

MONTHLY PERFORMANCE REPORT

ELECTRICAL INFRASTRUCTURE DIRECTORATE
July 2021

TABLE OF CONTENTS

INTRODUCTION	1
COMPLIANCE ASSURANCE DIVISION	2
FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS	2
DEFECTS	4
AUDIT PROGRAM	6
CONSUMER SAFETY CONCERNS	6
ADDITIONAL ACTIVITIES OF THE COMPLIANCE ASSURANCE DIVISION.....	7
SAFETY POLICY DIVISION	8
PROGRAM GUIDANCE AND PROCESSES	9
DATA ANALYTICS DIVISION	10
PROGRAM OVERVIEW	11

INTRODUCTION

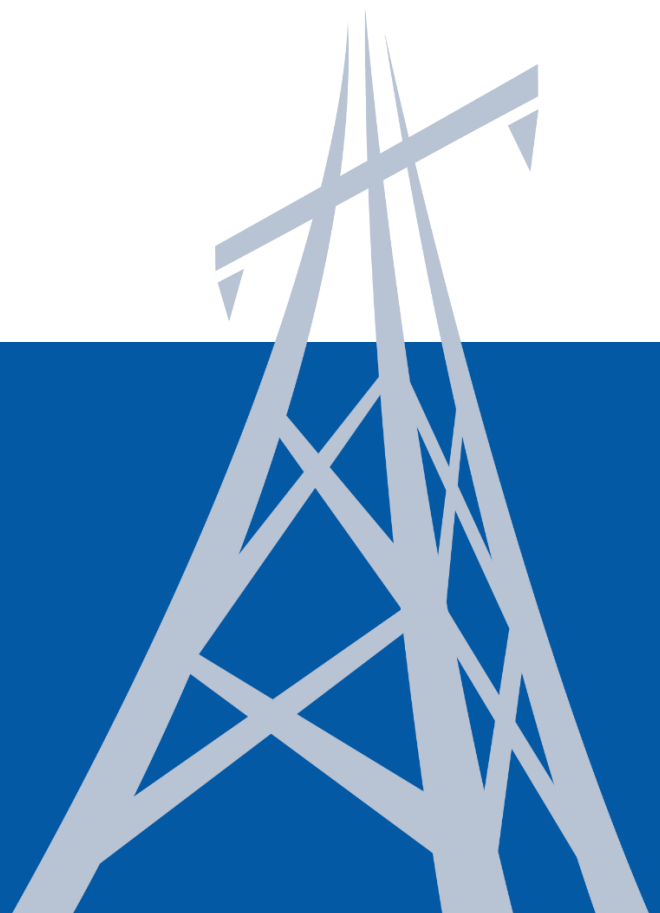
Effective July 1, 2021, all functions of the Wildfire Safety Division (WSD) under the California Public Utilities Commission (CPUC) transitioned into the Office of Energy Infrastructure Safety (hereby referred to as “Energy Safety”), a new department under the California Natural Resources Agency (CNRA), established pursuant to Section 15473 of the Government Code. Energy Safety’s strategy and mission is unchanged from the WSD. Our primary responsibility continues to ensure electrical corporations (ECs) are taking effective actions to reduce utility-related wildfire risk. Following the transition, Energy Safety is comprised of the following Divisions: Safety Policy Division, Compliance Assurance Division, Data Analytics Division (collectively organized under the Electrical Infrastructure Directorate), Administration Division, Legal Division, and a Communications & External Affairs Division.

Energy Safety’s primary purpose is to ensure ECs are taking 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 and summarizes key activities completed by the Safety Policy, Compliance Assurance, and Data Analytics Divisions in the month of July in support of Energy Safety’s mission.



OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY



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 July 2021.

FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

Compliance Assurance Division shifted resources in July to prioritize transition-related activities and review of the Independent Evaluator Annual Report on Compliance (IE ARC) final products and comments. Therefore, overall inspection activities decreased in the month of July 2021. Energy Safety inspection activities are expected to resume in the coming months, as new processes and systems are integrated post-transition.

In July 2021, Energy Safety conducted no inspection activities¹ at Pacific Gas & 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 percentage of total inspection activities for WMP categories.

Table 1: Total Number of Inspection Activities by Utilities

	July 2021	2021 Year to Date Activities	Program to Date Activities*
No. of Activities	-²	2378	5392
PG&E	-	739	2460
SCE	-	982	1714
SDG&E	-	413	825
LU	-	146	209
PacifiCorp	-	0	43
BVES	-	85	128
Horizon West	-	10	10
TBC	-	3	3
*Data from initiation of Field Inspection Program from July 2020 to July 31, 2021			

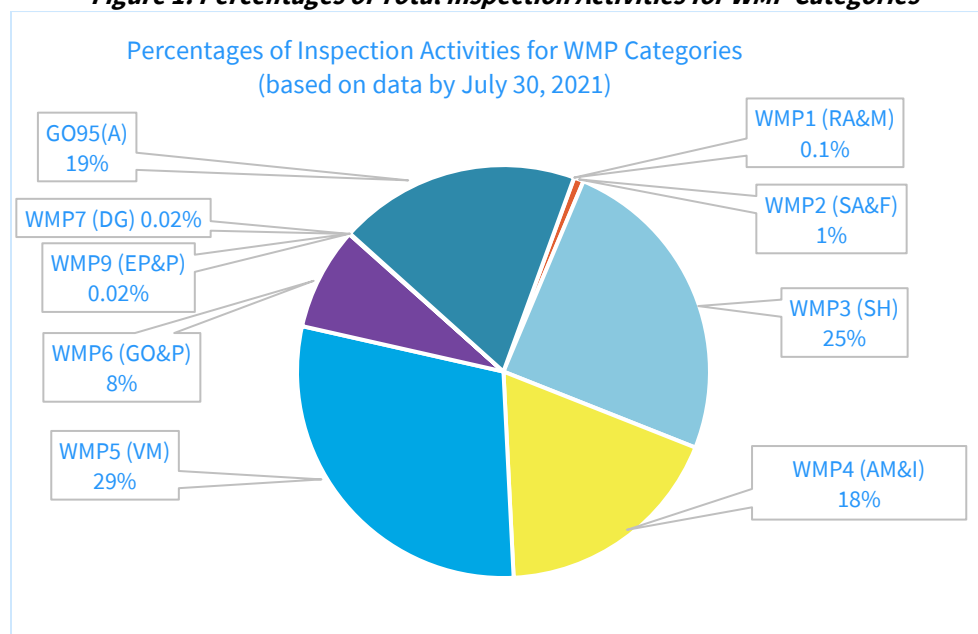
¹ An inspection of each individual WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a Grid Design and System Hardening initiative (i.e., WMP3) and inspected for compliance with a Vegetation Management and Inspections initiative (i.e., WMP5)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

² Energy Safety overall inspection activities decreased in the months of May, June, and July due to resourcing preparation for the transition to the Office of Energy Infrastructure Safety and other activities including oversight and execution of the Independent Evaluator process pursuant to the requirements of California Public Utilities Code Section 8386.3(C)(2).

Table 2: Number of Inspection Activities by WMP Categories

WMP Categories	July 2021	Total Activities to date*
No. of Activities	-	5392
WMP1³ (Risk Assessment & Mapping)	-	1
WMP2³ (Situational Awareness)	-	41
WMP3³ (System Hardening)	-	1330
WMP4³ (Asset Inspections)	-	982
WMP5³ (Vegetation Management)	-	1581
WMP6³ (PSPS)	-	434
WMP7³ (Data Governance)	-	3
WMP9³ (Emergency Planning & Preparedness)	-	1
GO 95	-	1019

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

Figure 1: Percentages of Total Inspection Activities for WMP Categories

³ 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>

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 severity and the location of the defect.⁴ Table 4 below summarizes the number of defects identified during inspections conducted in July 2021, 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 the month of July 2021, as inspections were not conducted.

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

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

	July 2021	All Defects to date	Open Defects as of 7/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	-	274	78	11	22	45	196
PG&E	-	179	41	11	11	19	138
SCE	-	33	9	-	-	9	24
SDG&E	-	31	12	-	1	11	19
LU	-	20	16	-	10	6	4
PacifiCorp	-	-	-	-	-	-	-
BVES	-	11	-	-	-	-	11
Horizon West	-	-	-	-	-	-	-
TBC	-	-	-	-	-	-	-

⁴ 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

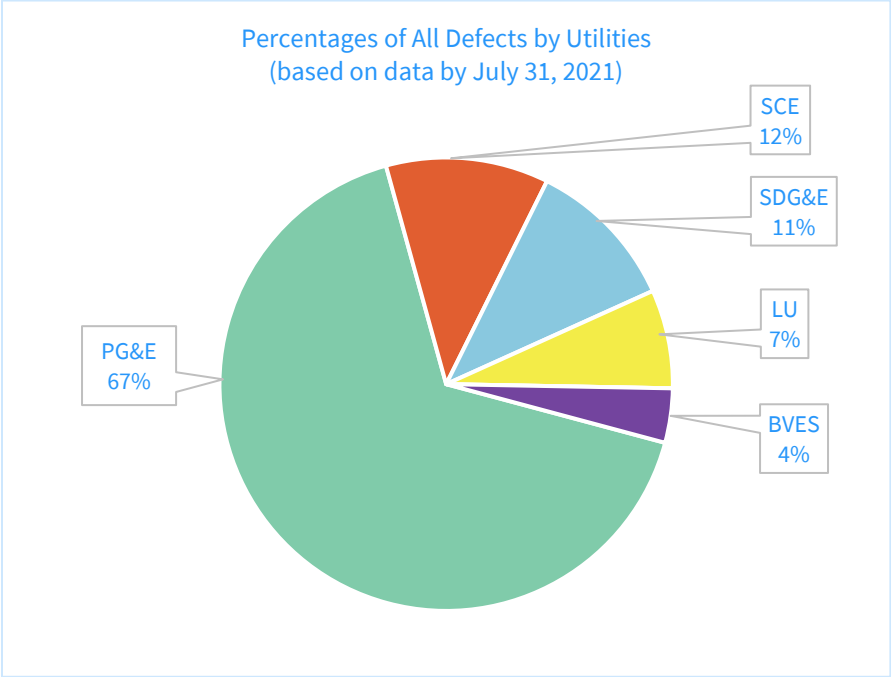
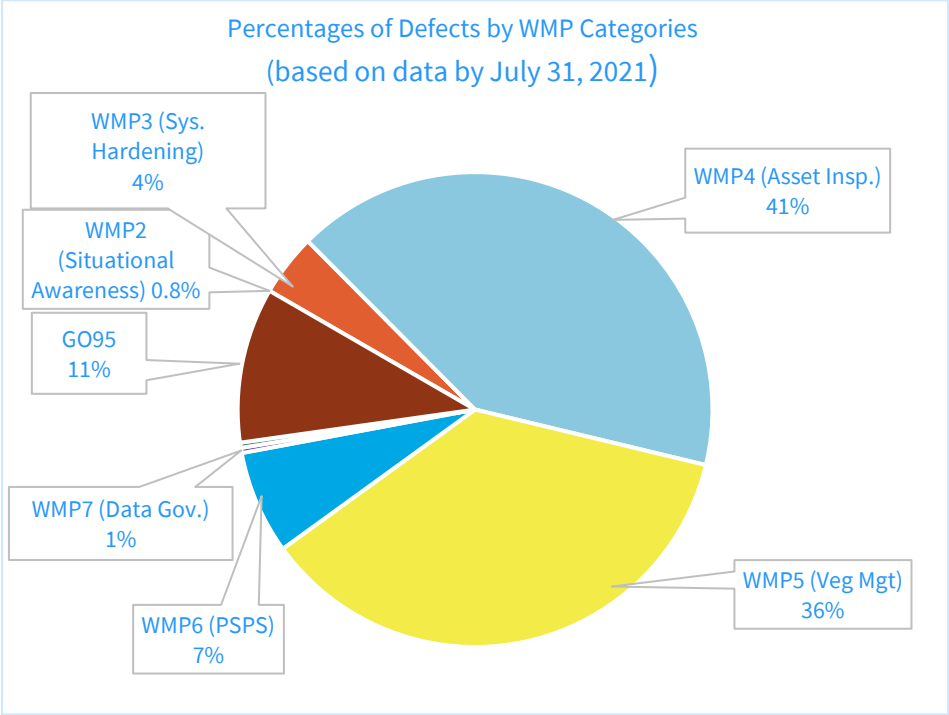


Figure 3: Percentages of all Defects to Date by WMP Categories



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 its Substantial Vegetation Management (SVM) requirements in their WMPs, upon completion. 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, promptly 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 from EC risk modeling outputs. Energy Safety is performing Risk Prioritization audits focused on grid hardening projects for SCE and SDG&E.

These audits are targeting the reduction of utility ignited wildfires.

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 inbox.⁵ 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 July 2021.

Table 5: Safety Concerns Investigated by Energy Safety

Responsible Division	July 2021	Year to Date 2021
Compliance	3	11

⁵ 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

Independent Evaluator (IE) Annual Report on Compliance (ARC) Published

On July 1, 2021, Energy Safety published the Final [IE ARC](#) ⁶ on its website. All legacy documents pertaining to the IE ARCs and IE process in general maybe found at the link above. Pursuant to new systems and processes developed for Energy Safety, all ongoing and future documents pertaining to the IE process will be made available through the IE case and respective docket on [Energy Safety's e-Filing website](#).⁷ Public comments on the Final IE ARC were initially due on July 22, 2021 with EC responses due on July 31, 2021. Pursuant to an Energy Safety letter published on July 19, 2021, these due dates were extended to August 6, 2021 and August 16, 2021, respectively.⁸

⁶ All IE ARCs are available at: <https://energysafety.ca.gov/what-we-do/compliance/independent-evaluators/>

⁷ All ongoing and future documents pertaining to the IE process are available at: <https://efiling.energysafety.ca.gov/Dockets.aspx?caseId=1249>

⁸ The July 19, 2021 letter can be found on the 2021 IE docket in the Energy Safety e-Filing System.



SAFETY POLICY DIVISION

SAFETY POLICY DIVISION

Energy Safety's Safety Policy Division⁹ comprehensively reviews ECs' 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 Safety Policy Division is committed to driving continuous improvement in utility-related wildfire mitigation approaches.

PROGRAM GUIDANCE AND PROCESSES

In July of 2021, the Safety Policy Division completed the following:

2021 Wildfire Mitigation Plan (WMP) Updates

On July 14, 2021, Energy Safety issued Final Action Statements on San Diego Gas and Electric (SDG&E), PacifiCorp, Liberty Utilities (LU), Horizon West Transmission (Horizon West), and Trans Bay Cable's (TBC) 2021 WMP Updates. On July 16, Energy Safety issued a Draft Action Statement on SCE's 2021 WMP Update. On July 20, 2021, Energy Safety issued Revised Final Action Statements for SDG&E, PacifiCorp, LU, Horizon West, and TBC. These revised versions replace broken CPUC hyperlinks with new Energy Safety hyperlinks.

Energy Safety continues to evaluate the 2021 WMP Updates for PG&E and BVES with a plan to provide its final determination in the coming months.

Safety Certification Guidelines

On July 26, 2021, Energy Safety published a Response to Comments on the draft 2021 Safety Certification Guidance issued on May 11, 2021. This summarized all stakeholder comments and reply comments received and set out Energy Safety's responses. In addition, Energy Safety issued its Final 2021 Safety Certification Guidance, pursuant to Pub. Util. Code Section 8389(f)(2). This provides guidance for the submission of 2021 Safety Certification requests based on the criteria set out in Pub. Util. Code Section 8389(e).

⁹ 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.



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 July of 2021, the Data Analytics Division completed the following:

Data

- As of July 2021, the Data Analytics Division is curating and maintaining over 1,000 datasets of utility information in tabular and spatial formats
- In collaboration with the Compliance Division, developing a spatial grid analysis to help guide inspectors on where to focus the areas for inspection

Systems

- Implemented Energy Safety's GIS Enterprise environment that will help with long-term storage, maintenance, and provide a more robust system for data analysis

Products

- Launched BETA version of QIU Dashboard
- Developed version 2.1 of GIS Data Reporting Standards

ADDITIONAL RESOURCES

All publicly available Energy Safety documents are available directly on our website at www.energysafety.ca.gov or through our e-Filing system.

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



OFFICE OF ENERGY
INFRASTRUCTURE
SAFETY

OFFICE OF ENERGY INFRASTRUCTURE SAFETY
A California Natural Resources Agency
www.energysafety.ca.gov

715 P Street, 20th Floor
Sacramento, CA 95814
916.902.6000

