



WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

April 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

On July 1, 2021, the WSD will transition into 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 would like to prepare you for the transition and provide awareness of this change. The full announcement is available at:

[HTTPS://WWW.CPUC.CA.GOV/WSD/](https://www.cpuc.ca.gov/wsd/)

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 April 2021.

2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

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In April 2021, WSD conducted 634 inspection activities¹ across 5 WMP Categories and General Order 95 (GO95) at Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), Liberty Utilities (LU), and Bear Valley Electric Service (BVES). Inspections for PacifiCorp, Horizon West Transmission (Horizon West) and Trans Bay Cable (TBC) are scheduled in the coming months.

Table 1: Total Numbers of Inspection Activities by Utilities

	April 2021	Total activities to date*
No. of Activities	634	5347
PG&E	65	2460
SCE	246	1714
SDG&E	215	825
LU	60	167
PacifiCorp	0	43
BVES	48	128
Horizon West	0	10
TBC	0	0

*Data from initiation of Field Inspection Program in May 2020 to April 30, 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 WMP initiatives.

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Figure 1: Percentages of Total Inspection Activities for Each Utility

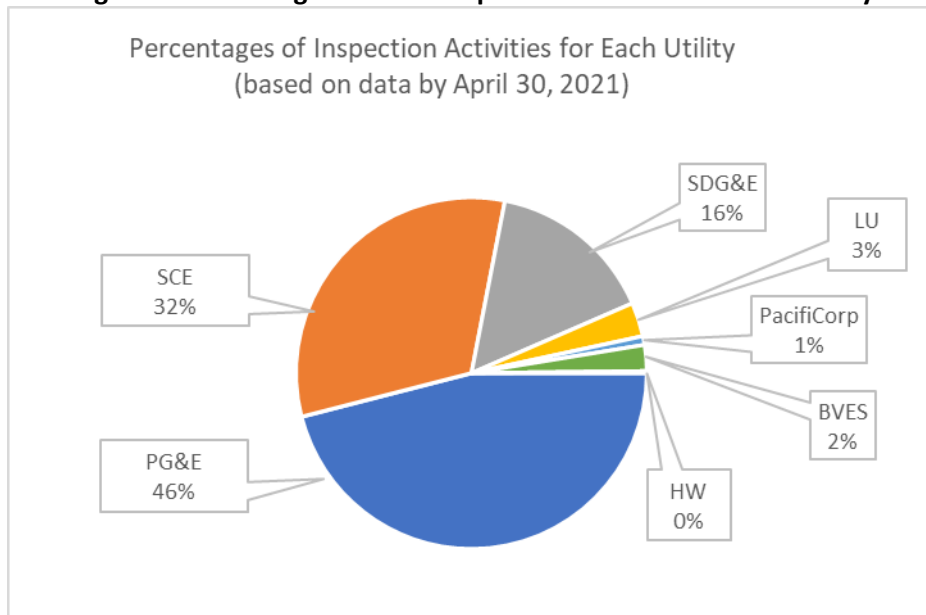


Table 2: Numbers of Inspection Activities by WMP Categories

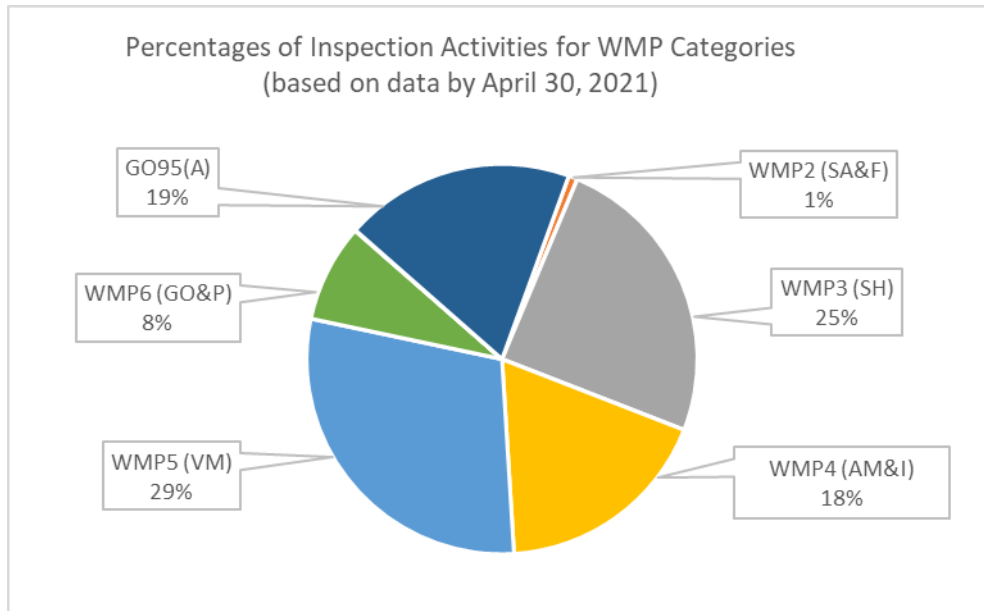
WMP Categories	April 2021	Total Activities to date*
No. of Activities	634	5347
WMP2² (Situational Awareness)	8	40
WMP3² (System Hardening)	114	1316
WMP4² (Asset Inspections)	168	968
WMP5² (Vegetation Management)	218	1567
WMP6² (PSPS)	24	434
WMP7² (Data Governance)	0	3
GO 95	102	1019

*Data from initiation of Field Inspection Program in May 2020 to April 30, 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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Figure 2: Percentages of Total Inspection Activities for WMP Categories



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 April 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.

Table 3 Defect Correction Timeline for Levels of Severity

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

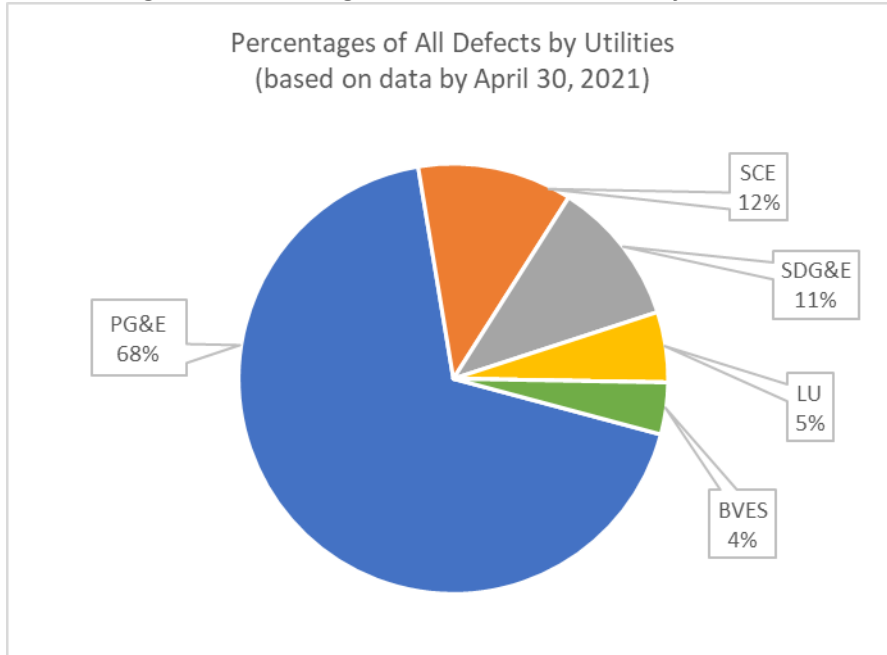
³ Resolution WSD-012, approved by the Commission on November 19, 2020, established a schedule for ECs to correct defects. Resolution WSD-012 is available at: <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M351/K834/351834801.PDF>

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

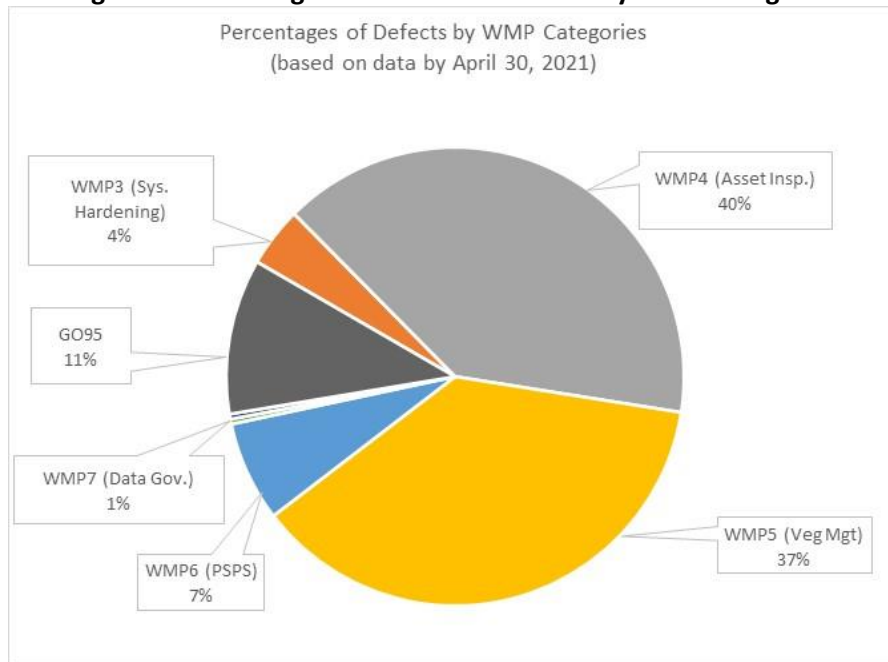
	April 2021	All Defects to date	Open Defects as of 4/30/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	33	283	132	20	42	70	151
PG&E	3	193	73	18	26	29	120
SCE	8	33	21	1	2	18	12
SDG&E	12	31	16	0	3	13	15
LU	3	15	13	0	7	6	2
PacifiCorp	0	0	0	0	0	0	0
BVES	7	11	9	1	4	4	2
Horizon West	0	0	0	0	0	0	0
TBC	0	0	0	0	0	0	0

Figure 3: Percentages of All Defects to Date by Utilities



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Figure 4: Percentages of all Defects to Date by WMP Categories



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.

Table 5: Audits initiated by WSD

ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
PG&E	Substantial Vegetation Management ⁴	In Progress	TBD
SCE	Substantial Vegetation Management ⁴	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.

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ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
SDG&E	Substantial Vegetation Management ⁴	In Progress	TBD
PG&E	WMP Forensic Accounting ⁵	In Progress	TBD
SCE	WMP Forensic Accounting ⁵	In Progress	TBD
SDG&E	WMP Forensic Accounting ⁵	In Progress	TBD
BVES	WMP Forensic Accounting ⁵	In Progress	TBD
PacifiCorp	WMP Forensic Accounting ⁵	In Progress	TBD
LU	WMP Forensic Accounting ⁵	In Progress	TBD
SCE	Risk Prioritization for System Hardening and Vegetation Management ⁶	In Progress	TBD
SDG&E	Risk Prioritization for System Hardening and Vegetation Management ⁶	In Progress	TBD

2.4 CONSUMER COMPLAINTS

The WSD receives customer complaints related to wildfire safety from the CPUCs Consumer Affairs Branch (CAB) and directly from stakeholders through the WSD general inbox. Each complaint is assessed and responded to depending on the type of complaint. Below is the summary of complaint(s) received in April 2021.

Table 6: Complaints Managed by WSD

Compliance Branch	April 2021	Year to Date 2021
Complaints investigated	1	3

⁵ 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.

⁶ 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

Quarterly Initiative Updates (QIU) on Compliance

Pursuant to California Public Utilities Code §8386.3(e)(7) and the WSDs Final Guidance on Compliance Operational Protocols issued on February 16, 2021, Electrical Companies (ECs) are required to submit Q4, 2020 QIU Report by April 1, 2021. The purpose of the QIU is to provide a quantitative and qualitative understanding of the ECs annual targets and projected quarterly progress for each initiative and enables WSD to track the ECs compliance with their initiative targets throughout the year. By April 1, 2021, eight QIUs were received separately from BVES, Horizon West, Liberty Utilities, PacifiCorp, PG&E, SCE, SDG&E, and Trans Bay Cable, LLC. The QIUs are available at: <https://www.cpuc.ca.gov/wsd/complianceprocess/>

2021 Guidance on Engagement of Independent Evaluators

On April 6, 2021, the WSD released the final 2021 Guidance on Engagement of Independent Evaluators (IEs) pursuant to Public Utilities Code §8386.3 for public comment. Each EC shall engage a qualified IE to review and assess the ECs compliance with its WMP. The Guidance entails the minimum responsibilities of IEs and their reporting requirements. The final 2021 Guidance on Engagement of IEs is available at:

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/WSD%20to%20Stakeholders%20-%20Final%202021%20Guidance%20Letter%20RE%20Hiring%20IEs%20-%2020210406%20\(003\)_ctj%20signed.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/WSD%20to%20Stakeholders%20-%20Final%202021%20Guidance%20Letter%20RE%20Hiring%20IEs%20-%2020210406%20(003)_ctj%20signed.pdf)

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Substantial Vegetation Management

Pursuant to Public Utilities Code §8386.3(c)(5)(A), IOUs are required to notify the WSD within one month after completing a substantial portion of vegetation management requirements in their WMPs, of the completion. Upon receiving the notice from the electrical corporation, the division shall, consistent with its authority pursuant to paragraph (1) of subdivision (a) of Section 326, promptly audit the work performed by, or on behalf of, the electrical corporation. To audit 2020 vegetation management work, the WSD issued data requests to collect the data needed to validate completion of high-priority WMP initiatives. As of April 30, 2021, the WSD has received data regarding the completion of substantial vegetation from SCE and PG&E.

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 certifications. The Wildfire Mitigation Branch is committed to continuous improvement in utility-related wildfire mitigation approaches.

3.1 PROGRAM GUIDANCE AND PROCESSES

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

2021 Wildfire Mitigation Plan (WMP) Updates

The WSD continues its review of the 2021 Wildfire Mitigation Plan (WMP) Updates. As part of the evaluation process, the WSD holds weekly utility content calls, as needed, to clarify information submitted in the utilities' WMPs and issues data requests when the evaluation team has questions that warrant written responses. All data requests and corresponding utility responses are uploaded to utility websites.

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On April 27, 2021, the WSD issued an Action Statement extending the three-month deadline to issue its draft determination of the 2021 WMP Updates for the Electrical Corporations per Public Utilities Code (Pub. Util. Code) 8389.3(a). The extension applies to PG&E, SCE, and BVES due to the issuance of Revision Notices⁷.

Pursuant to Pub. Util. Code Section 8386.3(a), before approval of a utility's WMP, the WSD may require modification of the WMP. The modification of the WMP is conducted through the issuance of Revision Notices outlining critical issues that require resolution. These critical issues will be of significant importance such that a delay in the three-month statutory deadline is necessary for the WSD to adequately determine that a utility's WMP is sufficiently reducing wildfire risk and impacts to public safety. As such, PG&E, SCE, and BVES are required to submit Revision Notice Responses within 30 days of issuance of the Revision Notices (by June 3, 2021), resolving the identified critical issues. Party comments and reply comments on the utility's Revision Notice Responses are due on June 10 and June 16, respectively.

There was no Revision Notice issued for SDG&E's 2021 WMP Update. However, there will be a delay in issuance of the WSD's draft determination on SDG&E's 2021 WMP Update. This is largely due to the additional time granted to parties to extend comment periods and the scheduling of Commission meetings.

Public Comments on 2021 WMP Updates

In April 2021, the WSD received reply comments on the PG&E, SCE, and SDG&E 2021 WMP Updates. The WSD also received opening comments on the small and multi-jurisdictional utilities (SMJUs) and independent transmission operators (ITOs) 2021 WMP Updates. Comments were received from stakeholder organizations, individuals, and the Wildfire Safety Advisory Board (WSAB). The WSD's Wildfire Mitigation Branch carefully reviews and considers all comments as part of the WMP review process.

⁷ PG&E, SCE, and BVES Revision Notices can be found at <https://www.cpuc.ca.gov/wildfiremitigationplans/>.

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Executive Compensation – BVES

On April 14, 2021, the WSD issued an Action Statement denying BVES executive compensation structure submission of January 15, 2021 for lack of adherence to the required structure as outlined in Pub. Util. Code 8389(e)(6)(A)(1).⁸ BVES is required to refile its executive compensation plan in a form that meets the requirements no later than 60 days from the date of this Action Statement.

4. RESOURCES

All publicly available Wildfire Safety Division documents are available at www.cpuc.ca.gov/wsd.

⁸ The WSD Action Statement denying BVES' executive compensation structure can be found at <https://www.cpuc.ca.gov/wsd/executivecomp/>.