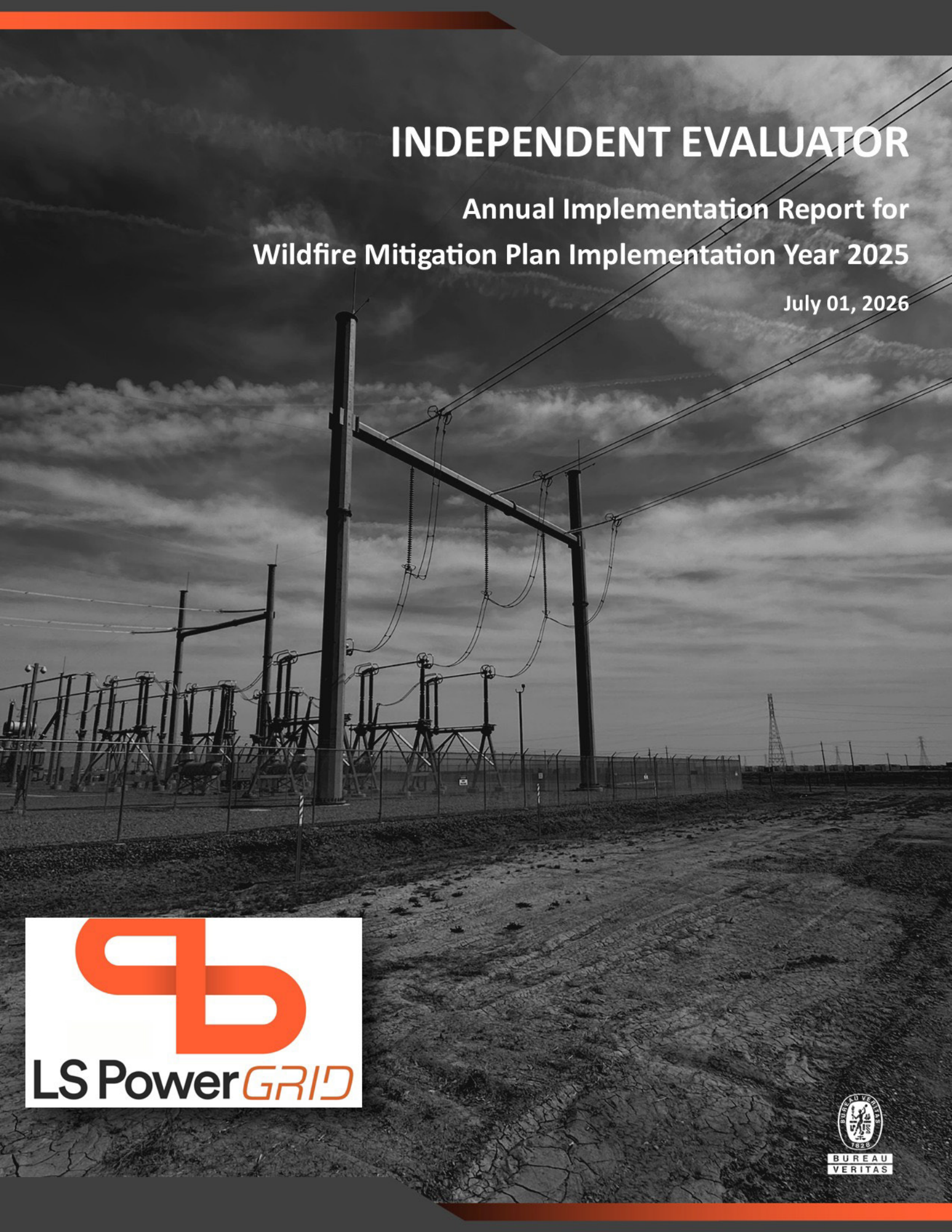

INDEPENDENT EVALUATOR

Annual Implementation Report for Wildfire Mitigation Plan Implementation Year 2025

July 01, 2026

LS PowerGRID

BUREAU VERITAS

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1. EXECUTIVE SUMMARY

Background

The devastating wildfires of the past and present have taught us valuable lessons about safeguarding California's lands, particularly in areas where electrical infrastructure coexists with wildland environments. In response to these challenges, the California Public Utilities Commission (CPUC) initiated Rulemaking 18-10-007 to provide guidance on Wildfire Mitigation Plans (WMPs) for Investor-Owned Utilities (IOUs), now referred to as Electrical Corporations (ECs). These WMPs are designed to cover a three-year period, with the first cycle of independent evaluations beginning in 2020.

The 2025 WMP is part of the second three-year planning cycle. During the first evaluation of this cycle, which ended in 2023, LSPGC experienced construction delays at both the Orchard and Fern Road Substations, resulting in delays to many WMP initiatives. In 2024, LSPGC made substantial progress on substation construction. The Orchard Substation was energized on March 12, 2025, with the Fern Substation energization expected in mid-2026. LSPGC completed all applicable initiatives for implementation year 2024 and continues these initiatives and other wildfire risk reduction activities into 2025.

This Independent Evaluator (IE) Annual Implementation Report (AIR) assesses LSPGC's WMP commitments for implementation year 2025. The IE AIR reviews the WMP initiatives as outlined for 2025 and evaluates LSPGC's performance in meeting their committed objective targets, verification of QA/QC program implementation, processes, and results, as well as the distribution of funding to mitigation efforts described within the WMP.

Pursuant to Public Utilities Code Section 8386.3(c)(2)(B)(i), (ii), (iii), and (iv), Bureau Veritas North America, Inc. (BVNA) has been selected as the IE to review and assess LSPGC's 2025 WMP in its entirety. This IE AIR will present BVNA's findings and results for review. BVNA was included in the Office of Energy Infrastructure and Safety (Energy Safety) Independent Evaluator List for 2025 WMPs, dated December 18, 2025, in accordance with Public Utilities Code section 8386.3(c)(2)(A).

In compliance with Energy Safety's requirements, LSPGC has contracted BVNA to provide the IE assessment. This assessment includes the IE responsibilities outlined in Public Utilities Code section 8386.3(c)(5)(C), which involve performing the following tasks:

- Task 1: Consult with Energy Safety on implementation assurance auditing that will be performed
- Task 2: Perform implementation assurance auditing, including field inspections
- Task 3: Draft and provide Energy Safety a report on audit findings, including deficiencies of underfunded WMP activities
- Task 4: Draft and provide Energy Safety a report on deficiencies of electrical corporations
- Task 5: Track and report deficiencies of audit findings

The evaluation process began with an Energy Safety kick-off meeting, which served as an introduction between LSPGC representatives, BVNA staff, and assigned Energy Safety personnel.

This introductory meeting established key elements, including communication and documentation protocols, as well as the identification of individuals responsible for receiving requests from the IE. Following this meeting, the IE initiated a review of LSPGC's 2025 WMP and related publicly available documents, as listed in Section 7. This review aimed to identify LSPGC's stated goals within the 2025 WMP.

To evaluate activities described in the WMP that were not available in public records, BVNA's team of evaluators submitted data requests and conducted interviews with Subject Matter Experts (SMEs). These steps helped verify activities stated within the 2023-2025 WMP (see Section 7 for a list of Data Requests/SME Interviews). Detailed analysis and key findings for each respective category are presented in the following sections of this report.

The IE has classified each activity as "Validated," "Not Validated", or "Not Applicable." "Validated" indicates that the EC has clearly demonstrated meeting the stated WMP target for the review year or continues to implement the activity as outlined. "Not Validated" means the EC either failed to provide sufficient documentation to support their claim of implementation or did not meet the WMP target, the individual reviews will elaborate and make the distinction. "Not Applicable" signifies that the EC has determined the activity is not relevant to the current review period.

Introduction to LS Power Grid California

LS Power Grid California operates two substation sites, Fern Road and Orchard, both Static Synchronous Compensator (STATCOM) facilities. The Orchard Substation construction was completed during 2023-2025 and was energized on March 12, 2025, after experiencing issues that delayed its original 2024 completion date. The Fern Road Substation experienced permit delays during 2023 that slowed construction progress. In January of 2024, the CPUC approved construction of the Fern Road Substation. Substantial construction progress was made during 2024 and 2025, with expected energization in mid-2026.

As outlined in LSPGC's Annual Report on Compliance (ARC) dated March 2025, LSPGC is a wholly owned subsidiary of LS Power, and a California Electrical corporation classified as an Independent Transmission Operator. LSPGC has no end-to-end use customers, and its infrastructure is limited to the two (2) 500 kilovolt (kV) substation facilities referred to as Fern Road and Orchard Substations. These substations are in two different geographical areas, the Fern Road Substation is in Shasta County, and the Orchard Substation is in Fresno County. Fern Road is located within a Tier 2 High Fire Threat District (HFTD) while Orchard is not located within a HFTD. The Orchard substation is in a non-burnable substrate (irrigated agricultural field) and, as referenced in the WMP, the Fern Road substation has little to no possibility of a woody tree making contact due to structure placement. LSPGC states that the likelihood of a catastrophic wildfire in both project areas is minimal due to the fire history, burn probability, and predicted fire behavior – both areas have seen few to no wildfires in the past two decades.

The Orchard Substation connects to PG&E's Gates Substation by two single-circuit 500kV interconnection transmission lines. The Gates Substation will connect through its 500 kV bus to the Orchard Substation 500kV take-off towers. The Orchard Substation was energized in March of 2025 and LSPGC anticipates the Fern Substation to be energized in mid-2026.

Key Findings

LSPGC successfully implemented six of nine applicable initiatives, achieving a 67% implementation rate. Three initiatives, LSP-02 (Substation Inspection Program), LSP-04 (Risk-Based Buffer Zones and Monthly Substation Inspection Program), and LSP-06 (Install Substation Cameras), missed their stated targets, though these shortfalls were primarily attributable to infrastructure delays rather than program deficiencies. Specifically, the Orchard Substation energization was delayed until March 2025, eliminating two months of planned inspection activity, while the Fern Road Substation energization was postponed to mid-2026, preventing all associated inspections and camera installations from being credited to the 2025 implementation year.

For Initiative LSP-02, LSPGC completed 10 of 15 targeted inspections during implementation year 2025, representing a 67% completion rate. The shortfall was attributable to infrastructure delays rather than program deficiencies. The Orchard Substation was not energized until March 12, 2025, eliminating the two inspections planned for January and February. The Fern Road Substation energization was postponed to mid-2026, preventing the three inspections planned for that facility from occurring in 2025. Once the Orchard Substation became operational in March, LSPGC executed all remaining monthly inspections through December 2025 without exception.

For Initiative LSP-04, LSPGC completed 6 dedicated defensible space inspections during implementation year 2025, representing a 40% completion rate against the 15-inspection target stated in the WMP. However, the maximum achievable number of inspections was 10, given the March 2025 energization of the Orchard Substation and the continued non-operational status of Fern Road. From March through June 2025, LSPGC documented vegetation conditions within Section 3 of the standard Asset Substation Monthly Inspection reports, capturing weed status and related observations. In July 2025, LSPGC formally developed and implemented the Substation Defensible Space Inspection program, introducing a dedicated "Monthly Defensible Space Inspection Checklist" that provided structured parameters for vegetation assessment, status verification, and comment documentation. From July through December, 6 formal defensible space inspections were conducted using this enhanced checklist format.

Financial performance revealed significant variances in six initiatives, with absolute percentage differences exceeding ten percent between budgeted and actual expenditures. The most substantial underrun occurred in LSP-02 (Substation Inspection Program), which expended only $14,400 against a $50,000 budget, representing a 71% variance directly correlated to the delayed substation energizations. Conversely, LSP-03 (Enhance Use of Computer Maintenance Management Systems) experienced a 423% overrun, spending $52,252 against a $10,000 budget due to unanticipated one-time integration labor costs for deploying IBM Maximo at the Orchard Substation. Three initiatives, LSP-04, LSP-06, and LSP-09, were implemented with zero planned budgets but incurred actual expenditures totaling $56,865, reflecting LSPGC's approach of embedding certain activities within broader operational or construction budgets rather than establishing standalone WMP line items. These financial variances did not impede program implementation, as all executed activities met quality standards and operational requirements once infrastructure constraints were resolved.

Initiatives Completed Within 5% of the WMP Targets: 6 Total Number of Initiatives (67%)

Table 1: List of Initiatives that Missed Target or Could Not Be Validated

Initiative Number, WMP Section Number, and Name	Missed Target or Could Not Be Validated
LSP-02, 8.1.3.1, Implement Substation Inspection Program	Missed Target
LSP-04, 8.2.2, Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program	Missed Target
LSP-06, 8.3.4.3, Install Substation Cameras	Missed Target

Table 2: Initiatives with Absolute % Budget Differences > 10%: 6 Total Number of Initiatives (60% of all LSPGC Initiatives)

Initiative Number, WMP Section Number, and Name	Total Budget	Total Expenditure	Total Variance Between Budget and Expenditure
LSP-02, 8.1.3.1, Implement Substation Inspection Program	$50,000	$14,400	-71.2%
LSP-03, 8.1.5, Enhance Use of Computer Maintenance Management Systems	$10,000	$52,252	422.5%
LSP-04, 8.2.2, Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program	$0	$39,300	100%
LSP-05, 8.3.2, Integrate StormGeo	$10,000	$0	-100%
LSP-06, 8.3.4.3, Install Substation Cameras	$0	$14,326	100%
LSP-09, 8.4.3, Establish Annual Contract with Local Fire Agencies	$0	$3,239	100%

Recommendations

An opportunity for enhanced transparency and recordkeeping was identified: producing a written report on the evaluation and analysis of the Live Video Feed (LSP-07) would create an official record that could be retrieved in the future for compliance, investigations, or audits. This report could be circulated to stakeholders, management, and compliance teams, establishing transparent distribution and accountability. Documentation of incidents, timestamps, locations, personnel involved, and recommended actions provides the detail and evidence necessary for analysis and decision-making.

Across all five WMP categories, LSPGC did not establish quantified initiative-specific risk reduction targets for initiatives, representing a limitation in the WMP's ability to measure wildfire risk mitigation effectiveness. The IE's validation methodology confirmed LSPGC's claims in the 2025 EC AIR; however, the absence of quantified risk reduction targets for individual initiatives limits the ability to assess risk reduction achieved within the category against projected reductions. Future WMP cycles would benefit from explicit risk reduction modeling or projections tied to

specific initiatives, enabling more rigorous evaluation of category-level risk mitigation effectiveness.

LSPGC should establish a reconciliation protocol to ensure consistency between asset counts reported in different documents, the 2025 EC AIR referenced 210 assets while IBM Maximo contained 183 assets, requiring post-submission clarification through Data Request 004. Implementing a pre-submission verification step that cross-references AIR figures with authoritative system outputs (such as Maximo reports) would prevent reporting discrepancies and strengthen data accuracy across regulatory submissions. For future substation energizations, including the anticipated mid-2026 Fern Road integration, LSPGC should apply lessons learned from the Orchard deployment to develop more accurate budget projections that account for both software licensing costs and the full scope of integration labor, ensuring that WMP financial planning reflects the true total cost of ownership for enterprise asset management system expansions.

2. FOCUS INITIATIVES AND DISCUSSION

Given LSPGC's limited scope as a transmission-only utility with only nine total applicable initiatives for implementation year 2025, all initiatives were designated as Focus Initiatives, as per Energy Safety guidance, which states that when an electrical corporation has fewer than 10 initiatives, each initiative should be considered a Focus Initiative, as shown in Table 3.

Table 3: List of Focus Initiatives

No.	Initiative Number, WMP Section Number, and Name
1	LSP-01, 8.1.8.3, Implement Hot Work Programs
2	LSP-02, 8.1.3.1, Implement Substation Inspection Program
3	LSP-03, 8.1.5, Enhance Use of Computer Maintenance Management Systems
4	LSP-04, 8.2.2, Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program
5	LSP-06, 8.3.4.3, Install Substation Cameras
6	LSP-07, 8.3.4.4, Evaluate and Enhance Use of Live Video
7	LSP-09, 8.4.3, Establish Annual Contract with Local Fire Agencies
8	LSP-10, 8.4.2, Formalized Review with Benchmarking
9	LSP-11, 8.5.5, Best Practice Sharing

3. SITE AND SAMPLE SELECTION AND DISCUSSION

BVNA employed random sampling for LSPGC utilizing a simplified version of Cochran's Sample Size Formula. Utilization of this formula helps determine the appropriate sample size required to achieve a desired level of precision and confidence in the results – this ensures that the sample is representative of the larger population. By specifying a confidence level for the EC's individual initiatives based upon historical trends and data, mainly previous year's validation rates, the conclusions drawn from the sample data have a higher degree of statistical confidence. This confidence rate ranged from 85% and 95%, and if the previous year's validation rate fell outside of this range, the low or high end was utilized. For example, if the prior year sample validation rate was 96%, then 95% was used, if the previous year sample validation rate was 84%, then 85% was used. If no information on the prior year's sample validation rate exists, then 90% was used, unless other factors influenced that determination.

Whether or not an initiative was classified as Focus or non-Focus also affected the number of samples required for a given initiative. For Focus Initiatives, the margin of error (MOE) was set at 5% and for non-Focus Initiatives, the MOE was set at 10%. Although there is only a 5% difference between these two MOEs, the difference in sample size produced when utilizing these two MOE values is quite significant. As the margin of error *increases*, the required sample size decreases because a larger margin of error allows for *more* variability in the sample, requiring fewer samples to achieve the desired level of precision. As the margin of error *decreases*, the opposite happens because a smaller margin of error allows for *less* variability in the sample, requiring more samples to achieve the desired level of precision. Therefore, Focus Initiatives require more sampling than non-Focus Initiatives.

Once the total number of samples was calculated for each initiative, the IE determined how many samples should come from non-HFTD, HFTD Tier 2, and HFTD Tier 3 areas. Due to HFTD-Tier 3 areas posing the most significant threat to wildfire ignition risk, it was determined that 70% of the sampling would occur in these areas, while 20% of sampling would occur in HFTD Tier 2 areas, and the remaining 10% would occur in non-HFTD areas. If a certain initiative did not reside within a HFTD Tier 3 area, then the sampling number would be drawn from a HFTD Tier 2 area; if an initiative did not reside within either a HFTD Tier 3 or 2 area, then all samples were drawn from the non-HFTD area.[1] An additional 25% of samples were identified to be used in the case that any of the primary samples were unusable or inaccessible.

[1] Due to LSPGC having no assets in HFTD Tier 3, all sample data was drawn from HFTD Tier 2 and the non-HFTD area. The Fern substation resides in HFTD Tier 2, and the Orchard Substation resides in a non-HFTD area.

4. REVIEW OF INITIATIVES ACROSS WMP CATEGORIES: IMPLEMENTATION AND FUNDING

To verify compliance, the IE employed a comprehensive approach that included reviewing and assessing multiple WMP activities through data requests and examining publicly available documents to validate the items outlined in LS Power Grid California's 2025 WMP.

At the outset of the evaluation, the IE initiated the assessment by thoroughly reviewing LSPGC's 2025 WMP to identify LSPGC's stated 2025 WMP goals. For WMP activities described in the 2025 WMP but not provided within the publicly available records, the IE submitted data requests to verify these activities (see Attachment 7.2).

The IE's analysis and synthesis of findings for each respective section are detailed further within Section 4, "Review of Initiatives Across WMP Categories: Compliance and Funding," of this report. This section provides an in-depth examination of LSPGC's compliance with the 2025 WMP based on information gathered through document review and data requests. The IE evaluated LSPGC's 2025 WMP initiatives across the standard five WMP categories.

Table 4: WMP Initiative Category Initiative Summary

WMP Initiative Category	No. of Focus and Field Verifiable Initiatives	No. of Focus and Non-Field Verifiable Initiatives	No. of Non-Focus and Field Verifiable Initiatives	No. of Non-Focus and Non-Field Verifiable Initiatives
Grid Design, Operations, and Maintenance	0	3	0	0
Vegetation Management and Inspections	0	1	0	0
Situation Awareness and Forecasting	0	2	0	0
Emergency Preparedness	0	2	0	0
Community Outreach and Engagement	0	1	0	0

Funding Evaluation Methodology

The IE employed a comprehensive approach to evaluate funding compliance for each initiative in the WMP. The funding methodology approach included the following:

- **Budget Baseline Establishment:** Reviewed WMP planned budgets from LSPGC's 2025 WMP filing to establish planned expenditure baselines and cross-referenced reported expenditures against accounting records and EOY 2025 QDR Table 11 which took precedence if any discrepancies were noted.
- **Actual Expenditure Verification:** Compared actual expenditures reported in LSPGC's April 2026 AIR against WMP budgets.
- **Variance Analysis:** Calculated absolute percent differences for all initiatives.

- **Threshold Application:** Applied a 10% threshold to identify initiatives requiring detailed explanation.
- **Supporting Documentation Review:** Requested and reviewed supporting documentation for all variances exceeding 10% if not already self-reported by LSPGC.

Using the above methodology and approach, Table 5 below summarizes the overall expenditures by Category, as detailed in LSPGC's April 2026 AIR, with additional details and synthesis for each initiative shown within the subsequent sections.

Table 5: WMP Initiative Category Initiative Summary

WMP Category	2025 Planned	2025 Actual	2025 Variance
Grid Design, Operations, and Maintenance	$60,000	$66,652	$6,652
Vegetation Management & Inspections	$0	$39,300	$39,300
Situational Awareness & Forecasting	$10,000	$14,326	$4,326
Emergency Preparedness	$20,000	$3,239	-$16,761
Community Outreach and Engagement	$20,000	$19,151	-$849
Total	$110,000	$142,668	$32,668

4.1 GRID DESIGN, OPERATIONS, AND MAINTENANCE

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.1.1 Initiative Summary Table

Table 6: Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[2]	Sample Validation Rate (%)[3, 4]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[5, 6]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
LSP-01, 8.1.8.3, Implement Hot Work Programs	Maintain Hot Work Programs[7]	2	Completed	2	100%	Fern WEAP Documentation Fern WEAP Logs Fern CFPP Fern TTR FPP & Hot Work Orchard WEAP Training Orchard CFPP & FPP (Frontload Data)	100%	$0	$0	No Goal Provided
LSP-02, 8.1.3.1, Implement Substation Inspection Program	15 Inspections	10 Inspections	Completed	10	100%	10 Substation Inspection Reports (Frontload Data & DR005)	67%	$50,000	$14,400 (-71.2%)	No Goal Provided
LSP-03, 8.1.5, Enhance Use of Computer Maintenance Management Systems (CMMS)	100% Integration	100%	Completed	N/A	N/A	IBM Maximo ScrnSht (Frontload Data) LSPGC Written Response (DR004)	100%	$10,000	$52,252 (422.5%)	No Goal Provided

[2] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[3] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[4] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[5] The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.
[6] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.
[7] The WMP's target was implementation of this program, which was completed in 2023. The target listed in the table is from LSPGC's 2025 EC AIR for maintenance of the program at both sites.

4.1.2 Written Detail for Initiatives

4.1.2.1 Initiative Review – Findings & Method

LSP-01 – 8.1.8.3 Implement Hot Work Programs – Focus and Non-Field Verifiable

LSP-01 addresses wildfire risk through implementation of Construction Fire Prevention Plans (CFPPs), Worker Environmental Awareness Program (WEAP), and hot work procedures. The 2025 EC AIR states that this initiative was completed in October 2023; however, the initiative is being maintained through 2025. In response to the Frontload Data Request, LSPGC provided documentation confirming implementation for both the Orchard and Fern Substations.

- Orchard Substation – Energized March 2025
  - WEAP Training Materials (effective 09/13/2022)
  - LSPGC Construction Fire Prevention Plan (effective 09/09/2022)
  - Primary Construction Contractor (TTR) Fire Prevention Plan
- Fern Road Substation
  - WEAP Training Materials (effective 01/12/2024)
  - LSPGC Construction Fire Prevention Plan (effective 06/16/2023)
  - Primary Construction Contractor (TTR) Fire Prevention Plan (effective 04/12/2024)
  - Primary Construction Contractor (TTR) Fire Prevention Plan (effective 06/14/2024)
  - TTR Welding, Cutting, and Hot Work Policy
  - Fern Road Sub WEAP Logs 2025

Documentation confirms that both substations have completed the required CFPPs and WEAP materials and provided associated training logs demonstrating continued implementation for 2025. The training logs document training sessions from January through May and September through December, including employee name, company, date, trainer, and signature. Red Flag Warning thresholds are included in the CFPPs, and a Health, Safety, and Environment (HSE) policy for Welding, Cutting, and Hot Work is included. The Fire Prevention Plan for TTR Substation Inc., the construction contractor working at Fern Road, was also provided and includes protocols for various hazard types and associated training for construction personnel.

Although LSP-01's original WMP initiative was completed in 2023 with no current WMP initiative target, LSPGC reported in the 2025 EC AIR that these programs will be maintained through 2025. Based on this analysis and the documentation provided, the IE has validated that LSPGC continues to maintain the programs outlined under LSP-01. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 7: Implement Hot Work Programs Summary

2025 Target	2025 AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Maintain Hot Work Programs	2	2	WEAP, CFPP, TTR FPP, & Training Logs	100%

LSP-02 – 8.1.3.1 Implement Substation Inspection Program – Focus and Non-Field Verifiable

The WMP describes the substation inspections as a program intended to mitigate wildfire risk through regular physical inspections. Inspections are conducted by experienced and trained personnel and are designed to inspect major and miscellaneous substation equipment. The WMP stated that LSPGC would perform 15 total inspections; however, the 2025 EC AIR reported 10 completed inspections. Two inspections were planned for January and February of 2025 but did not occur because the Orchard Substation was not energized until March 2025. The three remaining inspections were planned for the Fern Substation following its energization; however, energization has been delayed until 2026, and therefore these inspections did not take place.

LSPGC began performing substation inspections in March 2025 following the Orchard Substation energization. A total of 10 monthly inspections were conducted from March through December 2025, with one taking place in January of 2026. In response to the Frontload Data Request, LSPGC provided all 10 inspection reports. The reports included the location, personnel performing the inspection, and completion date. Asset items were listed with designated areas for status and problem identification. Five checklists specific to transformers are included in the reports, with an associated transformer ID number on each of the five sheets. Six of the ten reports included a "Monthly Defensible Space Inspection Checklist" (see LSP-04 for additional details).

All reports were properly completed with all areas filled and associated comments provided. Every report identified the same issue: "Fan 88F-11 on T-3 is out of balance and needs to be adjusted." LSPGC provided a written response categorizing this issue as "Priority P3" and stating that no work order was generated based on this priority level.

Although LSPGC did not meet the target of 15 inspections in 2025, the shortfall was not due to inspections that could have been conducted not being performed. Rather, the target was not met due to delays in the energization of both the Orchard and Fern Substations. Once the Orchard Substation was energized, LSPGC completed all remaining inspections in 2025. However, due to only completing 10 of the targeted 15 inspections, resulting in an initiative validation rate of 67%, the IE is unable to validate this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 8: Implement Substation Inspection Program Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
15 Inspections	10 Inspections	10 Inspections	Substation Monthly Inspection Reports	67%

LSP-03 – 8.1.5 Enhance Use of Computer Maintenance Management Systems (CMMS) – Focus and Non-Field Verifiable

Section 8.1.5 details LSPGC's utilization of an enterprise asset management (EAM) system to track substation maintenance. As described in the WMP, this EAM will contain substation equipment information such as manufacturer, model, and serial number. It will be used to schedule and execute planned maintenance tasks. The 2025 WMP stated that LSPGC would integrate 100% of their assets into IBM Maximo.

LSPGC provided a screenshot of the CMMS, IBM Maximo, that they employ. IBM Maximo contains data for 183 individual assets and includes site, asset number, type, asset description, location description, manufacturer, and model number. The 2025 EC AIR states that 210 assets were inspected through associated initiatives. The IE requested a total asset count from LSPGC to verify that the number displayed in IBM Maximo captures all assets and therefore meets the target of 100% integration. In written response to DR004, LSPGC confirmed that the 183 assets reflected in the frontload data is accurate and that the 210 figure in the EC AIR was a broader facility-level estimate from an earlier stage of the substation. To ensure consistency and accuracy in future submissions, LSPGC should reconcile its AIR figures with Maximo output prior to submitting reports.

Based on this analysis and the documentation provided, the IE has validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 9: Enhance Use of Computer Maintenance Management Systems (CMMS) Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR004 Response	Initiative Validation Rate
100% Integration	100%	100%	LSP-03 Written Response IBM Maximo Dashboard Screenshot DR004 Written Response	100%

4.1.2.2 Funding Verification – Findings

LSP-02: Implement Substation Inspection Program

- Planned Budget: $50,000
- Actual Expenditure: $14,400
- Variance: -$35,600 (-71%)

In response to DR002, LSPGC attributed the underrun to two operational conditions for implementation year 2025. Due to the Fern Road Substation remaining under construction with a delayed planned 2025 energization, no inspection activities were conducted. The portion of the planned budget associated with Fern Road was not expended, and inspection activities will not commence until energization and operational status is achieved. Although the Orchard Substation

was energized in 2025, it was delayed and did not become operational until March of that year. Inspections were conducted for the remainder of the year (March through December); however, no inspections took place in January and February. Together, these two conditions account for the 71% underrun for LSP-02. LSPGC stated that the reduced expenditure reflects scope deferral, not a reduction in program rigor or scope per asset.

LSPGC did not meet the target of 15 inspections in 2025; however, the shortfall was not due to inspections that could have been conducted not being performed. Rather, the target was not met due to delays in the energization of both the Orchard and Fern Substations. Once Orchard was energized, LSPGC conducted all remaining inspections for 2025. The underrun resulted from substation energization delays and did not negatively impact the conducting of inspections once fully operable. No risk reduction goal was provided for this initiative.

LSP-03: Enhance Use of Computer Maintenance Management Systems (CMMS)

- Planned Budget: $10,000
- Actual Expenditure: $52,252
- Variance: $42,252 (423%)

In response to DR002, LSPGC attributed the overrun to implementing the CMMS integration work for the Orchard Substation. Approximately $47,791.81 (91.46%) of the actual expenditure was affiliate labor required to deploy IBM Maximo, configure asset hierarchies, and integrate the Orchard Substation into the system. Software comprised $3,023.11 (5.78%), travel and expenses $1,353.85 (2.59%), and sales and use tax $83.46 (0.16%). LSPGC planned for recurring software-related costs but did not account for the one-time integration labor associated with integrating Orchard into the CMMS.

The overrun resulted from one-time integration labor costs that the $10,000 budget did not account for. This overrun did not negatively impact LSPGC's successful achievement of their target of 100% asset integration in the CMMS. LSPGC does not anticipate a comparable variance when Fern Road is energized because the labor component is non-recurring. No risk reduction goal was provided for this initiative.

4.1.3 Synthesis of Findings

4.1.3.1 Initiative Review

The Grid Design, Operations, and Maintenance category comprises three initiatives focused on substation infrastructure hardening, inspection, and asset management: LSP-01 (Hot Work Programs), LSP-02 (Substation Inspection Program), and LSP-03 (CMMS Integration).

All three initiatives in this category have been validated as implemented. LSP-01 and LSP-03 met their respective objectives. LSP-02 achieved 10 of its 15 planned inspections; however, this shortfall was not attributable to implementation gaps but rather to infrastructure constraints. Specifically, the Orchard Substation was not energized until March 2025 (delaying two planned inspections), and the Fern Substation energization was postponed to 2026 (preventing three additional inspections). Once the Orchard Substation became operational, LSPGC completed all

feasible inspections through December 2025, demonstrating full implementation within the available timeframe.

Documentation across all three initiatives demonstrates consistent and accurate record management. Training logs, inspection reports, and CMMS data were complete and properly maintained. No data quality or accuracy issues were identified in this category.

4.1.3.2 Funding Verification

The Grid Design, Operations, and Maintenance category encompassed two initiatives with significantly divergent budget trajectories in 2025. The category experienced a net underrun of approximately $6,948 against the combined planned budget of $60,000, representing a -12% variance overall. However, this aggregate figure obscures distinct implementation patterns across the two initiatives, each driven by specific operational circumstances. The funding variances in this category reveal how program execution depends on factors beyond budget allocation. LSP-02's underrun ($35,600) occurred not because of insufficient funding, but because inspection activities could not proceed until substations were energized and operational, a timeline constraint, not a financial one. Conversely, LSP-03's overrun ($42,252) resulted from underestimating the labor-intensive work required to integrate a new asset into the CMMS system. Despite these budget deviations, both initiatives successfully achieved their performance targets, demonstrating that variances reflected operational realities rather than program underperformance.

4.2 VEGETATION MANAGEMENT AND INSPECTIONS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.2.1 Initiative Summary Table

Table 10: Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[8]	Sample Validation Rate (%)[9], [10]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[11], [12]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
LSP-04, 8.2.2, Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program	15 Inspections	6 Inspections	Completed	10 Inspections	100%	10 Substation Inspection Reports (Frontload Data & DR005)	40%[13]	$0	$39,300 (100%)	No Goal Provided

[8] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[9] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[10] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[11] The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.
[12] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of $\geq 95\%$.
[13] 4 of the 10 inspections sampled were not conducted as part of the dedicated LSP-04 program. Therefore, the 6 inspections claimed on the 2025 EC AIR is used to calculate the initiative validation rate.

4.2.2 Written Detail for Initiatives

4.2.2.1 Initiative Review – Findings & Method

LSP-04 – 8.2.2 Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program – Focus and Non-Field Verifiable

The WMP describes the vegetation inspections as a program intended to mitigate wildfire risk through regular physical inspections. Inspections are conducted by experienced and trained personnel and are designed to identify vegetation encroachment or contact with electrical equipment. The WMP stated that LSPGC would perform 15 total inspections; however, the 2025 EC AIR reported 6 completed inspections and the 2025 QDR4 reported 10 completed inspections.

In a SME interview conducted on May 5, 2025, LSPGC stated that the utility developed and implemented a Substation Defensible Space Inspection program in July 2025 at the Orchard Substation. Prior to the formal program's creation in July and following Orchard's energization in March, LSPGC documented *vegetation inspections* under Section 3 of the Asset Substation Monthly Inspection document. From July onward, LSPGC included a dedicated "*Monthly Defensible Space* Inspection Checklist" in the reports. A total of six inspections were conducted from July through December 2025. In response to the Frontload Data Request, LSPGC provided all inspection reports. Vegetation findings from March through June were captured in Section 3 of the Asset Inspection form and included areas for status, problems found, and actions taken with the only vegetation item on the form being “weeds.” Reports from July through December included a dedicated defensible space checklist with parameters for the inspector to verify all pertaining to vegetation, a status column, and an area for description and comments. Each report included the inspector's signature, title, date, and time of inspection. All reports were properly completed with all areas filled and no issues were identified. LSPGC maintained an open work order from July to September for a contracted vegetation management company performing weed abatement around the substation. On December 12 and 17, LSPGC conducted site visits to confirm vegetation control effectiveness.

Based on this analysis and the documentation reviewed, the IE has not validated this initiative. Although LSPGC demonstrated that vegetation inspections and defensible space inspections are being performed, the target of 15 inspections outlined in the WMP was not met. Considering that the Orchard Substation was energized in March, a maximum of 10 dedicated substation defensible space inspections could have been conducted for 2025. While LSPGC did conduct ten total vegetation inspections, only six defensible space inspections were performed, falling four short of the ten possible dedicated inspections for 2025. The initiative cannot be validated because LSPGC did not conduct dedicated defensible space inspections for all possible months of 2025. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 11: Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
15	6	10	LSP-04 Written Response Substation & Vegetation Monthly Inspection Reports	40%

4.2.2.2 Funding Verification – Findings

LSP-04: Establish Risk-Based Buffer Zones & Implement Monthly Substation Inspection Program

- Planned Budget: $0
- Actual Expenditure: $39,300
- Variance: $39,300

In response to DR002, LSPGC stated that no planned budget was established for LSP-04 because the initiative was scoped around program establishment and routine operational activity rather than defined capital or contracted scope of work. LSPGC attributes the actual expenditure to five operational procedures:

- Establishment and maintenance of risk-based vegetation buffer zones, including engagement of a contracted vegetation management company for weed abatement.
- Development and deployment of the Substation Defensible Space procedure, which began July 21, 2025.
- Execution of six Substation Defensible Space Inspections at Orchard from July through December 2025.
- Documentation of vegetation condition during the ten substation inspections completed from March through December 2025.
- Site visits conducted on December 12 and 17, 2025 to confirm vegetation control effectiveness.

The budget overrun resulted from LSPGC not anticipating capital or contracted scope of work associated with the initiative. This overrun did not negatively impact the implementation of LSP-04, as LSPGC conducted defensible space inspections accordingly once the program was implemented in July 2025. No risk reduction goal was provided for this initiative.

4.2.3 Synthesis of Findings

4.2.3.1 Initiative Review

LSPGC has only one Vegetation Management and Inspections initiative; therefore, no synthesis is necessary as Section 4.2.2.1 Initiative Review – Findings & Method provides all relevant details pertaining to category review.

4.2.3.2 Funding Verification

LSPGC reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.2.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

4.3 SITUATIONAL AWARENESS AND FORECASTING

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.3.1 Initiative Summary Table

Table 12: Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[14]	Sample Validation Rate (%)[15, 16]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[17, 18]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
LSP-05, 8.3.2, Integrate StormGeo	100% Integration	Integration Completed in 2024	Completed	N/A	N/A	LSPGC Written Response StormGeo Procurement DTN EEI Sample Report (DR003)	Not Applicable	$10,000	$0 (-100%)	No Goal Provided
LSP-06, 8.3.4.3, Install Substation Cameras	61 Cameras Installed	29 Cameras Installed	Completed	29 Cameras	100%	Purchase Orders LSP10116 & LSP10121 Notice for Services (NextGen) (Frontload Data) SME Interview: May 04, 2026	48%	$0	$14,326 (100%)	No Goal Provided
LSP-07, 8.3.4.4, Evaluate and Enhance Use of Live Video	Camera Live Feed Analysis	1	In Progress	1 Analysis	100%	Camera Notes Meeting Minutes Live Camera Use Internal Meeting Agenda (Frontload Data) SME Interview: May 04, 2026	100%	$0	$0 (0%)	No Goal Provided

[14] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[15] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[16] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[17] The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.
[18] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

4.3.2 Written Detail for Initiatives

4.3.2.1 Initiative Review – Findings & Method

LSP-05 – 8.3.2 Integrate StormGeo – Focus and Non-Field Verifiable

StormGeo integration is intended to enhance situational awareness through utilization of the StormGeo platform, which provides real-time weather intelligence, lightning visualization, and risk-based alerting.

LSPGC integrated StormGeo at the Orchard Substation prior to the implementation period to support initial construction activities. Purchase Order 3546, dated February 14, 2023, verifies the procurement of StormGeo's StormWatch service for the LSPGC territory. Emergency Operations Plan (EOP-011) Version 1.0 and 2.0 reference StormGeo in various sections: Section 5.7 Emergency Management Task Force Activation triggers, Section 6 Extreme Weather Monitoring, and Attachment C StormGeo Phased Alert System.

In December 2025, LSPGC transitioned from StormGeo to DTN, primarily driven by DTN's Energy Event Index (EEI), which provides daily asset-level wildfire risk ranking. This EEI is more granular and operationally actionable than StormGeo's alert-based system. Using DTN's EEI, LSPGC can assess wildfire risk on a per-asset basis each day. EOP-011 Version 3.0 reflects DTN as the primary weather monitoring provider. LSPGC provided a sample daily EEI report generated on May 6, 2026, and covered the week of May 6 through May 10, 2026. The EEI contains two parameters: wildfire and confidence level, displaying the same regions associated with both parameters. Each day of the week contains a wildfire threat level and an associated confidence level. The document also provides detailing of what the values represent. Additional data is provided per region for each day of the week and includes timing, relative humidity, sustained wind, burn index, and the EEI rating.

StormGeo was integrated ahead of schedule in 2024 and LSPGC has transitioned to a new platform, DTN, the 2025 target was met as outlined in the 2025 WMP. However, due to initiative completion in 2024, the IE has determined this initiative to be not applicable for 2025. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 13: Integrate StormGeo Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
100% Integration	Integration Completed in 2024	Integration Completed in 2024	StormGeo PO#3546 DR003 Written Response	Not Applicable

LSP-06 – 8.3.4.3 Install Substation Cameras – Focus and Non-Field Verifiable

The WMP outlines the installation of CCTV infrastructure at LSPGC's Orchard and Fern substation as part of its wildfire risk mitigation strategy. This initiative involves the deployment

of surveillance equipment to improve situational awareness and asset security by allowing Transmission System Operators (TSOs) the ability to remotely view indoor and outdoor areas of the substations 24/7. The WMP set forth a goal of 61 camera installations and in the 2025 EC AIR, LSPGC claimed to have installed 29 cameras by Q1 of 2025.

In response to the Frontload Data Request, LSPGC submitted two supporting purchase orders (POs), LSP10116, which confirms procurement of 29 CCTV cameras and associated hardware, and LSP10121, which documents commissioning and configuration services for the camera system. PO LSP10116, dated 5/29/24, includes line items for specific camera models, mounts, licensing, enclosures, and accessories to support a comprehensive surveillance system installation. PO LSP10121, dated 6/11/24, covers professional services for configuration, testing, and commissioning of the cameras at the Orchard site.

The cameras at the Orchard Substation were not claimed for initiative completion until Q1 2025, the same quarter that Orchard was energized, because the cameras served no purpose until energization occurred and the feed could be analyzed from the control room. During an SME interview conducted on May 4, 2026, LSPGC stated that 28 cameras have been installed at Fern Substation as of Q1 2026; however, these will not be counted toward initiative progress until Fern is fully energized.

Although LSPGC has only installed and claimed 29 of the 61 targeted cameras due to construction delays, all operable cameras are in service demonstrating progress toward initiative completion. However, based on this analysis, the documentation provided, and ultimately failing to meet the target as outlined in the WMP, the IE has not validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 14: Install Substation Cameras Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
61 Camera Installations	29 Camera Installations	29 Camera Installations	PO LSP10116 PO LSP10121	48%

LSP-07 – 8.3.4.4, Evaluate and Enhance Use of Live Video – Focus and Non-Field Verifiable

LSP-07 is a 10-year initiative focused on evaluating how video feeds from substation surveillance systems are used by transmission system operators (TSOs) during fire season. The WMP did not state an explicit target, but rather an objective of "evaluate operational maturity related to use of live video." In the QDR4, LSPGC provided a target unit of a "Camera Live Feed Analysis" and in both the QDR4 and 2025 EC AIR, LSPGC claimed to have completed one Live Feed Analysis in for 2025.

In response to the Frontload Data Request, LSPGC provided a calendar meeting invitation for December 19, 2025. The invitation included a brief purpose for the meeting which was to review how LSPGC is currently using live video at their facilities and discuss opportunities to strengthen camera coverage and monitoring practices, with a goal to identify where improvements could be

made. An agenda was detailed and included: current performance and reliability of live-video systems, how camera feeds are used to check surroundings, conditions, and unusual activity, any observed issues, blind spots, or improvement opportunities, potential enhancement to camera positioning, workflows, or tools, and next steps and assignments.

During an SME interview conducted on May 4, 2026, the IE requested further documentation detailing the findings from the supplied meeting agenda. LSPGC provided brief meeting notes from the Operations Supervisor/Outage Coordinator. These notes detail that the current cameras have approximately 95–97% performance and reliability with approximately 3–5% loss of video feed. LSPGC stated there are no known issues or blind spots and recommended that thermal capabilities would be beneficial for the TSO to help during fire danger conditions or to identify possible hot spots to alert EMS/SCADA. During the aforementioned SME interview, LSPGC informed the IE that they are currently pursuing vendors to integrate AI technology into their camera system to supplement the thermal request from the ITOs.

Based on this analysis and the documentation provided, the IE has validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative. LSPGC should consider producing a formal written report for their camera live feed analysis. A written report creates an official record that could be retrieved in the future for compliance, investigations, or audits. It could be circulated to stakeholders, management, and compliance teams, establishing transparent distribution and accountability. Documentation of incidents, timestamps, locations, personnel involved, and recommended actions provides the detail and evidence necessary for analysis and decision-making. Overall, a written report would improve transparency and recordkeeping while aligning more directly with the WMP target goal of providing an analysis.

Table 15: Evaluate and Enhance Use of Live Video Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
Camera Live Feed Analysis	1 Live Feed Analysis	1 Live Feed Analysis	Live Camera Use Meeting Agenda Live Camera Use Notes	Initiative Validated

4.3.2.2 Funding Verification – Findings

LSP-05: Integrate StormGeo

- Planned Budget: $10,000
- Actual Expenditure: $0
- Variance: -$10,000

LSPGC integrated StormGeo at the Orchard Substation in 2024. The underrun is attributed to the expenditures with LSP-05 implementation being recorded in 2024. This underrun did not have a negative impact on the implementation of LSP-05.

LSP-06: Install Substation Cameras

- Planned Budget: $0
- Actual Expenditure: $14,326
- Variance: $14,326

In response to DR002, LSPGC stated that there was no planned budget for LSP-06 because camera procurement and installation at both substations were included in the broader substation construction project budgets rather than a standalone WMP financial line item. Associated financial activity was expected to appear only when post-energization expenditures occurred. The Orchard Substation energized in March 2025, and the $14,326 CAPEX expenditure was attributed to the procurement activity associated with the 29 cameras (PO# LSP10116) and camera commissioning and configuration (PO# LSP10121).

The budget overrun resulted from LSPGC budgeting camera installation into the greater substation construction costs rather than an individual WMP line item. This overrun did not negatively impact the implementation of LSP-06. No risk reduction goal was provided for this initiative.

4.3.3 Synthesis of Findings

4.3.3.1 Initiative Review

The Situational Awareness and Forecasting category comprises three initiatives focused on enhancing real-time weather intelligence, asset surveillance, and operational monitoring: LSP-05 (StormGeo), LSP-06 (Substation Camera Installation), and LSP-07 (Live Video Feed Analysis). LSP-05 was integrated ahead of schedule in 2024 and marked "Not Applicable" in the 2025 IE ARC due to its target implementation year being 2025; it is now validated in this 2025 AIR. LSP-06 and LSP-07 represent the first year of operational implementation credit, with camera systems becoming operational upon substation energization in 2025.

All three initiatives in this category have been validated as implemented. LSP-05 met its 2025 target through successful integration of weather monitoring infrastructure. LSP-06 achieved 29 camera installations at the Orchard Substation (operationally credited upon Q1 2025 energization) and has staged an additional 28 cameras at the Fern Substation awaiting full energization in 2026. While 29 of the 61 targeted cameras have been installed and are operational, progress toward the full target is constrained by infrastructure completion timelines rather than implementation capacity. LSP-07 completed one Live Feed Analysis in 2025, establishing the baseline for this 10-year initiative.

The IE notes that while LSP-07's Live Feed Analysis was completed and documented through meeting notes, LSPGC should consider producing a formal written report for future analyses. A structured written report would create an official, retrievable record for compliance, investigations, and audits; enable transparent distribution to stakeholders and management; and document specific findings, incidents, timestamps, and recommended actions with sufficient detail for decision-making. Formal reporting would strengthen alignment with the WMP target objective of providing

analysis and improve overall transparency and accountability. LSPGC has indicated intent to pursue vendor partnerships for AI technology integration into the camera system to supplement the thermal imaging enhancement identified by operations staff.

4.3.3.2 Funding Verification

LSPGC reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.3.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

4.4 EMERGENCY PREPAREDNESS

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.4.1 Initiative Summary Table

Table 16: Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[19]	Sample Validation Rate (%)[20, 21]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[22, 23]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
LSP-09, 8.4.3, Establish Annual Contact with Local Fire Agencies	2 Meetings	2 Meetings	Completed	2 Meetings	100%	LSPGC Written Response (Frontload Data)	100%	$0	$3,239 (100%)	No Goal Provided
LSP-10, 8.4.2, Formalized Review with Benchmarking	Formalized Review with Benchmarking	2 Review Activities	Completed	2 Review Activities	100%	EOP-011 (Frontload Data) EOP Benchmark Meeting EOP-011 v.1 LSPGC Written Response (DR006)	100%	$0	$0 (0%)	No Goal Provided

[19] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[20] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[21] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[22] The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.
[23] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

4.4.2 Written Detail for Initiatives

4.4.2.1 Initiative Review – Findings & Method

LSP-09 – 8.4.3 Establish Annual Contact with Local Fire Agencies – Focus and Non-Field Verifiable

LSPGC conducts annual visits with fire agencies local to each site to enhance collaboration on wildfire mitigation and overall operational safety. The 2025 WMP outlines a target of two meetings with local agencies, and the 2025 EC AIR claims that LSPGC met this target.

In September, LSPGC hosted OEIS Director Caroline Thomas Jacobs and CAL FIRE Shasta County Deputy Fire Chief Don Watt. Verification of this visit is documented in the September WEAP logs (LSP-01) for Fern Road, where both signatures are recorded on September 25, 2025. Heath Holt, Senior Manager, HSE, made informal visits to CAL FIRE Station 35 (11787 Ponderosa Way, Whitmore, CA 96096) on Tuesday, March 18, 2025, and Wednesday, May 21, 2025.

Based on this analysis and the documentation provided, the IE has validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 17: Establish Annual Contract with Local Fire Agencies Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data Response	Initiative Validation Rate
2 Meetings	2 Meetings	2 Meetings	LSP-09 Written Response September WEAP Logs (LSP-01)	100%

LSP-10 – 8.4.3 Formalized Review with Benchmarking – Focus and Non-Field Verifiable

LSP-10 is a 10-year initiative to formalize emergency preparedness planning and benchmark those plans against peer utilities. For implementation year 2025, LSPGC set a target of two review activities and claimed to have conducted both.

LSPGC provided the Emergency Operations Plan (EOP-011), which went into effect January 1, 2025. On August 1, 2025, LSPGC conducted a benchmarking meeting which included a review of PG&E's publicly available WMP practice and informed the subsequent updates to LSPGC's EOP-011. Page two of the EOP includes a revisions table and Version 2.0 went into effect on August 7, 2025. LSPGC confirmed that Version 2 of the EOP includes revisions from the benchmarking meeting. LSPGC also participated in the CEATI Wildfire Mitigation and Resiliency Working Group, which includes benchmarking discussions on WMP practices across utilities.

Based on this analysis and the documentation provided, the IE has validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 18: Formalized Review with Benchmarking

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR006 Response	Initiative Validation Rate
Formalized Review with Benchmarking	2 Review Activities	2 Review Activities	LSP-10 Written Response EOP-011 Rev. 2.0 DR006 Written Response	100%

4.4.2.2 Funding Verification – Findings

LSP-08: Integrate Into Local Dispatch Systems

- Planned Budget: $20,000
- Actual Expenditure: $0
- Variance: $0

This initiative was completed in 2024 and had no associated costs for implementation year 2025.

LSP-09: Establish Annual Contact with Local Fire Agencies

- Planned Budget: $0
- Actual Expenditure: $3,239
- Variance: $3,239

In response to DR002, LSPGC stated that there was no planned budget for LSP-09 because the initiative was structured around internal staff outreach, site visits, and meeting coordination rather than procurement of equipment, contracted services, or vendor deliverables. LSPGC anticipated that implementation would occur through time of operations and HSE personnel performing routine outreach as part of standard duties, with any incidental costs expected to be minor and embedded within general operations accounting. The actual expenditure of $3,239 is attributable to the site and personnel visits conducted in 2025.

The budget overrun resulted from LSPGC conducting site visits and personnel meetings during 2025. This overrun did not negatively impact the implementation of LSP-09. No risk reduction goal was provided for this initiative.

4.4.3 Synthesis of Findings

4.4.3.1 Initiative Review

The Emergency Preparedness category comprises two initiatives focused on strengthening wildfire response coordination and operational readiness: LSP-09 (Annual Contact with Local Fire Agencies) and LSP-10 (Formalized Review with Benchmarking). LSP-09 establishes ongoing collaboration with local fire agencies, while LSP-10 represents a 10-year initiative to formalize emergency preparedness planning and align practices with peer utilities.

Both initiatives in this category have been validated as implemented. LSP-09 met its target of two meetings with local fire agencies in 2025. LSP-10 met its target of two review activities in 2025, representing the first year of benchmarking activities following the energization of the Orchard

Substation. All documentation supporting both initiatives was complete and accurate, with no data quality or recordkeeping issues identified.

4.4.3.2 Funding Verification

LSPGC reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.4.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

4.5 COMMUNITY OUTREACH AND ENGAGEMENT

The Initiative Summary Table is populated from the 2025 WMP, Table 1 of the 2025 QDR4, and the 2025 EC AIR. Initiative targets come from the WMP, while EC Claimed Progress and Status are sourced from the EC AIR, with Table 1 of the 2025 QDR4 as a secondary source when EC AIR data is unavailable.

4.5.1 Initiative Summary Table

Table 19: Initiative Summary Table

Initiative Number, WMP Section Number, and Name	WMP – Initiative Target	EC-Claimed Progress	EC-Claimed Initiative Status	Sample Size[24]	Sample Validation Rate (%)[25,26]	Verification Method	IE Finding on Initiative (Initiative Validation Rate)[27,28]	WMP – Planned Spend ($)	EC-Claimed Actual Spend ($ and % from budget)	Satisfied Risk Reduction Goal?
LSP-11, 8.5.5, Best Practice Sharing	Instances of Collaboration	8	Completed	N/A	N/A	R.Y. EUCI Disaster Preparedness (Frontload Data) LSPGC Written Response AI & The Grid Agenda EUCI Wildfire Mitigation Agenda GridFWD Wildfire Symposium Agenda OEIS Wildfire Symposium Agenda (DR007)	100%	$20,000	$19,151 (-4.2%)	No Goal Provided

[24] N/A in the "Sample Size" column indicates that no target was provided by the EC, or the target was qualitative and did not have a sampling component.
[25] The Sample Validation Rate is determined by taking the number of samples validated by the IE and dividing it by the total sampling request.
[26] N/A in the "Sample Validation Rate" column indicates that no sampling was reviewed; therefore, no validation rate was applied.
[27] The Initiative Validation Rate is determined by taking the Sample Validation Rate (%) times the EC-claimed amount and then divided by the WMP Initiative Target.
[28] Energy Safety's Implementation Year 2025 IE AIR Outline establishes an Initiative Validation Rate of ≥95%.

4.5.2 Written Detail for Initiatives

4.5.2.1 Initiative Review – Findings & Method

LSP-11 – 8.5.5 Best Practice Sharing – Focus and Non-Field Verifiable

LSP-11 details LSPGC's collaborative efforts with other operators and utilities to share best practices and lessons learned. The 2025 WMP did not set a numerical target for this initiative, however, the 2025 EC AIR claims that LSPGC conducted eight instances of collaboration.

LSPGC stated that Rituraj Yadav, Associated Manager, Wildfire Mitigation, participated in eight conferences and forums for implementation year 2025. In response to DR007, LSPGC provided event description, role, location, and dates for all eight events.

Event	Role	Location	Date(s) (2025)
Red Sky Summit	Attendee	San Diego, CA	02/25 – 02/26
AI and the Grid Conference	Attendee	Sacramento, CA	03/25 – 03/26
Grid FWD Wildfire Symposium	Attendee	Boise, ID	04/15 – 04/18
OEIS Wildfire Symposium	Attendee	Portland, OR	06/04
WEI WMP Workshop	Attendee	San Diego, CA	07/14 – 07/18
EUCI Wildfire Mitigation for Utilities Conference	Attendee	Monterey, CA	10/06 – 10/08
EUCI Disaster Preparedness Utilities Conference	Attendee	San Francisco, CA	11/04
ESRI 2025 Safety and Security Summit	Presenter	San Antonio, TX	11/12 – 11/13

Five event agendas were produced and demonstrate that these events are collaborative and attended by peer utilities. Based on this analysis and the documentation provided, the IE has validated this initiative. The 2025 WMP identifies no risk reduction goal for this initiative.

Table 20: Best Practice Sharing Summary

2025 Target	2025 EC AIR	2025 Q4 QDR	Frontload Data & DR007 Response	Initiative Validation Rate
Instances of Collaboration	8 Instances	8 Instances	LSP-11 Written Response EUCI Disaster Preparedness for Utilities Conferences OEIS Wildfire Symposium GridFWD Symposium AI and the Grid	100%

4.5.2.2 Funding Verification – Findings

LSP-11: Best Practice Sharing

The absolute percentage difference between budgeted and actual for this initiative is less than 10%, please refer to Table 19.

4.5.3 Synthesis of Findings

4.5.3.1 Initiative Review

LSPGC has only one Community Outreach and Engagement initiative; therefore, no synthesis is necessary as Section 4.5.2.1 Initiative Review – Findings & Method provides all relevant details pertaining to category review.

4.5.3.2 Funding Verification

LSPGC reported expenditures for only one initiative; therefore, no synthesis is necessary as Section 4.5.2.2 Funding Verification – Findings provides all relevant details pertaining to category funding.

5. EVALUATION OF QA/QC PROGRAMS

LSPGC – QA/QC Introduction

LSPGC maintains a Wildfire Mitigation Plan with documented QA/QC programs outlined in WMP Sections 6.6 (Risk Assessment), 8.1.6 (Grid Design and Maintenance), and 8.2.5 (Vegetation Management). LSPGC's operational profile reflects a recently commissioned utility building its QA/QC infrastructure in real-time during its first year of operations, with formal procedures, technology systems, and audit protocols established or advanced throughout 2025. The following assessment evaluates LSPGC's current practices against the five-dimension maturity framework, recognizing that LSPGC has established formal WMP-specific QA/QC structures, dedicated SME roles, digital work management systems, and technology-enabled inspection capabilities that reflect a higher baseline of organizational formalization despite its recent operational start date.

Roles and Responsibilities – 2 Applied

LSPGC's QA/QC roles and responsibilities reflect Level 2 (Applied) maturity, with defined and documented roles integrated into the organizational structure through the WMP and supporting procedures. The Senior Director, Asset Management has overall responsibility for the WMP and QAQC programs described in WMP Sections 8.1.6 (Grid Design and Maintenance), 8.2.5 (Vegetation Management), and 6.6 (Risk Assessment), with the Manager of Field Operations or qualified designee performing annual field audits of substation inspections at HFTD sites and non-HFTD sites at least once per three-year WMP cycle. The Senior Manager of HSE oversees QAQC components of the Hot Work Program, Construction Fire Prevention Plans, and WEAP training, while the Associate Manager of Wildfire Mitigation supports day-to-day QAQC tracking, evidence collection, and regulatory reporting. QAQC duties are communicated through the WMP Section 2 (Responsible Persons), the LSPG Operations Training Process Manual (revised 9/3/2024 to incorporate LSPGC), Emergency Operations Plan EOP 011, the LSPGC Substation Defensible Space procedure (LSPGC-SDS, v1.0, effective July 21, 2025), and LSPGC Construction Fire Prevention Plans, with accountability tracked through monthly substation inspection reports, Substation Defensible Space inspection reports, and work order records in IBM Maximo. Escalation flows from Field Operations personnel to the Senior Manager of Field Operations, and ultimately to the Senior Director of Asset Management, demonstrating formal communication channels. QAQC responsibilities are defined in service-level agreements and contracts, including the long-term maintenance contract with the STATCOM manufacturer requiring warranted maintenance services and annual detailed inspections, and standing work orders with contracted vegetation management companies verified through site visits. Leadership demonstrates support through direct participation in audit oversight, resource allocation for corrective actions, and establishment of formal procedures and systems during LSPGC's first year of operations, placing the utility at Level 2 where roles are defined, documented, and actively supported but not yet fully integrated with accountability mechanisms characteristic of Level 3.

Quality Culture – 2 Applied

LS Power Grid California's quality culture reflects Level 2 (Applied) maturity, with formal training programs established and quality integrated into company vision, though proactive engagement and continuous improvement mechanisms characteristic of higher levels are still developing. LSPGC provides extensive onboarding training for internal employees in their area of responsibility by management and/or experienced personnel, with employees involved in extensive WMP initiatives such as vegetation management and substation inspections subject to internal audits. Required training includes LSPG Hazard Communication, LSPG Portable Fire Extinguishers, and the LSPG Emergency Action Plan (WMP Tables 8-9, 8-10, 8-11, and 8-20), with the Operations Training Process Manual (revised 9/3/2024 to add LSPGC) governing analysis, design, development, implementation, and evaluation of TSO and operations support training, and the Emergency Operations Plan reviewed and trained on annually. Third-party contractors are subject to contractual commitments including personnel qualifications, warranty provisions, and workmanship guarantees, and are under immediate field supervision of LSPGC Construction Management or Field Services personnel. LSPGC demonstrates a non-fear-based reporting culture through established escalation protocols and corrective action processes, with deficiencies identified during inspections or audits assigned Priority 1, 2, or 3 and tracked through IBM Maximo, and repeat violations potentially resulting in retraining and/or formal disciplinary action, indicating accountability without retaliation. Lessons learned are incorporated into LSPGC work procedures and flow back to field teams through procedure revisions, WEAP refresher content, and Field Operations briefings, with updates to broader plans such as the 2025 review and update of EOP-011 communicated through internal review meetings. LSPGC also participates in the California Joint IOU WMP Meeting Working Group and the CEATI Wildfire Mitigation and Resiliency Working Group to incorporate external lessons learned. However, while employees report failures and problems through established channels and informal coaching occurs between relevant personnel and department leadership following audit failures, LSPGC has not yet established formal feedback mechanisms for quality suggestions, structured processes for acknowledging employee contributions, or documented examples of employee-driven quality improvements beyond procedure updates driven by operational experience, preventing progression to Level 3 where proactive engagement and continuous improvement culture are fully embedded.

Quality Management Systems (QMS) – 2 Applied

LSPGC’s QMS reflects Level 2 (Applied) maturity, with standardized formats and centralized data repositories that enable more sophisticated quality inspections and checks. LSPGC's QAQC framework is documented in the 2023-2025 WMP, specifically Sections 6.6 (Risk Assessment QA/QC), 8.1.6 (Grid Design and Maintenance QA/QC), and 8.2.5 (Vegetation Management QA/QC), which define audited activities, sample sizes, audit type, and yearly target pass rates (WMP Tables 8-7 and 8-18), with implementing procedures including the LSPGC Substation Defensible Space procedure (LSPGC-SDS, v1.0, effective July 21, 2025), LSPGC Construction Fire Prevention Plans, the Operations Training Process Manual (revised 9/3/2024 to incorporate LSPGC), and Emergency Operations Plan EOP-011. IBM Maximo serves as LSPGC's CMMS for opening, tracking, and closing maintenance work orders, with the Orchard Substation fully integrated in 2025 and Fern Road integration expected upon energization. Inspection forms are standardized using reporting templates in use across LS Power Grid affiliates, and inspection

reports, work orders, vegetation records, and training records are stored on LSPGC's internal network drives in accordance with the Records Retention Program Procedure, with access available to all employees supporting LSPGC and restricted to those approved by management based on business need (WMP Section 6.5). Process compliance is ensured through the documented workflow: qualified field personnel or trusted contractors perform monthly substation patrol inspections per the inspection program (WMP Table 8-6) and Substation Defensible Space inspections per LSPGC-SDS; findings are recorded on standardized inspection forms and submitted to LSPGC management; deficiencies are assigned Priority 1, 2, or 3 per CAISO procedures and CPUC GO 95; work orders are opened in IBM Maximo for findings requiring corrective action; the Manager, Field Operations or qualified designee performs an annual field audit at HFTD sites and at least once per three-year WMP cycle for non-HFTD sites; the STATCOM manufacturer performs an annual detailed facility inspection under the long-term maintenance contract; and CAISO conducts an annual review of LSPGC maintenance practices, including field visits, under the Transmission Control Agreement. While LSPGC has established centralized digital data repositories through Maximo and network drives that enable standardized documentation and work order tracking, the system does not yet provide the analytical capabilities, real-time performance monitoring, automated dashboards, or continuous improvement mechanisms characteristic of Level 3 (Routine), placing LSPGC at Level 2 where the QMS is fully digitized with standardized formats and centralized repositories but has not yet achieved the optimization, integration, and advanced analytical capabilities of higher maturity levels.

Quality Inspections and Audits – 2 Applied

LSPGC's inspection and audit practices reflect Level 2 (Applied) maturity, with inspections conducted more frequently in high-risk areas and results used to make ad hoc corrections and identify deficiencies. LSPGC performs monthly substation patrol inspections at the Orchard Substation per WMP Table 8-6 (commenced March 2025, ten inspections completed in 2025) and Substation Defensible Space inspections per LSPGC-SDS (commenced July 2025, six inspections completed in 2025), representing 100% coverage of LSPGC's operational footprint during its first year of operations. The Manager, Field Operations or qualified designee performs an annual field audit at HFTD sites and at non-HFTD sites at least once per three-year WMP cycle (WMP Tables 8-7 and 8-18), satisfying the "annually" SME review criterion and exceeding the minimum frequency for Level 2. LSPGC's inspection frequency reflects risk-based prioritization, with HFTD sites receiving annual audits while non-HFTD sites are audited at least once per three-year cycle, though the utility does not employ predictive modeling or real-time dynamic risk assessment characteristic of Level 3 (Routine). LSPGC has not established a formal inspector qualification and certification program, instead relying on the operational experience and technical competency of Field Operations personnel, with the STATCOM manufacturer performing detailed annual facility inspections under the long-term maintenance contract and CAISO conducting annual reviews of LSPGC maintenance practices including field visits under the Transmission Control Agreement. Inspection and audit results are utilized to identify deficiencies and make corrections through the documented workflow: findings are recorded on standardized inspection forms and submitted to LSPGC management; deficiencies are assigned Priority 1, 2, or 3 per CAISO procedures and CPUC GO 95; work orders are opened, tracked, and closed in IBM Maximo; and

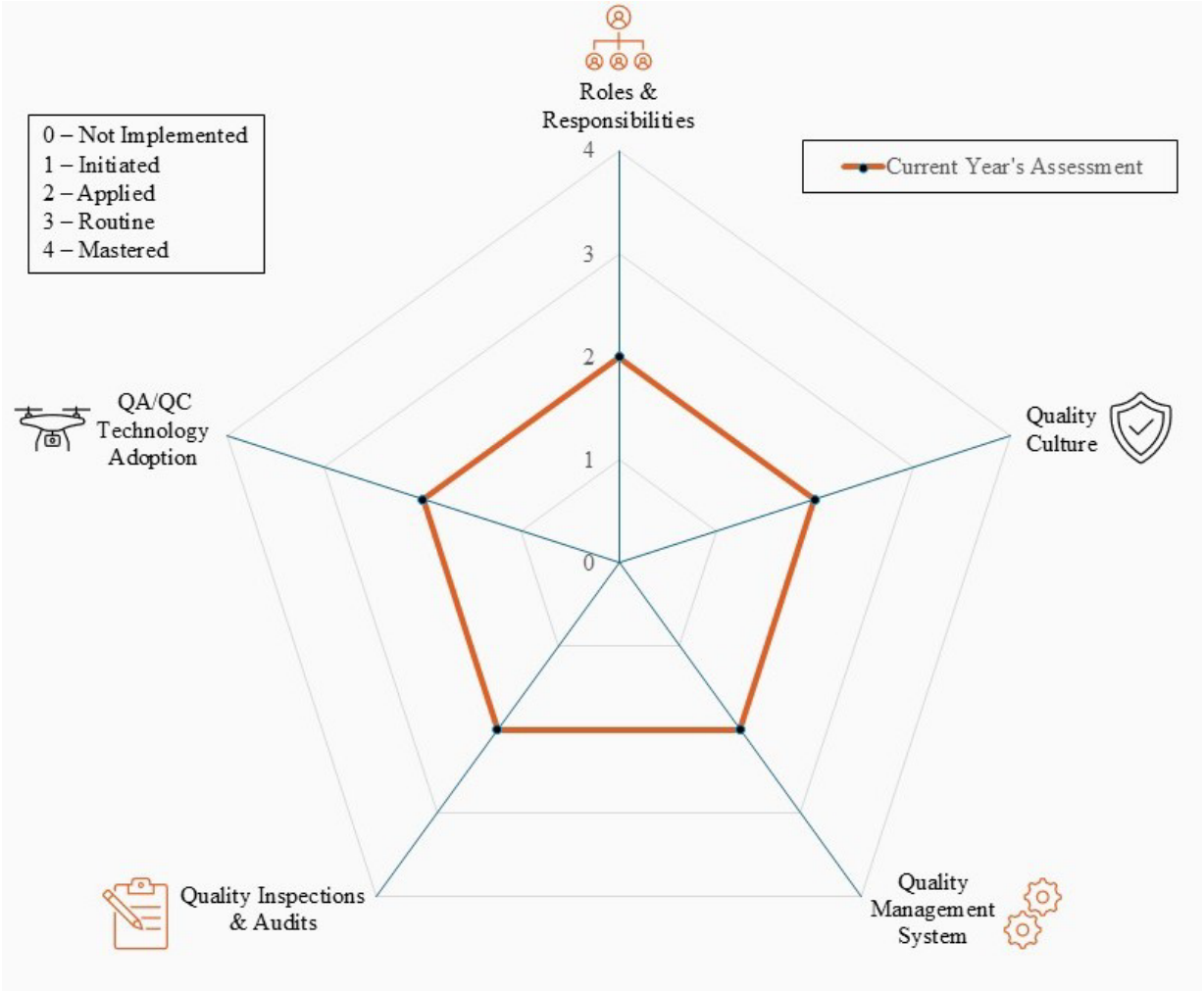
any work order not closed within its remediation deadline is escalated to the Manager, Field Operations. LSPGC demonstrates systematic use of results to identify deficiencies and weaknesses, with the development and issuance of the Substation Defensible Space procedure (LSPGC-SDS, v1.0) in July 2025 representing a concrete example of process improvement driven by operational experience during the first months of operations at Orchard, and lessons learned are incorporated into LSPGC work procedures and flow back to field teams through procedure revisions, WEAP refresher content, and Field Operations briefings. However, the absence of root cause analysis requirements, effectiveness verification processes, closure timeframes by severity level beyond the P1/P2/P3 matrix, or systematic trend analysis for continuous improvement limits LSPGC's utilization of results to ad hoc corrections and deficiency identification rather than the process improvement integration characteristic of Level 3 (Routine), placing LSPGC at Level 2 where inspections are conducted based on risk prioritization using historical data and results are used to identify deficiencies systematically.

QA/QC Technology Adoption – 2 Applied

LS Power Grid California's technology adoption for QA/QC activities reflects Level 2 (Applied) maturity, with introduction of digital tools and field technologies that improve efficiency and data collection, though advanced automation and AI/ML capabilities characteristic of higher levels have not yet been deployed. LSPGC utilizes IBM Maximo as its CMMS for opening, tracking, and closing maintenance work orders, with the Orchard Substation fully integrated in 2025 and Fern Road integration expected upon energization, representing a centralized digital platform for work order management that eliminates manual tracking and provides standardized documentation workflows. LSPGC has deployed twenty-nine Avigilon H6A PTZ surveillance cameras at the Orchard Substation (LSP-06), providing Transmission System Operators with 24/7 remote viewing of indoor and outdoor substation areas and addressing the prior gap of no remote visibility of the substation perimeter or interior, documented through purchase orders LSP10116 (cameras) and LSP10121 (commissioning). DTN serves as LSPGC's weather monitoring and situational awareness service (LSP-05), providing daily Energy Event Index (EEI) reports that rank wildfire risk at the asset level, which LSPGC uses to inform operational decisions and field activity scheduling, and a Pulsar 600 weather station is installed at the Orchard Substation feeding local weather data into LSPGC's situational awareness operations. DTN replaced StormGeo, the prior weather service provider, on December 4, 2025, demonstrating active technology adoption during LSPGC's first year of operations. Inspection reports, work orders, vegetation records, and training records are stored on LSPGC's internal network drives in accordance with the Records Retention Program Procedure, with access available to all employees supporting LSPGC and restricted to those approved by management based on business need (WMP Section 6.5), and work order data resides in IBM Maximo and is accessible to Field Operations, work planning, and supply chain functions through the EAM/CMMS interface. However, LSPGC does not currently use AI/ML-powered inspection tools, drones, LiDAR technology, satellite sensors, autonomous inspection systems, or mobile field apps for QA/QC, placing technology adoption at Level 2 where basic digital tools and some field technologies are deployed but extensive use of drones, LiDAR, advanced automation, or AI-driven analytics characteristic of Level 3 (Routine) and Level 4 (Mastered) have not yet been implemented. The utility's technology adoption trajectory reflects a

recently commissioned facility building its digital infrastructure during its first year of operations, with three QA/QC-relevant systems commissioned or advanced in 2025 (Avigilon cameras, DTN weather service, and Maximo integration), demonstrating proactive adoption mindset though not yet reaching the extensive automation and advanced sensor deployment of higher maturity levels.

Figure 1: QA/QC Maturity Sunburst Chart



6. CONCLUSION

LSPGC demonstrates a comprehensive wildfire mitigation program across multiple operational domains, with validated implementation of nine out of ten initiatives for 2025. The organization maintains construction fire prevention protocols through Worker Environmental Awareness Programs and hot work procedures at both substations, supported by documented training logs and contractor fire prevention plans. Infrastructure oversight is conducted through monthly substation inspections that evaluate major equipment and identify maintenance needs, with all assets integrated into the IBM Maximo enterprise asset management system for tracking and scheduling planned maintenance activities.

Vegetation management practices include monthly inspections to identify encroachment risks and maintain defensible space, though the formal defensible space inspection program was not fully implemented until July 2025, resulting in six dedicated inspections rather than the ten possible following the Orchard Substation's March energization. This represents the only initiative not validated for 2025. Contracted vegetation management services were maintained throughout the year with documented site visits confirming control effectiveness.

Situational awareness capabilities have been significantly enhanced through multiple technological integrations. LSPGC transitioned from StormGeo to DTN's Energy Event Index platform in December 2025, providing more granular daily asset-level wildfire risk assessment. Surveillance infrastructure includes 29 operational CCTV cameras at the Orchard Substation with 24/7 remote viewing capability for Transmission System Operators, demonstrating 95-97% system reliability. The organization conducted a formal evaluation of live video operational maturity and identified opportunities for enhancement, including potential thermal imaging and AI integration to improve monitoring during high-risk conditions.

Emergency preparedness is maintained through formalized planning, active collaboration with local fire agencies, and continuous improvement processes. The Emergency Operations Plan underwent two revisions in 2025, incorporating benchmarking insights from peer utilities including PG&E's publicly available practices. LSPGC conducted annual coordination meetings with CAL FIRE and OEIS representatives, including facility tours and operational discussions. The organization actively participates in industry forums and conferences to share best practices and lessons learned, with documented attendance and presentation at eight collaborative events throughout 2025.

Implementation progress was affected by construction delays that postponed the Fern Substation energization until 2026, reducing the total number of inspections and camera installations claimed for 2025. However, all operational assets demonstrate consistent maintenance, monitoring, and documentation practices aligned with wildfire mitigation objectives.

7. ATTACHMENTS

7.1 CATALOG OF INITIATIVES

7.2 DATA REQUESTS

7.3 SME INTERVIEWS

7.4 PICTURES OF NON-CONFORMANCE