



WILDFIRE SAFETY DIVISION MONTHLY PERFORMANCE REPORT

December 2020



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 activities completed in the prior month in support of the WSD's mission. As the inaugural Monthly Performance Report, this report will include a summary of key WSD activities completed in 2020.

2. COMPLIANCE BRANCH

The WSD Compliance Branch assures utility compliance with their approved Wildfire Mitigation Plans (WMP) through annual and ongoing assessments, including field inspections and audits. Below is a summary of key activities completed in 2020.

2.1 FIELD INSPECTIONS OF UTILITY INFRASTRUCTURE AND OPERATIONS

WSD staff initiated its Field Inspection Program in May of 2020. WSD conducts inspections to assess EC implementation of and compliance with approved WMP initiatives. Due to Covid-travel restrictions, available staff locations, and priority interest, initial inspections focused on Pacific Gas & Electric Company (PG&E). As Covid-related safety precautions were developed and additional staff hired, staff expanded inspections to all ECs. By the end of 2020, WSD had conducted 2950 inspection activities¹ across 6 WMP Categories for ECs including Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas and Electric (SDG&E), Liberty

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.

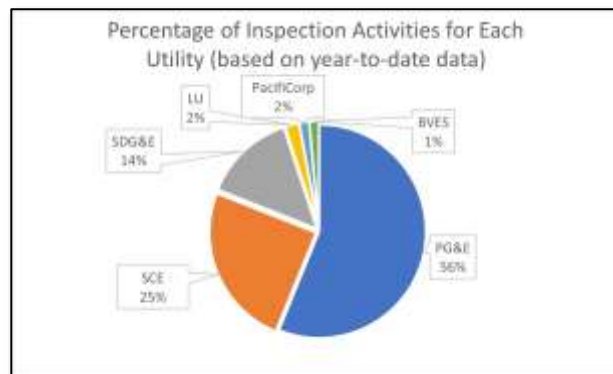
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Utilities (LU), PacifiCorp, and Bear Valley Electric Service (BVES). In December 2020, WSD completed 308 inspection activities.

Total Number of Inspection Activities by Utility

	December	YTD*
No. of Activities	308	2950
PG&E	108	1657
SCE	95	732
SDG&E	62	412
LU	0	63
PacifiCorp	43	43
BVES	0	43

*YTD – Year to Date

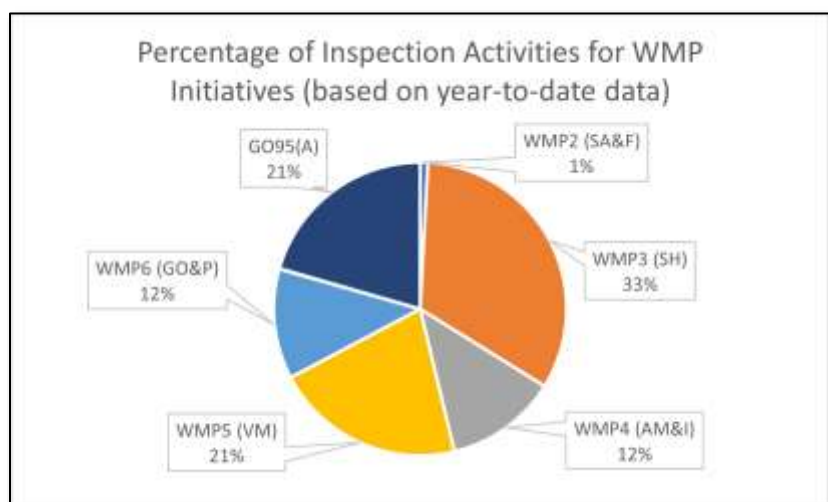


Total Number of Inspection Activities by WMP Category

	December	YTD
No. of Activities	308	2950
WMP2 ² (Situational Awareness)	2	25
WMP3 ² (System Hardening)	64	973
WMP4 ² (Asset Inspections)	36	366
WMP5 ² (Vegetation Management)	96	620
WMP6 ² (PSPS)	42	358
WMP7 ² (Data Governance)	2	2
GO 95	66	606

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 total number of defects identified during inspections conducted in December 2020, Year-to-Date (YTD) and the status of all defects corrected by ECs. Depending on the level of defect severity—with a range of severe, moderate, and minor defects—the WSD requires repairs in intervals that depend on severity and the location of the defect³.

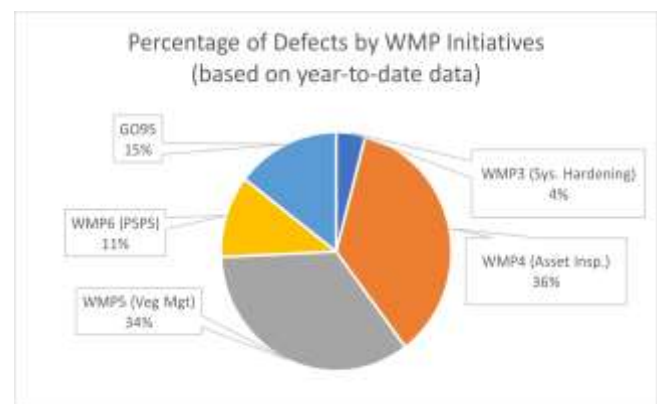
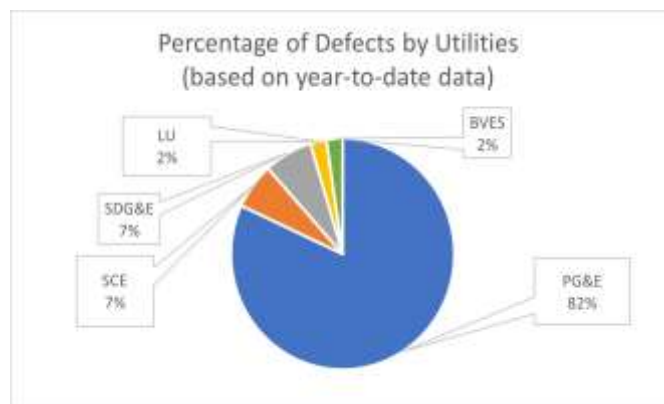
Category	Correction Timeline
Category 1 - Severe	Immediate resolution
Category 2 - Moderate	1-2 months (in HFTD Tier 3) 3-6 months (in HFTD Tier 2) 6 months (if relevant to worker safety) 12 months or scheduled in WMP update (other)
Category 3 - Minor	12 months or resolution schedule included in WMP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

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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	December	YTD	Open Defects				Resolved Defects
			Total	Severe	Moderate	Minor	
No. of Defects	17	171	93	22	35	36	78
PG&E	11	140	70	22	24	24	70
SCE	3	11	7	0	6	1	4
SDG&E	3	12	10	0	5	5	2
LU	0	4	2	0	0	2	2
PacifiCorp	0	0	0	0	0	0	0
BVES	0	4	4	0	0	4	0

WSD completed 1657 inspection activities on infrastructure and operations of PG&E, which resulted in the higher percentage of defects compared to other ECs. Inspections for other large ECs including SCE and SDG&E also started in May/June 2020, and by the end of 2020, 732 inspection activities for SCE and 412 inspection activities for SDG&E were completed. For smaller ECs, WSD has completed 63 inspection activities for LU, 43 for PacifiCorp and 43 for BVES.



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

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launched audits of PGE, SDG&E and SCE's vegetation management activities. A full list of initiated audits is below.

Electrical Corporation	Description of Audit	Audit Status	Major Deficiencies/ Findings
PG&E	Substantial Vegetation Management ⁴	In Progress	TBD
PG&E	Enhanced Vegetation Management ⁵	In Progress	TBD
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

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 December 2020.

Compliance Branch	December	YTD 2020
Complaints Investigated	1	20

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 is a term used by PG&E, which describes vegetation management completed in the prioritized areas based on maturity model/risk scores.

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.

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2.5 ADDITIONAL HIGHLIGHTS OF THE COMPLIANCE BRANCH

Wildfire Mitigation Plan Compliance Process, Resolution WSD-012

On November 19, 2020, the CPUC adopted the Wildfire Mitigation Plan Compliance Process in Resolution WSD-012. This Resolution provides a process to oversee ECs' implementation of the approved WMPs and assure compliance. The Wildfire Mitigation Plan Compliance Process is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/20201008%20Compliance%20Staff%20Proposal_FINAL.pdf

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 November and December of 2020, the WSD Mitigation Branch accomplished the following:

Resolution WSD-011

Issued on November 30, 2020, Resolution WSD-011 implements the requirements of Public Utilities Code Sections 8389(d)(1), (2) and (4), related to ECs subject to the Commission's regulatory authority. The statute requires the following:

- (d) By December 1, 2020, and annually thereafter, the Commission, after consultation with the Wildfire Safety Division, shall adopt and approve all the following:

- (1) Performance metrics for electrical corporations.

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- (2) Additional requirements for wildfire mitigation plans.
- (4) A process for the division to conduct annual safety.

To implement Sections (d)(1) and (2), Resolution WSD-011 provides updates to ECs' 2021 WMP requirements, including updates to the metrics, templates, reports and maturity model required of ECs for 2020 WMPs. To implement Section (d)(4), the Resolution provides a recommended process for annual safety culture assessments for each EC.

Resolution WSD-011 is available at:

<https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M352/K490/352490594.PDF>

Executive Compensation Guidelines

On December 22, 2020, the WSD issued guidance to ECs on submission of Executive Compensation Approval Requests, pursuant to Public Utilities Code 8389(e)(4) and 8389(e)(6). The guidance is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organization/Divisions/WSD/WSD%20Executive%20Compensation%20Guidance%2020201222.pdf

Remedial Compliance Plan (RCP) Evaluations

In December 2020, the WSD issued RCP Evaluations to five electrical corporations – (1) PG&E, (2) SCE, (3) SDG&E, (4) LU, and (5) PacifiCorp. These evaluations addressed a combined total of 16 Class A deficiencies, 15 of which were found to be insufficiently rectified in the RCPs, while one was deemed sufficient. The breakdown is as follows:

Utility	# of Deficiencies	# Insufficient	# Sufficient
PG&E	8	8	-
SCE	4	3	1
SDG&E	2	2	-
Liberty	1	1	-
PacifiCorp	1	1	-
Totals	16	15	1

Based on the evaluations, each of the five utilities' RCPs were determined "Insufficient", and the utilities were subsequently issued Notices of Non-Compliance (NONC). Due to

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the "Insufficient" determinations, each of the five utilities are required to address a set of "Conditions" in their 2021 WMP updates, based on their corresponding Class A deficiencies.

All RCPs and NONCs are available at:

<https://www.cpuc.ca.gov/wildfiremitigationplans/>

Quality Control Reports

On December 30, 2020, the WSD issued four quality control (QC) reports reviewing the completeness and quality of initial geographic information systems (GIS) data submissions received as part of the September 9, 2020 quarterly reports, pursuant to Resolution WSD-002. QC reports were issued for the following ECs:

1. PG&E
2. SCE
3. SDG&E
4. BVES

All QC reports are available at: <https://www.cpuc.ca.gov/wildfiremitigationplans/>

Utility Wildfire Mitigation Strategy and Roadmap

In December 2020, the WSD finalized and released its strategic roadmap for reducing utility-related wildfire risk. The final report – *Utility Wildfire Mitigation Strategy and Roadmap for the Wildfire Safety Division* – defines longer-term objectives that will support the WSD (and future Office of Energy Infrastructure Safety [OEIS]), the utilities, and other relevant stakeholders in working toward both near and long term solutions to systematically reduce the risk of ignition of wildfires from utility infrastructure.

The final report of *Utility Wildfire Mitigation Strategy and Roadmap for the Wildfire Safety Division* is available at:

https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/About_Us/Organizational/Divisions/WSD/Final_Report_WildfireMitigationStrategy_WSD.pdf

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4. RESOURCES

All publicly available Wildfire Safety Division documents are available at

www.cpuc.ca.gov/wsd.