



WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

March 2021



California Public
Utilities Commission

Wildfire Safety Division Monthly Performance Report

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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.

1.1 WSD IMPORTANT ANNOUNCEMENT

Transition from WSD at the CPUC to the Office of Energy Infrastructure Safety at the California Natural Resources Agency

By July 1, 2021, CPUC's WSD will become the Office of Energy Infrastructure Safety (OEIS) under the California Natural Resources Agency (CNRA). This transition is statutorily required by Assembly Bill 111. As the transition date approaches, the WSD communicate changes due to the transition and provide awareness to government, utility, and public stakeholders throughout the process. The full announcement is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/Service%20List%20Docket%20Transition%20Letter%2020210407.pdf

2. COMPLIANCE BRANCH

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

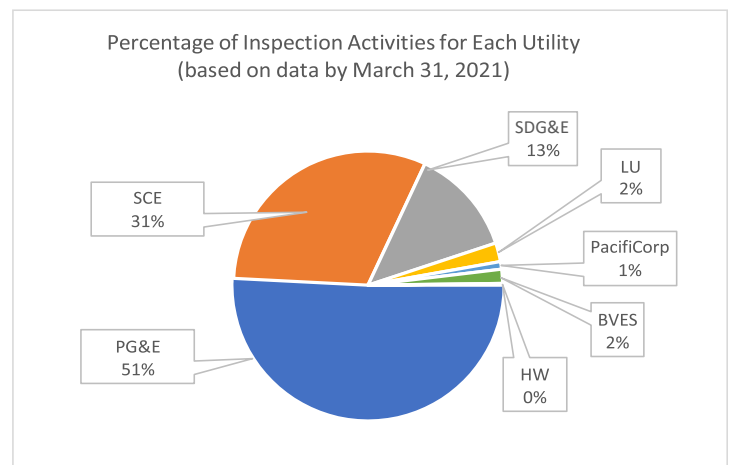
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2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

In March 2021, WSD conducted 753 inspection activities¹ across 6 WMP Categories at Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), Liberty Utilities (LU), PacifiCorp, and Horizon West Transmission (Horizon West). Inspections for Bear Valley Electric Service (BVES) and Trans Bay Cable (TBC) are scheduled in the coming months.

Total Number of Inspection Activities by Utility

	March 2021	Total activities to date*
No. of Activities	753	4713
PG&E	276	2395
SCE	291	1468
SDG&E	132	610
LU	44	107
PacifiCorp	0	43
BVES	0	80
Horizon West	10	10
TBC	0	0



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

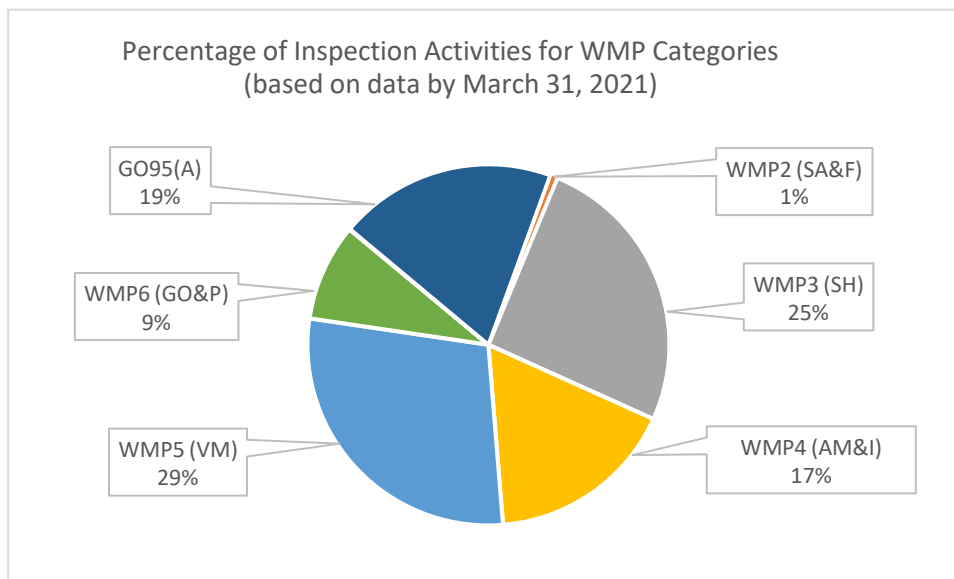
¹ An inspection of each individual WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a WMP3 (Grid Design and System Hardening) initiative and inspected for compliance with a WMP5 (Vegetation Management and Inspections) initiative is counted 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 WMP Category

WMP Categories	March 2021	Total Activities to date*
No. of Activities	753	4713
WMP2² (Situational Awareness)	6	32
WMP3² (System Hardening)	51	1202
WMP4² (Asset Inspections)	235	800
WMP5² (Vegetation Management)	334	1349
WMP6² (PSPS)	13	410
WMP7² (Data Governance)	0	3
GO 95	114	917

*Data from initiation of Field Inspection Program in May 2020 to March 31, 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

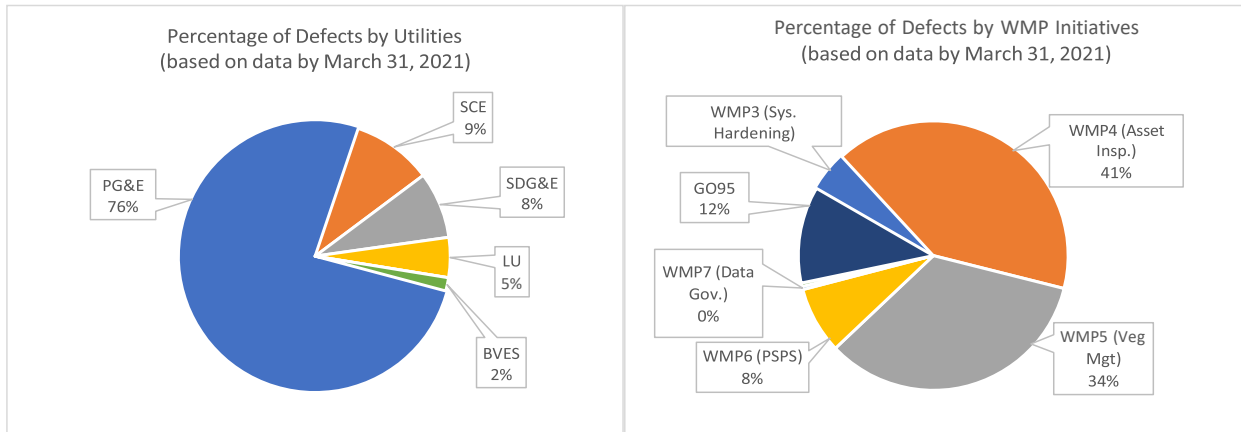
During inspection, WSD staff document any condition noted that is inconsistent with the WMP Category as a defect. The table below summarizes the number of defects identified during inspections conducted in March 2021, total number of defects to date, and the status of all defects corrected by ECs. Depending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

	March 2021	All Defects to date	Open Defects as of 3/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	45	250	121	18	40	63	129
PG&E	27	190	81	18	29	34	109
SCE	4	24	13	0	1	12	11
SDG&E	6	20	14	0	5	9	6
LU	8	12	10	0	5	5	2
PacifiCorp	0	0	0	0	0	0	0
BVES	0	4	3	0	0	3	1
Horizon West	0	0	0	0	0	0	0
TBC	0	0	0	0	0	0	0

³Resolution 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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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.

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 March 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

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.

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ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
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

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 March 2021.

Compliance Branch	March 2021	Year to Date 2021
Complaints investigated	1	2

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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2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH

Annual Report on Compliance

Pursuant to California Public Utilities Code §8386.3(c)(1) and the WSD's Final Guidance on Compliance Operational Protocols issued on February 16, 2021, ECs are required to submit an Annual Report on Compliance (ARC) by March 31 of each year. The ARC shall provide an assessment of whether the EC met the risk reduction intent by implementing the approved WMPs, descriptions of WMP initiative spend, public safety power shutoff (PSPS) events, and a summary of all defects and corrective actions taken. By March 31, 2021, BVES, Horizon West, Liberty, PacifiCorp, PG&E, SCE, SDG&E, and Trans Bay Cable, LLC submitted their individual ARCs to the WSD. The ARCs are available at: <https://www.cpuc.ca.gov/wsd/complianceprocess/>.

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.

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3.1 PROGRAM GUIDANCE AND PROCESSES

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

2021 Wildfire Mitigation Plan (WMP) Updates and Workshops

On March 5th, 2021, the WSD received the 2021 Wildfire Mitigation Plan (WMP) Updates from Liberty Utilities, Bear Valley Electric Service (BVES), PacifiCorp, Horizon West, and Trans Bay Cable. As a part of the evaluation process, the WSD holds weekly utility content calls to clarify information submitted in the WMP and issues data requests when the evaluation team has questions that warrant written responses.

On March 23rd, the WSD held a public workshop covering the 2021 WMP Updates. The technical workshop covered key topic areas including Risk Assessment and Mapping, Resource Allocation Methodology, Vegetation Management, and Grid and System Hardening. Liberty, BVES, and PacifiCorp provided panel presentations on each topic, while Horizon West and Trans Bay Cable presented during the Grid Design and System Hardening session. Each session was followed by public comment.

Public Comments on 2021 WMP Updates

On March 29th, 2021, the WSD received public comments on the 2021 WMP Updates for PG&E, SCE, and SDG&E. Public comments include those from stakeholder organizations, individuals, and the Wildfire Safety Advisory Board (WSAB). The Mitigation Branch carefully reviews and considers each public comment submission as part of the WMP review process.

4. RESOURCES

All publicly available Wildfire Safety Division documents are available at

www.cpuc.ca.gov/wsd.