



OFFICE OF ENERGY INFRASTRUCTURE SAFETY

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To: Meredith Allen, Senior Director of Regulatory Relations, Pacific Gas and Electric Company
Mike A. Backstrom, Vice President of Regulatory Policy, Southern California Edison Company
Dan Skopec, Senior Vice President & Chief Regulatory Officer, San Diego Gas & Electric Company
Paul Marconi, President, Bear Valley Electric Service Inc.

From: Office of Energy Infrastructure Safety

cc: Diana S. Gallegos, Principal Manager of Regulatory Relations, SCE
Kellan C. Gill, Regulatory Business Manager, SDG&E
Safety Certification Service List (OEIS_SAFETY_CERTS)

Date: September 8, 2021

Subject: **Submission of Safety Certification Request and Supporting Documents**

Background

On July 26, 2021, the Office of Energy Infrastructure Safety (Energy Safety) issued guidance for electrical corporations seeking a 2021 Safety Certification (Guidelines).¹ The Guidelines enumerate the requirements set forth in Public Utilities Code section 8389(e) and describe how an electrical corporation requesting a Safety Certification must demonstrate that it meets each requirement. This letter provides instructions for submitting a Safety Certification request and supporting documents.

Safety Certification Requests

Electrical corporations requesting a Safety Certification this year must submit their documentation to the 2021 Safety Certification docket (#2021-SCs).

Board-Level Safety Briefing Presentation

Public Utilities Code section 8389(e)(5) and Guidelines section 2.4 describe the requirements for electrical corporations requesting a Safety Certification to establish board-level reporting to the California Public Utilities Commission (CPUC) and Energy Safety on safety issues.

¹ <https://efiling.energysafety.ca.gov/eFiling/Getfile.aspx?fileid=51679&shareable=true> (accessed September 3, 2021).

On August 25, 2021, Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) each presented a board-level safety briefing to the CPUC and Energy Safety.² As of the date of this letter, the board-level safety briefings for Pacific Gas and Electric Company (PG&E) and Bear Valley Electric Service Inc. (BVES) have not yet been scheduled. Each electrical corporation requesting a Safety Certification must submit its board-level safety briefing presentation materials (e.g., slide deck) to the 2021 Safety Certification docket (#2021-SCs). Presentation materials must be submitted no later than the submission of an electrical corporation's 2021 Safety Certification request.

2021 Q2 Notification of Wildfire Mitigation Plan Implementation

Public Utilities Code section 8389(e)(7) and Guidelines section 2.2 describe the requirement of a quarterly notification to Energy Safety documenting "the electrical corporation is implementing its approved wildfire mitigation plan."³

On July 22, 2021, Assembly Bill (AB) 148 came into effect, changing Public Utilities Code section 8389(e)(7) quarterly filing requirement from a "tier 1 advice letter" to a "notification of implementation."⁴ The required elements of the quarterly filing were unchanged.

Not all electrical corporations requesting a Safety Certification submitted 2021 Q2 quarterly notifications to Energy Safety. Each electrical corporation requesting a Safety Certification must submit or resubmit its 2021 Q2 quarterly notification to Energy Safety through the 2021 Safety Certification docket. In the event the 2021 Q2 quarterly notification was formatted as a tier 1 advice letter to the CPUC, the advice letter may be submitted to the docket in its original form. 2021 Q2 quarterly notifications must be submitted no later than the submission of an electrical corporation's 2021 Safety Certification request.

Future Quarterly Notifications

Electrical corporations requesting a Safety Certification must submit all future Public Utilities Code section 8389(e)(7) quarterly notifications to the Safety Certification docket of the corresponding year.⁵ Quarterly notifications must be submitted by the last day of the month following the end of the quarter. The table below shows the schedule for quarterly notifications.

² <https://www.cpuc.ca.gov/events-and-meetings/public-meeting-on-utility-safety-practices> (accessed September 3, 2021).

³ Public Utilities Code section 8389(e)(7).

⁴ Public Utilities Code section 8389(e)(7) (Amended by Stats. 2021, Ch. 115, Sec.82. (AB 148) Effective July 22, 2021).

⁵ For example, next year the electrical corporations should submit quarterly notifications to the 2022 Safety Certification docket, and so on.

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Quarter (date range)	Due date of quarterly notification
Quarter 1 (January 1 – March 31)	April 30
Quarter 2 (April 1 – June 30)	July 31
Quarter 3 (July 1 – September 30)	October 31
Quarter 4 (October 1 – December 31)	January 31

As such, the next quarterly notification, for 2021 Q3, is due to be submitted to the 2021 Safety Certification docket by October 31, 2021.

Sincerely,



Lucy Morgans
Acting Program Manager, Safety Policy Division
Office of Energy Infrastructure Safety