project construction activities, pursuant to APM TRA-3, LSPGC shall submit a report to the CPUC and other jurisdictions whose facilities have been affected by Project construction (e.g., city, county, state, etc.). This report will confirm that repairs are consistent with preconstruction conditions and in accordance with applicable requirements associated with permits granted for the Project. The report shall be submitted within 30 days after completion of the repair(s).	Applicable	LSPGC and its contractors will implement this measure as needed for NTPR-3 construction activities.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
LSPGC Mitigation Measure 3.17-1c: Pre-Construction Coordination Prior to construction within the public right-of-way or near railroad crossings, the Project Applicant shall coordinate with the appropriate transportation and infrastructure agencies to ensure that the design, alignment, and construction methods for trenching, duct bank installation, vaults, access roads, and other subsurface facilities do not adversely affect roadway geometry, rail infrastructure, or multimodal transportation facilities. This coordination shall include the following requirements: • **Railroad Crossings and CPUC GO-88 Compliance:** The Project Applicant shall confirm whether a California Public Utilities Commission (CPUC) General Order 88-B (GO-88-B) application is required for any work within or adjacent to railroad crossings. If applicable, the Applicant shall obtain CPUC approval under GO-88-B prior to construction and provide documentation to the CPUC. The Applicant shall coordinate with the applicable local jurisdiction and Union Pacific Railroad (UPRR) for all design, construction, and traffic control activities near rail crossings. • **Coordination with City of San José Department of Transportation:** The Project Applicant shall coordinate trench and duct bank design, alignment, and construction staging, including verification that subsurface or structural modifications will not create conflicts or hazards in geometric alignment or sight-distance, with project managers for the following City of San José Department of Transportation (DOT) projects: o Monterey Road Grade Separations Project. o Monterey Road Transit Project o Monterey Road Railroad Crossing Improvements (north of Curtner Avenue) o High Speed Rail Project. • **Coordination with Adjacent Transportation and Transit Agencies:** The Project Applicant shall coordinate with the Santa Clara Valley Transportation Authority (VTA) and Bay Area Rapid Transit (BART) for trenching and vault work located adjacent to existing or planned bus stops (including concrete bus pads), light-rail transit (LRT) facilities, or future BART station footprints, alignments, and construction staging/haul routes. Traffic control and access plans shall be designed to maintain safe pedestrian, bicycle, and transit operations consistent with City of San José standards and the San José Better Bike Plan 2025. • **Coordination with the Monterey Road Wildlife Crossing Project and POST:** The Project Applicant shall coordinate with the Monterey Road Wildlife Crossing design team and the Peninsula Open Space Trust (POST) to ensure consistency between proposed trenching or duct bank installations and planned crossing infrastructure. Any proposed design changes to subsurface facilities that could affect the wildlife crossing structure or roadway profile shall be reviewed in coordination with these entities prior to construction. • **Traffic Control and Public Right-of-Way Management:** The Project's traffic control plans shall include all City of San José public streets along the trench alignment (including but not limited to North 1st Street and Bassett Street), ensuring full compliance with City standard details and permitting requirements. All construction staging, lane closures, and detours shall be coordinated with City DOT to avoid cumulative disruption or unsafe geometric design changes.	Not Applicable	NTPR-3 construction activities will not involve work within the public ROW or at a railway crossings.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
Documentation of agency coordination and final design approvals from each relevant entity (City of San José DOT, UPRR, VTA, BART, CPUC, and POST) shall be submitted to the CPUC prior to issuance of the Notice to Proceed for construction within affected rights-of-way. The Project shall implement all reasonable design modifications or timing adjustments requested by these agencies to maintain roadway safety and geometric integrity.		
APM TCR-1: WEAP Training LSPGC shall work with interested Tribes to design the TCRs component of a WEAP that shall be provided to all Project personnel who may encounter and/or alter TCRs or prehistoric/ethnohistoric archaeological properties, including construction supervisors and field personnel. The WEAP shall be submitted to the CPUC prior to construction. No construction worker shall be involved in ground-disturbing activities without having participated in the WEAP. • The WEAP shall include, at a minimum: • Training on how to identify potential TCRs and human remains during the construction process; • A review of applicable regulations pertaining to TCRs; • A discussion of procedures to be followed in the event that unanticipated TCRs are discovered during implementation of the Project; • A discussion of culturally appropriate dignity, taking into account the Tribal cultural values and meaning of the resource, including the cultural character and integrity, traditional uses, and confidentiality of resources. • 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 designed with the input of interested Tribes.	Applicable	**Ongoing.** The Project WEAP was submitted to the CPUC on March 20, 2026. The WEAP includes protocols for training and monitoring activities. All personnel will be WEAP-trained prior to performing work on the Project. WEAP sign-in sheets will be submitted with compliance reports to the CPUC.
APM TCR-2: Cultural Resources Monitoring Native American and archaeological monitoring shall be conducted during ground disturbance associated with the Project when within 100 feet (30 meters) of previously recorded prehistoric, ethnohistoric, or TCRs. Prehistoric and/or ethnohistoric archaeological sites have been recorded within the Project area, and the SLF search and Tribal outreach indicates that lands sacred to sacred to the Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, the Ohlone Indian Tribe, the Tamien Nation, and the Amah Mutsun Tribal Band are present within the Project search area. A Native American monitor determined during Tribal consultation shall be retained by LSPGC to monitor excavation associated with the Project to ensure that there is no impact to any significant unanticipated prehistoric, ethnohistoric, or TCR. Prior to construction, LSPGC shall confer with a designated Tribal representative on the appropriate course of action to be taken should unanticipated cultural materials, and specifically human remains, be discovered during construction. Native American monitoring requirements established in this APM may be superseded by government-to-government consultation conducted between the CPUC and Tribal organizations as part of the AB 52 process or otherwise.	Applicable	Cultural and Native American monitoring will take place at the Grove Terminal during ground disturbing activities within 100 feet of previously recorded resources or any unanticipated discovery of cultural resources in accordance with this measure and the Cultural Resources Management Plan, as needed. At the Grove Terminal Staging Yard site, cultural and Native American monitoring will take place during initial site preparation activities (i.e., grading, if required) located within 100 feet of a previously recorded resource.

Applicant Proposed Measure (APM) / Mitigation Measure (MM)	Applicability to NTPR-3	Compliance Action / Status
APM UTIL-1: Coordination with Utilities LSPGC shall notify all utility companies with utilities located within or crossing the Project ROW to locate and mark existing underground utilities along the entire length of the Project. Due to the linear nature of transmission line construction, utilities shall be marked in short segments prior to construction within said segments. 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 shall be realigned vertically and/or horizontally, as appropriate, to avoid other utilities and provide adequate operational and safety buffering, or relocation of the existing utility shall be coordinated with each utility owner/operator. LSPGC shall coordinate with third-party utilities and shall submit the intended construction methodology to the owner of the third-party utility for review and coordination. Construction methods shall be adjusted as necessary to ensure that the integrity of existing utility lines is not compromised.	Applicable	NTPR-3 activities at the Grove Terminal and Grove Terminal Staging Yard sites will not include work within the Project ROW; therefore, most of the conditions addressed by UTIL-1 are not triggered. LSPGC and its contractors will use the Underground Service Alert system (Dial 811) to request that existing utilities in the vicinity of the planned excavation areas associated with NTPR-3 be marked out prior to ground disturbing activities.
LSPGC Mitigation Measure 3.19-5: Utility Coordination and Induction Study At least 90 days prior to the start of construction, LSPGC shall notify all municipalities, companies, and other public and private entities owning and maintaining utilities within or crossing the right-of-way of the Project and shall positively identify and confirm the location and type of any utilities present. For those identified utilities that do not pose a threat of AC-induced corrosion attributable to the Project, APM UTIL-1 shall be implemented. For the identified natural gas pipelines, and all other utilities potentially affected by Project-related AC-induced corrosion (i.e., metallic utilities), design and construction of the Project's transmission lines shall be coordinated with the applicable utility owners to definitively locate each utility relative to the Metcalf to Grove 500 kV AC underground transmission line, determine the distance of separation between the transmission line and potentially affected utility, and determine the point of intersection and/or distance along which the Project transmission line is parallel to the utility. LSPGC shall prepare a detailed induction study for all identified existing utilities potentially affected by the Project transmission line alignments. At minimum, the study shall include, but not be limited to, a detailed analysis of the known [metallic] pipelines or other utilities identified during these utility surveys; shall identify adequate and implementable measures to avoid corrosion potential; and shall present commitments to the implementation of those actions, including a design of the AC mitigation system for any pipeline found to have an AC potential of 2 volts or greater and a schedule to implement any required AC mitigation systems. Pursuant to Section 6.6.2 of National Association of Corrosion Engineers SP21424-2018, *Alternating Current Corrosion on Cathodically Protected Pipelines: Risk Assessment, Mitigation and Monitoring*, the induction study shall demonstrate that any required mitigation system would reduce the AC potential to less than 2 volts, or an AC density level of less than a time-weighted average of 30 amperes per square meter. Prior to the start of construction of a Project segment containing an underground utility or utilities identified to be materially affected by accelerated corrosion caused by the Project, LSPGC shall submit the induction study for such Project segment, including the AC mitigation component, to the CPUC for review and concurrence. Once the CPUC concurrence is secured, LSPGC shall implement the AC mitigation system during construction of the Project, phased into the construction process as appropriate.	Not Applicable	NTPR-3 construction activities do not involve underground utilities or utilities identified to be materially affected by accelerated corrosion caused by the Project. Further, NTPR-3 activities at the Grove Terminal and Grove Terminal Staging Yard sites will not include work within the Project ROW or PG&E Project components (refer to page 3 for a discussion of PG&E components not included in NTPR-3).

LSPGC is authorized to proceed with the proposed construction activities associated with NTPR-3 contingent that documentation will be submitted to the CPUC confirming that all proposed actions and applicable measures that have yet to be implemented as described in the table above are carried out in accordance with the methods and conditions described in NTPR-3. This NTP approval is subject to completion of the following implementing actions by LSPGC:

- LSPGC must submit to the CPUC copies of the outstanding authorizations and approvals from Santa Clara County, the City of San Jose, and Caltrans, as identified in NTPR-3, before beginning work on the activities covered by these authorizations.
- LSPGC shall develop the Site Design and Landscape Plan, required per APM AES-2, in consultation with the Santa Clara County Parks and Recreation Department, the City of Santa Jose, and other interested stakeholders. LSPGC shall provide this plan to the CPUC for review prior to the start of landscaping onsite.
- Preconstruction nesting bird surveys shall be conducted for the Grove Terminal and Grove Terminal Staging Yard sites prior to the start of NTPR-3 construction activities.
- Protocol surveys for Swainson's hawk and bald eagle shall take place prior to the start of NTPR-3 construction activities for suitable nesting habitat within 0.5 mile.
- Focused surveys for tri-colored blackbird and burrowing owl shall take place prior to the start of NTPR-3 construction activities.
- LSPGC shall conduct raptor surveys for the Grove Terminal and Grove Terminal Staging Yard sites prior to the start of NTPR-3 construction activities.
- In accordance with APM CUL-2 and the CRMP, cultural and Native American monitoring will be conducted for any excavation activities within 100 feet of the documented cultural resources in the vicinity of the Grove Terminal site, and during initial site preparation of the Grove Terminal Staging Yard.
- Prior to construction of the Grove HVDC Terminal Site, LSPGC shall obtain and submit to the CPUC copy of all necessary authorizations from the County of Santa Clara, Santa Clara Valley Water Agency, and (if deemed necessary) Waste Discharge Requirements and associated conditions of approval from the San Francisco Bay Regional Water Quality Control Board.
- LSPGC shall provide updates to the SWPPP for the Grove Terminal site and Staging Yard and shall coordinate with the Santa Clara Valley Water District to ensure that the proposed Grove Terminal site design provides adequate safeguards for surface and groundwater quality.

Sincerely,

Cesar Moreno

Cesar Moreno
CPUC Environmental Project Manager

cc: Michelle Wilson, CPUC
Silvia Yanez, ESA
Rosalind Searle, ESA

Attachment A, NTPR-3 Components Map

POWER SANTA CLARA VALLEY PROJECT

NTP-3 Grove Terminal

City of San José, Santa Clara Co., CA

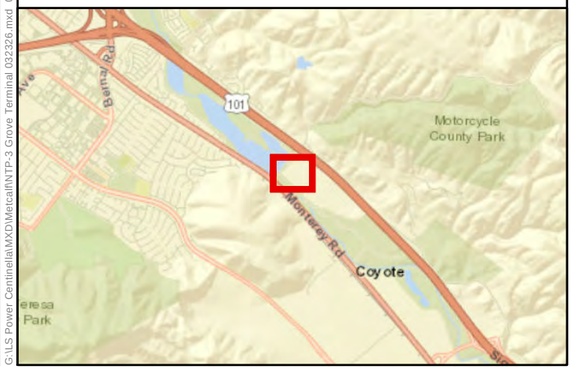
LEGEND

NTP-3 Components

- Metcalf to Grove 500kV Transmission Line (PG&E Scope)
- Substation Connection
- New Distribution Line
- New Internet Service Provider
- Dead End Structure
- Grove Terminal Site (Limits of Construction)
- Grove Property Boundary
- PG&E Metcalf Substation Modification Area
- Perimeter Fence
- Grove Terminal AC Equipment
- Control Enclosure
- Converter Reactors and DC Switchyard
- Converter Transformers
- HVDC Converter Enclosure
- Access Road
- PLC Filter
- Storm Water Retention
- Valve Cooler

0 100 200 300

Feet



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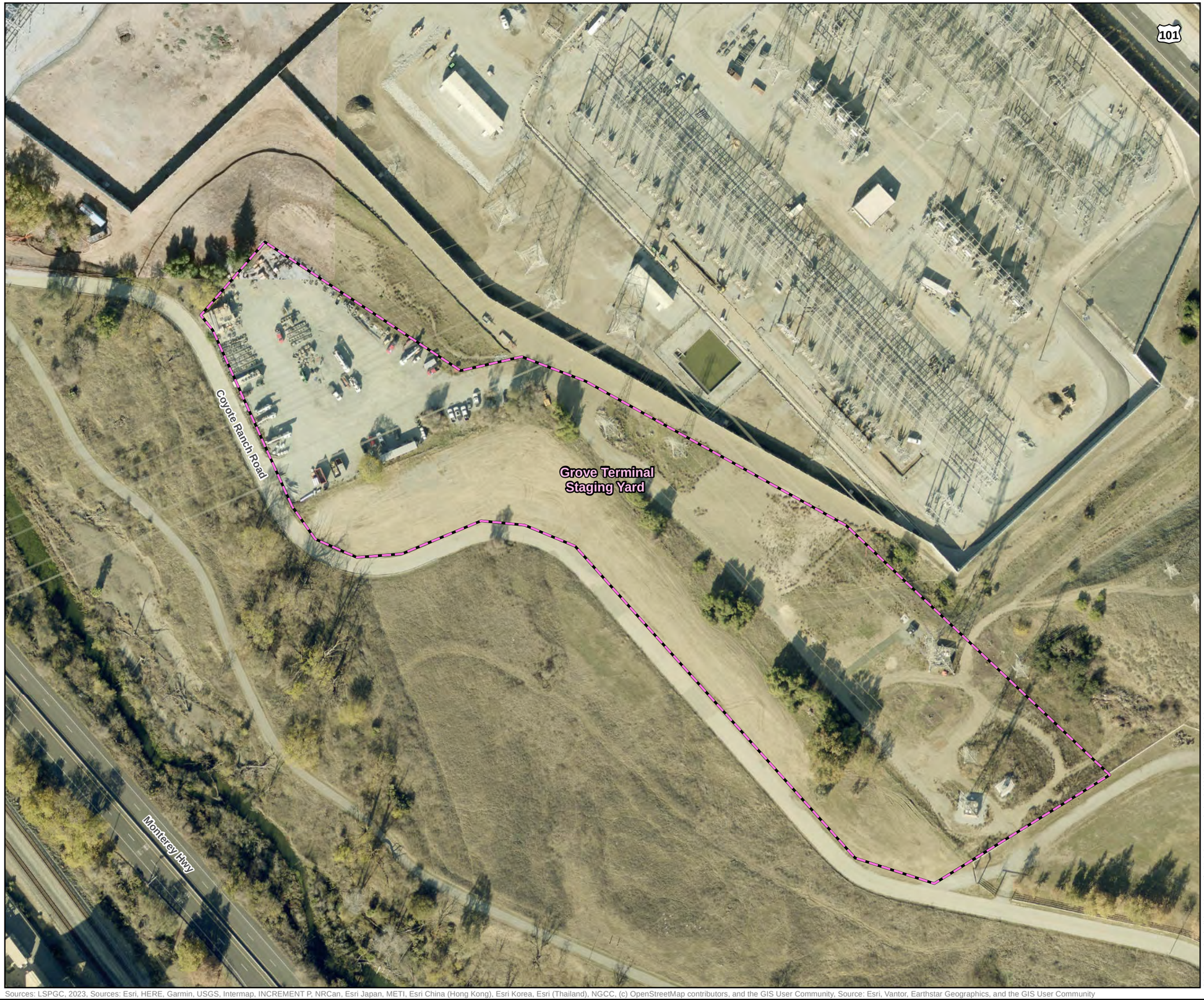
Sources: LSPGC, 2023, Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community

POWER SANTA CLARA VALLEY PROJECT

NTP-3 Grove Terminal

City of San José, Santa Clara Co., CA



LEGEND

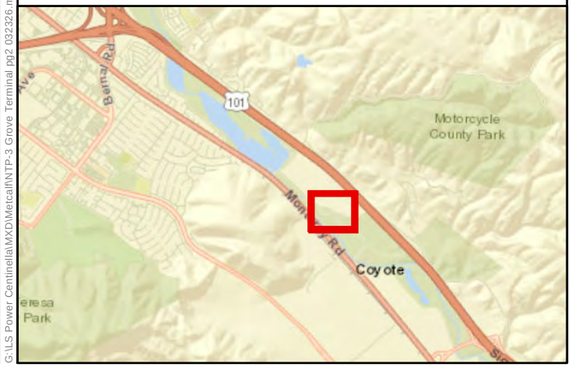
NTP-3 Components

Grove Terminal Staging Yard

Page 2 of 2

0 100 200 300

Feet



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