

# MONTHLY PERFORMANCE REPORT

**ELECTRICAL INFRASTRUCTURE DIRECTORATE**

August 2021



# TABLE OF CONTENTS

**INTRODUCTION ..... 1**

COMPLIANCE ASSURANCE DIVISION ..... 2

    FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS ..... 2

    DEFECTS ..... 4

    AUDIT PROGRAM ..... 6

    CONSUMER SAFETY CONCERNS ..... 6

    ADDITIONAL ACTIVITIES OF THE COMPLIANCE ASSURANCE DIVISION..... 7

**ELECTRIC SAFETY POLICY DIVISION..... 8**

    PROGRAM GUIDANCE AND PROCESSES ..... 9

**DATA ANALYTICS DIVISION ..... 11**

    PROGRAM OVERVIEW ..... 12

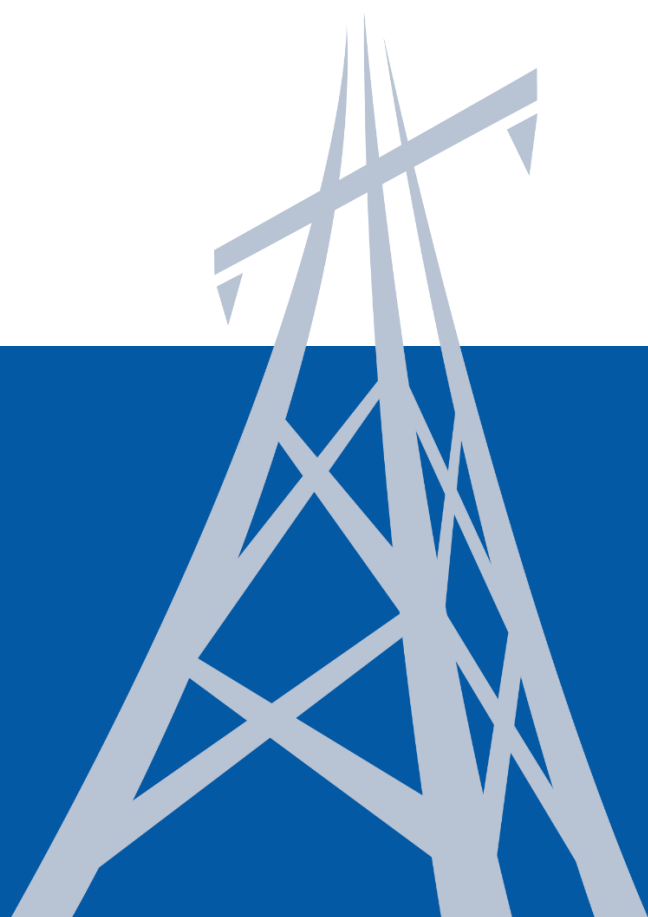
## INTRODUCTION

The Office of Energy Infrastructure Safety's (Energy Safety) primary purpose is to ensure electrical corporations (ECs) are taking effective actions to reduce utility-related wildfire risk. We implement measures to ensure an integrated, utility-related wildfire mitigation approach; amalgamate local perspectives into utility approaches to reflect community differences; support decision making with data and analytics; and exercise innovative problem solving.

The Monthly Performance Report (MPR) is prepared by Electrical Infrastructure Directorate staff and summarizes key activities completed by the Electric Safety Policy, Compliance Assurance, and Data Analytics Divisions in the month of August in support of Energy Safety's mission.



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY



## COMPLIANCE ASSURANCE DIVISION

The Compliance Assurance Division oversees utility compliance with their approved Wildfire Mitigation Plans (WMP) through ongoing assessments, including field inspections and audits. Below is a summary of key activities completed in August 2021.

### FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

Compliance Assurance Division shifted resources in August to prioritize transition-related activities and is currently building new systems and processes to enhance its efficiencies. Therefore, overall inspection activities decreased in August 2021. Energy Safety inspection activities are expected to resume in the coming months, as the new processes and systems are built and integrated post-transition.

In August 2021, Energy Safety conducted no inspection activities<sup>1</sup> at Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), Bear Valley Electrical Services, Inc. (BVES), PacifiCorp, Liberty Utilities (LU), Horizon West Transmission (Horizon West), and Trans Bay Cable (TBC). Tables 1 and 2 below indicate the total number of inspection activities to date by Utility and WMP categories, respectively. Figure 1 below indicates the percentage of total inspection activities for WMP categories.

**Table 1: Total Number of Inspection Activities by Utilities**

	August 2021	2021 Year to Date Activities	Program to Date Activities*
<b>No. of Activities</b>	- <sup>2</sup>	<b>2378</b>	<b>5392</b>
<b>PG&amp;E</b>	-	739	2460
<b>SCE</b>	-	982	1714
<b>SDG&amp;E</b>	-	413	825
<b>LU</b>	-	146	209
<b>PacifiCorp</b>	-	0	43
<b>BVES</b>	-	85	128
<b>Horizon West</b>	-	10	10
<b>TBC</b>	-	3	3
*Data from initiation of Field Inspection Program from July 2020 to August 31, 2021			

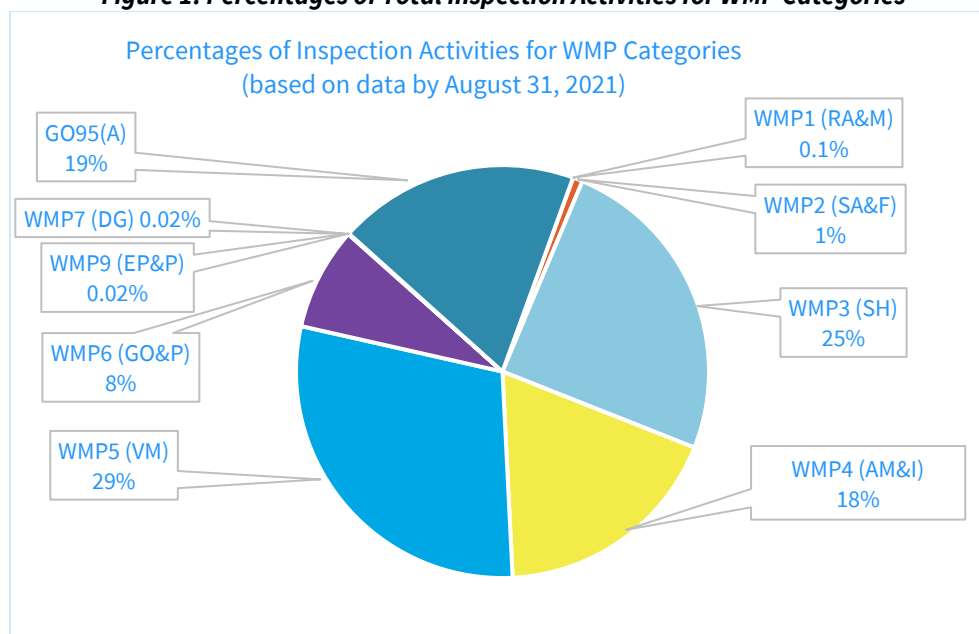
<sup>1</sup> An inspection of each WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a Grid Design and System Hardening initiative (i.e., WMP3) and inspected for compliance with a Vegetation Management and Inspections initiative (i.e., WMP5)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

<sup>2</sup> Energy Safety overall inspection activities decreased in May, June, July, and August due to resourcing preparation for the transition to the Office of Energy Infrastructure Safety and other activities including oversight and execution of the Independent Evaluator process according to the requirements of California Public Utilities Code Section 8386.3(C)(2).

**Table 2: Number of Inspection Activities by WMP Categories**

WMP Categories	August 2021	Total Activities to date*
<b>No. of Activities</b>	-	<b>5392</b>
<b>WMP1<sup>3</sup> (Risk Assessment &amp; Mapping)</b>	-	1
<b>WMP2<sup>3</sup> (Situational Awareness)</b>	-	41
<b>WMP3<sup>3</sup> (System Hardening)</b>	-	1330
<b>WMP4<sup>3</sup> (Asset Inspections)</b>	-	982
<b>WMP5<sup>3</sup> (Vegetation Management)</b>	-	1581
<b>WMP6<sup>3</sup> (PSPS)</b>	-	434
<b>WMP7<sup>3</sup> (Data Governance)</b>	-	3
<b>WMP9<sup>3</sup> (Emergency Planning &amp; Preparedness)</b>	-	1
<b>GO 95</b>	-	1019

\* Data from initiation of Field Inspection Program in July 2020 to August 31, 2021

**Figure 1: Percentages of Total Inspection Activities for WMP Categories**

<sup>3</sup> WMP Guidelines categorize mitigation initiatives 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 categorization is available at: <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M322/K133/322133494.PDF>

## DEFECTS

During inspections, Energy Safety staff document any condition noted that is inconsistent with the WMP Initiatives as a defect. Each identified defect is also assigned a severity category which corresponds to a corrective action timeframe, as provided in Table 3 below. Depending on the level of defect severity—with a range of severe, moderate, and minor—Energy Safety requires repairs in intervals that depend on the severity and the location of the defect.<sup>4</sup> Table 4 below summarizes the number of defects identified during inspections conducted in August 2021, the total number of defects to date, and the status of all defects corrected by ECs. Figures 2 and 3 below summarize the total percentages of all defects to date by EC and WMP category, respectively. No defects were noted in August 2021, as inspections were not conducted.

**Table 3: Defect Correction Timeline for Levels of Severity**

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

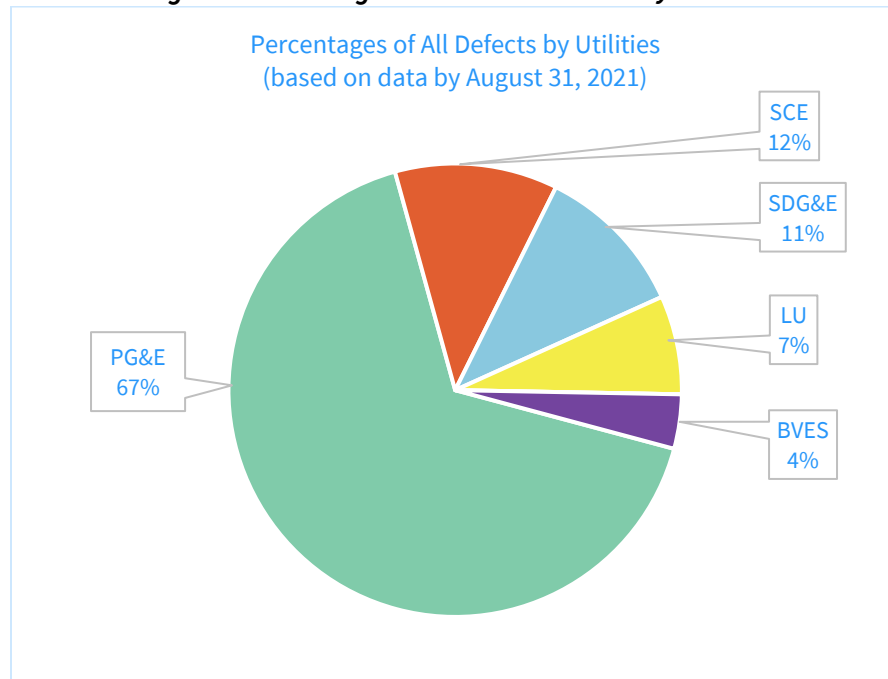
**Table 4: Summary of Status of Open and Closed Defects with Severities**

	August 2021	All Defects to date	Open Defects as of 8/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
<b>No. of Defects</b>	-	<b>274</b>	<b>59</b>	<b>7</b>	<b>20</b>	<b>32</b>	<b>215</b>
<b>PG&amp;E</b>	-	179	24	7	9	8	155
<b>SCE</b>	-	33	7	-	-	7	26
<b>SDG&amp;E</b>	-	31	12	-	1	11	19
<b>LU</b>	-	20	16	-	10	6	4
<b>PacifiCorp</b>	-	-	-	-	-	-	-
<b>BVES</b>	-	11	-	-	-	-	11
<b>Horizon West</b>	-	-	-	-	-	-	-
<b>TBC</b>	-	-	-	-	-	-	-

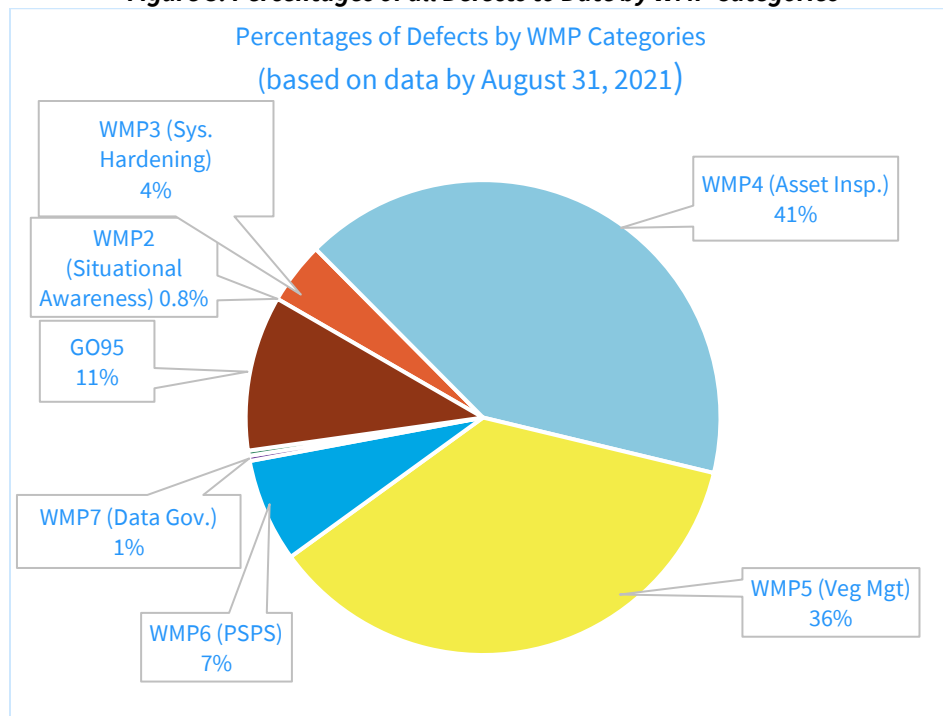
<sup>4</sup> Resolution WSD-012, approved by the Commission on November 19, 2020, established a schedule for ECs to correct defects. Resolution WSD-012 is available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M351/K834/351834801.PDF>

**Figure 2: Percentages of All Defects to Date by Utilities**



**Figure 3: Percentages of all Defects to Date by WMP Categories**



## AUDIT PROGRAM

After launching the Field Inspection Program, Energy Safety initiated its Audit Program in the Fall of 2020. To date, three audit types are in progress: Forensic Accounting, Substantial Vegetation Management, and Risk Prioritization.

The Forensic Accounting audit examines ECs spending in the execution of its WMP programs and initiatives relative to its prior General Rate Case (GRC) applications. The audit will assess whether any expenses and/or investments identified in the 2019 and 2020 WMPs are duplicative of operating and capital expenditures approved in previous GRCs. Energy Safety is performing Forensic Accounting audits on PG&E, SCE, BVES, SDG&E, LU, and PacifiCorp.

Pursuant to Public Utilities Code §8386.3(c)(5)(a), ECs are required to notify Energy Safety within one month after completing a substantial portion of vegetation management requirements in their WMPs (referred to as “Substantial Vegetation Management” or SVM). Upon receiving the notice of completion from the ECs, the division shall, consistent with its authority pursuant to paragraph (1) of subdivision (a) of Section 326, audit the work performed by, or on behalf of, the EC. Energy Safety is performing SVM audits on PG&E, SCE, SDG&E, BVES, LU, and PacifiCorp.

The Risk Prioritization audit analyzes whether ECs have performed or are planning to perform vegetation management and/or grid hardening projects on circuits identified as high risk, as identified by outputs from EC developed risk models. Energy Safety is performing Risk Prioritization audits focused on grid hardening projects for SCE and SDG&E.

These audits are targeting the reduction of utility ignited wildfires.

## CONSUMER SAFETY CONCERNS

Energy Safety receives customer safety concerns related to wildfire safety directly from the public via the Energy Safety website or to the [Consumer@energysafety.ca.gov](mailto:Consumer@energysafety.ca.gov) inbox.<sup>5</sup> Each safety concern is assessed and responded to depending on the type of issue. Table 6 below shows a summary of safety concerns year to date and received in August 2021.

**Table 5: Safety Concerns Investigated by Energy Safety**

Responsible Division	August 2021	Year to Date 2021
Compliance Assurance	3	14

<sup>5</sup> The public safety concern form is available and may be submitted on Energy Safety’s website found here: <https://energysafety.ca.gov/what-we-do/safety-concerns/>



## ADDITIONAL ACTIVITIES OF THE COMPLIANCE ASSURANCE DIVISION

### **Public and Electrical Corporations responses to the Independent Evaluator (IE) Annual Report on Compliance (ARC) Published**

On August 6, 2021, and August 16, 2021, Energy Safety published the Public and Electrical Corporations responses to the Final [IE ARC](#) <sup>6</sup> on its website. All legacy documents pertaining to the IE ARCs and IE process in general may be found at the link above. Pursuant to new systems and processes developed for Energy Safety, all ongoing and future documents pertaining to the IE process will be made available through the IE case and respective docket on [Energy Safety's e-Filing website](#).<sup>7</sup> Public comments on the Final IE ARC were initially due on July 22, 2021 with EC responses due on July 31, 2021. Pursuant to an Energy Safety letter published on July 19, 2021, these due dates were extended to August 6, 2021 and August 16, 2021, respectively.<sup>8</sup>

---

<sup>6</sup> All IE ARCs are available at: <https://energysafety.ca.gov/what-we-do/compliance/independent-evaluators/>

<sup>7</sup> All ongoing and future documents pertaining to the IE process are available at the IE docket in the Energy Safety e-Filing system: <https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1249>

<sup>8</sup> The July 19, 2021 letter can be found on the 2021 IE docket in the Energy Safety e-Filing System.





# **ELECTRIC SAFETY POLICY DIVISION**



## ELECTRIC SAFETY POLICY DIVISION

Energy Safety's Electric Safety Policy Division<sup>9</sup> comprehensively reviews Electrical Corporations (EC) WMPs in accordance with Public Utilities Code (Pub. Util. Code) Section 8386 et. seq. The Division also develops wildfire safety policy and performance metrics, conducts safety culture assessments, and reviews and issues safety certificates. The Electric Safety Policy Division is committed to driving continuous improvement in utility-related wildfire mitigation approaches.

## PROGRAM GUIDANCE AND PROCESSES

In August of 2021, the Electric Safety Policy Division completed the following:

### 2021 Wildfire Mitigation Plan (WMP) Updates

On August 6, 2021, Energy Safety issued its Draft Action Statement on Bear Valley Electrical Services, Inc.'s (BVES) 2021 WMP Update. On August 9, 2021, Energy Safety issued its Draft Action Statement on Pacific Gas and Electric's (PG&E) 2021 WMP Update. On August 18, 2021, Energy Safety issued its Final Action Statement approving Southern California Edison's (SCE) 2021 WMP Update.

On August 26, 2021, the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submitted opening comments on Draft Resolution WSD-022 and Draft Action Statement on BVES's 2021 WMP Update. On August 30, 2021, multiple stakeholders – Mussey Grade Road Alliance (MGRA), Green Power Institute (GPI), Cal Advocates, as well as PG&E – submitted comments on Draft Resolution WSD-021 and Draft Action Statement on PG&E's 2021 WMP Update.

Energy Safety continues to evaluate the 2021 WMP Updates for PG&E and BVES with a plan to provide its final determination in September.

### Executive Compensation

On August 11, 2021, Energy Safety issued approval letters on San Diego Gas and Electric (SDG&E) and SCE's 2021 executive compensation structures. On August 12, 2021, Energy Safety issued an approval letter on BVES's 2021 executive compensation structure.

---

<sup>9</sup> Pursuant to Public Utilities Code Section 326(b), on July 1, 2021, the Wildfire Safety Division (WSD) transitioned from the Commission into the Office of Energy Infrastructure Safety (Energy Safety) under the California Natural Resources Agency. Energy Safety "is the successor to" and "is vested with all of the duties, powers, and responsibilities of the Wildfire Safety Division," (Government Code Section 15475) including, but not limited to, jurisdiction for evaluating and approving or denying electrical corporations' WMPs and evaluating compliance with regulations related to the WMPs. The Commission and the newly formed Energy Safety will adhere to all statutory requirements pertaining to the WMP process. WSD is used to describe the work of the WSD prior to July 1, 2021. Energy Safety is used to describe the work of Energy Safety beginning on July 1, 2021. Any references to WSD action post July 1, 2021 or to Energy Safety action prior to July 1, 2021 are inadvertent and should be interpreted as the actions of WSD or Energy Safety as appropriate.

**Safety Certification**

On August 24, 2021, Energy Safety issued a letter postponing the schedule for PG&E's Safety Certification request submission. Each electrical corporation seeking a Safety Certification must brief the California Public Utilities Commission (CPUC) and Energy Safety on safety performance to demonstrate that it meets the requirements set forth in Public Utilities Code section 8389(e)(5). PG&E's briefing has not yet been scheduled, necessitating the postponement of PG&E's Safety Certification request submission. A new submission date and corresponding timeline for PG&E's 2021 Safety Certification will be confirmed in due course. The new submission date will be within one year of January 14, 2021, the approval date of PG&E's current Safety Certification.

**Notice of Proposed Emergency Action**

On August 26, 2021, Energy Safety issued a Notice of Proposed Emergency Action pursuant to Government Code section 11346.1(a)(2). The emergency action proposes process and procedure regulations for Energy Safety following the transition from the CPUC. Energy Safety intends to submit the proposed rulemaking action for Office of Administrative Law review on September 3, 2021.





# DATA ANALYTICS DIVISION



## DATA ANALYTICS DIVISION

Energy Safety's Data Analytics Division supports the operational needs of the Office of Energy Infrastructure Safety (Energy Safety). The Division is focused on data analysis and GIS development to enable data-driven decision making.

### PROGRAM OVERVIEW

In August of 2021, the Data Analytics Division completed the following:

#### Data

On August 1<sup>st</sup>, 2021 Energy Safety received quarterly submission of utility data.

#### Products

On August 20<sup>th</sup>, 2021 Energy Safety released GIS Data Reporting Standards version 2.1 for a five-day public comment period. The final document is scheduled to be published on Energy Safety's e-Filing system on September 7<sup>th</sup>, 2021. All legacy documents pertaining to the [GIS Data Reporting Standards](#) in general may be found at Energy Safety's e-Filing system.<sup>10</sup>

### ADDITIONAL RESOURCES

All publicly available Energy Safety documents are available directly on our website at [www.energysafety.ca.gov](http://www.energysafety.ca.gov) or through our e-Filing system.

---

<sup>10</sup> Data Analytics Division public documents may be found here:  
<https://efiling.energysafety.ca.gov/Dockets.aspx?caseld=1252>

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY  
INFRASTRUCTURE  
SAFETY

OFFICE OF ENERGY INFRASTRUCTURE SAFETY  
A California Natural Resources Agency  
[www.energysafety.ca.gov](http://www.energysafety.ca.gov)

715 P Street, 20th Floor  
Sacramento, CA 95814  
916.902.6000

