



SAFETY AND ENFORCEMENT DIVISION MONTHLY PERFORMANCE REPORT

September 2024



California Public
Utilities Commission

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Introduction

The CPUC's Safety and Enforcement Division (SED) oversees the safety of electric and communication facilities, natural gas infrastructure and propane facilities. SED is comprised of three branches of utility engineers, analysts and investigators that focus on ensuring the safety of utility infrastructure and reducing utility caused wildfires. SED advocates for public safety through performing safety audits, conducting incident investigations, and appearing in CPUC safety proceedings. SED has the authority to issue citations with penalties against utility operators who violate public utility safety codes and requirements.

Gas Safety and Reliability Branch (GSRB)

The Gas Safety and Reliability Branch (GSRB) ensures that intra-state natural gas and liquid petroleum gas (LPG) pipeline systems are designed, constructed, operated, and maintained according to safety standards set by the CPUC and the federal government. CPUC gas safety engineers are trained and qualified by the federal government. The CPUC enforces natural gas and LPG safety regulations; inspects construction, operation, and maintenance activities; and makes necessary amendments to regulations. Its mission is to protect and promote the safety of the public and utility employees that work on the gas pipeline systems. September 2024 external activities included:

- Leadership Meeting with Southwest Gas in Incline Village, NV
- Meeting with PG&E to discuss waiver requests
- GSRB Q3 Branch Meeting
- Meeting with SoCalGas to discuss Benzene, Toluene, Ethylbenzene and Xylenes (BTEX)
- National Association of Pipeline Safety Representatives (NAPSR) National Meeting in Niagara Falls, NY

SED has the authority to issue citations with penalties for operator violations of public utility safety codes and requirements. The citation process allows the CPUC to act expediently in matters where violations of state and federal rules are clear and unambiguous. Citations may arise out of an ongoing investigation into related matters when a violation is brought to the CPUC's attention directly. Previous citations can be found on the CPUC's website [here](#). There are currently no outstanding gas safety citations.

On August 19, 2024, the Pipeline and Hazardous Materials Safety Administration (PHMSA) sent results to President Alice Reynolds of its evaluation of the pipeline safety program activities carried out by GSRB in Calendar Year 2023. PHMSA reviewed documents, pipeline program procedures and records, and observed an on-site pipeline operator inspection by GSRB staff on July 9-11, 2024.

Federal law authorizes PHMSA to monitor state pipeline safety programs. This annual evaluation ensures compliance with the Pipeline Safety Act requirements which provides the basis for determining the state's pipeline safety grant allocation.

For CY 2023, GSRB scored 99 out of 100 points, its highest score in the past three years.

PHMSA noted that because the California pipeline safety program is large with many operators, the ability to manage compliance issues is more difficult to manage manually. PHMSA “strongly encouraged” GSRB to upgrade to an electronic system for tracking open violations to closure to close a process gap and enhance program reliability. SED is currently competing for ITSD funding for an electronic system.

In the area of transparency, the Pipeline Safety Trust, which annually reviews each state’s pipeline safety website to assess its accessibility and the amount of information available to members of the public, awarded California (GSRB) a perfect score. It stated, “This state excels in transparency regarding the agency’s authority. This helps the public understand the state pipeline safety program’s jurisdiction and the issues it addresses.” California was one of five states to score 100%.

Congratulations GSRB! Find more information about GSRB [here](#).

Natural Gas Inspections (Year to Date)

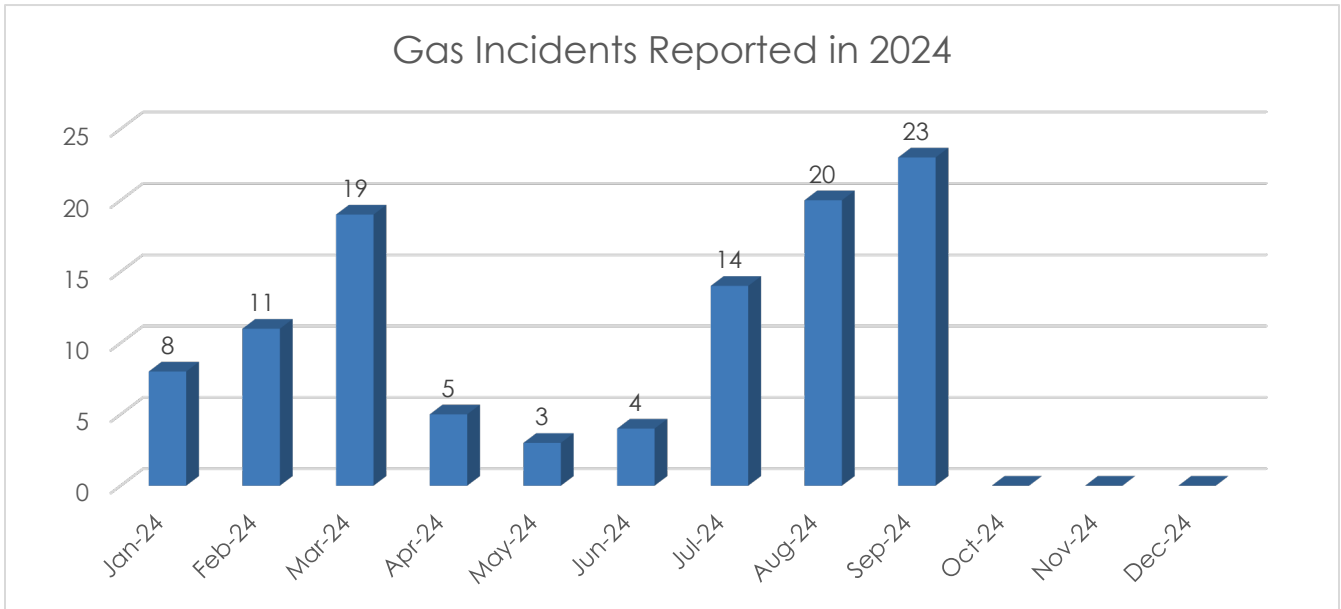
The purpose of GSRB’s inspections is to confirm that operators continue to construct, operate, and maintain their pipeline facilities in a manner that ensures the safety of workers and the public. In addition to routine inspections, GSRB also conducts on-site construction inspections. Typically, each inspection consists of a records review of an operator’s past compliance activities, and field verifications. Results are documented in a final report and sent to the operator after the inspection. The expectation is to have a final report sent to the operator within 60 days of the inspection. GSRB will submit an Inspection Closure Letter to the operator within 120 days from the day the inspection is completed. The table below shows GSRB’s inspection activity year-to-date in 2024.

Inspections	Year to date, through September 2024
Conducted	31
Final Report Completed	21

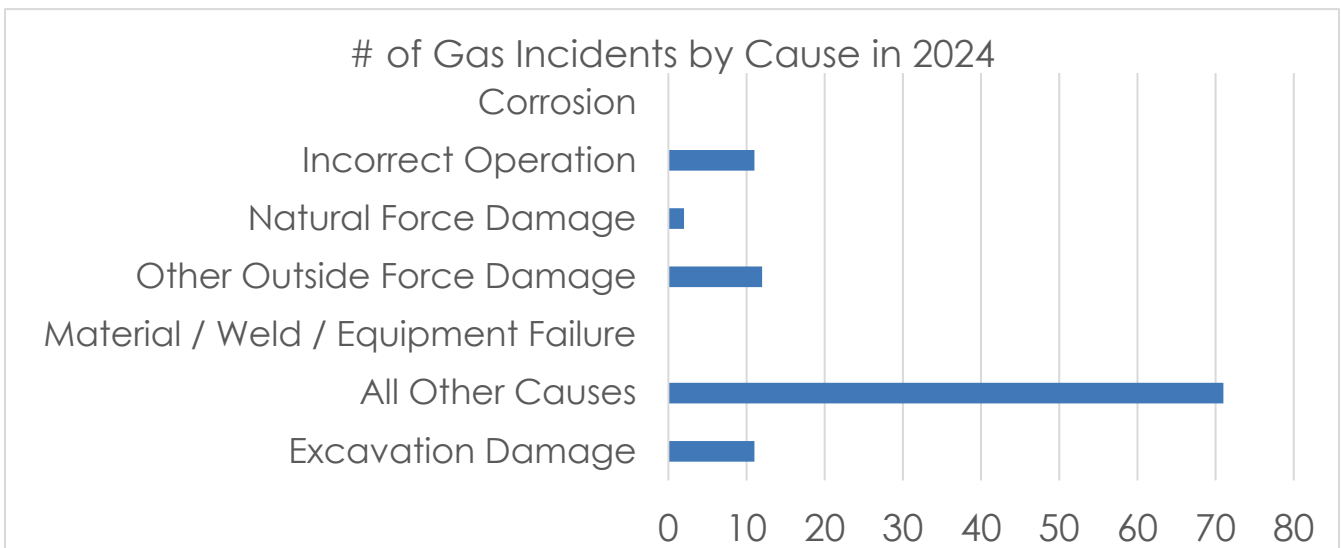
Natural Gas Incident Reports and Investigations through September 2024

As of September 30, 2024, GSRB Staff has received reports of 107 incidents. All reported incidents are assigned to GSRB engineers to investigate and prepare a final report. The report indicates if there were any violations of General Order (GO) 112-F committed by the operators. Operators report incidents based on the criteria outlined in GO 112-F.

The table below illustrates the number of reported gas incidents per month, ending September 2024



The bar chart below shows the 107 incidents by cause as of September 2024



The table below shows the 107 incidents by incident level and status.

Status	Level 1	Level 2	Level 3	Level 4	TOTAL
Open	3	10	9	1	23
Closed	71	9	4	0	84
TOTAL	74	19	13	1	107

The table below describes the four incident levels and provides the timeframes/guidelines for incident reports to be completed and closed from the date of assignment of an investigation.

Levels	Definition of Incident Levels	Guidelines
1	Did not result in injury, fatality, fire or explosion; may be due to an unrelated event outside of the Operator’s control.	60 days
2	Did not result in injury, fatality, fire or explosion; may or may not have caused a release of gas, have been reported due to Operator judgment.	120 days
3	Resulted in a release of gas but did not result in injury, fatality, fire or explosion.	150 days
4	Resulted in injury, fatality, fire or explosion caused by release of natural gas from the Operator’s facilities.	≥ 180 days

Natural Gas Utility Self-Identified Violation (SIV) Investigations

There were no Self-Identified Violations reported to GSRB in September 2024.

Customer Safety Complaints

GSRB received and investigated three (3) new customer complaints and inquiries in September.

One (1) complaint was closed after GSRB determined no IOU involvement was present.

The remaining two (2) complaints are being investigated and listed as: a customer complaint about an IOU’s leak repair and a customer complaint about a propane park’s leak repair.

Inspection Notices / Notice of Probable Violation Letters (NOPV)

SED may issue an NOPV based on an investigation, customer complaint, or inspection for a violation of an applicable law or regulation. In September, GSRB issued 2 inspection notice and 3 NOPV letter.

- September 5 – City of Vernon inspection letter (recommended to Pipeline and Hazardous Materials Safety Administration (PHMSA)) – 1 probable violation found.
- September 11 – PG&E Northern Area inspection letter – 0 probable violations found.
- September 11 – SoCalGas Coastal Transmission Area inspection letter – 0 probable violations found.
- September 11 – SoCalGas Northwest-San Fernando Valley Area inspection letter – 1 probable violation found.
- September 30 – Central Valley Gas Storage inspection letter – 4 probable violations found.

Natural Gas Safety and Reliability Proceedings

Mobile Home Parks (MHP) Utility Conversion Program (D.20-04-004) (Commissioner Rechtschaffen / ALJ Hecht) (SED Advocacy): On April 24, 2020, the Commission issued Decision 20-04-004 which established the Mobile Home Park Utility Conversion Program (MHP-UCP) which authorizes IOUs to install new gas and electric utility systems in mobile home parks to replace master-metered utility systems. The program goal is to convert 50% of all mobile home spaces by the end of 2030 according to a risk-based priority ranking system developed by GSRB. GSRB received forms of intent from 986 mobile home communities before the deadline on March 31, 2021. SED created a risk-prioritization list which included new applicants, and parks still on the Pilot list from 2015, and ranked them according to their utility system’s risk of failure. SED has delivered the priority list to all participating investor-owned utilities, and the utilities are currently working with MHP Owners to plan and execute conversion projects. There are currently 586 “Category 1” parks, which have a total of 37,890 spaces. SED estimates the utilities will start the conversion process with these Category 1 Parks sometime before the second priority list is produced in July 2025.

In February 2024, the utility companies filed their required MHP-UCP Annual Reports, which track (among other things) the number of MHP spaces converted to direct service for gas and electric, both to the meter (TTM) and beyond the meter (BTM), and the cost of those construction projects in 2023, as described in the table below:

Summary of 2024 MHP-UPC Annual Reports by Utility

Utility	Electric Spaces Installed (TTM)	Electric Spaces Installed (BTM)	Gas Spaces Installed (TTM)	Gas Spaces Installed (BTM)	Total Cost
Bear Valley Electric	0	0	n/a	n/a	\$0
Liberty Electric	265	265	n/a	n/a	\$5,547,104
PacifiCorp	0	0	n/a	n/a	\$2,833
PG&E	1,186	1,173	2,022	1,991	\$62,410,262
SCE	1,559	1,538	n/a	n/a	\$22,549,927
SoCal Gas	n/a	n/a	2,279	2,782	\$18,198,355
SDG&E	128	628	70	567	\$24,589,849
Southwest Gas	n/a	n/a	278	275	\$4,973,166

Since the beginning of the MHP Utility Conversion Pilot Program in 2015, the utilities have reported installing new electric services to 39,652 spaces and installing new gas services to 45,859 spaces. As of January 1, 2024, the utilities have reported spending \$1.42 billion on construction projects and management of this program.

In accordance with Ordering Paragraph #4 of D.20-04-004, SED is required to post a list of the MHPs that were re-prioritized in the prior year due to extenuating circumstances by April 1 of each year. Extenuating circumstances that allow for adjustment on prioritization lists include wildfire (or other large-scale fire incident), earthquake, destructive flooding, other natural disasters, public unrest or riot, and catastrophic damage from foreign objects (such as aircraft crash or train derailment). In 2023, SED authorized the re-prioritization of one park with 50 spaces. The full reports, as well as a list of reprioritized parks, can be found on the MHP-UCP [webpage](#).

Decision 20-04-004 requires a second application period between January 1 and March 31, 2025. GSRB is currently reaching out to potential applicants to educate them on the process and alert them to the new application periods.

PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy): On February 20, 2020, the Commission issued Decision 20-02-036 which closed this Investigation but via the Settlement between Pacific Gas & Electric Company (PG&E), the Commission’s Safety and Enforcement Division (SED), and the Coalition of California Utility Employees (CUE), the Commission ordered several shareholder-funded gas and electric System Enhancement Initiatives (SEI) but with a longer compliance audit period of four years and a \$110 million total penalty.

On April 24, 2024, PG&E submitted its fourth Locate and Mark Annual Report. The reporting period for this Annual Locate and Mark Report is from January 1 to December 31, 2023.

On September 24, 2024, PG&E indicated that they have implemented several process improvements on classification of locate and mark tickets.

Electric Safety and Reliability Branch (ESRB)

The mission of ESRB is to enforce state statutes and regulations regarding the safety and reliability of electric facilities, communication facilities, and power plants that are within the jurisdiction of this Commission in California, to ensure that the facilities are operated and maintained in a safe and reliable manner, to protect and promote the public health and safety, and to facilitate an environment inside and outside of the Commission that increases the safety and reliability of these facilities. September 2024 activities are below and include:

- Conducted 1 Electric Distribution audit, 6 Communication Infrastructure Provider (CIP) audits, 1 Substation audit, 1 Transmission audit, and 1 Power Plant audit.
- Issued 7 Electric Distribution audit reports, 3 CIP audit reports, 4 Substation audit reports, and 1 Power Plant audit report.

ESRB reviews daily outage reports from power plants. Outages could be forced or planned. ESRB reviews the status and cause of each outage, may issue data requests related to the status and cause of each outage, and will follow up with power plants regarding the outage as necessary. In September 2024, ESRB monitored the status of eight planned outages and 100 forced outages reported by natural gas and renewable energy power plants.

Electric Facilities Citations

SED has the authority to issue citations with penalties for electric utilities and Communication Infrastructure Providers (CIPs) for violating Commission General Orders (GO) and Public Utility Code (PU Code) rules. Citations may arise from violations discovered during incident investigations, audits, customer complaint investigations, whistleblower investigations, or other safety matters that are brought to the attention of SED.

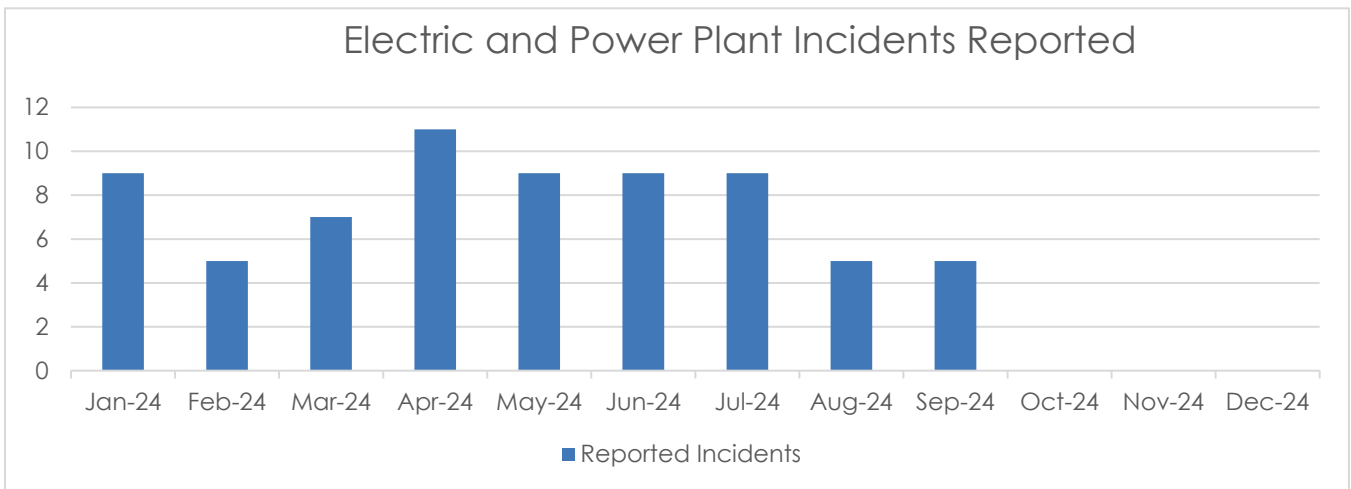
The table below shows the status of citations issued by ESRB in 2022 and 2024. ESRB did not issue a citation in 2023. All ESRB citations related to electric and communication facilities can be found on the Commission’s website [here](#).

Citation Number	Utility	Amount	Violations	Date Cited	Description	Status
D.16-09-055 E.21-10-001	PG&E	\$100,000	General Order (GO) 95, Rule 38, Minimum Clearances of Wires from Other Wires	10/21/2022	Failing to maintain minimum clearance between conductors on the same crossarm.	Paid on November 18, 2022.

Citation Number	Utility	Amount	Violations	Date Cited	Description	Status
D.16-09-055 E.22-11-001	SCE	\$1,020,000	GO 95, Rule 31.1, Design, Construction and Maintenance	11/15/2022	Failing to install and maintain its 66 kV conductor and insulator adequately and safely.	Paid in December 2022.
D.16-09-055 E.22-12-001	SCE	\$4,500,000	Three violations of GO 95, Rule 31.1, Design, Construction and Maintenance	12/16/2022	Failing to follow its Contractor Safety Management Standard (CSMS) which may have resulted in a fatal injury.	Resolution ALJ-460 approved the settlement agreement on June 20, 2024, resulting in a \$3.5 million penalty to SCE. Paid in August 2024.
D.16-09-055 E.24-02-001	SCE	\$2,404,000	Two violations of GO 95, Rule 31.1, Design, Construction and Maintenance, and two violations of GO 95, Rule 38, Minimum Clearances of Wires from Other Wires	2/5/2024	Failing to install overhead facilities properly to allow them to maintain the required GO 95 clearance during normal conditions.	Paid on February 16, 2024.

Electric and Power Plant Incidents Reported

ESRB received 3 electric incident reports and 2 power plant incident reports in September 2024.



Electric Facilities and Power Plant/Generation Incident Investigations

Incident status		Level 1	Level 2	Level 3	Total
Total open incidents	Electric Facilities	32	10	63	105
	Generation	22	0	2	24
Total incidents reported in 2024	Electric Facilities	13	4	36	53
	Generation	19	0	2	21
Total incidents closed in 2024	Electric Facilities	29	13	34	76
	Generation	2	0	1	3
Total open 2024 incidents	Electric Facilities	8	3	26	37
	Generation	17	0	1	18
Incidents reported in September 2024	Electric Facilities	1	1	1	3
	Generation	2	0	0	2
Incidents closed in September 2024	Electric Facilities	2	3	6	11
	Generation	0	0	0	0

The table above shows information about ESRB incident investigations as of September 30, 2024, and incidents reported and closed in September 2024.

In August 2024, ESRB revised the definitions of incident levels as follows:

- Level 3 incident (highest level): Incidents that result in a fatality or personal injury/injuries as defined in the electric incident reporting requirement.
- Level 2 incident (medium level): Incidents that are the subject of significant public attention or media coverage and are attributable or allegedly attributable to the utility’s electrical facilities.
- Level 1 incident (lowest level): Incidents that involve damage to property with the amount consistent with the reporting requirement.

Customer Safety Complaints

ESRB investigated 15 electric and communication safety and reliability customer complaints in September 2024.

Notice of Violation Letters

ESRB did not issue any Notice of Violation (NOV) letters in September 2024. ESRB may issue an NOV in response to an investigation or customer complaint for a violation of an applicable law or regulation.

Electric Safety and Reliability: Proceedings

PG&E Locate and Mark Practices OII (I.18-12-007) (Commissioner Rechtschaffen/ALJ Allen) (SED Advocacy): The Commission issued D. 20-02-036 which closed this Investigation but via the Settlement between Pacific Gas & Electric Company (PG&E), the Commission’s Safety and Enforcement Division (SED) and the Coalition of California Utility Employees (CUE), the Commission approved several shareholder-funded gas and electric System Enhancement Initiatives but with a longer compliance audit period of four years and a \$110 million total penalty.

In November 2020, ESRB staff reviewed PG&E’s One Call Concepts Timely Ticket Review Methodology and PG&E’s Field Review Methodology and provided comments to GSRB for consideration.

On June 4, 2021, ICQ Professionals, LLC, submitted “Proposed Objectives, Methodology and Final Report Description for SED Consultation of Field Audits for Locate and Mark OII I.18-12-007 Settlement”. This submittal starts the process of consulting with the CPUC/SED on the objectives, methodology, and the final product description of the field audit of PG&E’s Locate and Mark Program by ICQ Professionals, LLC. The primary focus is to provide the sampling methodology to be used to conduct this audit. ICQ Professionals, LLC is the contractor conducting field audits throughout 21 PG&E divisions to check for PG&E’s compliance with its Mark and Locate procedures.

In August 2024, SED received the Monthly Status Report for July 2024 from ICQ Professionals, LLC. Field audits are 21% complete; 815 field audits were completed in July.

On September 23, 2024, SED received ICQ Professionals, LLC’s Monthly Status Report for August 2024 which reported 688 field audits completed in August. It reported 39% of field audits were completed in August, an 18% increase from the July 2024 Report which reported 21% completion.

The target number is 3,855 total field audits completed. As of August 31, 2024, 1,503 field audits have been completed.

Rulemaking to Update Rules for the Safety, Reliability, and Resiliency of Electrical Distribution Systems (R.24-05-023) (Commissioner Baker/ALJ Rizzo) (SED Advocacy): On June 6, 2024, the Commission issued a Rulemaking to consider changes to existing policies, procedures, and rules regarding the safety, reliability, and resiliency of electrical distribution systems. The Commission identified four points as the preliminary scope of issues for this proceeding: 1) Reliability of Electrical Distribution Service, 2) Outage Transparency for Customers, 3) Supporting Short-term Reliability, Safety, and System Resilience, and 4) Reasonableness of Costs and Cost Allocation. The Commission included a set of questions to be addressed and answered by participating parties.

In June 2024, SED reviewed the Rulemaking and filed comments on July 8, 2024. Reply comments were due on July 23, 2024.

In August 2024, SED reviewed and analyzed the reply comments submitted by parties to this proceeding. Pending.

Creation of a Shared Database or Statewide Census of Utility Poles and Conduit (I.17-06-027); Communications Provider Access to Poles (R.17-06-028) (Commissioner Batjer/ALJ Mason) (SED Advocacy): In 2017, the Commission opened a proceeding to address the feasibility of establishing a data management platform for pole owners and tenants to access pole data, attachment and conduit data. This investigation is being conducted in three tracks.

On December 15, 2020, the Assigned Commissioner’s Office issued a Second Amended Scoping Memo and Ruling that outlined the next steps in the consolidated Pole OII/OIR proceeding. On March 9, 2021, the ALJ issued a Ruling that requested parties to file comments by April 12, 2021, on a One-Touch-Make-Ready (OTMR) proposal.

On June 15, 2022, the Commission issued an Amended Scoping Memo and Ruling to address Track 3 issues which relate to conduit data. Such issues will be identified by a subsequent ruling from either the Assigned Commissioner or the assigned Administrative Law Judge. The Ruling also set a procedural schedule for the One-Touch-Make-Ready Decision, the Conduit Data Ruling, and the Conduit Data Decision.

On September 16, 2022, the Commission issued a Proposed Decision that adopts CPUC staff’s One Touch Make Ready (OTMR) requirements. OTMR is an expedited process for attachment of communication facilities that require “simple make-ready” work. On October 27, 2022, the Commission issued D.22-10-025 which adopts, with modifications, the One-Touch Make-Ready Staff Proposal amendments to the Right-of-Way Rules.

In July 2023, multiple parties submitted Requests For Extension to comply with Ordering Paragraph 8 of D.21-10-019, the Track 2 Decision Adding Attachment Data To Pole Owner Databases Ordered in D.20-07-004. Ordering Paragraph 8 requires pole attachers to “provid[e] the information required by Phase 1 Data Points 1-5 and 18-20 in Attachment A for existing and new pole attachments within 12 months from the date the Tier 2 Advice Letters of the five major pole owners in California ... were approved.”

On February 28, 2024, the ALJ issued a ruling denying the previously filed Motion by Joint Pole Attachers who requested that the pole attachment information they are required to provide to the Major Pole Owners be exempt from public disclosure.

In May 2024, SED attended a 3-day workshop to address Track 2, Phase 2 – Technical Review of 12 Data Points and Use of Data Points. The workshop was organized and hosted by pole owners as required by D.21-10-019.

In August 2024, parties produced a draft workshop report which was reviewed by SED. Also in August, SED met with the subject parties to discuss the parties' recommendations in the draft report.

In September 2024, Parties met with SED to discuss steps going forward based on recommendations in the workshop report and potential modification to a requirement in the Commission decision. Pending.

Petition to Adopt New General Order 95 (GO 95) Rules and Regulations Governing the Design and Construction of Overhead Electric and Communications Facilities (P.24-03-014) (Commissioner Baker/ALJ Rizzo) On March 11, 2024, SCE filed a Petition on behalf of the General Order 95/128 Rules Committee to amend General Order 95 (GO 95) to incorporate the Load and Resistance Factor Design (LRFD) methodology into the current Safety Factor methodology. The petition requests that the Commission adopt a package of 21 proposed rule changes (PRCs) designed to incorporate LRFD into GO 95, as well as five related Ancillary Rule Changes (ACRs). ESRB reviewed the Petition and filed a Response on April 17, 2024.

On September 11, 2024, SCE filed supplemental comments which solicited the Commission to consider including/discussing modifications to GO 95 Rule 18 within the scope of the proceeding. On September 13, 2024, SED filed a Response to SCE's supplemental comments to request that the Commission not consider SCE's filing because the timeframe for comments had elapsed in mid-July. Alternatively, SED asked the Commission to provide an opportunity for all parties to respond if the Commission intends to allow SCE's supplemental comments. Pending.

Other ESRB Activities

Progress Update for the ongoing Administrative Consent Order (ACO) agreement between SED and SCE for the 2017-2018 Southern California Wildfires: The Administrative Consent Order (ACO) between SED and Southern California Edison (SCE) regarding the 2017-2018 Southern California Wildfires was approved by the Commission in December 2021. The ACO required that SCE pay the cost of fines, safety measures and disallowances totaling \$550 million. Of that amount, SED and SCE discussed SCE's strategies and priorities for deploying the \$65 million in shareholder funds that were allocated specifically for safety measures.

On January 19, 2023, discussions continued to establish progress reporting criteria and timelines, and to prepare for spending the initial funds on activities in the first quarter of 2023. In addition to technical

studies, data analysis, and proceeding support actions, SCE proposed that some of the funding be used for activities related to secondary firebreak protection and community protection in the form of subsidies to governmental and non-governmental entities to purchase and operate transit vans during local emergencies. SED has been meeting with SCE monthly to discuss SCE's progress with the implementation of the safety measures. SED continues to review SCE's quarterly reports and monitors SCE's compliance with the ACO.

Compliance with Decision 20-05-019 regarding PG&E's 2017 and 2018 Wildfires (I.19-06-015): On May 8, 2020, Decision (D.) 20-05-019 was issued approving a Settlement Agreement, with modifications, between SED, PG&E, Coalition of California Utility Employees (CUE), and the Office of Safety Advocates (OSA). On December 4, 2020, a Final Decision (D.20-12-015) was issued modifying D. 20-05-019 and denying rehearing of D. 20-05-019. The Decision imposes penalties on PG&E totaling \$2.137 billion consisting of \$1.823 billion in disallowances for wildfire-related expenditures, \$114 million in shareholder-funded System Enhancement Initiatives, and a \$200 million fine payable to the General Fund (the fine to be suspended). ESRB is monitoring PG&E's work to ensure compliance with the Settlement Agreement and D. 20-05-019. On February 12, 2021, and consistent with D. 20-05-019, PG&E filed its first semi-annual report which provided updates and an overview of PG&E's progress on each of the 20 corrective actions in the Settlement Agreement.

The Settlement Agreement requires PG&E to implement several Safety Enhancement Initiatives (SEI). PG&E hired contractor David Mason + Associates (DMA) to conduct the independent audits under SEI #14 which addresses Wildfire Safety audits.

SEI #14: Independent Wildfire Safety Audits requires PG&E to retain a Safety Evaluator(s), defined as an independent consultant(s), who will review PG&E's policies, procedures, practices, and financial data concerning (a) PG&E's Tree Tracker Application, (b) Overhead Distribution and Transmission Preventative Maintenance Program, (c) Local Conditions Study of PG&E's territory and (d) Evidence Collection and Retention.

On August 2, 2023, DMA reviewed PG&E's Vegetation Management (VM) procedures, General Order 95, and Public Resources Code. DMA is also reviewed the One VM App which runs on vendor-supplied mobile devices and utilizes the Lemur mobile app for data collection. Lemur is geospatial in nature allowing both Inspection and Tree Crews to physically see on a map where the work is occurring which ends the need to carry paperwork requests or log inspections via paper map procedures. The One VM App provides a map-centric interface to direct users to work locations while adding scheduling and dispatch features to plan and execute field work. Monthly meetings between DMA, PG&E, and SED began in September 2023.

DMA reviewed the One VM App and PG&E's VM inspection and tree work orders to select locations for field inspections. After finalizing the site visits schedule, DMA began conducting field work and "shadowing" PG&E's VM crews to check the functionality of the One VM App in the field in November 2023.

On December 6 and 7, 2023, SED conducted site visits in Willits and Laytonville to observe One VM App in the field with PG&E and DMA. DMA also conducted site visits in December 2023 to observe/survey PG&E VM staff on the usability/reliability of the One VM app. On January 11 and 25, 2024, SED had bi-weekly meetings with DMA and PG&E to monitor the progress of site visits. DMA is continuing the site visits and surveys of PG&E VM pre-inspector (PI) personnel and tree crews.

SED staff conducted a site visit with DMA and PG&E in Oakland on March 18, 2024, to evaluate the field use of the VM app by a PG&E contractor vegetation management (VM) pre-inspector and the tree crew. SED observed DMA conduct interviews of the tree crew and pre-inspector who stated the VM app had issues at first but had improved over time and now functioned well. DMA completed its field work on March 26, 2024. DMA's next step is to draft the final report by the end of April for SED and PG&E to review.

In April 2024, DMA informed SED that the draft Audit Report is not yet ready for review by SED and PG&E.

In June 2024, SED reviewed DMA's Final Audit Report and provided edits/feedback on June 19. PG&E had no edits/feedback for the Final Audit Report.

On July 11, 2024, DMA provided responses to SED's comments/feedback and edits on the Report. SED reviewed DMA's responses and on July 24, 2024, DMA issued the Final Audit Report. SED's work is complete for SEI #14.

Safety Enhancement Initiative (SEI) #20 requires an independent study of PG&E's transmission and distribution system. Monitoring of SEI #20 was transferred from the CPUC's Safety Policy Division (SPD) to SED. The Settlement Agreement requires PG&E shareholders to pay for an independent engineering firm to study the grounding methods, and circuit and transformer configuration in PG&E's distribution and transmission systems. Quanta Technology (Quanta), the selected consultant, will conduct a study to identify and assess plausible factors impacting wildfire risk associated with PG&E transmission and distribution circuits. PG&E will provide the requested data needed to Quanta to conduct the study. SED will oversee PG&E and Quanta by reviewing the project deliverables, confirming that the deliverables meet SEI #20 requirements, and confirming that Quanta is receiving the necessary data from PG&E. SED is currently reviewing the final contract between PG&E and Quanta.

In September 2024, the SEI #20 contract between PG&E and Quanta was signed and the project has begun.

Technical Workshop on Energy Storage Systems Operation and Maintenance Standards: On March 26, 2024, ESRB hosted a technical workshop to present a walkthrough of the proposed revisions to General Order (GO) 167-B to implement operation and maintenance standards for energy storage systems as required by Senate Bill 1383. ESRB also addressed all concerns of workshop participants. The workshop presentation and materials are posted on the CPUC Electric Generation Safety and Reliability [webpage](#).

In May 2024, ESRB hosted a second workshop that was attended by Generator Asset Owners (GAOs) to address the implementation of Senate Bill 1383.

Transmission Maintenance Coordination Committee (TMCC): TMCC is an advisory committee to help the California Independent System Operator (CAISO) develop, review, and revise Transmission Maintenance Standards. TMCC holds quarterly meetings to discuss recent improvements in construction and maintenance processes and techniques, and industry best practices. ESRB is a member of TMCC and attends meetings. The most recent meeting occurred on April 18, 2024.

The Transmission Maintenance Coordination Committee (TMCC) meeting for Q3/2024, scheduled for July 18, 2024, was canceled by the organizer CAISO; no reason was given. The next meeting is expected in Q4/2024, on or about October 24, 2024.

Summer Reliability

Each summer, ESRB implements its Summer Reliability Operating Procedure to assist the CPUC and other agencies in ensuring electric generation reliability from June to October. ESRB's Summer Reliability Standard Operating Procedure consists of two parts:

1. Summer Reliability Data Request and Analysis

Under Section 10.1 of General Order (GO) 167-B, the ESRB Generation Section prepares the summer reliability preparedness data request (SR-DR) to send to all Generating Asset Owners (GAOs) during the first week of April 2024. The previous year's data request is modified to reflect the current year's concerns. ESRB coordinates with other divisions (i.e., Energy Division) and state agencies (i.e., California Energy Commission (CEC)) to obtain their input on questions for the SR-DR. The GAOs are directed to respond to all the questions in the SR-DR in 30 days. Once the GAOs' responses are received, ESRB Generation Section staff review and analyze the GAOs' responses regarding operation and maintenance practices, staffing status, fuel and water supply issues, environmental restrictions, parts and technical service procurement pertaining to summer reliability. Generation Section staff conduct follow-ups as necessary, including follow-ups with GAOs who have not complied with the request. These processes and endeavors provide ESRB with a comprehensive understanding of the GAOs' summer preparedness for all types of

power generating resources under CPUC jurisdiction. These processes also equip Generation Section staff with topics of focus for audits, investigations and other enforcement activities.

This year, an additional data request was included in the SR-DR regarding Battery Energy Storage Systems (BESS). The purpose of this request is to help establish BESS operation and maintenance standards for inclusion in GO 167-B for the implementation of Senate Bill 1383. With the number of BESS systems installed increasing rapidly in California, it is crucial to ensure the ongoing reliability of these systems given the tight electric power grid situation during the summer. The modification process is underway to include energy storage systems in the existing GO 167-B.

2. Daily Summer Outage Monitoring

Each year, ESRB staff monitors power plant outages throughout the summer season which runs from June 1 to October 31 each year. The purpose of monitoring outages is to ensure that ESRB can track any significant outages that could impact system reliability, as well as to ensure compliance with the operation and maintenance standards of GO 167-B. Since 2017, all jurisdictional GAOs have been required to report their planned and forced outages to SED daily through the Power Plant Outage Reporting system (PPOR). These requirements apply to all jurisdictional fossil fuel and renewable generating assets. Energy storage systems are also expected to be under these requirements upon approval of the proposed modifications to GO 167-B. Information on power plant outages is primarily obtained from the PPOR. ESRB staff also supplements this information with information from the CAISO Outage Management System (CAISO OMS) and CAISO website of Outage Management.¹ During the summer period, GAOs are required to report full and partial *forced* outages of 50 MWs or greater which are 2 hours or longer in duration, and any *planned* outages of 50 MWs or greater which are 24 hours or longer in duration.

Two assigned ESRB staff monitor daily outages and analyze the nature of these outages concerning safety and reliability. Staff will also follow up with power plants to collect detailed outage information as needed. ESRB staff then compile the weekly activities for all significant outage events into a weekly report for CPUC management. When an extreme heat wave event is called, the ESRB supervisor deploys the assigned engineer to be on-call and available to conduct any necessary rapid response audits. Rapid response audits can be triggered by several factors such as forced outages, outages lasting longer than 24 hours, media coverage, outages in isolated locations, or a load pocket during extreme heat wave events.

ESRB's efforts toward summer reliability data requests and daily outage monitoring are essential to achieve the ultimate purpose of the summer reliability program which helps to minimize and prevent electric reliability disruptions and prolonged outages especially during peak energy demand periods.

¹ CAISO website of Outage Management: [Outages | California ISO \(caiso.com\)](https://www.caiso.com/outages)

Wildfire Safety and Enforcement Branch (WSEB)

WSEB is dedicated to the enforcement of public utility wildfire safety and Public Safety Power Shutoff (PSPS) violations. WSEB is the lead investigator for utility incidents relating to wildfire, PSPS events and other aspects related to wildfire events. The staff conducts incident investigations and provides input into policy development.

September 2024 activities for WSEB:

- Currently investigating twelve (12) utility-related wildfires
- Monitored three (3) PSPS events in September 2024: SCE on September 7 and 15, 2024, and PG&E on September 30, 2024
- Participated in SDGE’s Q3 PSPS Regional Working Group Meeting on September 11, 2024
- Participated in PG&E’s Q3 PSPS Regional Working Group Meetings on September 18-20, 2024
- Participated in PG&E’s PSPS Seminar on September 3, 2024
- Reviewed PG&E’s July 2, 2024, and July 20, 2024, PSPS Post Event Reports

Activations, De-energizations and Post Event Reports in September 2024

PSPS Activities	PG&E	SCE	SDG&E	Bear Valley Electric	PacifiCorp	Liberty Utilities
Total PSPS Activations	1	2	0	0	0	0
Total PSPS w/De-energizations	1	1	0	0	0	0
Total PSPS Post Event Reports Reviewed	2	0	0	0	0	0

WSEB Wildfire and PSPS Enforcement Actions to Date

WSEB Wildfire/PSPS Enforcement	Enforcement Action	Citation/ Resolution Number	Utility	Penalty Amount	Date Approved
SCE 2020 PSPS Events	Administrative Enforcement Order	Resolution ALJ-440	SCE	\$7,000,000	06/08/2023
SDG&E 2020 PSPS Events	Administrative Enforcement Order	Resolution M-4863	SDG&E	\$24,000	10/06/2022
PacifiCorp 2020 PSPS Events	Administrative Enforcement Order	Resolution M-4862	PacifiCorp	\$0	10/06/2022
PG&E 2020 PSPS Events	Administrative Enforcement Order	Resolution ALJ-445	PG&E	\$8,000,000	10/12/2023
Brewer Fire	Staff Citation	D.16-09-055 W.23-05.001	PG&E	\$132,500	05/05/2023
Mule Fire	Staff Citation	D.16-09-055 W.23-08.001	PG&E	\$1,074,000	08/29/2023
Dixie Fire	Administrative Consent Order	Resolution SED-8	PG&E	\$45,000,000	01/25/2024
Old Fire	Staff Citation	D.16-09-055 W.24-04.001	PG&E	\$800,500	04/22/2024
SDG&E 2021 PSPS Events	Administrative Consent Order	Resolution SED-9	SDG&E	\$70,830	08/01/2024
PacifiCorp 2021 PSPS Events	Administrative Consent Order	Resolution SED-10	PacifiCorp	\$18,030	08/01/2024

PSPS-Related Proceedings and Events

In August 2024, the CPUC continued to hold utilities accountable for conducting safe and appropriate PSPS events by requiring the electric IOUs to publicly present on lessons learned from PSPS events in 2023 and preparedness for PSPS events in 2024.

Liberty Utilities, PacifiCorp, and SCE presented on August 7; SDG&E, Bear Valley Electric Service, and PG&E presented on August 8. The electric utilities provided updates on the status of preparation efforts and coordination with public safety partners, critical infrastructure and facilities, and customers, including those most vulnerable and/or with access and functional needs. The utilities presented on efforts to mitigate customer impacts and identified changes to processes or operations in 2024 based on lessons learned. The presentation from each electric IOU can be found [here](#).

On August 6, 2024, the Center for Accessible Technology (CforAT) filed a Motion requesting the Commission issue an Order to Show Cause (OSC) against SCE for its substantial notification failures during PSPS de-energization events that took place during the 2023 wildfire season. CforAT cited two distinct but related categories: (1) notification failures affecting customers, critical facilities and infrastructure operators, and public safety partners; and (2) issues with public safety partner notification emails. On August 21, 2024, SCE filed a response opposing the Motion. On August 26, 2024, Public Advocates Office (PAO) filed comments in support of the Motion.

On September 3, 2024, CforAT filed reply comments to SCE's response.

Rulemaking to Examine Electric Utility De-Energization of Power Lines in Dangerous Conditions (R.18-12-005) (President Reynolds /ALJ Kao/ALJ DeAngelis) (SED Advisory): The Commission opened this Rulemaking to further examine policies and guidelines adopted in ESRB-8 regarding communication, notification, mitigation and other logistic and implementation issues of a Public Safety Power Shutoff (PSPS) event.

On July 12, 2022, Pioneer Community Energy, Sonoma Clean Power Authority, East Bay Community Energy, Marin Clean Energy, and Rural County Representatives of California (collectively, the “Joint Parties”) filed a Motion requesting that the Commission open an expedited track of the Public Safety Power Shutoff (PSPS) Rulemaking 18-12-005 to address issues associated with the investor-owned utilities’ (IOU) “fast trip” settings and to adopt rules to govern these settings. Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) filed responses opposing the Motion. The California Energy Storage Alliance, Joint Local Governments, and Center for Accessible Technology filed comments in support of the Motion.

In July 2022, Safety and Enforcement Division (SED) staff met with representatives from the Joint Parties to listen to their concerns and their recommendations.

On February 23, 2023, President Reynolds issued a Ruling responding to the July 12, 2022 Joint Parties' Motion. The Ruling directed CPUC staff to hold a public workshop outside the instant De-Energization Rulemaking to identify the appropriate range of issues and questions that may help the Commission propose a scope and actions on the emerging challenges associated with reliability, including consideration of rules for governing the electric IOUs' fast trip programs. The workshop was held on March 17, 2023, and included presentations from each of the large electric IOUs. The workshop also included a presentation from the parties who filed the Joint Parties' Motion.

Public Safety Power Shutoff (PSPS) Citation Program: On September 21, 2023, the Commission approved a new citation program for PSPS. This authorization expands the CPUC's already existing PSPS enforcement capabilities, which include Orders Instituting Investigation, Orders to Show Cause, and Administrative Enforcement Orders. This new citation program establishes a tool that CPUC staff may use when appropriate to swiftly cite utilities for lack of compliance with PSPS guidelines. The PSPS citation program covers violations in the areas of reporting, notifications, community resource centers, and the IOUs' PSPS websites. It will help encourage complete and timely compliance with the PSPS guidelines and deter violations. Under the program, each citation, which might constitute multiple offenses, may not exceed \$8 million.

Protective Equipment and Device Settings (PEDS)

PG&E, SCE, and SDG&E have adjusted "fast trip" settings, also known as Protective Equipment and Device Settings (PEDS), on their equipment as a wildfire mitigation measure. The utilities have stated that the altered settings reduce wildfire risk, but these settings have resulted in unplanned outages for which advance notification is not possible. Formal guidance has been limited from the Commission regarding "fast trip" settings.

While there is no existing requirement for each of the IOUs to report on PEDS outages specifically and separately, President Marybel Batjer's October 25, 2021, letter to PG&E imposed reporting requirements for PG&E to report its Enhanced Powerline Safety Settings (EPSS) program performance.

PG&E's reports and more information on PG&E's Enhanced Powerline Safety Settings can be found [here](#).

Monitoring the Whistleblower Website and Safety Hotline

The Commission regulates privately-owned utilities. It serves the public interest by protecting consumers and ensuring that utility services and infrastructure are safe, reliable, and available at reasonable rates. It is charged with ensuring that these regulated service providers comply with the regulations. Whistleblower complaints can result in investigations that may involve safety and other issues. In September 2024, fourteen (14) whistleblower submissions and eleven (11) safety hotline inquiries were sent online to SED.