



# WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

May 2021



California Public  
Utilities Commission

# Wildfire Safety Division Monthly Performance Report

## Contents

---

1. REPORT PURPOSE.....	2
1.1 WSD IMPORTANT ANNOUNCEMENT .....	2
2. COMPLIANCE BRANCH .....	2
2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS .....	2
2.2 DEFECTS .....	5
2.3 AUDIT PROGRAM .....	8
2.4 CONSUMER COMPLAINTS.....	9
2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH.....	10
3. WILDFIRE MITIGATION BRANCH .....	11
3.1 PROGRAM GUIDANCE AND PROCESSES.....	11
4. RESOURCES .....	13

### Disclaimer

This Report was prepared by California Public Utilities Commission (CPUC) staff. It does not necessarily represent the views of the CPUC, its Commissioners, or the State of California.

The CPUC, the State of California, its employees, contractors, and subcontractors make no warrants, expressed or implied, and assume no legal liability for the information in this Report.

# 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 WSDs 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, CPUCs WSD will become the Office of Energy Infrastructure Safety (Energy Safety) 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/uploadedFiles/CPUCWebsite/Content/About\\_Us/Organizational/Divisions/WSD/WSD%20to%20Energy%20Safety%20Transition%20FAQ%2020210524.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/WSD%20to%20Energy%20Safety%20Transition%20FAQ%2020210524.pdf)

## 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 May 2021.

### 2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

---

## Wildfire Safety Division Monthly Performance Report

In May 2021, WSD conducted 42 inspection activities<sup>1</sup> across three WMP Categories at Liberty Utilities (LU). 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**

	May 2021	Total activities to date*
<b>No. of Activities</b>	<b>42<sup>2</sup></b>	<b>5389</b>
<b>PG&amp;E</b>	-	2460
<b>SCE</b>	-	1714
<b>SDG&amp;E</b>	-	825
<b>LU</b>	42	209
<b>PacifiCorp</b>	-	43
<b>BVES</b>	-	128
<b>Horizon West</b>	-	10
<b>TBC</b>	-	0

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

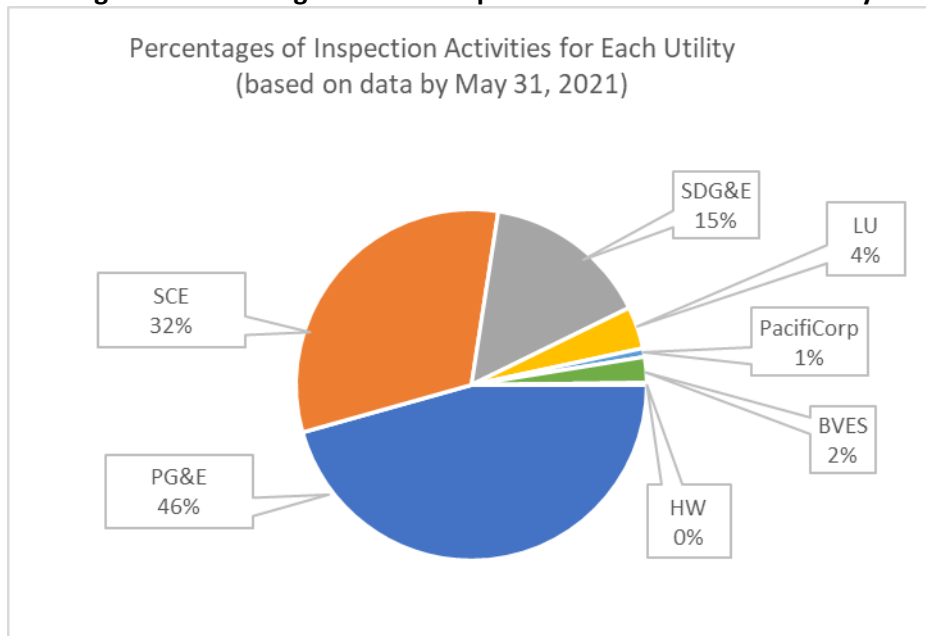
---

<sup>1</sup> 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 two inspection activity units, though only one pole is inspected. An inspection report may contain multiple inspection activities across multiple WMP initiatives.

<sup>2</sup> WSD overall inspection activities decreased in the month of May due to resourcing preparation for the transition to the Office of Energy Infrastructure Safety.

# Wildfire Safety Division Monthly Performance Report

**Figure 1: Percentages of Total Inspection Activities for Each Utility**



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

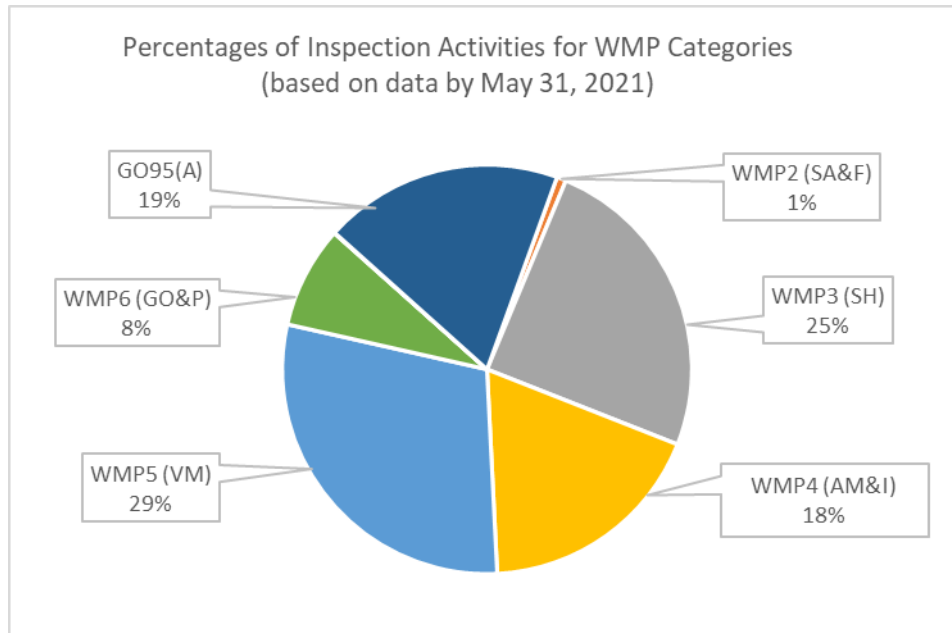
WMP Categories	May 2021	Total Activities to date*
<b>No. of Activities</b>	<b>42</b>	<b>5389</b>
<b>WMP2<sup>3</sup> (Situational Awareness)</b>	-	40
<b>WMP3<sup>3</sup> (System Hardening)</b>	14	1330
<b>WMP4<sup>3</sup> (Asset Inspections)</b>	14	982
<b>WMP5<sup>3</sup> (Vegetation Management)</b>	14	1581
<b>WMP6<sup>3</sup> (PSPS)</b>	-	434
<b>WMP7<sup>3</sup> (Data Governance)</b>	-	3
<b>GO 95</b>	-	1019

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

<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>

# Wildfire Safety Division Monthly Performance Report

**Figure 2: Percentages of Total Inspection Activities for WMP Categories**



## 2.2 DEFECTS

During inspections, 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 May 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 defect.<sup>4</sup>

<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>

## Wildfire Safety Division Monthly Performance Report

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

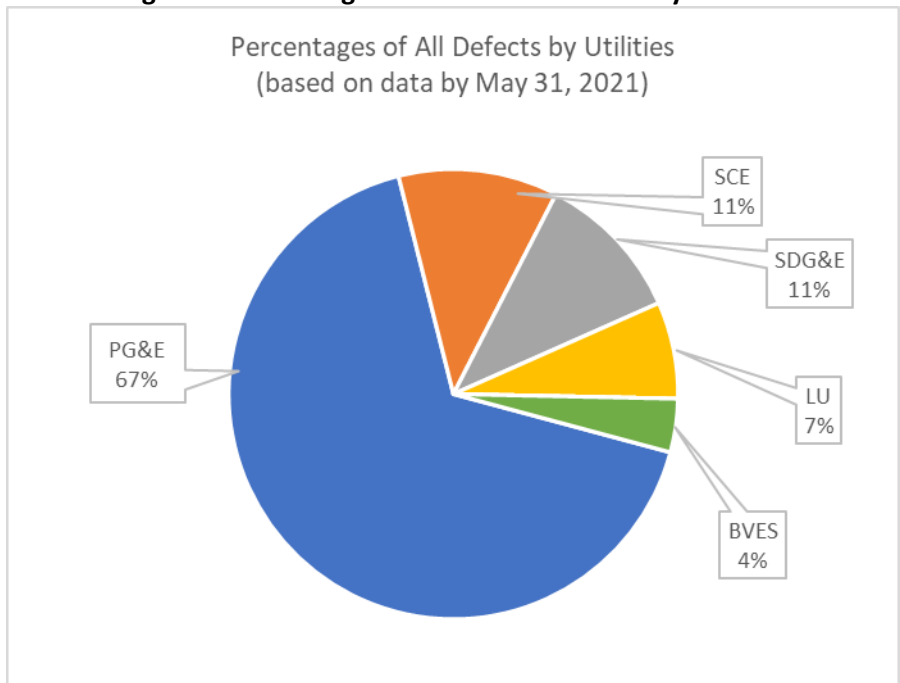
Category	Correction Timeline
<b>Category 1 - Severe</b>	Immediate resolution
<b>Category 2 - Moderate</b>	1-2 months (in HFTD Tier 3) 3-6 months (in HFTD Tier 2) 6 months (if relevant to worker safety) 12 months or scheduled in WMP update (other)
<b>Category 3 - Minor</b>	12 months or resolution schedule included in WMP update

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

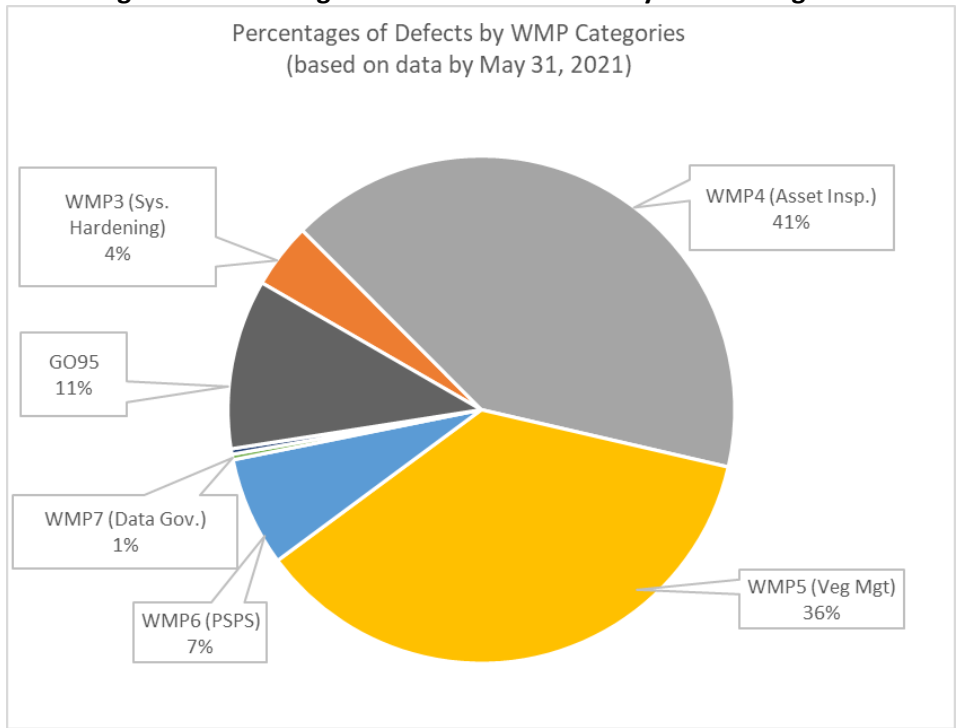
	May 2021	All Defects to date	Open Defects as of 5/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
<b>No. of Defects</b>	<b>5</b>	<b>287</b>	<b>113</b>	<b>20</b>	<b>42</b>	<b>70</b>	<b>174</b>
<b>PG&amp;E</b>	-	192	63	17	21	25	129
<b>SCE</b>	-	33	20	-	2	18	13
<b>SDG&amp;E</b>	-	31	12	-	1	11	19
<b>LU</b>	5	20	18	-	10	8	2
<b>PacifiCorp</b>	-	-	-	-	-	-	-
<b>BVES</b>	-	11	-	-	-	-	11
<b>Horizon West</b>	-	-	-	-	-	-	-
<b>TBC</b>	-	-	-	-	-	-	-

# Wildfire Safety Division Monthly Performance Report

**Figure 3: Percentages of All Defects to Date by Utilities**



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





# Wildfire Safety Division Monthly Performance Report

## 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 Pacific Gas & Electric (PG&E), Southern California Edison (SCE), San Diego Gas & Electric (SDG&E), Bear Valley Electric Service, Inc. (BVES), PacifiCorp, and LU. WSD has also launched audits of PGE, SCE, and SDG&E vegetation management activities. A full list of initiated audits is below.

### 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. 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 May 30<sup>th</sup>, 2021, the WSD has received data regarding the completion of substantial vegetation from PG&E, SCE, SDG&E, and BVES.

**Table 5: Audits initiated by WSD**

ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
<b>PG&amp;E</b>	Substantial Vegetation Management <sup>5</sup>	In Progress	TBD
<b>SCE</b>	Substantial Vegetation Management <sup>5</sup>	In Progress	TBD

---

<sup>5</sup> 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.

---

## Wildfire Safety Division Monthly Performance Report

ECs	Description of Audit	Audit Status	Major Deficiencies/ Findings
<b>SDG&amp;E</b>	Substantial Vegetation Management <sup>5</sup>	In Progress	TBD
<b>BVES</b>	Substantial Vegetation Management <sup>5</sup>	In Progress	TBD
<b>PG&amp;E</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>SCE</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>SDG&amp;E</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>BVES</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>PacifiCorp</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>LU</b>	WMP Forensic Accounting <sup>6</sup>	In Progress	TBD
<b>SCE</b>	Risk Prioritization for System Hardening and Vegetation Management <sup>7</sup>	In Progress	TBD
<b>SDG&amp;E</b>	Risk Prioritization for System Hardening and Vegetation Management <sup>7</sup>	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 May 2021.

**Table 6: Complaints Managed by WSD**

Compliance Branch	May 2021	Year to Date 2021
<b>Complaints investigated</b>	<b>1</b>	<b>4</b>

<sup>6</sup> 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.

<sup>7</sup> 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.

# Wildfire Safety Division Monthly Performance Report

## 2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH

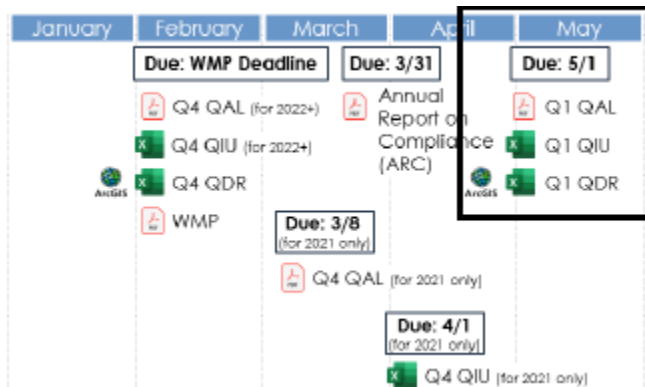
---

### Independent Evaluator and Wildfire Safety Division Kick Off Meeting

On May 19, 2021, an introductory meeting was held introducing WSD staff to independent evaluator (IE) staff. The meeting addressed IE expectations and deadlines. Expectations included communications between the ECs, IEs, and WSD, and IE's scope of work. Pursuant to California Public Utilities Code §8386.3(c)(2)(B) the final IE reports will be submitted by July 1, 2021.

### Quarterly Advice Letter Submissions

Per the WSD's Compliance Operational Protocols<sup>8</sup>, ECs are to submit Q1 2021 data for WMP activities in the form of Quarterly Advice Letters (QAL), Quarterly Initiative Updates (QIU), and Quarterly Data Reports (QDR) by March 31, 2021.



---

<sup>8</sup> Wildfire Safety Division-Compliance Operational Protocols, dated February 16, 2021, may be found here: [https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About\\_Us/Organization/Divisions/WSD/2021.02.16%20Compliance%20Operational%20Protocols.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/2021.02.16%20Compliance%20Operational%20Protocols.pdf)

---

# Wildfire Safety Division Monthly Performance Report

## 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 May of 2021, the WSD Mitigation Branch accomplished the following:

#### 2021 Wildfire Mitigation Plan (WMP) Updates

The WSD continues its review of the ECs' 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.

On May 4, 2021, the WSD issued Revision Notices for PG&E, SCE, and BVES<sup>9</sup>. 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 in order 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

---

<sup>9</sup> PG&E, SCE, and BVES Revision Notices can be found at:  
<https://www.cpuc.ca.gov/wildfiremitigationplans/>

## Wildfire Safety Division Monthly Performance Report

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 will be 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.

### Proposed Changes to 2021 Safety Certification Guidance

All electrical corporations seeking a Safety Certification must satisfy the requirements pursuant to Pub. Util. Code 8389(f)(1) and must submit their request for a Safety Certification to the WSD prior to the expiration of their current Safety Certification. To receive a Safety Certification, an electrical corporation must provide documentation to satisfy the requirements of Pub. Util. Code §8389(e).

On May 11, 2021, the WSD published its proposed changes to the 2021 Safety Certification guidance for public comment<sup>10</sup>. The WSD proposes two key changes to the 2021 Safety Certification process. The first proposed change is to synchronize the timeline for electrical corporations to submit their Safety Certification requests. The second is to develop guidance, through a public process, for the WSD to use when evaluating Safety Certification requests from all electrical corporations.

---

<sup>10</sup> Opening comments on the WSD's proposed 2021 Safety Certification guidance can be found at <https://www.cpuc.ca.gov/safetycertificates/>

## Wildfire Safety Division Monthly Performance Report

On June 1, 2021, the WSD received opening stakeholder comments on the proposed 2021 Safety Certification guidance<sup>11</sup>. Reply comments must be submitted by June 15, 2021.

### Executive Compensation – BVES

In response to the WSD's Action Statement denying BVES's executive compensation structure submission of January 15, 2021, BVES submitted its revised executive compensation plan<sup>12</sup> on May 24, 2021. The WSD is in the process of reviewing the revised submission for adherence to the required structure as outlined in Pub. Util. Code 8389(e)(6)(A)(1).

## 4. Resources

All publicly available Wildfire Safety Division documents are available at [www.cpuc.ca.gov/wsd](http://www.cpuc.ca.gov/wsd).

---

<sup>11</sup> The WSD's Proposed Changes to the 2021 Safety Certification Guidance can be found at <https://www.cpuc.ca.gov/safetycertificates/>

<sup>12</sup> BVES's revised executive compensation plan can be found at: <https://www.cpuc.ca.gov/wsd/executivecomp/>