

Quarterly Compliance Report

Quarter 3 2024



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1.0 INTRODUCTION

In accordance with the Mitigation Monitoring, Reporting and Compliance Program (MMRCP), for the Round Mountain 500 kilovolt (kV) Dynamic Reactive Support Project (Fern Road Substation or Project), this Quarterly Compliance Report provides an overview of the construction progress and implementation of Applicant Proposed Measures (APM) and Mitigation Measures (MM), as well as details regarding compliance-related activities conducted by LS Power Grid California, LLC (LSPGC) on the Project during the 3rd Quarter of 2024 (July 2024 - September 2024).

To date, LSPGC construction activities have been authorized by the California Public Utilities Commission (CPUC) under Notice to Proceed No. 1 (NTP-1), Minor Project Refinement No. 1 (MPR-1), MPR-2, MPR-3, and MPR-4. The approval of NTP-1 authorized construction of the new Fern Road Substation, including the installation of two static synchronous compensator (STATCOM) enclosures, three 500 kV voltage transformers, and various 97.5 kV and 500 kV gas-insulated switchgear. The NTP-1 approval also includes the connection of the Fern Road Substation to Pacific Gas & Electric Company's (PG&E's) two existing Round Mountain – Table Mountain #1 and #2 500 kV overhead transmission lines, modifications to accommodate integration of the transmission lines into the Fern Road Substation, the development of one new permanent substation access road, the construction of chain link and barbed wire security fencing, and installation of temporary wildlife-friendly cattle exclusion fencing.

2.0 CONSTRUCTION SUMMARY

The following activities were performed during the reporting period:

- Delivery of materials
- Compression testing
- Rock removal
- Grading and spreading of class 2 base on substation pad
- Transfer of soil from pad to expanded storage area west of laydown yard
- Relocation of boulder stockpile to expanded storage area north of laydown
- Spoils management
- Installation of anchor bolts for control enclosures 1 and 2
- Excavation, rebar installation, concrete pouring, and water seal installation for Transformers 1, 2, and 3 foundation pits
- Conduit installation for Transformers 1, 2, and 3 foundation pits
- GIS foundation excavation
- Testing and stripping foundation forms
- Grading of access roads and swales
- Drilling of pier foundation holes
- General housekeeping

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

2.1 CONSTRUCTION STATUS

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

Table 1: Construction Status

Project Activity	Approximate Duration (months) ¹	Anticipated Start Date ²	Approximate Percent Complete
Site Development (includes survey, road work, site and staging yard preparation)	4	April 2024	90
Below-Grade Construction	7	June 2024	35
Above-Grade Construction and Equipment Installation	9	<i>October 2024</i>	0
Commissioning and Testing	5	<i>July 2025</i>	0
¹ Duration is not necessarily continuous.			
² Dates in <i>italics</i> are anticipated dates for activities that have not yet begun.			

2.2 PROJECT MODIFICATIONS AND APPROVALS

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

Table 2: NTP and MPR Schedule

NTP / MPR	Description	Submittal Date ¹	Requested / Actual Approval Date
NTP-1	NTP-1 approval permitted the construction of the new Fern Road Substation that will include two static synchronous compensator (STATCOM) enclosures, three 500 kV voltage transformers, various 97.5 kV and 500 kV gas-insulated switchgear, and ancillary components.	Submitted January 12, 2024 Resubmitted January 23, 2024	Approved January 25, 2024
MPR-1	MPR-1 authorized the use of equipment components that contain a reflective finish that are not commercially available in a neutral gray color for construction of the Fern Road Substation.	Submitted January 23, 2024	Approved January 25, 2024

NTP / MPR	Description	Submittal Date¹	Requested / Actual Approval Date
MPR-2	MPR-2 allowed additional tree clearing in an area contiguous with the anticipated Fern Road Substation for compliance with California Public Utilities Code 8386 and LSPGC's Wildfire Mitigation Plan.	Submitted February 6, 2024	Approved February 15, 2024
MPR-3	MPR-3 authorized the expansion of the existing staging area approved in NTP-1, a new materials storage area, and the utilization of a portion of the previously approved MPR-2 area for materials storage.	Submitted June 27, 2024	Approved July 5, 2024
MPR-4	MPR-4 permitted the off-haul of surplus soil from Project excavations to be provided to a private property owner located directly adjacent to the Project site.	Submitted September 3, 2024	Approved September 27, 2024 ¹
¹ Approval is conditional upon inclusion of a signed statement by the homeowner agreeing to take responsibility for soil management in a manner compliant with rules set forth by the Shasta County Air Quality Management District.			

3.0 ENVIRONMENTAL COMPLIANCE SUMMARY

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

3.1 AESTHETICS

In compliance with APM AE-1, all active Project work areas were maintained in a clean and orderly state with general housekeeping documented in the weekly LEI Field Reports. On August 8, 2024, LS Power notified the CPUC of an early morning concrete pour on August 9, 2024. Lighting utilized during this pour was directed away from residences and utilized shields in compliance with APM AES-1. No compliance issues were documented during the reporting period.

3.2 AIR RESOURCES

Initial listing memorandums identifying certified tier specification and diesel particulate filter status specifications for all off-road diesel-powered equipment used during the first and second quarter construction activities were submitted to the CPUC as required by MM AQ-1 and the Project's Notice to Proceed Request (NTPR) approval letter dated January 25, 2024. All off-road diesel-powered equipment that was utilized for the Fern Road Substation met the United States Environmental Protection Agency (USEPA)-certified Tier 4 standards, the highest USEPA-certified tiered emission standards, with Level 3 diesel particulate filters. In accordance

with MM AQ-1, a tracking tool for daily equipment use hours of all diesel-powered equipment was therefore not required.

Dust Control Plan measures were implemented to control fugitive dust and particulate emissions associated with Shasta County Air Quality Management District (SCAQMD) Standard Mitigation Measures (SMMs) in accordance with APM AQ-2. All Project activities were in compliance with this measure during the reporting period. Contractor staging occurred in approved areas within Project limits during the reporting period. Water trucks were utilized onsite as necessary to water down ongoing construction activity and stockpiled materials. Reduced speed limits were employed within the Project limits.

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

3.3 BIOLOGICAL RESOURCES COMPLIANCE SUMMARY

In accordance with the Project's MMCRP, all Project activities were conducted in compliance with each biological resource measure during the reporting period. Vehicle speeds along access roads and on the Project site were limited to 15 miles per hour. Project personnel remained on established roads within the limits of disturbance as necessary to reduce potential for accidents and animal road mortality. All vehicles were cleaned prior to mobilization to the Project site to avoid the spread of noxious weeds and non-native invasive plant species. There were no compliance issues or concerns related to biological resources during the reporting period, and no special-status species were observed within active work areas.

In accordance with APM BIO-4 and APM BIO-5, construction during the migratory bird nesting season requires surveys to determine the presence or absence of nesting birds. If an active nest or raptor nest is identified, a suitable construction buffer will be implemented to ensure that the nesting activities are not substantially adversely affected. Pre-construction surveys for nesting birds were performed during the Project's first quarter on February 5 and 6, 2024, in which no nests were observed. During the reporting period, there were no active nests identified onsite.

MM BIO-1 states that pre-construction surveys shall be conducted by a qualified biologist for the presence of roosting bats in trees to be removed or pruned. Pre-construction surveys for roosting bats were performed during the Project's first quarter on February 5 and 6, 2024, in which no roosting bats were identified. Therefore, no further action was required for this reporting period, as Project activities have continuously persisted and there was no tree or vegetation removal that took place.

Per APM BIO-9, pre-construction sweeps should occur within the Project work area for special-status wildlife and plants by a qualified biologist prior to initial vegetation clearance and ground-disturbing activities. Sweeps were conducted prior to initial tree removal activities and ground disturbance during the Project's first quarter. An additional biological sweep was conducted during the Project's second quarter in anticipation of tree removal and materials storage within the Project's approved MPR-3 work areas. Avoidance signage was posted where aquatic features intersect Project limits, with a five-foot buffer and signage maintained throughout the reporting

period as required by APM BIO-10. There are no other sensitive biological areas within Project work areas.

3.4 CULTURAL, NATIVE AMERICAN AND PALEONTOLOGICAL RESOURCES

3.4.1 Cultural Resources and Native American Monitoring

Prior to construction, LSPGC engaged in tribal outreach to consult with the contact representative provided by the Native American Heritage Commission about mitigation procedures should cultural resources be encountered within the Project boundary; however, no response was received. The pre-construction Tribal consultation requirement was documented by LSPGC within the Project's Proponent Environmental Assessment (PEA) sent to the CPUC dated April 2022.

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

3.4.2 Paleontological Resources

In compliance with APM PALEO-1, a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) has been prepared for the Project in which monitoring procedures, areas and types of earthwork that require monitoring, and methods for determining the significance of fossil discoveries were identified. As required by the PRMMP, excavations or grading at depths exceeding two feet below ground surface in sedimentary deposits of the Montgomery Creek Formation and the sedimentary portions of the Tuscan Formation shall be monitored by a Paleontological Monitor under the supervision of a Qualified Paleontologist. The duration and timing of paleontological monitoring is determined by the Qualified Paleontologist, and can be modified based on results of monitoring. Paleontological monitoring and spot checking occurred for ground-disturbing work involving excavation below two feet that took place within the main access road, laydown yard, and substation pad, as well as for the relocation of stockpiled material and boulders to the expanded storage area approved in MPR-3. No paleontological resources were encountered during the reporting period.

3.5 FIRE PREVENTION AND PROTECTION

All Project activities were in compliance with the Construction Fire Prevention Plan (CFPP) during the reporting period. Construction personnel were observed to have appropriate personal protective equipment (PPE), and all Project vehicles were equipped with appropriate fire-suppression equipment. Vehicles were parked away from dry vegetation. Water tanks, fire extinguishers, and water trucks were available onsite for fire protection during construction during the reporting period.

All personnel carry a laminated card and hard hat sticker at all times that lists pertinent telephone numbers for reporting fires and immediate steps to take should a fire start in accordance with

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

On July 26, 2024, the CPUC was provided a notification regarding an active fire, called the “Park Fire”, that was located approximately 30 miles south of the Project site. The Park Fire originated north of Chico on July 24, 2024, and had grown up to 164,000 acres with 0% containment by the time of the Project’s notification to the CPUC on July 26, 2024. As a result of the Park Fire progression, a red flag warning was issued within the region including the Project area. Though there was no concern that the Project site was vulnerable to the fire, work was postponed during the week of July 29, 2024 to August 5, 2024. No hot work was scheduled when work commenced after August 5, 2024, and the use of equipment within vegetated areas was avoided. In total, the Park Fire grew to approximately 429,603 acres and has since been 100% contained as of September 27, 2024. No deviations from the Project’s CFPP occurred throughout the reporting period, and no other fires occurred on or near the Project during the third quarter of 2024.

3.6 GEOLOGY AND SOILS

Mitigation measures were implemented during construction activities to minimize potential impacts from geological hazards and disturbance to soils in accordance with APM GEO-1. Measures implemented throughout the reporting period included keeping vehicles and construction equipment within Project limits and approved construction work areas and avoiding construction in areas with saturated soils whenever practicable to reduce impacts to soil structure. Removed vegetation was disposed of off-site to an appropriate licensed facility or chipped onsite to be used as mulch during restoration. No compliance issues were recorded during the reporting period.

3.7 HAZARDOUS MATERIALS

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

3.8 STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

In compliance with APM WQ-1, all Project activities were conducted in compliance with the Project’s SWPPP during the reporting period. No groundwater was encountered over the course of the reporting period. Rain events took place August 23 – 24, and September 15 – 16 during

the quarter with approximately 0.13 inch of rain recorded in August, approximately 0.65 inch of rain recorded in September, and no rain recorded in July. Best Management Practice (BMP) installation was completed in April 2024 during the Project's second quarter prior to the start of ground disturbing activities onsite, and maintenance of BMPs occurred during the quarterly reporting period. No compliance issues were recorded.

A SWPPP change of information (COI) was filed in February 2024 following the approval of MPR-2. A second COI was filed in July 2024 for MPR-3. A copy of the Project's SWPPP is maintained on the Project site.

3.9 TRAFFIC AND TRANSPORTATION

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

4.0 MMCRP COMPLIANCE

There were no non-compliance incidents during the reporting period.

5.0 WORKER ENVIRONMENTAL AWARENESS PROGRAM

In compliance with the MMCRP, APM BIO-8, APM CUL-1, and the CFPP Section 8, all Project personnel participated in the WEAP training prior to performing work. During the reporting period, 23 new Project personnel attended the WEAP training. **Attachment 2, WEAP Sign-In Sheets** includes a record for WEAP training conducted during this quarter's reporting period.

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ATTACHMENT 1
PHOTOGRAPH LOG

Photo 1. View of TTR crew fill grading and working the slope in the southwest corner of the substation pad.

Direction: West. Date: 7/1/2024



Photo 2. View of TTR skid steer trenching for conduit in transformer 1 (T1) foundation pit.

Direction: Southeast. Date: 7/1/2024



Photo 3. View of TTR excavator grooming slope at southwest corner of substation pad.
Direction: West. Date: 7/8/2024



Photo 4. View of TTR crew installing conduit in transformer 2 (T2) foundation pit.
Direction: Southeast. Date: 7/8/2024



Photo 5. View of TTR crew fine tuning foundation framing and rebar install in T1 foundation pit.
Direction: Southwest. Date: 7/10/2024



Photo 6. Overview of substation pad showing control enclosure #1 and #2 foundation frame ups on the left, T1, T2, & transformer 3 (T3) pits just right of center, and excess soil pile on the right.

Direction: South. Date: 7/10/2024



Photo 7. View of TTR crew doing T2 foundation pit slurry pour.
Direction: West. Date: 7/10/2024

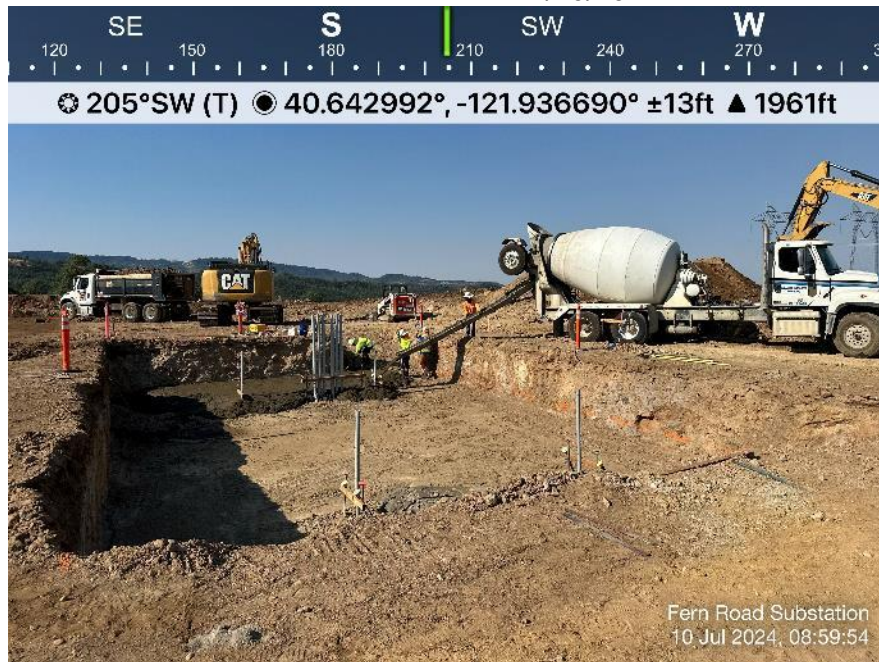


Photo 8. View of TTR crew starting to push rock up farther into expanded storage area.
Direction: Northwest. Date: 7/11/2024



Photo 9. View of TTR installing a layer of rebar into the T2 foundation framing.
Direction: Southwest. Date: 7/12/2024



Photo 10. View of TTR transferring soil to stockpile south of the laydown yard.
Direction: Northwest. Date: 7/15/2024

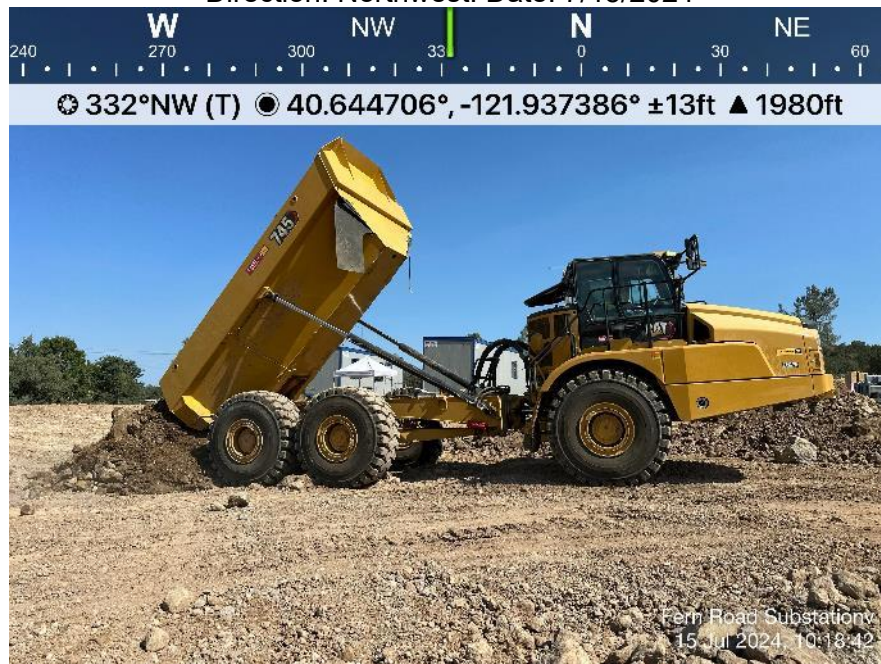


Photo 11. View of TTR crew making a cut in the northwest slope of the substation pad.
Direction: Northwest. Date: 7/16/2024

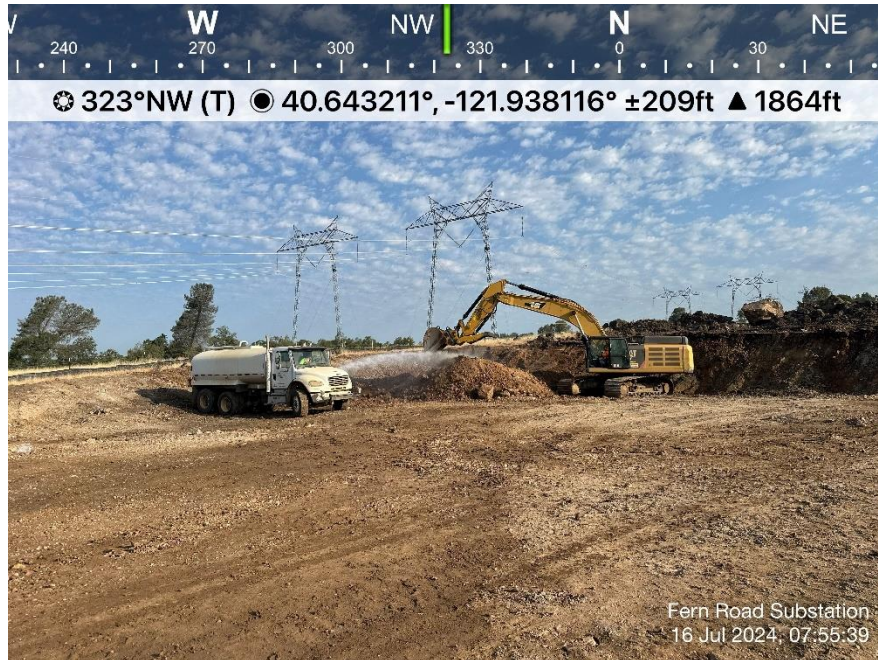


Photo 12. View of concrete pump truck using concrete washout.
Direction: Northwest. Date: 7/25/2024

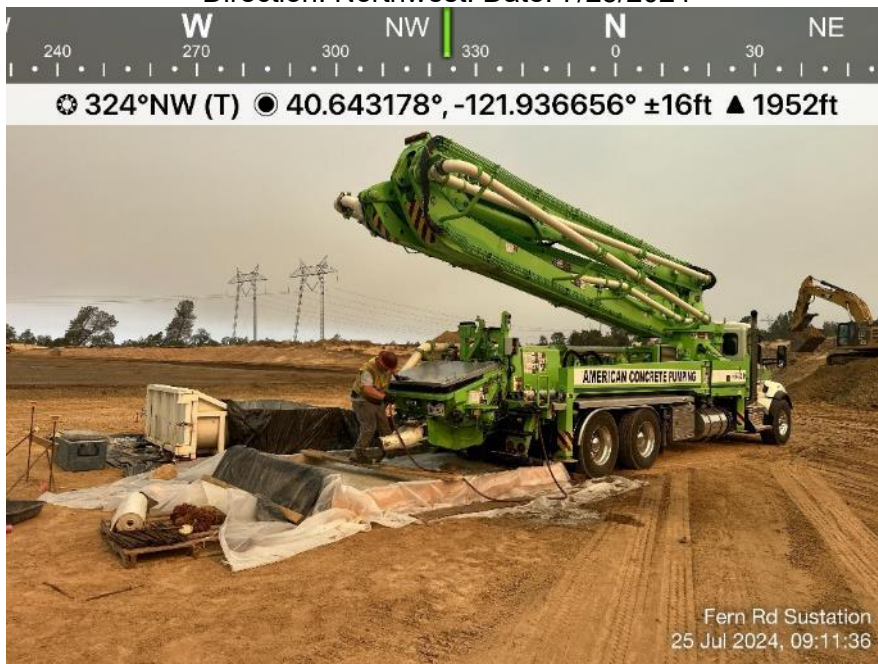


Photo 13. View of TTR pouring concrete at T3 foundation pit.
Direction: South. Date: 7/25/2024

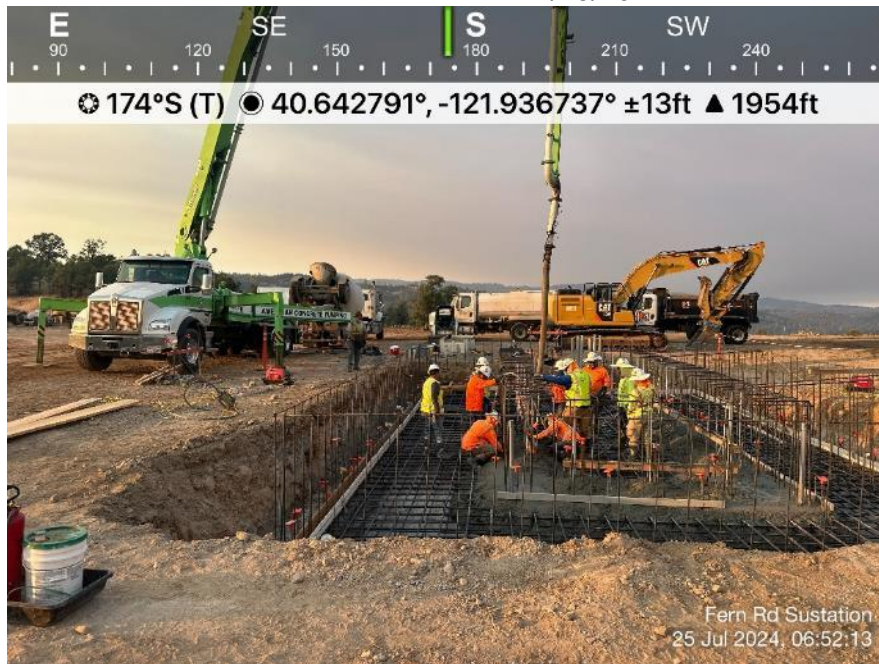


Photo 14. View of TTR concrete washout after clean up.
Direction: Southwest. Date: 8/5/2024



Photo 15. View of repaired silt fence on western perimeter.
Direction: Northwest. Date: 8/5/2024



Photo 16. View of Komatsu drill rig drilling pier holes in substation pad.
Direction: West. Date: 8/20/2024



Photo 17. View of TTR working on swales around the laydown yard pad.
Direction: North. Date: 8/20/2024



Photo 18. View of TTR grading construction entrance at Fern Road.
Direction: North. Date: 8/24/2024

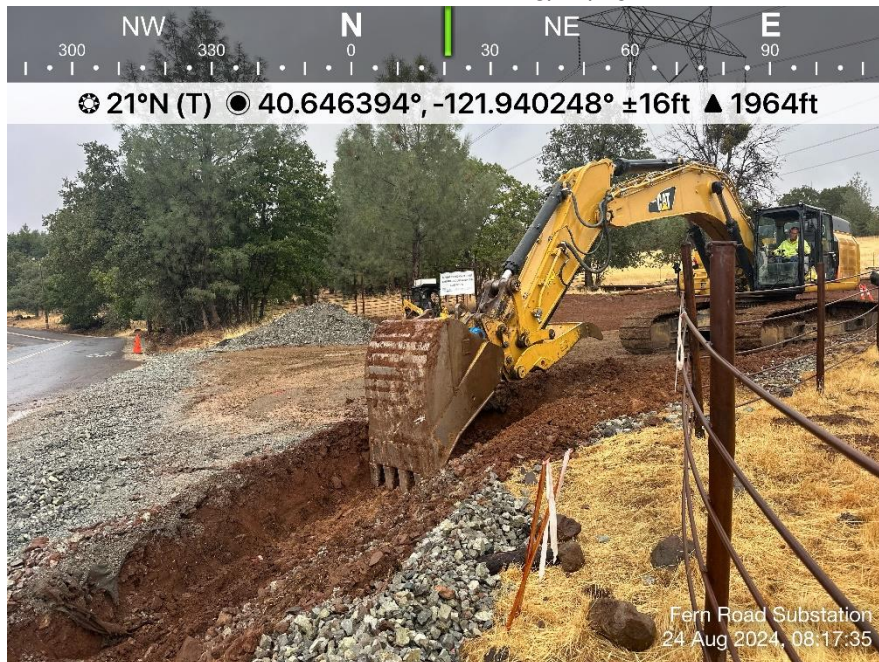


Photo 19. View of fence crew installing new gate posts and re-graded construction entrance.
Direction: West. Date: 8/24/2024



Photo 20. View of TTR scraping and brushing track-out from Fern Road at construction entrance.
Direction: Southeast. Date: 8/24/2024



Photo 21. View of energy dissipater installed at end of swale showing no movement of soil.
Direction: Northeast. Date: 8/24/2024

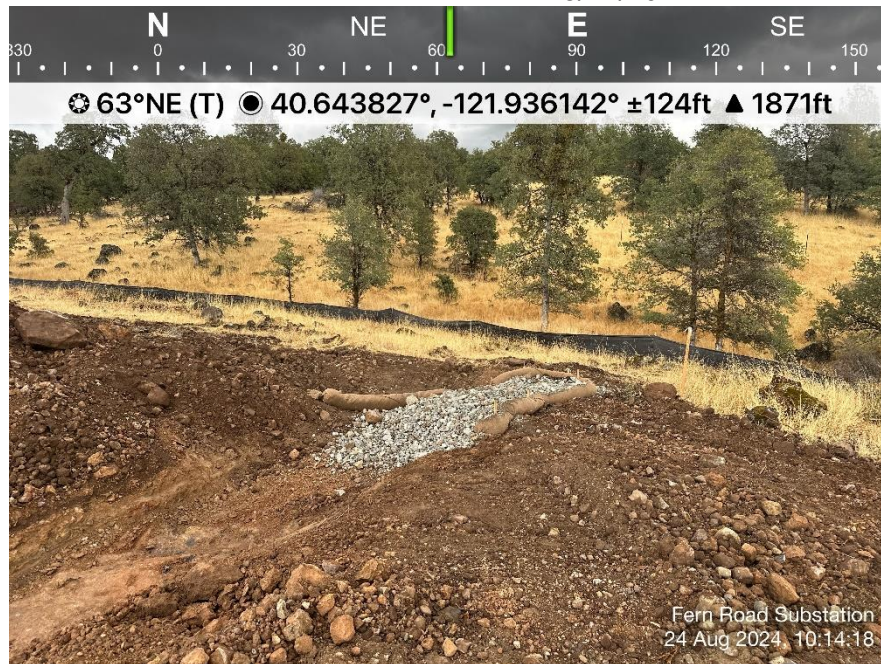


Photo 22. View of silt fence at low point showing no offsite discharge.
Direction: North. Date: 8/24/2024



Photo 23. View of drill rig boring a pier foundation hole for a dead end.
Direction: North. Date: 9/24/2024

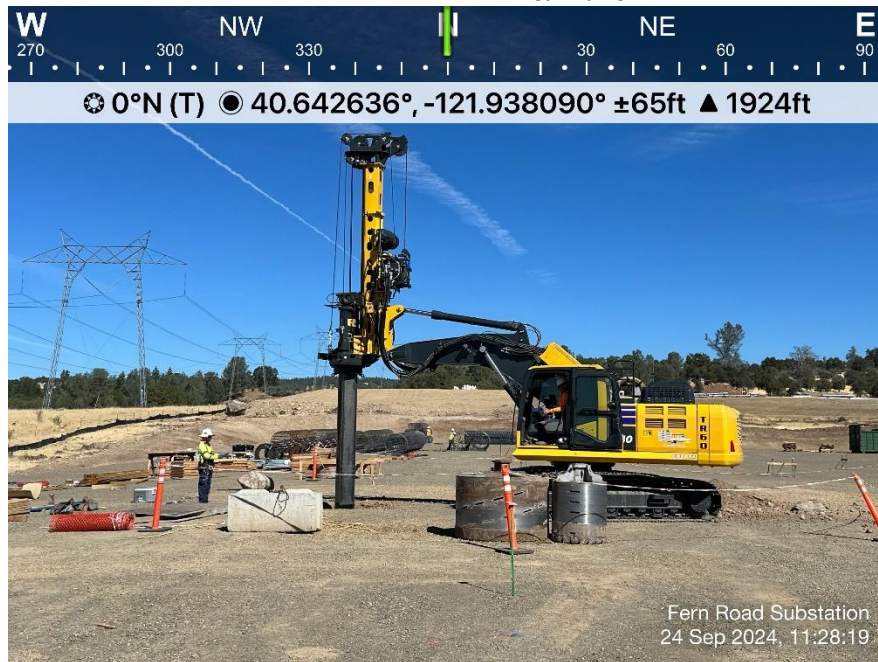


Photo 24. View of TTR excavating substation component foundation pit.
Direction: Northwest. Date: 9/26/2024

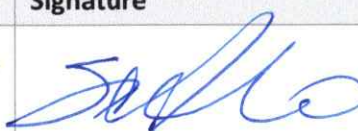


ATTACHMENT 2
WEAP SIGN-IN SHEETS

ROUND MOUNTAIN 500 kV DYNAMIC REACTIVE SUPPORT - FERN ROAD SUBSTATION PROJECT

WORKER ENVIRONMENTAL AWARENESS PROGRAM (WEAP) TRAINING LOG

This form acknowledges that I have received and understand the mandatory Worker Environmental Awareness Program (WEAP) training. The WEAP includes Project compliance and environmental information on each resource. The training is mandatory for all individuals (supervisors, inspectors, surveyors, employees, construction engineers, contractors, contractor's employees, and subcontractors) working on the project. By signing below, I acknowledge that I understand and will implement the guidelines provided in the program materials.

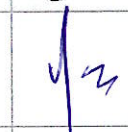
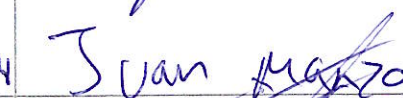
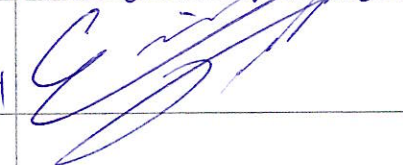
Name (First, Last)	Company	Phone	Date	Signature	Trainer
Sly Alvarado	TTRS	559-580-4289	7/1/24		Bhatte
Scott Jackson	TTRS	559-863-7038	7/1/24		"
KEITH IVASHILEVICH	TTRS	707-953-2504	7/1/24		"
AUGUST VOIC	TTR	360-520-7155	7-1-24		"
CHRISTOPHER TUCK	TTR	925-490-2790	7-15-24		"
KEVIN MODESTO	LSP GCA	636-497-8126	7-17-24		"
MARK MILBURN	LSP GCL	636-236-8576	7-17-24		"

Name (First, Last)	Company	Phone	Date	Signature	Trainer
Heath Holt	LS Power	512 931 9069	7/17/24	Heath Holt	Brian
Gary Piper	LS Power	518.925.6115	7/17/24	Gary Piper	Brian
Shane Corvell	TTR	509.550.9137	7/24/24	Shane Corvell	Corey
Ratzo/Alvaro	TTR	559-421-8829	7/24/24	Ratzo/Alvaro B.	Corey
Nathan Martinez	TTR	559.203.2698	8/5/24	NATHAN MARTINEZ	Brian
Donna Fey	TTR	5593653225	8-15-24	Donna Fey	Brian
Jason Adcock	Amprical	574-360-2223	8-5-24	Jason Adcock	Corey
Rob Grace	Amprical	541-941.2635	8/19/24	Rob Grace	
Nathan Stansberry	TTR	530708-1574	9/27/24	Nathan Stansberry	Corey
Donna Fey	Amprical	601-751.6501	9-10-24	Donna Fey	

ROUND MOUNTAIN 500 kV DYNAMIC REACTIVE SUPPORT - FERN ROAD SUBSTATION PROJECT

WORKER ENVIRONMENTAL AWARENESS PROGRAM (WEAP) TRAINING LOG

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Name (First, Last)	Company	Phone	Date	Signature	Trainer
JAIME BALZAC	AMPIRICAL	787-245-6976	09/10/24		COREY.
BOB HAWK	PSC PROMONIS	559 999 7884	9/10/24		Corey
Oscar A Ceballos	TTR		9/10/24		Corey
Robert Meyer	Chronicle Heritage	925 984 9249	9/17/24		Corey
JUAN MANZO	TTR	(559) 567-3381	9/17/24		Corey
ERICK FAUDON	AMPIRICAL	346-348-3497	9/25/24		BRIAN