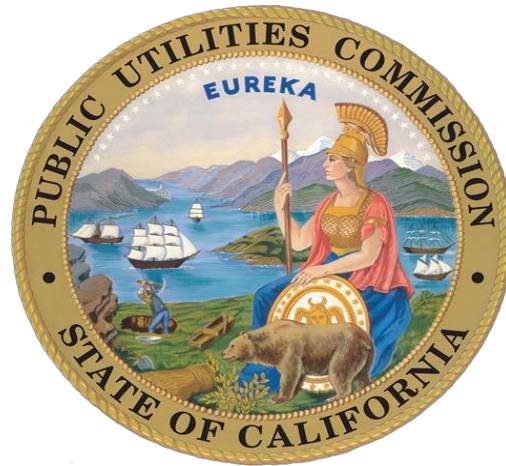# CPUC Wildfire Safety & Regulatory Oversight

Wildfire Investigations, PSPS Compliance, and Wildfire Mitigation Plans

March 26, 2025

California Public
Utilities Commission

CPUC External Affairs Division

Local Government and Community Outreach Liaisons

- Build & Maintain relationships with community partners
  - Local Governments
  - Community Based Organizations
  - Other Interested Parties
- Provide education and information on CPUC policies and programs to promote CPUC visibility and access
- Encourage community partner engagement in the CPUC decision-making process
- Advance CPUC policies at the local and regional level

Community Partnership Team

Local Government and Community Outreach Liaisons

Stephanie Green (Supervisor): 415-703-5245 Stephanie.green@cpuc.ca.gov

Chris Moore: 213-220-1344   christopher.moore@cpuc.ca.gov

Heather Iwamuro: 213-264-4876   heather.iwamuro@cpuc.ca.gov

Hope Christman: 213-266-4731   hope.christman@cpuc.ca.gov

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Nora Gutierrez: 213-364-2447   nora.gutierrez@cpuc.ca.gov

Working Together

Webinar Agenda

- Stephanie Green – External Affairs: Opening Remarks

- Koko Tomassian – Safety Policy Division: Wildfire Safety & Regulatory Oversight

- Ron DeMayo – Safety and Enforcement Division: Wildfire Investigations, PSPS Compliance, and Wildfire Mitigation Plans

- Closing Comments

CPUC Wildfire Safety & Regulatory Oversight

External Affairs Division

Stephanie Green

Program and Project Supervisor | Business and Community Outreach
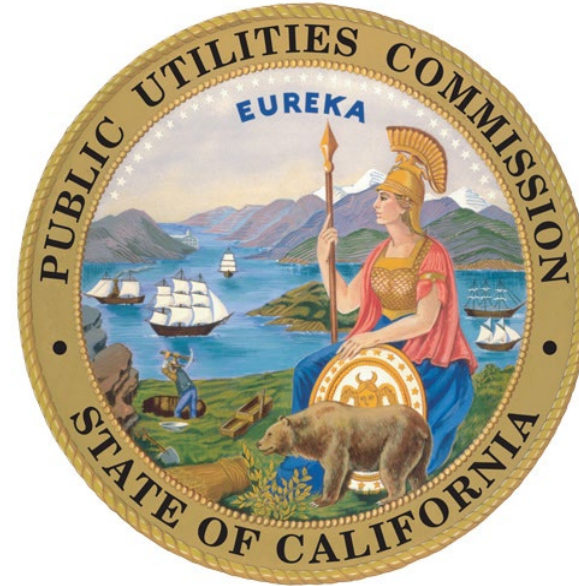
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CPUC Wildfire Safety & Regulatory Oversight

Wildfire Mitigation Plans

Public Safety Power Shutoff

Safety and Enforcement Division

Safety Policy Division

CPUC Wildfire Safety & Regulatory Oversight

Safety Policy Division

Koko Tomassian, P.E.

Program Manager | Safety Management Systems Branch

California Public
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Wildfire Safety & Regulatory Oversight Webinar

Safety Policy Division

California Public
Utilities Commission

Agenda

- Wildfire Mitigation Plans (WMP) Overview

- WMP Review & Approval Process

- WMP Implementation Tracking

WMP Overview

Why Do We Need WMPs?

Statutory Authorities

- Public Utilities Code 8386
  - Requires electric IOUs to submit annual Wildfire Mitigation Plans (WMP)
  - Designed to reduce risk of utility-related catastrophic wildfire
  - Specifies the minimum requirements to be addressed in WMPs

- Public Utilities Code 8386.3
  - Requires WMPs to be reviewed and approved by Energy Safety
  - After approval by Energy Safety, the CPUC shall ratify the action of Energy Safety
  - Energy Safety oversees utility compliance with WMPs

What is Included in a WMP?

A Utility Must Satisfy <u>All</u> 23 Specifications Listed Below

1. Persons responsible for execution
2. Objectives of the plan
3. **Preventive strategies and programs**
4. **Metrics to evaluate performance**
5. Application of metrics to new plan
6. Protocols for **de-energization** – Distribution
7. Customer notification for de-energization
8. Circuits frequently de-energized
9. **Vegetation management**
10. **Inspections for infrastructure**
11. Protocols for de-energization – Transmission
12. **Prioritization of wildfire risks and risk drivers**

13. Consistent with Risk Assessment Mitigation Phase filing
14. **System hardening actions** description
15. **Undergrounding** consideration
16. Workforce to restore service
17. Identification of higher wildfire threat areas
18. Methods for safety and wildfire risk identification
19. Disaster and **emergency preparedness plan**
20. Plan to restore service after a wildfire
21. Protocols for customer support (wildfire, outage, etc.)
22. Processes and procedures:
    - Monitor and audit plan implementation
    - Identify deficiencies
    - Monitor effectiveness of inspections
23. Any other information that [Energy Safety] may require.

Who Must File WMPs?

- **Large Utilities (IOUs)**
  - San Diego Gas and Electric (SDG&E)
  - Southern California Edison (SCE)
  - Pacific Gas and Electric (PG&E)
- **Small and Multi-Jurisdictional Utilities (SMJUs)**
  - PacifiCorp (PC)
  - Liberty Utilities (LU)
  - Bear Valley Electric Service (BVES)
- **Independent Transmission Operators (ITOs)**
  - Trans Bay Cable (TBC)
  - Horizon West (HW)
  - LS Power (LSP)

WMP Review & Approval Process

2023-2025 WMP Guidelines

- Technical Guidelines

- Process Guidelines

- Mitigation Maturity Model

- Mitigation Maturity Survey

- ITO Supplement

Energy Safety Review of WMPs

- Energy Safety requires utilities to submit WMPs with information and format specified in its **WMP Process and Evaluation Guidelines**:
- Evaluation Criteria
  - Completeness
  - Technical and programmatic feasibility and effectiveness
  - Resource use efficiency
  - Demonstrated year-over-year progress
  - Forward-looking growth
  - Performance metrics
  - Targets

WMP Evaluation Options

Energy Safety may:

- Approve or Deny a WMP by issuing **Final Decision**
- Define **Areas for Continued Improvement** (ACI) remedies to be addressed in subsequent WMP submissions
- Require modification of current-year WMP by issuing **Revision Notice** regarding **Critical Issues** for the following conditions
  - Utility provided insufficient information for evaluation
  - Utility failed to implement ACI remedies from prior year
  - Any WMP element critical to safety is unsatisfactory
  - WMP does not meet evaluation criteria

WMP Evaluation Process
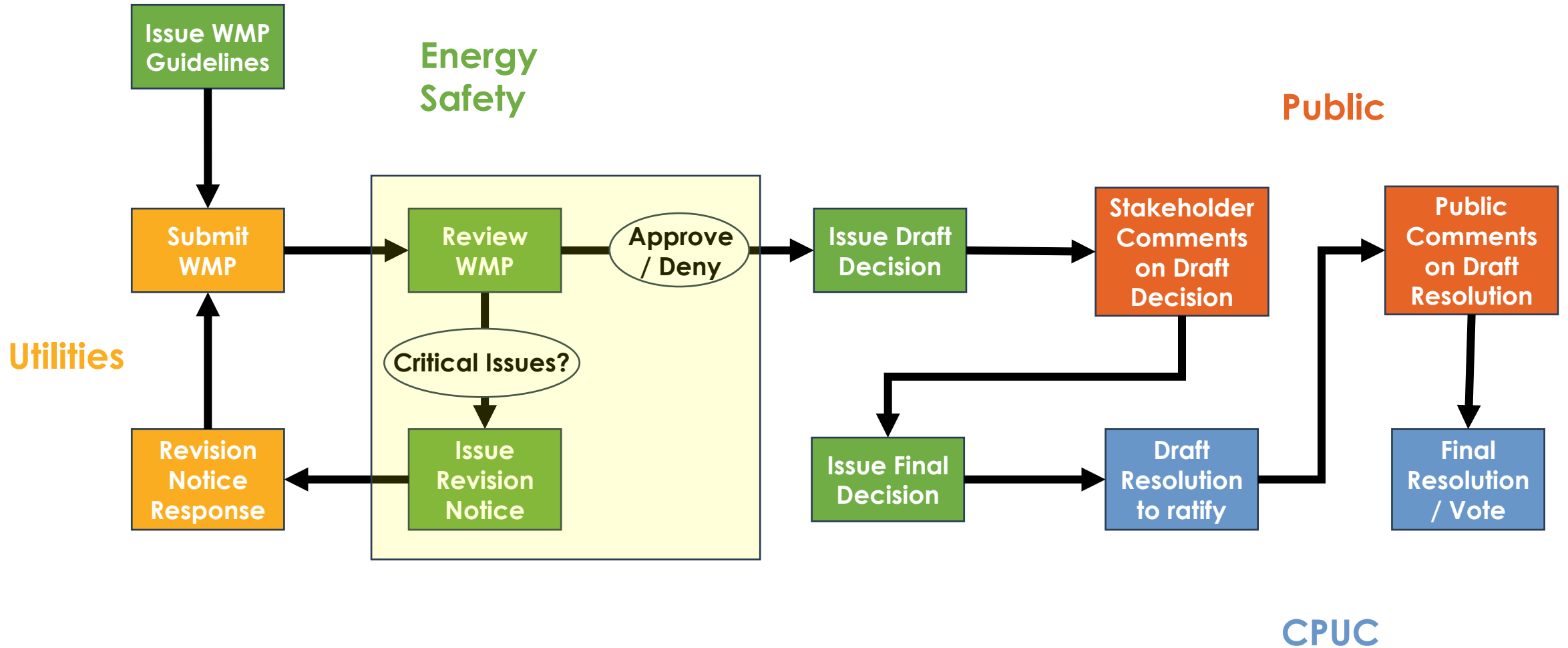
WMP Implementation Tracking

WMP Quarterly Data Reports (QDR)

- **Summary:**

  Submitted Quarterly to Energy Safety –
  Energy Safety, in turn, provides it to SPD

  - Non-spatial (Tabular):
    Progress/Financials of Wildfire Mitigation
    Initiatives, Metrics, Risk Events, Open
    Work Orders

  - Spatial (GIS): Spatial data of IOU Assets,
    Initiatives, Risk Events, PSPS Events and
    Other Data
    - Dated from Q2 2020 to Present day
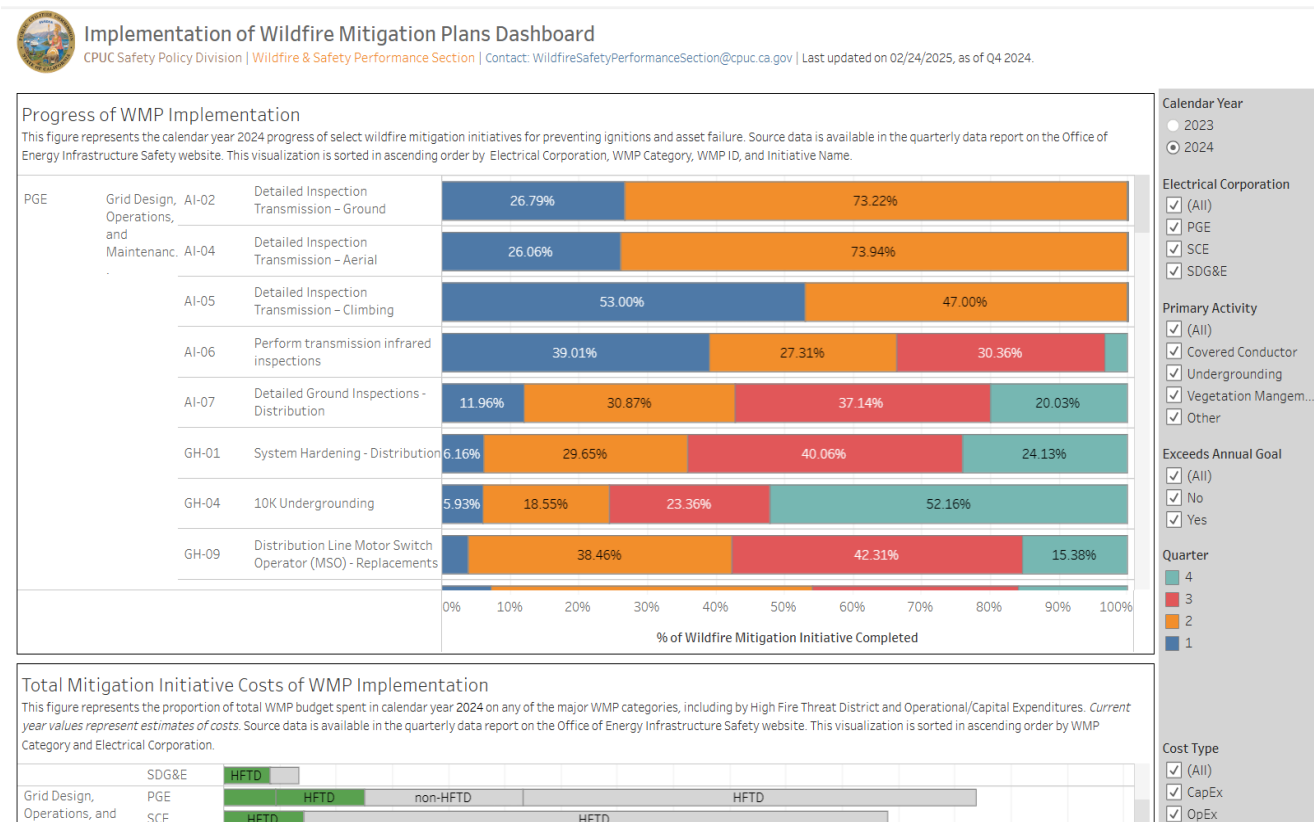

Link: Energy Safety Electrical Data Dockets

WMP Implementation Progress Tracking

- Using tabular QDR data

- Utilizes Tableau

- Publicly available dashboard to track WMP implementation progress and costs

- Data available for 3 large IOUs:
  - Covers 2023-2024
  - Includes select initiatives (system hardening, inspections, veg. management, etc.)

Link: Implementation of Wildfire Mitigation Plans
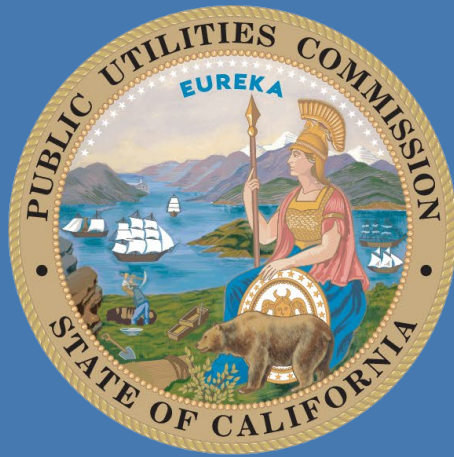
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CPUC Wildfire Safety & Regulatory Oversight

Safety and Enforcement Division

Ron DeMayo

Program and Project Supervisor | Wildfire Safety and Enforcement Branch

California Public
Utilities Commission

CPUC Wildfire Safety & Regulatory Oversight: Wildfire Investigations, PSPS Compliance, and Wildfire Mitigation Plans

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Wildfire Safety Enforcement Branch

Mission Statement

- The Wildfire Safety and Enforcement Branch (WSEB) of the Safety and Enforcement Division regulates and enforces electrical and Public Safety Power Shutoff (PSPS) safety regulations and guidelines, and develops policies to protect consumers, safeguard the environment, and assure Californians' access to safe and reliable utility infrastructure and services. WSEB conducts investigations of investor-owned utility (IOU)-reported wildfires and the electric IOUs' PSPS compliance.

- WSEB is comprised of the Wildfire Investigations Section and the PSPS Section.

State Agency Collaboration

California Department of Forestry and Fire Protection (CAL FIRE)

- CAL FIRE investigates the cause of fires
- Conducts site visits with WSEB engineers

California Governor's Office of Emergency Services (Cal OES)

- Interfaces with county/local emergency management
- Created PSPS Standard Operating Guide (separate from CPUC regulations)
- Collaborates and aligns with CPUC to provide feedback to IOUs during and after PSPS events

Office of Energy and Infrastructure Safety (Energy Safety)

- Creates Annual Report on Compliance (ARC) for IOU Wildfire Mitigation Plans (WMP)

Wildfire Investigations Overview

- Conducts investigations of IOU reported wildfires for General Order (GO) violations
- Reviews ARC created by Energy Safety for compliance and potential IOU enforcement

Wildfire Investigations Overview

- Jurisdictional Overview

General Order (GO)	Description
95: Overhead Electric Line Construction	Requirements for overhead line design, construction, and maintenance to ensure adequate service and secure safety for workers and the public.
128: Construction of Underground Electric Supply and Communication Systems	Requirements for underground electrical supply and communications systems design, construction, and maintenance to ensure adequate service and secure safety for workers and the public.
165: Inspection Cycles for Electric Distribution Facilities	Requirements for electric distribution and transmission facilities inspections to ensure safe and high-quality electrical service.
174: Rules for Electric Substations	Requirements for substation inspection programs in order to promote safety of workers, the public and enable adequacy of service.

PSPS Compliance Oversight

During PSPS Events:

- WSEB staff conducts real time compliance monitoring of IOU PSPS activities in relation to CPUC PSPS Guidelines and Requirements
- Daily contact/communications with IOUs
- Participates in daily IOU State Executive Briefings
- Observes IOU internal staff meetings
- Visit IOU emergency operations centers (as needed)

After PSPS Events:

- Conducts compliance assessment of IOU 10 Day Post Event Reports
  - Issues Data Requests, as needed, for additional information
- Reviews all party comments submitted for PSPS Post Event Reports, Pre-Season, and Post Season Reports
- Conducts compliance assessment of IOU annual PSPS Pre-Season and Post Season Reports
- Observes/Participates in all IOU annual PSPS Exercises
- Participates in all IOU Quarterly PSPS Regional Working Groups
- Conducts enforcement actions, as needed

PSPS Compliance & Enforcement Flow Chart

PSPS Event → 10 Day Report → Party Comments → IOU DR/NOV Response

Real Time Compliance | Start Compliance Assessment | Finish Compliance Review | Closeout/ DR/NOV | Response Assessment | Enforcement Decision | Close Out | Citation | AEO/ ACO | All Docs posted / Action Follow-ups
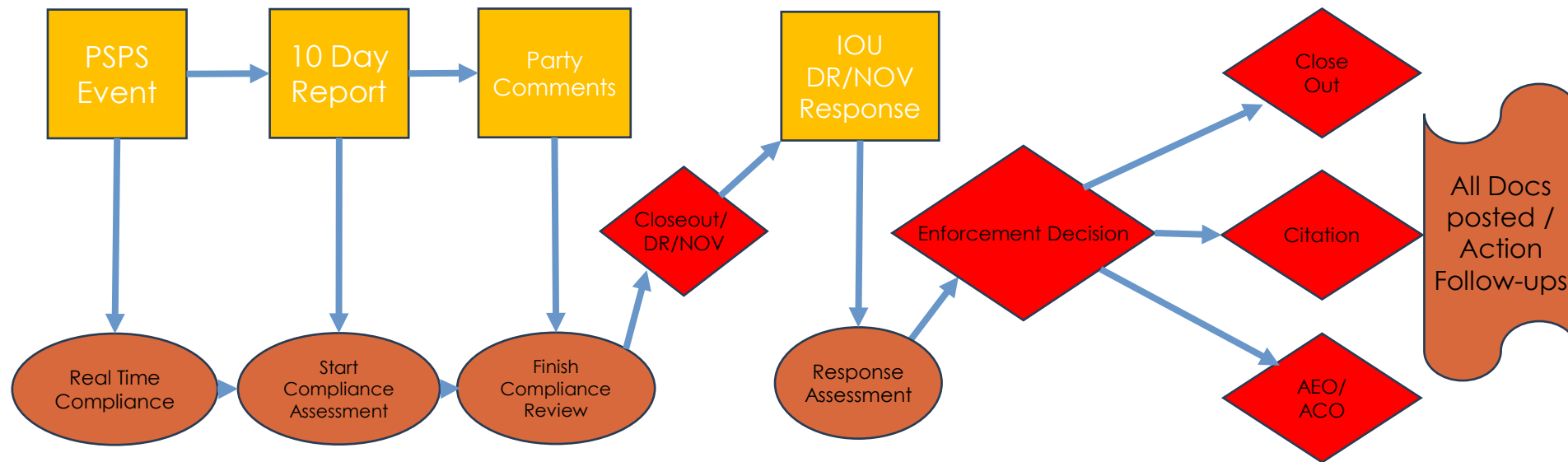
ACRONYMS
DR = Data Request
NOV = Notice of Violation
AEO = Administrative Enforcement Order
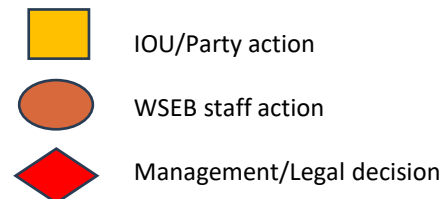ACO = Administrative Consent Order

LEGEND
IOU/Party action
WSEB staff action
Management/Legal decision

PSPS Post Event Reports

- Each IOU must submit one comprehensive PSPS post event report for each event no later than 10 business days after the shut-off event ends (ESRB-8).

- In the report, the IOU is required to demonstrate compliance with various reporting requirements covering topics in PSPS decision-making, de-energized data, damage and hazard, notification, public safety partner engagement, complaint, restoration, community resource center, mitigation, lesson learned, etc.

- 142 post-event reports have been filed since 2018.

# of PER/ Year	SCE	PG&E	SDG&E	Liberty	PacifiCorp	Year Total
2018	3	2	4	0	0	9
2019	16	7	3	0	0	26
2020	12	7	5	0	2	26
2021	10	5	2	1	1	19
2022	6	1	0	1	0	8
2023	8	4	1	0	0	13
2024	20	7	2	5	0	34
2025	2	3	2	0	0	
Grand Total	77	36	19	7	3	142

Post-Season Report & Pre-Season Report

- Each electric investor-owned utility must file a comprehensive Post-Season Report of **prior year** PSPS event information, no later than March 1 of each year, in R.18-12-005 or its successor proceeding.
  - Report includes, but is not limited to, amendments to post-event reports, education and outreach survey, access and functional need, PSPS mitigation, public safety partner request, impacted transmission analysis, PSPS data by census tract, education outreach cost, complaint data, etc.

- Each IOU must file and serve its **current year** PSPS Pre-Season Report no later than July 1 of each year via Rulemaking (R.) 18-12-005 or its successor proceeding.
  - Report includes the community resource center plan, critical facilities plan, PSPS Exercise Reports, education and outreach related surveys, accessibility efforts & associated costs, notification plan, lessons learned, greatest risk circuits, etc.

- All PSPS reports and PSPS data are located at the CPUC website: Utility Company PSPS Reports: Post-Event, Post-Season and Pre-Season

CPUC Public PSPS Dashboard

- Based on the post-event report data, WSEB created a CPUC public PSPS Dashboard to view post-event PSPS data and a map displaying PSPS de-energized GIS polygons.

- Link: CPUC Public PSPS Dashboard
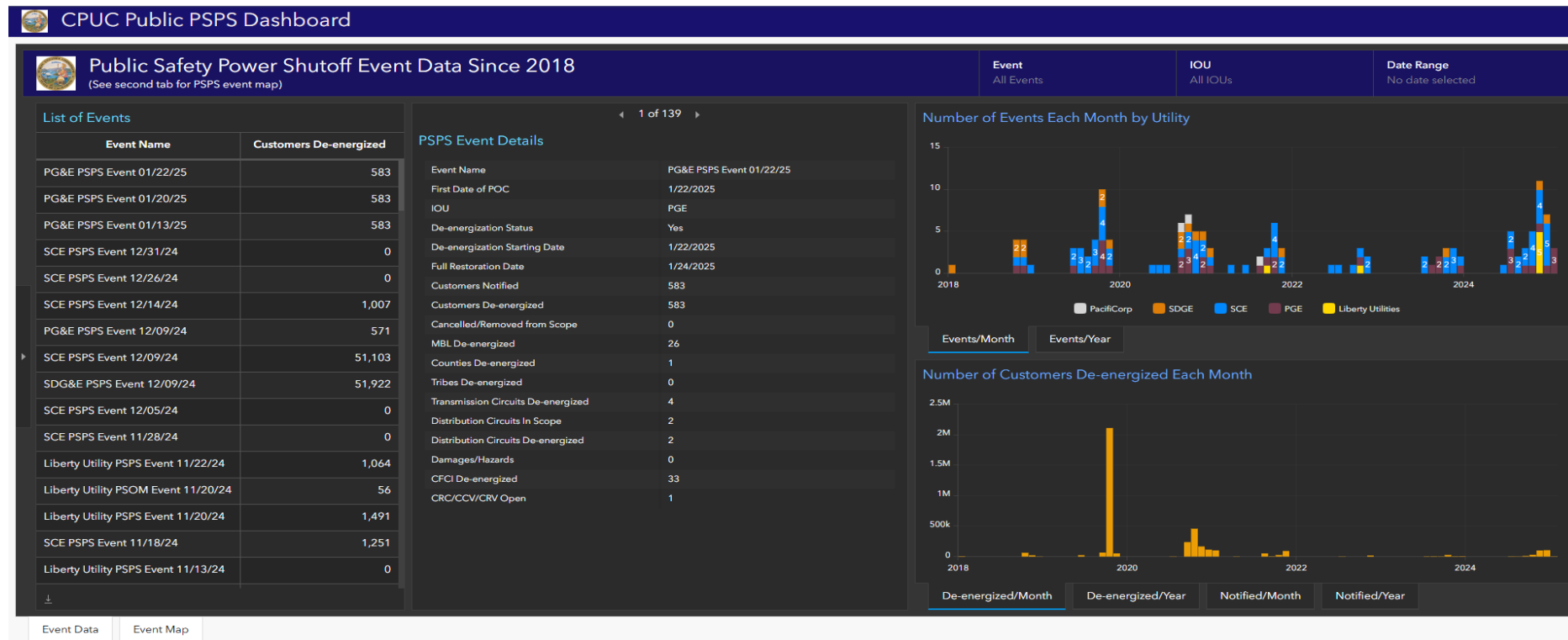
CPUC Public PSPS Dashboard

- Each IOU must submit in its post-event report a zipped geodatabase file that includes PSPS event polygons of de- energized areas. Based on the submitted polygon files, an event map is included as a second tab in the CPUC PSPS dashboard.
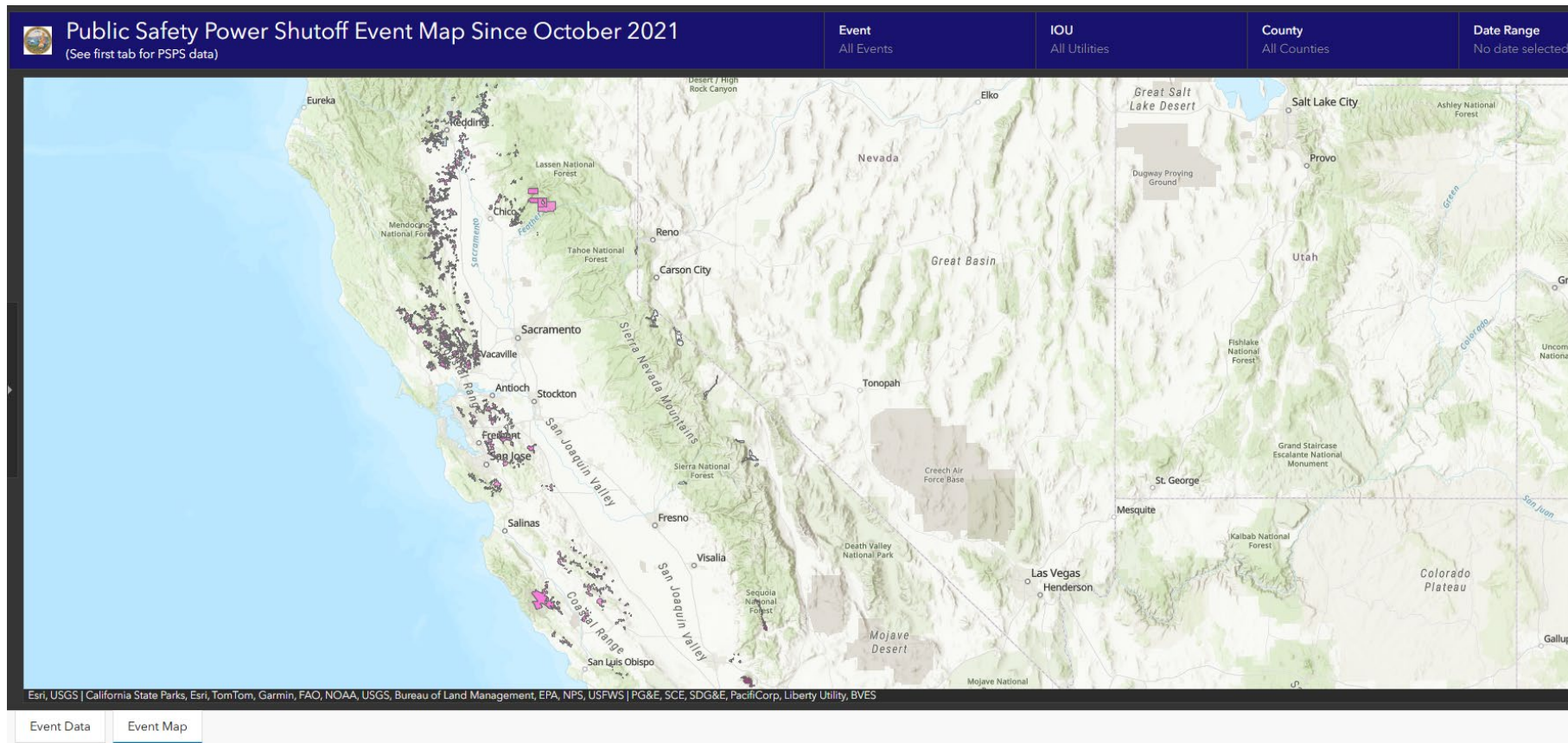
CPUC Public PSPS Dashboard Details

- Not a "live" dashboard for in-event PSPS information
- Based on post-event historical data received from IOUs
- First Tab - PSPS Event Data Since 2018
  - List of events since 2018
  - Event details for each event
  - Event number trend by month and by year
  - De-energized customer number trend by month and by year
  - Notified customer number trend by month and by year
  - Filters by event, IOU name, and date
- Second Tab - PSPS Event Map Since October 2021
  - Historical event polygons since October 2021
  - Filters by event, IOU name, and date
  - Other layers for visual comparison
- Data Sources:
  - PSPS Post Event Reports (PER) and amendments
  - Annual Post Season Reports and Post Season Data Reports
  - Data Requests
- Update Timeline:
  - The PSPS Dashboard – Event Data tab will be updated within 1 week of receiving any of the above data sources. The Event Map tab is typically updated within 2 weeks depending on any corrections filed by the IOU.

Wildfire Investigations Timeline

PG&E Dixie Fire Administrative Consent Order, Resolution SED-8

Dixie Fire Investigation

Dixie Fire Initial Enforcement Actions

PG&E files USRB Incident Report

PG&E files 20-Day Report

Data Requests sent to IOU, if needed, and responses reviewed

Investigation Report complete and submitted to WSEB Management for review

Notice of Violation (NOV) Sent

Penalty Amount Estimated

Draft Resolution SED-8 developed and sent out for 30-day comment period

CPUC Legal completes edits to SED-8

SED follows up on terms of the settlement

WSEB Engineer conducts site visit

Witnesses interviewed and evidence examined

3RD party records reviewed

Utility Response Reviewed

Settlement talks between CPUC and PG&E and ACO drafted

Comments reviewed by WSEB and Legal

SED-8 approved by Commissioners during CPUC Voting Meeting

PSPS Compliance Timeline

PG&E 2021 PSPS Events Administrative Consent Order, Resolution SED-12

Repeat initial compliance review process for all 2021 PG&E Post Event Reports

Above timeline:
- PSPS Event ends
- PSPS Compliance Review initiated
- Party comments reviewed
- Initial Compliance Review complete and submitted to WSEB Management for review
- 2021 PG&E PSPS Annual Compliance Review complete
- PG&E Notice of Violation Response received
- Draft Resolution SED-12 developed and sent out for 30-day comment period
- CPUC Legal completes edits to SED-12

Below timeline:
- Post-Event Report submitted within 10 business days
- Party comments submitted within 15 days
- Data Requests sent to IOU, if needed, and responses reviewed
- 2021 PG&E PSPS Events Notice of Violation sent to PG&E with 30 day response due date
- PSPS Settlement talks between CPUC and PG&E and ACO drafted
- Comments reviewed by WSEB and Legal
- SED-12 approved by Commissioners during CPUC Voting Meeting

California Public Utilities Commission

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CPUC Resources

CPUC Home page www.cpuc.ca.gov

Power Outage Map

High Fire Threat District Map

Consumer Protections & Resources for Wildfire Victims

SED Wildfire Incident Reports and Staff Investigations

Report Public Safety Concerns

Home › Consumer Support › File a Complaint › Public Safety Complaint

Public Safety Complaint

Let us know about public safety issues related to gas, electric, cable, telephone, water, or mobile home park utilities.

California Public Utilities Commission

Thank You for Joining
www.cpuc.ca.gov/informational-webinars

Other Resources

- Southern California Edison (SCE) PSPS Alerts [Get Outage Alerts](#)

- Pacific Gas & Electric PSPS Alerts [PG&E Outage Center - Get PSPS Alerts](#)

- San Diego Gas & Electric PSPS Alerts [Outage Notification Sign-Up | San Diego Gas & Electric](#)

- Prepare for Power Down [Home – What You Can Do to Prepare](#)

- Office of Energy Infrastructure Safety [Wildfire Mitigation Plans | Office of Energy Infrastructure Safety](#)

- CAL FIRE [California Department of Forestry and Fire Protection | CAL FIRE](#)

- South Coast Air Quality Management District [AQMD – Home](#)