



# WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

January 2021



California Public  
Utilities Commission

# Wildfire Safety Division Monthly Performance Report

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# Wildfire Safety Division Monthly Performance Report

## 1. REPORT PURPOSE

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The primary purpose of the Wildfire Safety Division (WSD) is to ensure that electrical corporations (ECs) are taking effective actions to reduce utility-related wildfire risk. The Monthly Performance Report is prepared by Division staff and summarizes key WSD activities completed in the prior month in support of the WSD's mission.

## 2. COMPLIANCE BRANCH

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The WSD Compliance Branch assures utility compliance with their approved Wildfire Mitigation Plans (WMP) through monthly and ongoing assessments, including field inspections and audits. Below is a summary of key activities completed during January 2021.

### 2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

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In January 2021, WSD conducted 271 inspection activities<sup>1</sup> across 4 WMP Categories at Pacific Gas and Electric Company (PG&E) and Southern California Edison (SCE). Inspections for San Diego Gas and Electric (SDG&E), Liberty Utilities (LU), PacifiCorp, Bear Valley Electric Service (BVES) and Horizon West Transmission (Horizon West) are scheduled in future months.

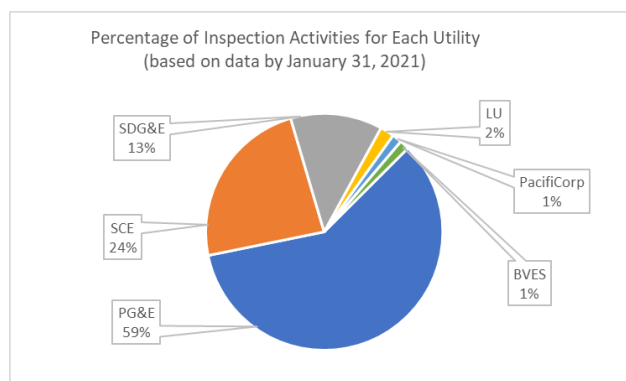
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<sup>1</sup> An inspection of each individual WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a WMP3 (Grid Design and System Hardening) initiative and inspected for compliance with a WMP5 (Vegetation Management and Inspections) initiative is counted as 2 inspection activity units, though only one pole is inspected. An inspection report may contain multiple inspection activities across multiple MWP initiatives.

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### Total Number of Inspection Activities by Utility

	January 2021	Total activities to date*
<b>No. of Activities</b>	<b>271</b>	<b>3285</b>
<b>PG&amp;E</b>	227	1948
<b>SCE</b>	44	776
<b>SDG&amp;E</b>	0	412
<b>LU</b>	0	63
<b>PacifiCorp</b>	0	43
<b>BVES</b>	0	43



\*Data from initiation of Field Inspection Program in May 2020 to January 31, 2021

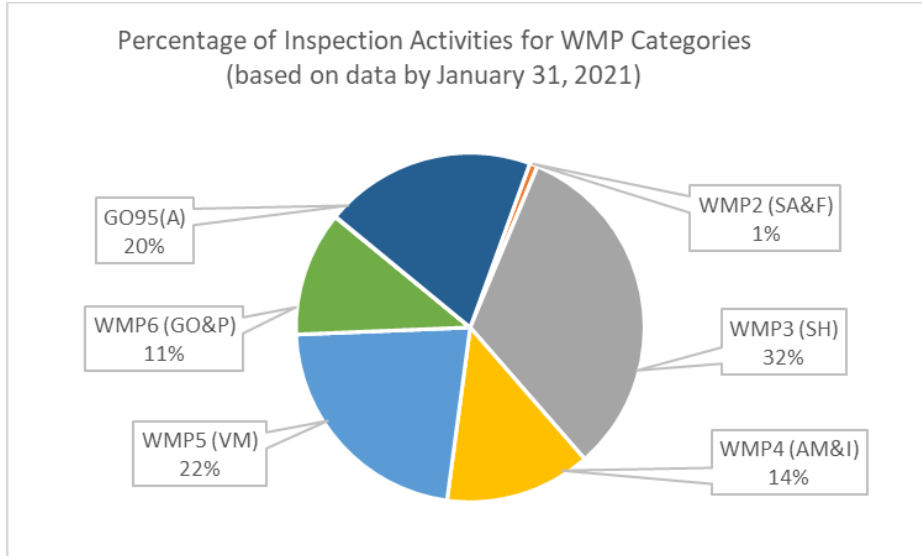
### Total Number of Inspection Activities by WMP Category

	January 2021	Total Activities to date*
<b>No. of Activities</b>	<b>271</b>	<b>3285</b>
<b>WMP2<sup>2</sup> (Situational Awareness)</b>	0	25
<b>WMP3<sup>2</sup> (System Hardening)</b>	67	1060
<b>WMP4<sup>2</sup> (Asset Inspections)</b>	57	445
<b>WMP5<sup>2</sup> (Vegetation Management)</b>	88	730
<b>WMP6<sup>2</sup> (PSPS)</b>	21	379
<b>GO 95</b>	38	644

\*Data from initiation of Field Inspection Program in May 2020 to January 31, 2021

<sup>2</sup> Wildfire Mitigation Plan Guidelines categorized ECs' mitigation strategy into 10 Categories: Category 1 – Risk assessment and mapping (commonly referred to as WMP1), Category 2 – Situational awareness and forecasting (WMP2), Category 3 – Grid design and system hardening (WMP3), Category 4 – Asset management and inspections (WMP4), Category 5 – Vegetation management and inspections (WMP5), Category 6 – Grid operation and protocols (WMP6, also referred to as public safety power shutoff or PSPS), Category 7 – Data governance (WMP7), Category 8 – Resource allocation methodology (WMP8), Category 9 – Emergency planning and preparedness (WMP9), and Category 10 – Stakeholder cooperation and community engagement (WMP10). More information of WMP Categories is available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M322/K133/322133494.PDF>

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### 2.2 DEFECTS

During inspection, WSD staff document any condition noted that is inconsistent with the WMP Category as a defect. The table below summarizes the number of defects identified during inspections conducted in January 2021, total number of defects to date and the status of all defects corrected by ECs. Depending on the level of defect severity—with a range of severe, moderate, and minor—the WSD requires repairs in intervals that depend on severity and the location of the defect<sup>3</sup>.

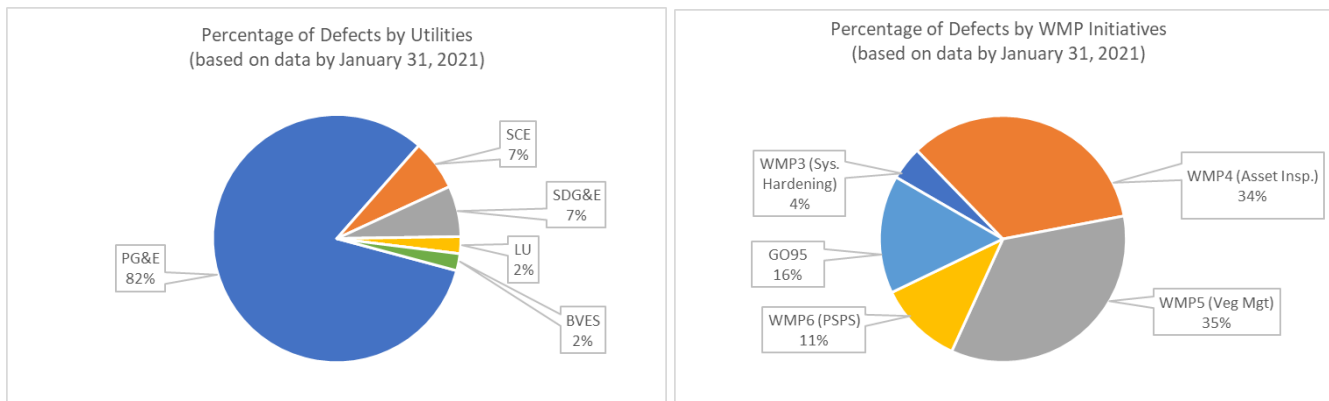
Category	Correction Timeline
<b>Category 1 - Severe</b>	Immediate resolution
<b>Category 2 - Moderate</b>	1-2 months (in HFTD Tier 3) 3-6 months (in HFTD Tier 2) 6 months (if relevant to worker safety) 12 months or scheduled in WMP update (other)
<b>Category 3 - Minor</b>	12 months or resolution schedule included in WMP update

<sup>3</sup> Resolution WSD-012, approved by the Commission on November 19, 2020, established a schedule for ECs to correct defects. Resolution WSD-012 is available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M351/K834/351834801.PDF>

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	January 2021	All Defects to date	Open Defects as of 1/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
<b>No. of Defects</b>	<b>9</b>	<b>181</b>	<b>87</b>	<b>19</b>	<b>28</b>	<b>40</b>	<b>94</b>
<b>PG&amp;E</b>	8	149	65	19	17	29	84
<b>SCE</b>	1	12	7	0	6	1	5
<b>SDG&amp;E</b>	0	12	10	0	5	5	2
<b>LU</b>	0	4	2	0	0	2	2
<b>PacifiCorp</b>	0	0	0	0	0	0	0
<b>BVES</b>	0	4	3	0	0	3	1

WSD initially prioritized a larger number of inspections in PG&E territory and is continuing to expand its coverage of other ECs.



### 2.3 AUDIT PROGRAM

After launching the Field Inspection Program, the WSD initiated its Audit Program in the Fall of 2020. In September 2020, WSD launched forensic accounting audits of 2019 and 2020 WMP investments for PG&E, SCE, SDG&E, BVES, PacifiCorp, and LU. WSD has also launched audits of PGE, SDG&E and SCE's vegetation management activities. A full list of initiated audits is below.

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Electrical Corporation	Description of Audit	Audit Status	Major Deficiencies/ Findings
<b>PG&amp;E</b>	Substantial Vegetation Management <sup>4</sup>	In Progress	TBD
<b>PG&amp;E</b>	Enhanced Vegetation Management <sup>5</sup>	Completed on February 5, 2021	Major deficiencies/findings can be found at <a href="https://www.cpuc.ca.gov/uploadedFiles/C_PUCWebsite/Content/About_Us/Organization/Divisions/WSD/2021.02.08.EVMAudit.pdf">https://www.cpuc.ca.gov/uploadedFiles/C_PUCWebsite/Content/About_Us/Organization/Divisions/WSD/2021.02.08.EVMAudit.pdf</a>
<b>PG&amp;E</b>	Santa Cruz Wood Management	In Progress	TBD
<b>SCE</b>	Substantial Vegetation Management <sup>4</sup>	In Progress	TBD
<b>SDG&amp;E</b>	Substantial Vegetation Management <sup>4</sup>	In Progress	TBD
<b>PG&amp;E</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>SCE</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>SDG&amp;E</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>BVES</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>PacifiCorp</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>LU</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD

### 2.4 CONSUMER COMPLAINTS

The WSD receives customer complaints related to wildfire safety from the CPUC's Consumer Affairs Branch (CAB). Each complaint is assessed and responded to

<sup>4</sup> Senate Bill 247 requires ECs to notify WSD of their substantial compliance with WMP vegetation management. The audit is to verify whether ECs have completed what they have committed in the approved WMPs for vegetation management.

<sup>5</sup> Enhance vegetation management refers to vegetation management conducted in excess of routine vegetation management practices in areas prioritized based on wildfire risk.

<sup>6</sup> Forensic Accounting Audit is to assess whether any expenses/investments identified in the 2019 and 2020 WMPs are duplicative of operating and capital expenditures approved in previous General Rate Cases.

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depending on the type of complaint. Below is the summary of complaint(s) received in January 2021.

Compliance Branch	January 2021	Year to Date 2021
Complaints investigated	1	1

### 2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH

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#### Compliance Operational Protocols

On January 8, 2021, the WSD issued its Draft Compliance Operational Protocols, pursuant to Resolution WSD-012 and Attachment 1. The Draft Compliance Operational Protocols propose annual and quarterly reporting/ requirements for all utilities, and provide draft guidance to utilities on the content, format, and timing of the annual and quarterly reports. Six comment letters were received by comment deadline of January 22, 2021. The Final Compliance Operational Protocols was released on February 16, 2021 and is available at:

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About\\_Us/Organizational/Divisions/WSD/2021.02.16%20Compliance%20Operational%20Protocols.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/2021.02.16%20Compliance%20Operational%20Protocols.pdf)

### 3. WILDFIRE MITIGATION BRANCH

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The WSD Wildfire Mitigation Branch comprehensively reviews ECs' WMPs in accordance with Public Utilities Code Section 8386 et. seq. The Branch also develops wildfire safety policy and performance metrics, conducts safety culture assessments, and reviews and issues safety certificates. The Wildfire Mitigation Branch is committed to continuous improvement in utility-related wildfire mitigation approaches.

#### 3.1 PROGRAM GUIDANCE AND PROCESSES

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In January of 2021, the WSD Mitigation Branch accomplished the following:



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### **Change Order Report Evaluations – PG&E**

On January 5, 2021, the WSD issued an Action Statement approving PG&E's Change Order Report submitted on September 11, 2020 to postpone its Sensor IQ Pilot Program completion date from February 2021 to October 2021. On January 28, 2021 the WSD issued an Action Statement approving PG&E's Change Order Report submitted on December 11, 2020 to postpone deployment of the Smart Meter Partial Voltage Detection initiative from February 2021 to June 2021.

### **Utility Working Group Meetings**

On December 16, 2020, the WSD facilitated the first of two virtual meetings to respond to IOU questions related to the 2021 Wildfire Mitigation Plan (WMP) Guidelines issued November 30, 2020. On January 5, 2021, the WSD provided a summary of the questions and answers from that meeting to the R.18-10-007 Service List and posted the summary to [www.cpuc.ca.gov/wildfiremitigationplans](http://www.cpuc.ca.gov/wildfiremitigationplans).

On January 13, 2021, the WSD held the second of two virtual meetings to respond to IOU questions related to the 2021 WMP Guidelines. On January 22, 2021, the WSD provided a summary of the questions and answers from that meeting to the R.18-10-007 service list and posted the summary to [www.cpuc.ca.gov/wildfiremitigationplans](http://www.cpuc.ca.gov/wildfiremitigationplans).

### **Quarterly Report Evaluations and Notices of Non-Compliance (NONCs)**

On January 8, 2021, the WSD issued Evaluations of PG&E's, SCE's, and SDG&E's First Quarterly Reports (QRs). The WSD's evaluations deemed each of the aforementioned utility QRs to be insufficient and concurrently issued Notices of Non-Compliance (NONCs).

On January 21, 2021, the WSD issued Evaluations of Liberty Utilities' (LU) and PacifiCorp's First Quarterly Reports. The WSD deemed both LU's and PacifiCorp's QRs insufficient and concurrently issued NONCs.

NONCs issued to ECs can be found at: <https://www.cpuc.ca.gov/2020wmp/>

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### **2020 Safety Certification – PG&E**

On January 14, 2021, the WSD issued PG&E's 2020 Safety Certification, certifying that PG&E has met the minimum requirements of Public Utilities Code (Pub. Util. Code) §8389 regarding its 2020 Safety Certification.

### **Safety Culture Assessment Requirements**

On January 22, 2021, the WSD issued its final 2021 Safety Culture Assessment (SCA) Requirements of Electrical Corporations. The SCA Requirements of Electrical Corporations presents the WSD's requirements for the first annual SCA process in 2021. The Final SCA Requirements of Electrical Corporations can be found at:

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About\\_Us/Organizational/Divisions/WSD/WSD%20Safety%20Culture%20Assessment%20Requirements%20FINAL%2020210122.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/WSD%20Safety%20Culture%20Assessment%20Requirements%20FINAL%2020210122.pdf)

### **Updates to 2021 WMP Schedule, Guidelines and Tables**

On January 22, 2021, the WSD released an updated 2021 WMP schedule. The updated schedule changes the dates of the Large EC workshop and adds in a due date for the ECs to submit maturity model survey results.

On January 22, 2021, the WSD also released updated versions of the 2021 WMP Guidelines (Resolution WSD-011 – Attachment 2.2) and tables. The changes reflect comments from utilities during EC working group calls held on December 16, 2020 and January 13, 2021.

### **Approval of PG&E Request for Extension of Response to Mussey Grade Road Alliance Data Requests**

On January 29, 2021, the WSD approved PG&E's request for an extension of time to respond to Mussey Grade Road Alliance's Data Requests Nos. 1 and 2, submitted pursuant to Resolution WSD-001.

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## **WSD Guidance on Resolution WSD-001 and Data Request Best Practices**

On January 29, 2021, the WSD issued guidance on Resolution WSD-001 and data request best practices. The January 29, 2021 letter provides guidance on the WSD-001 data request process as well as data request best practices that should be followed.

The January 29, 2021 Guidance can be found at:

[www.cpuc.ca.gov/wildfiremitigationplans](http://www.cpuc.ca.gov/wildfiremitigationplans).

## **4. RESOURCES**

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All publicly available Wildfire Safety Division documents are available at

[www.cpuc.ca.gov/wsd](http://www.cpuc.ca.gov/wsd).