

# **MONTHLY PERFORMANCE REPORT**

## **ELECTRICAL INFRASTRUCTURE DIRECTORATE**

September 2021



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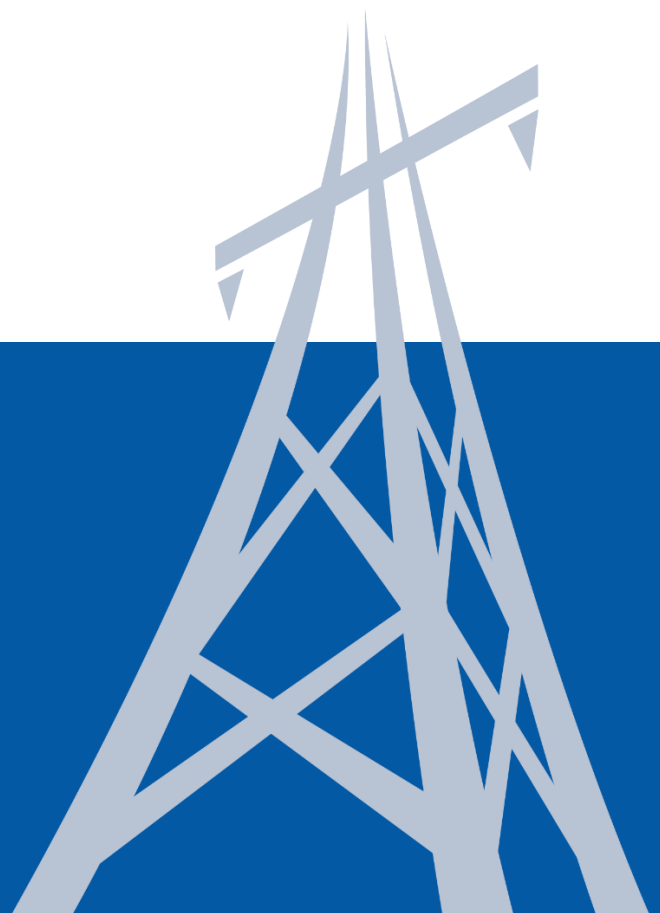
## INTRODUCTION

The Office of Energy Infrastructure Safety's (Energy Safety) primary purpose is to ensure electrical corporations (ECs) take 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. It summarizes key activities completed by the Electric Safety Policy, Compliance Assurance, and Data Analytics Divisions in the month of September in support of Energy Safety's mission.



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## 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 September 2021.

### FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

Compliance Assurance Division shifted resources in September to focus on building of new systems and processes to enhance the efficiencies of its inspection program. Therefore, overall inspection activities continued to decrease in September 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 September 2021, Energy Safety conducted no inspection activities<sup>1</sup> at Pacific Gas and 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**

	September 2021	2021 Year to Date Activities	Program to Date Activities*
<b>No. of Activities</b>	<b>-<sup>2</sup></b>	<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 September 30, 2021			

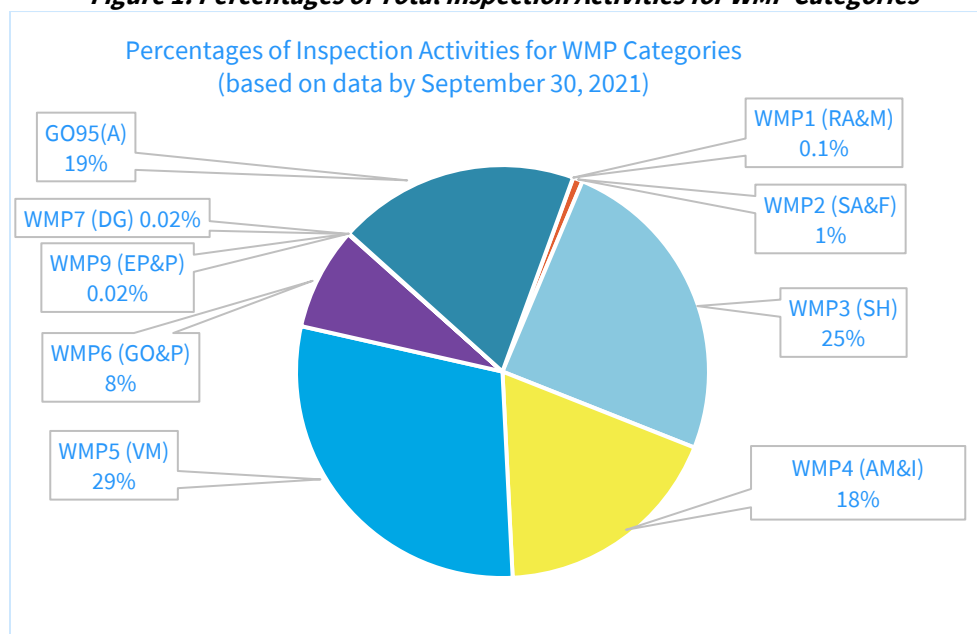
<sup>1</sup> An inspection of each WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a Grid Design and System Hardening initiative (i.e., WMP3) and inspected for compliance with a Vegetation Management and Inspections initiative (i.e., WMP5) 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, August, and September due to resourcing preparation for the transition to the Office of Energy Infrastructure Safety, building new systems and processes to enhance its efficiencies, 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	September 2021	Program to Date Activities*
<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 September 30, 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://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/attachment-2.2-to-wsd-011-2021-wmp-guidelines-template.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 September 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 September 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**

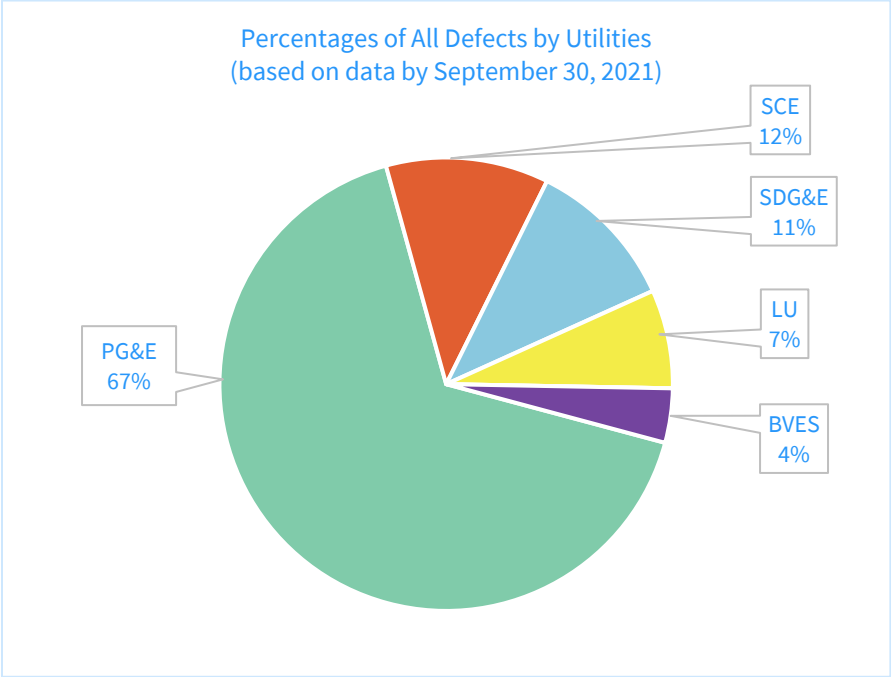
	September 2021	Program to date Defects*	Open Defects as of 9/30/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
<b>No. of Defects</b>	-	<b>275</b>	<b>53</b>	<b>7</b>	<b>19</b>	<b>27</b>	<b>222</b>
<b>PG&amp;E</b>	-	180	21	7	9	5	159
<b>SCE</b>	-	33	5	-	-	5	28
<b>SDG&amp;E</b>	-	31	11	-	-	11	20
<b>LU</b>	-	20	16	-	10	6	4
<b>PacifiCorp</b>	-	-	-	-	-	-	-
<b>BVES</b>	-	11	-	-	-	-	11
<b>Horizon West</b>	-	-	-	-	-	-	-
<b>TBC</b>	-	-	-	-	-	-	-

\* Data from initiation of Field Inspection Program in July 2020 to September 30, 2021

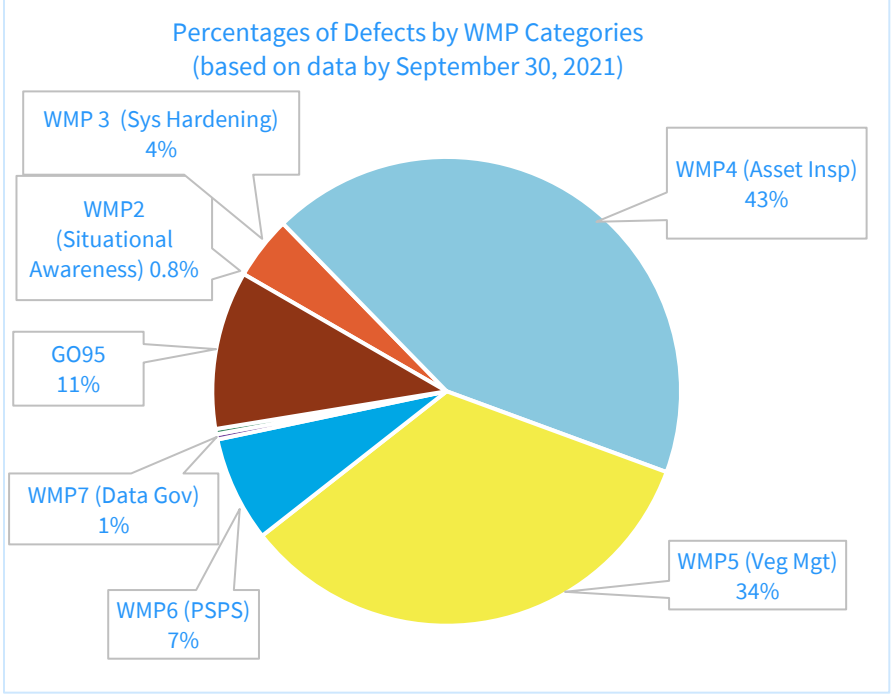
<sup>4</sup> Resolution WSD-012, approved by the Commission on November 19, 2020, established a schedule for ECs to correct defects. Resolution WSD-012 is available at:

<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.

## 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 September 2021.

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

Responsible Division	September 2021	Year to Date 2021
<b>Compliance Assurance</b>	<b>1</b>	<b>11*</b>
*In the August 2021 MPR, Energy Safety reported a total of 14 Consumer Safety Concerns. Three of these fall under Safety Enforcement Division of the California Public Utilities Commission. Therefore, three Consumer Safety Concerns were removed from this table.		

<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**

### **Continuous Learning and Training**

In keeping with Energy Safety's commitment to safety and objective to be a continuously learning organization, during the month of September 2021, Compliance Assurance Division staff completed a week long training on Electrical Safety for Inspectors through the AVO Training Institute. In addition, all Compliance Assurance Division staff completed CPR and first aid training in September 2021.

### **Energy Safety's Field Visit with PG&E on the Tree Assessment Tool**

Energy Safety staff, in coordination with the California Public Utilities Commission (CPUC) staff, coordinated a field visit on September 7, 2021 with local PG&E vegetation management personnel in Vacaville, CA where PG&E demonstrated their Tree Assessment Tool. The tool was developed by PG&E to prescribe tree mitigation work within its Enhanced Vegetation Management (EVM) program while in the field. Energy Safety staff were able to confer with local PG&E personnel on the strengths and challenges of the Tree Assessment Tool and the EVM program.





# **ELECTRIC SAFETY POLICY DIVISION**



## ELECTRIC SAFETY POLICY DIVISION

Energy Safety’s Electric Safety Policy Division<sup>6</sup> comprehensively reviews Electrical Corporations (EC) Wildfire Mitigation Plans (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 September of 2021, the Electric Safety Policy Division completed the following:

### 2021 Wildfire Mitigation Plan (WMP) Updates

On September 8, 2021, Energy Safety issued its Final Action Statement approving Bear Valley Electrical Services, Inc.’s (BVES) 2021 WMP Update. On September 22, 2021, Energy Safety issued its Final Action Statement approving Pacific Gas and Electric (PG&E) 2021 WMP Update.

Following the issuance of final Action Statements, each of the utilities<sup>7</sup> are required to submit a progress report to Energy Safety on November 1, 2021 to outline the extent to which Key Areas for Improvement have been addressed. Key Areas for Improvement are high priority issues identified in the Action Statements that may rise to a potential reason for denial in future submissions. The utilities<sup>8</sup> must also report on Additional Issues (lower priority areas for improvement identified in the Action Statements) in the 2022 WMPs.

On September 29, 2021, Energy Safety issued its Wildfire Risk Modeling Working Group Workplan Guidelines. The working group, led by Energy Safety, is a required collaboration between the three Large Investor-Owned Utilities (“Large IOUs”) – PG&E, Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) – and the Small and Multi-jurisdictional Utilities (“SMJUs”) –

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<sup>6</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.

<sup>7</sup> Here “utilities” refers to Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), PacifiCorp, Liberty Utilities (Liberty), and BVES; although this may not be the case every time “utilities” is used.

<sup>8</sup> Here “utilities” refers to PG&E, SCE, SDG&E, PacifiCorp, Liberty, BVES, Horizon West Transmission (Horizon West), and Trans Bay Cable (TBC); although this may not be the case every time “utilities” is used.

PacifiCorp, Liberty, and BVES. A result of a Key Area for Improvement identified in the Action Statements, the working group is focused on bringing more consistency across utilities in terms of risk modeling and determining the most effective and accurate methods, data sets, and analyses for the utilities to utilize in modeling.

### **Executive Compensation**

On September 29, 2021, Energy Safety held an Executive Compensation Workshop to present and discuss the results of contractor executive compensation research and potential updates to the Executive Compensation Guidelines [Pub. Util. Code Section 8389(e)(6)]. The staff workshop included presentations by Energy Safety staff, contractors and representatives of the three Large IOUs.

### **Safety Certification**

On September 8, 2021, Energy Safety issued a letter providing instructions for submitting Safety Certification requests and supporting documents. On September 14, 2021, Energy Safety issued a letter outlining the public comment period deadlines for opening and reply comments on SDG&E and SCE's Safety Certification request submissions.

SDG&E submitted its Safety Certification request on September 7, 2021, and SCE submitted its request on September 13, 2021. Energy Safety is in the process of evaluating the requests, with a plan to provide determinations in the coming months.

### **Safety Culture Assessments**

On September 2, 2021, Energy Safety issued its 2021 Safety Culture Assessment (SCA) reports for SCE and SDG&E, pursuant to Pub. Util. Code Section 8389(d)(4). These are the first annual SCAs under this statute and as such provide a baseline for future comparison. Energy Safety will use the SCA reports to assess safety culture outcomes over time and incorporate continuous learning into the SCA process. SCE and SDG&E can satisfy the "good standing" requirement in Pub. Util. Code. Section 8389(e)(2) by agreeing to implement all of the findings of their most recent SCA.





# 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 September of 2021, the Data Analytics Division completed the following:

#### Products

On September 7<sup>th</sup>, 2021 Energy Safety published the GIS Data Reporting Standard version 2.1 on Energy Safety's e-Filing system. All legacy documents pertaining to the [GIS Data Reporting Standards](#), in general, may be found at Energy Safety's e-Filing system.<sup>9</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>

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<sup>9</sup> Data Analytics Division public documents may be found here:

<https://efiling.energysafety.ca.gov/Dockets.aspx?caselid=1252>

<sup>10</sup> Energy Safety's e-filing system may be found at: <https://efiling.energysafety.ca.gov>

# DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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