

MONTHLY PERFORMANCE REPORT

ELECTRICAL INFRASTRUCTURE DIRECTORATE

October 2021

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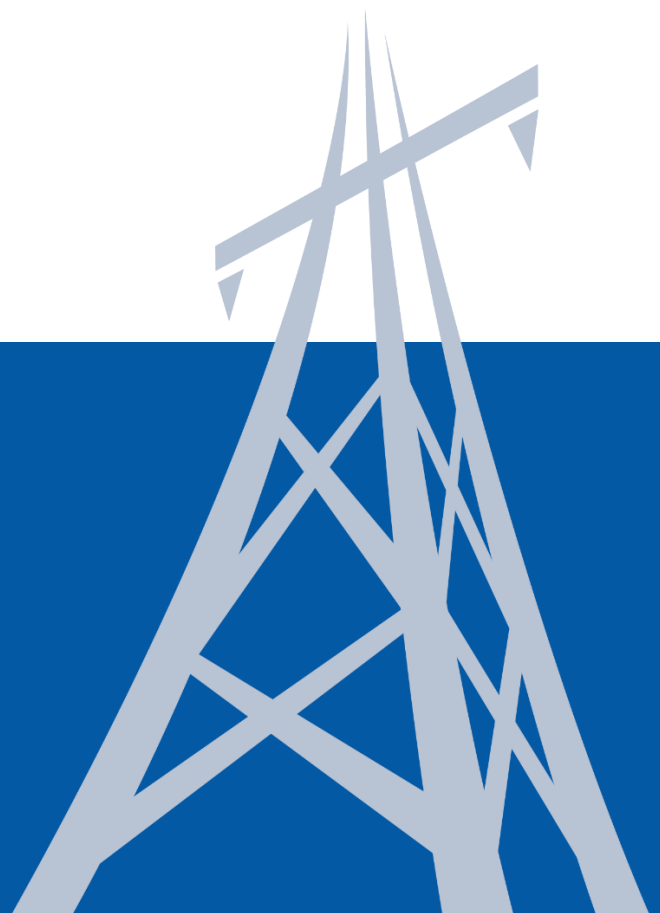
INTRODUCTION

The Office of Energy Infrastructure Safety's (Energy Safety) primary purpose is to ensure electrical corporations (ECs) take 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. It summarizes key activities completed by the Electric Safety Policy, Compliance Assurance, and Data Analytics Divisions in the month of October 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 October 2021.

FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

Compliance Assurance Division shifted resources in October to focus on building new systems and processes to enhance the efficiencies of its inspection program. Therefore, overall inspection activities continued to decrease in October 2021. Energy Safety inspection activities are expected to resume in the coming months, as the new processes and systems are built and integrated post-transition.

In October 2021, Energy Safety conducted no inspection activities¹ at Pacific Gas and 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 in 2021 and to date by Utility and WMP categories, respectively. Figure 1 below shows the percentage of total inspection activities for WMP categories.

Table 1: Total Number of Inspection Activities by Utilities

	October 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	-	-	43
BVES	-	85	128
Horizon West	-	10	10
TBC	-	3	3

*Data from initiation of Field Inspection Program from July 2020 to October 31, 2021

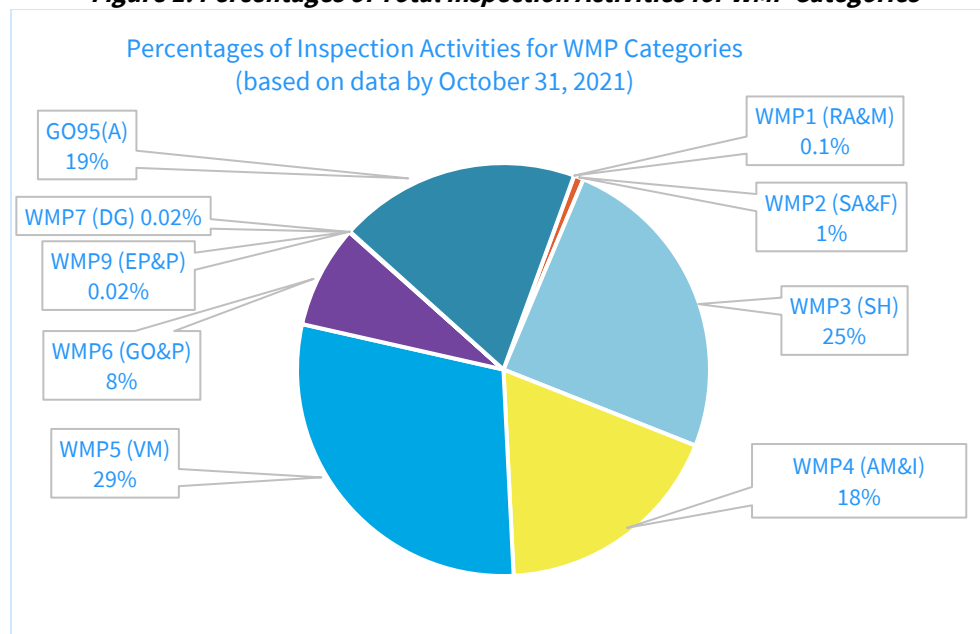
¹ An inspection of each WMP initiative is considered a separate inspection activity. For example, a pole inspected for compliance with a Grid Design and System Hardening initiative (i.e., WMP3) and inspected for compliance with a Vegetation Management and Inspections initiative (i.e., WMP5) is counted 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 between the months of May to October due to resourcing preparation for the transition to the Office of Energy Infrastructure Safety, building new systems and processes to enhance its efficiencies, and other activities including oversight and execution of the Independent Evaluator process according to the requirements of California Public Utilities Code Section 8386.3(C)(2).

Table 2: Number of Inspection Activities by WMP Categories

WMP Categories	October 2021	Program to Date Activities*
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 October 31, 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://energysafety.ca.gov/wp-content/uploads/docs/wmp-2021/attachment-2.2-to-wsd-011-2021-wmp-guidelines-template.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 corresponding to a corrective action timeframe, as provided in Table 3 below. Depending on the defect severity level—with a range of severe, moderate, and minor—Energy Safety requires repairs in intervals that depend on the severity and the location of the defect.⁴ Table 4 below summarizes the number of defects identified during inspections conducted in October 2021, the 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 October 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

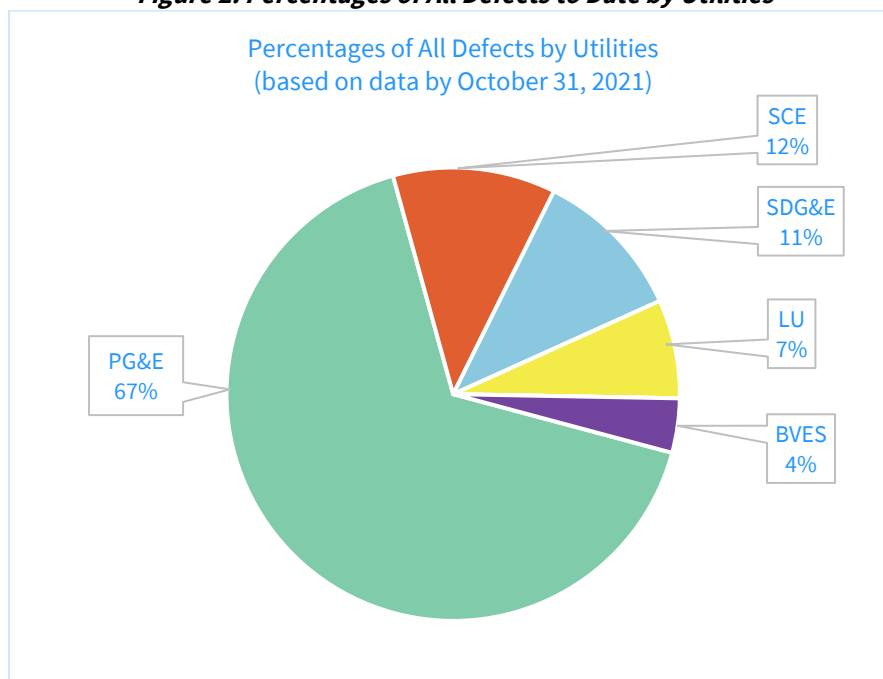
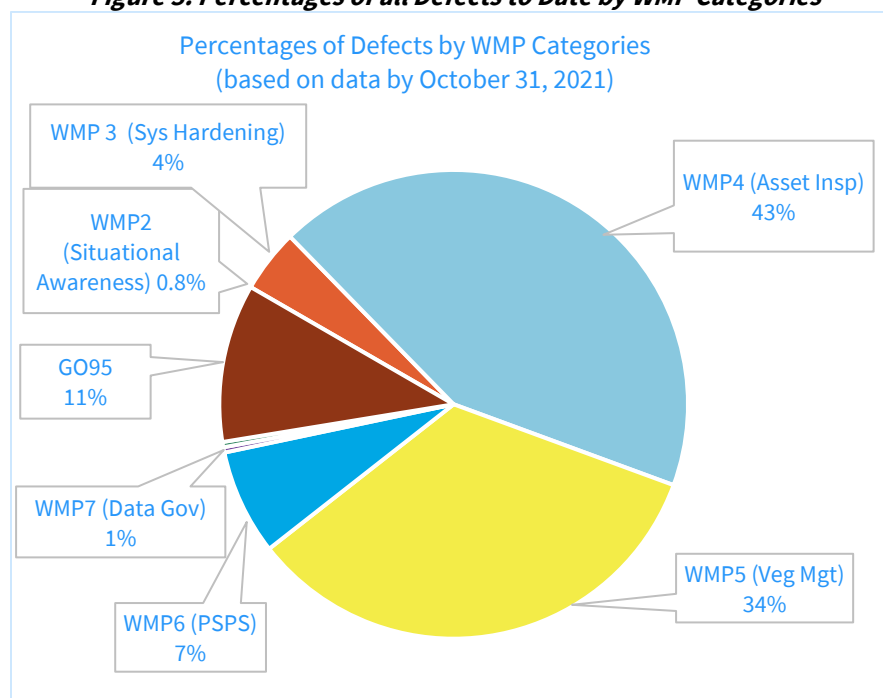
Table 4: Summary of Status of Open and Closed Defects with Severities

	October 2021	Program to date Defects*	Open Defects as of 10/31/2021				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	-	272	39	2	15	21	233
PG&E	-	177	11	3	5	3	166
SCE	-	33	5	-	-	5	28
SDG&E	-	31	7	-	-	7	24
LU	-	20	16	-	10	6	4
PacifiCorp	-	-	-	-	-	-	-
BVES	-	11	-	-	-	-	11
Horizon West	-	-	-	-	-	-	-
TBC	-	-	-	-	-	-	-

* Data from initiation of Field Inspection Program in July 2020 to October 31, 2021

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: Performance Audit of WMP Expenditures, Substantial Vegetation Management, and Risk Prioritization.

The Performance Audit of WMP Expenditures examines ECs spending in executing its WMP programs and initiatives relative to its prior General Rate Case (GRC) applications. The audit assesses 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 conducting Performance Audits of WMP Expenditures on PG&E, SCE, BVES, SDG&E, LU, and PacifiCorp. Energy Safety completed and published its Performance Audit of WMP Expenditures for PG&E on October 11, 2021. The audit is available on Energy Safety’s website [here](#).⁵

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 vegetation management requirements in their WMPs (referred to as “Substantial Vegetation Management” or SVM). Upon receiving the notice of completion from the ECs, the Division shall, consistent with its authority under paragraph (1) of subdivision (a) of Section 326, audit the work performed by, or on behalf of, the EC. Energy Safety performs 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, as identified by outputs from EC-developed risk models. Energy Safety is performing Risk Prioritization audits focused on grid hardening projects for SCE and SDG&E.

CONSUMER SAFETY CONCERNS

Energy Safety receives customer safety concerns related to wildfire safety directly from the public via the Energy Safety website or the Consumer@energysafety.ca.gov inbox.⁶ 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 October 2021.

Table 5: Safety Concerns Investigated by Energy Safety

Responsible Division	October 2021	Year to Date 2021
Compliance Assurance	1	12

⁵ Energy Safety’s Performance Audit of WMP Expenditures for PG&E may be found on Energy Safety’s website found here: https://energysafety.ca.gov/wp-content/uploads/docs/audits/pge-wmp-expenditures-performance-audit_20211011.pdf

⁶ 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



ELECTRIC SAFETY POLICY DIVISION

ELECTRIC SAFETY POLICY DIVISION

Energy Safety's Electric Safety Policy Division⁷ comprehensively reviews Electrical Corporations (EC) Wildfire Mitigation Plans (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 Electric Safety Policy Division is committed to driving continuous improvement in utility-related wildfire mitigation approaches.

PROGRAM GUIDANCE AND PROCESSES

In October of 2021, the Electric Safety Policy Division completed the following:

2021 Wildfire Mitigation Plan (WMP) Updates

On October 6, 2021, Energy Safety issued its final guidance on the Change Order process for changes to the utilities' 2021 WMP Updates. The goal of the Change Order process is to ensure that utilities make significant changes to their approved WMPs prior to submission of the subsequent year's WMPs only if the utilities demonstrate these changes to be improvements per WMP approval criteria (i.e., completeness, technical feasibility, effectiveness, and resource use efficiency).

On October 5 and 6, 2021, Energy Safety held a two-day Wildfire Risk Modeling Workshop and, on October 27, led the first Wildfire Risk Modeling Working Group Meeting. The working groups are a required collaboration between the three Large Investor-Owned Utilities ("Large IOUs") – Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas & Electric (SDG&E) – and the Small and Multi-jurisdictional Utilities ("SMJUs") – PacifiCorp, Liberty Utilities (Liberty), and Bear Valley Electrical Services, Inc. (BVES). A result of a Key Area for Improvement identified in the Action Statements, the working groups are focused on bringing more consistency across utilities in terms of risk modeling and determining the most effective and accurate methods, data sets, and analyses for the utilities to utilize in modeling. On October 29, Energy Safety posted its draft proposed schedule and topics for the remaining working group meetings. A final version will be posted on November 8, 2021 pending comments from the workshop due on November 6, 2021.

⁷ 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.

Executive Compensation

On October 19, 2021, Energy Safety issued a letter approving PG&E's 2021 executive compensation structure, which minimally satisfies the requirements of Pub. Util. Code Sections 8389(e)(4) and (e)(6).

Safety Certification

On October 7, 2021, the Public Advocates Office (Cal Advocates) submitted comments on SDG&E's Safety Certification request; on October 18, 2021, both SDG&E and the Coalition of California Utility Employees (CUE) submitted reply comments. On October 13, 2021, Cal Advocates submitted comments on SCE's Safety Certification request; on October 25, 2021, SCE and CUE submitted reply comments.

Energy Safety is in the process of evaluating the requests and party comments, with a plan to provide determinations in the coming months.

Safety Culture Assessments

Pursuant to Pub. Util. Code Section 8389(d)(4), Energy Safety issued its 2021 Safety Culture Assessment (SCA) report for PG&E on October 6, 2021. On October 27, 2021, Energy Safety issued its 2021 SCA report for BVES. On October 29, 2021, Energy Safety issued its 2021 SCA report for PacifiCorp. These are the first annual SCAs under this statute and as such provide a baseline for future comparison. Energy Safety will use the SCA reports to assess safety culture outcomes over time and incorporate continuous learning into the SCA process. Utilities can satisfy the "good standing" requirement in Pub. Util. Code. Section 8389(e)(2) by agreeing to implement all of the findings of their most recent SCA.



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

Products

On October 21st and 26th Energy Safety held Data Discussions with the three Large Investor-Owned Utilities ("Large IOUs") – Pacific Gas and Electric (PG&E), Southern California Edison (SCE), and San Diego Gas and Electric (SDG&E) – and the Small and Multi-Jurisdictional Utilities ("SMJUs") – PacifiCorp, Liberty Utilities, and Bear Valley Electric Service, Inc., and the Independent Transmission Operators ("ITOs") – Transbay Cable and Horizon West Transmission. The discussion included presentations on the progress of implementing the Energy Safety [GIS Data Reporting Standard](#),⁸ a review session on data quality from Energy Safety staff, and a discussion on how to ensure data quality is improved moving forward.

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](#).⁹

⁸ Energy Safety's GIS Data Reporting Standards may be found at the following link: <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51719&shareable=true>

⁹ Energy Safety's e-filing system may be found at: <https://efiling.energysafety.ca.gov>

DATA DRIVEN FORWARD-THINKING INNOVATIVE SAFETY FOCUSED



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