



WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

February 2021



California Public
Utilities Commission

Wildfire Safety Division Monthly Performance Report

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Wildfire Safety Division Monthly Performance Report

1. REPORT PURPOSE

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

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 February 2021.

2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

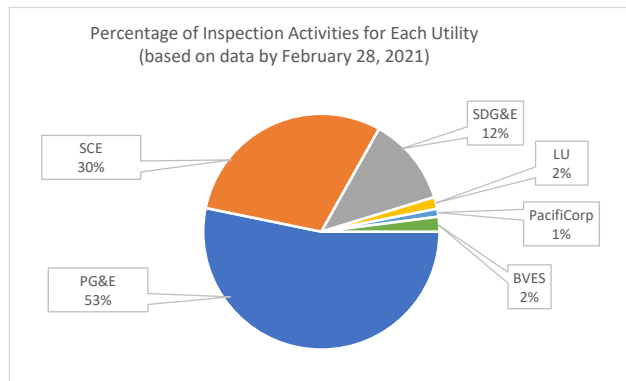
In February 2021, WSD conducted 675 inspection activities¹ across 6 WMP Categories at Pacific Gas and Electric Company (PG&E) and Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), and Bear Valley Electric Service (BVES). Inspections for Liberty Utilities (LU), PacifiCorp, and Horizon West Transmission (Horizon West) are scheduled in future months.

¹ 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

	February 2021	Total activities to date*
No. of Activities	675	3960
PG&E	171	2119
SCE	401	1177
SDG&E	66	478
LU	0	63
PacifiCorp	0	43
BVES	37	80



*Data from initiation of Field Inspection Program in May 2020 to February 28, 2021

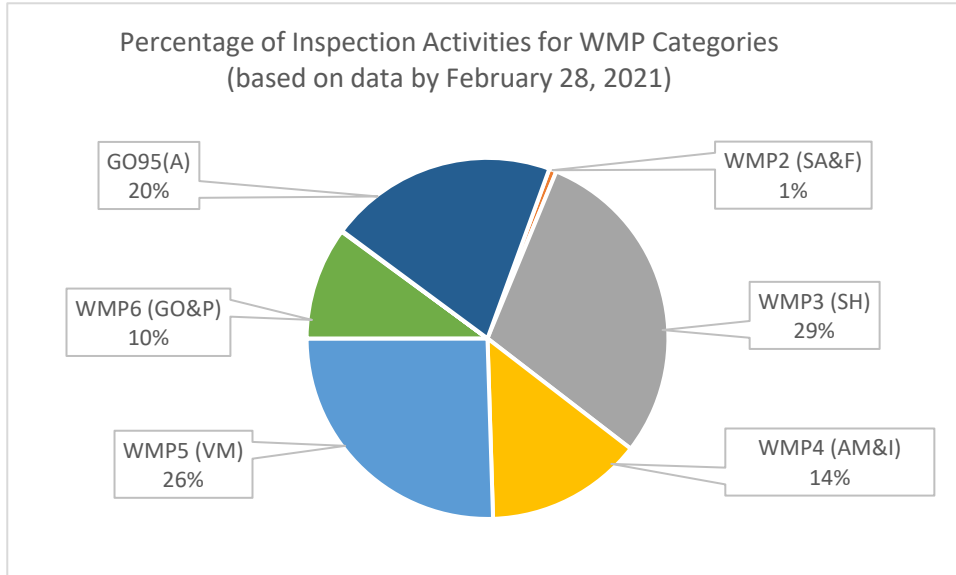
Total Number of Inspection Activities by WMP Category

	February 2021	Total Activities to date*
No. of Activities	675	3960
WMP2² (Situational Awareness)	1	26
WMP3² (System Hardening)	91	1151
WMP4² (Asset Inspections)	120	565
WMP5² (Vegetation Management)	285	1015
WMP6² (PSPS)	18	397
WMP7² (Data Governance)	1	3
GO 95	159	803

*Data from initiation of Field Inspection Program in May 2020 to February 28, 2021

² 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

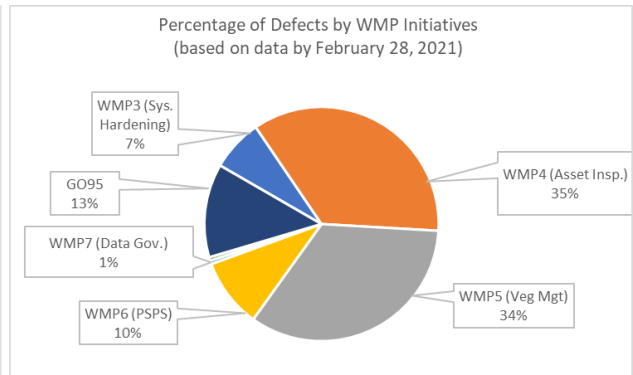
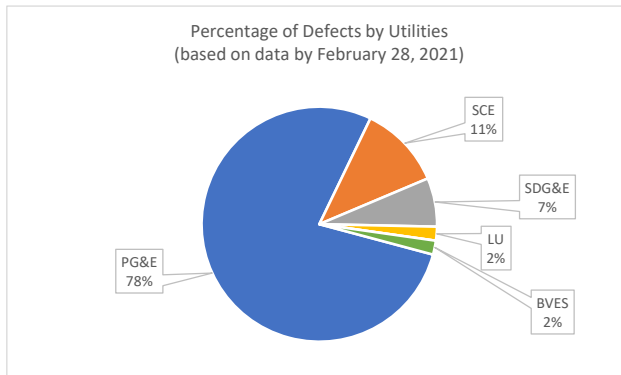
During inspection, WSD staff document any condition noted that is inconsistent with the WMP Category as a defect. The table below summarizes the number of defects identified during inspections conducted in February 2021, total number of defects to date and the status of all defects corrected by ECs. 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 defect³.

Category	Correction Timeline
Category 1 - Severe	Immediate resolution
Category 2 - Moderate	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)
Category 3 - Minor	12 months or resolution schedule included in WMP update

³ 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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	February 2021	All Defects to date	Open Defects as of 2/28/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	31	209	105	19	31	55	104
PG&E	18	164	76	19	21	36	88
SCE	11	23	16	0	7	9	7
SDG&E	2	14	8	0	3	5	6
LU	0	4	2	0	0	2	2
PacifiCorp	0	0	0	0	0	0	0
BVES	0	4	3	0	0	3	1



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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ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
PG&E	Substantial Vegetation Management ⁴	In Progress	TBD
PG&E	Enhanced Vegetation Management ⁵	Completed on February 5, 2021	Major deficiencies/findings can be found at https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/2021.02.08.EVM_Audit.pdf
PG&E	Santa Cruz Wood Management	In Progress	TBD
PG&E	Napa/Sonoma Wood Management	In Progress	TBD
SCE	Substantial Vegetation Management ⁴	In Progress	TBD
SDG&E	Substantial Vegetation Management ⁴	In Progress	TBD
PG&E	WMP Forensic Accounting ⁶	In Progress	TBD
SCE	WMP Forensic Accounting ⁶	In Progress	TBD
SDG&E	WMP Forensic Accounting ⁶	In Progress	TBD
BVES	WMP Forensic Accounting ⁶	In Progress	TBD
PacifiCorp	WMP Forensic Accounting ⁶	In Progress	TBD
LU	WMP Forensic Accounting ⁶	In Progress	TBD
SCE	Risk Prioritization for System Hardening and Vegetation Management ⁷	In Progress	TBD
SDG&E	Risk Prioritization for System Hardening and Vegetation Management ⁷	In Progress	TBD

⁴ 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.

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

⁶ 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.

⁷ Risk Prioritization for System Hardening and Vegetation Management is to evaluate EC's 2021 plans in implementing system hardening and vegetation management at prioritized areas for effective reduction of wildfire risks based on data collected in 2020.

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

Compliance Branch	February 2021	Year to Date 2021
Complaints investigated	0	1

2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH

Independent Evaluator Enlistment Announcement

On February 22, 2021, the WSD jointly with the California Department of Forestry and Fire Protection's (CAL Fire) Utility Fire Mitigation Division announced a list of approved independent evaluators (IEs) who are qualified in assessing the safe operation of electrical infrastructure. The full announcement with the detailed list of IEs is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/WSD_IEList_2021.pdf

2021 Draft Guidance on Engagement of Independent Evaluators

On February 22, 2021, the WSD released the draft 2021 Guidance on Engagement of Independent Evaluators (IEs) pursuant to Public Utilities Code §8386.3 for public comment. Each EC shall engage an IE listed to review and assess the EC's compliance with its WMP. The draft Guidance entails the minimum responsibilities of IEs and their reporting requirements. Stakeholder may submit comments on the draft Guidance by March 24, 2021. The draft Guidance is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/Draft_21_IEGLet.pdf

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3. WILDFIRE MITIGATION BRANCH

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

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

2021 Wildfire Mitigation Plan (WMP) Updates and Workshops

On February 5th, 2021, the WSD received and began evaluation of the 2021 Wildfire Mitigation Plan (WMP) Updates from PG&E, SCE, and SDG&E. On February 22nd and 23rd, the WSD held public workshops covering the 2021 WMP Updates. The technical workshops covered key topic areas including Risk Assessment and Mapping, Resource Allocation Methodology, Vegetation Management, Grid and System Hardening, and Public Safety Power Shutoffs (PSPS). Each of the large ECs – PG&E, SCE, and SDGE – provided panel presentations on each topic, followed by discussion and Q&A sessions.

Change Order Report Evaluation – SCE

On February 26th, 2021, the WSD issued an Action Statement deferring approval of Change Order 1 and approving Change Order 2, 3 and 4 of Southern California Edison Company's (SCE) Change Order Report submitted on September 11, 2020. The WSD will evaluate Change Order 1 as part of the review of the 2021 Wildfire Mitigation Plan (WMP) Update.

4. Resources

All publicly available Wildfire Safety Division documents are available at

www.cpuc.ca.gov/wsd.