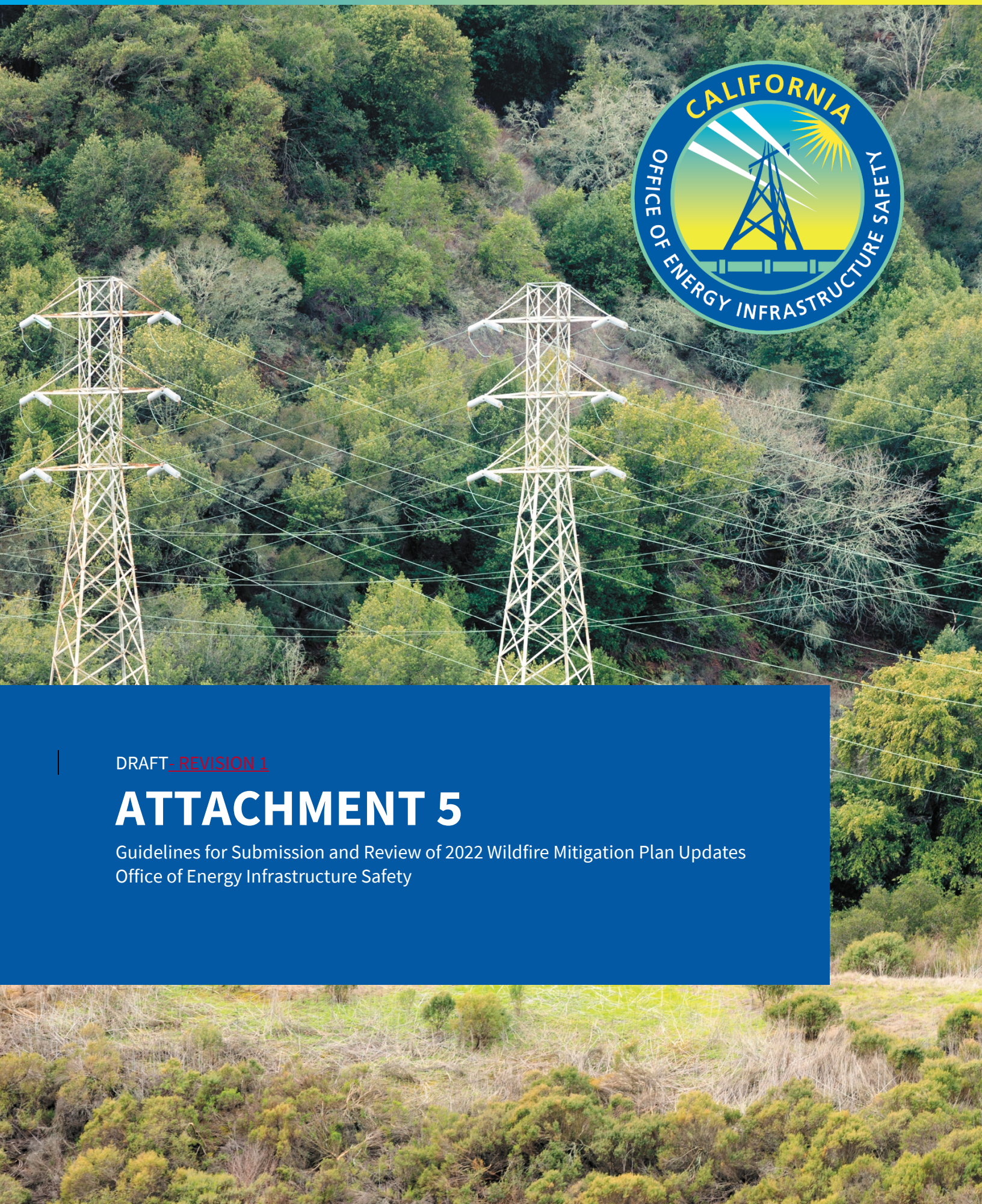

DRAFT- REVISION 1

ATTACHMENT 5

Guidelines for Submission and Review of 2022 Wildfire Mitigation Plan Updates
Office of Energy Infrastructure Safety

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Introduction

Pursuant to Assembly Bill 1054 (Holden 2019) the Office of Energy Infrastructure Safety (Energy Safety) is to review and approve or deny the Wildfire Mitigation Plans (WMP) of electrical corporations (sometimes referred to as "utilities"). This document establishes guidelines for Energy Safety's review and disposition of the 2022 WMP Updates.

This document supersedes all previous guidance on the WMP process in Resolution WSD-001 and WSD-011.

Background

Public Utilities Code § 8386(b)1 requires each electrical corporation to annually prepare and submit a WMP to Energy Safety for review and approval and for Energy Safety to establish a schedule for the annual submissions as follows:

> Each electrical corporation shall annually prepare and submit a wildfire mitigation plan to [Energy Safety] for review and approval. In calendar year 2020, and thereafter, the plan shall cover at least a three-year period. The division shall establish a schedule for the submission of subsequent comprehensive wildfire mitigation plans, which may allow for the staggering of compliance periods for each electrical corporation. In its discretion, [Energy Safety] may allow the annual submissions to be updates to the last approved comprehensive wildfire mitigation plan; provided, that each electrical corporation shall submit a comprehensive wildfire mitigation plan at least once every three years.

Public Utilities Code § 8386(c) sets forth the mandatory contents of the WMPs and specifies that they shall also include any other information that Energy Safety may require.[1]

[1] Public Utilities Code § 8386(c)(22).

Public Utilities Code § 8386.3(a) requires Energy Safety to approve or deny each WMP within three months of submittal and for the Commission to thereafter ratify Energy Safety's action as follows:

> The Wildfire Safety Division[2] shall approve or deny each wildfire mitigation plan and update submitted by an electrical corporation within three months of its submission, unless [Energy Safety] makes a written determination, including reasons supporting the determination, that the three-month deadline cannot be met. Each electrical corporation's approved plan shall remain in effect until [Energy Safety] approves the electrical corporation's subsequent plan. The division shall consult with the Department of Forestry and Fire Protection on the review of each wildfire mitigation plan and update. In rendering its decision, [Energy Safety] shall consider comments submitted pursuant to subdivision (d) of Section 8386. Before approval, [Energy Safety] may require modifications of the plan. After approval by [Energy Safety], the commission shall ratify the action of [Energy Safety]. Section 8386(d) requires the Division to post the submittals on the Commission's website and to accept public comment on them as follows: The Wildfire Safety Division shall post all wildfire mitigation plans and annual updates on the commission's internet website for no less than two months before the Wildfire Safety

2022 WMP Update Submission and Review Guidelines

Completeness of WMP Submissions

Energy Safety will first evaluate each electrical corporation's 2022 WMP Update as submitted for completeness based on the statutory requirements and adherence to the 2022 Guidelines. WMP approval is contingent upon complete and adequate filings. Energy Safety will reject without further review any WMP that does not satisfy initial completeness checks (i.e., incomplete, not fully referenced, or unsubstantiated statutory compliance check list). For an efficient and streamlined WMP review process, WMP submissions at a minimum must satisfy Public Utilities Code § 8386 (c) statutory requirements and demonstrate this via the requisite compliance checklist in Attachment 2.

Submission Schedule for 2022 WMP Updates

[2] As of July 1, 2021, the Wildfire Safety Division (WSD) transitioned into Energy Safety under the California Natural Resources Agency (CNRA) vested with all the powers, duties, and responsibilities of the WSD established pursuant to Section 15475 of the Government Code.

The 2022 WMP Update submission schedule incorporates a staggered submission process whereby ~~the large investor-owned utilities (IOUs)~~PG&E, SCE and SDG&E submit their respective 2022 WMP Updates one week apart during February~~/early March, staggered by two weeks.~~. Approximately ~~two (2~~three (3) months later in early May, the small multi-jurisdictional utilities (SMJUs) and independent transmission operators (ITOs) will submit their respective 2022 WMP Updates.

~~The deadline for the large IOUs to submit their respective 2022 WMP Updates is as follows:~~

- ~~Pacific Gas and Electric Company (PG&E) = Friday, February 4, 2022~~
- ~~Southern California Edison Company (SCE) = Friday, February 18, 2022~~
- ~~San Diego Gas & Electric Company (SDG&E) = Friday, March 4, 2022~~

~~The deadline for the SMJUs and ITOs to submit their respective 2022 WMP Updates is as follows:~~

- ~~Bear Valley Electric Service, Inc (Bear Valley) = Friday, May 6, 2022~~
- ~~Liberty Utilities (Liberty) = Friday, May 6, 2022~~
- ~~PacifiCorp = Friday, May 6, 2022~~
- ~~Horizon West Transmission LLC (Horizon West) = Friday, May 6, 2022~~
- ~~TransBay Cable = Friday, May 6, 2022~~

~~Based on this submission schedule, Energy Safety will issue draft action statements as follows:~~

- ~~Pacific Gas and Electric Company (PG&E) = Friday, May 6, 2022~~
- ~~Southern California Edison Company (SCE) = Friday, May 20, 2022~~
- ~~San Diego Gas & Electric Company (SDG&E) = Friday, June 3, 2022~~
- ~~SMJUs/ITOs = Friday, August 5, 2022~~

~~Pursuant to Public Utilities Code § 8386.3(a), issuance of the draft action statements may be delayed at the discretion of Energy Safety upon a written determination that the three-month evaluation deadline cannot be met.~~

Table 1 ~~– Table 3~~ below ~~outline~~outlines the 2022 WMP Update submission & evaluation timeline for PG&E, SCE, and SDG&E~~;~~ (Large Utilities), with ~~Table 4~~Table 2 setting forth that for the SMJUs/ITOs.

Table 1 – 2022 WMP Update Submission & Evaluation Schedule for PG&E, SCE, and SDG&E

Date[3]	**Action**
Friday, February ~~4~~11, 2022	**SDG&E's WMP Update** ~~(including **Q4 Quarterly Reports**)~~ due ~~for PG&E~~[4]
Friday, February 18, 2022	**SCE's WMP Update** due
Friday, February ~~11~~25, 2022	**PG&E's WMP** ~~**workshop** for PG&E~~**Update** due
Thursday, March 10, 2022	Large Utility **WMP workshop**
~~Thursday, March 3~~Monday, April 11, 2022	Public comments ~~(~~on ~~**WMP**~~**Large Utility WMPs and workshop**~~)~~ due ~~for PG&E WMP~~
~~Thursday, March 10~~Monday, April 18, 2022	**Reply comments** ~~(~~on ~~**WMP**~~Large Utility WMPs and workshop~~)~~ due ~~for PG&E WMP~~[5]
Thursday, May 12, 2022	Energy Safety publishes **draft decision for SDG&E**[6]
Thursday, May 19, 2022	Energy Safety publishes **draft decision for SCE**
~~Friday~~Thursday, May ~~6~~26, 2022	Energy Safety publishes ~~the~~ **draft** ~~**action statement**~~**decision for PG&E**~~[7]~~
Wednesday, June 1, 2022	**Public comments** on SDG&E draft decision due
Wednesday, June 8, 2022	**Public comments** on SCE draft decision due
~~Thursday, May 26~~Wednesday, June 15, 2022	**Public comments** on PG&E draft ~~**action statement**~~decision due

Table ~~2~~2 – 2022 WMP Update Submission & Evaluation Schedule for ~~SCE~~SMJUs and ITOs

Date[8]	**Action**

[3] If any deadline falls on a weekend or holiday, the deadline must be moved to the following business day.
[4] Energy Safety plans to hold working calls with utilities in December 2021 and January 2022 to clarify WMP guidelines and metrics, as needed.
[5] Any stakeholder may submit reply comments.
[6] Pursuant to Public Utilities Code § 8386.3(a), issuance of the draft action statements may be delayed at the discretion of Energy Safety upon a written determination that the three-month evaluation deadline cannot be met.
~~[7] Draft action statement must be issued for PG&E by May 6, 2022, unless Energy Safety issues a written determination indicating that the three-month deadline cannot be met, pursuant to Public Utilities Code § 8386.3(a).~~
[8] If any deadline falls on a weekend or holiday, the deadline must be moved to the following business day.

Friday, ~~February 18~~May 6, 2022	**SMJU and ITO WMP ~~Update (including Q4 Quarterly Reports)~~Updates** due ~~for SCE~~[9]
~~Friday, February 25~~Wednesday, May 18, 2022	SMJU and ITO **WMP workshop** ~~for SCE~~
~~Thursday, March 17~~Monday, June 20, 2022	**Public comments** ~~(~~on ~~**WMP**~~SMJUs and ITO WMPs and workshop~~)~~ due ~~for SCE WMP~~
~~Thursday, March 24~~Monday, June 27, 2022	**Reply comments** ~~(~~on ~~**WMP**~~SMJU and ITO WMPs and workshop~~)~~ due ~~for SCE WMP~~[10]
~~Friday, May 20~~Thursday, August 4, 2022	Energy Safety publishes ~~the~~ **draft** ~~action statement~~**decisions** for ~~SCE~~SMJUs and ITOs[11]
~~Thursday, June 9~~Wednesday, August 24, 2022	**Public comments** on ~~SCE~~SMJU and ITO draft ~~**action statement**~~decisions due
Wednesday, August 31, 2022	**Reply comments** on SMJU and ITO draft decisions due

~~*Table 3 – 2022 WMP Update Submission & Evaluation Schedule for SDG&E*~~

~~**Date**~~[6]	~~**Action**~~
~~Friday, March 4, 2022~~	~~**WMP Update** (including **Q4 Quarterly Reports**) due for SDG&E~~[7]
~~Friday, March 11, 2022~~	~~**WMP workshop** for SDG&E~~
~~Thursday, March 31, 2022~~	~~Public comments (on **WMP and workshop**) due for SDG&E WMP~~
~~Thursday, April 7, 2022~~	~~Reply comments (on **WMP and workshop**) due for SDG&E WMP~~[8]
~~Friday, June 3, 2022~~	~~Energy Safety publishes the draft action statement for SDG&E~~[9]
~~Thursday, June 23, 2022~~	~~Public comments on SDG&E **draft action statement** due~~

~~*Table 4 – 2022 WMP Update Submission & Evaluation Schedule for SMJUs and ITOs*~~

~~**Date**~~[12]	~~**Action**~~

[9] Energy Safety plans to hold working calls with the utilities in December 2021 and January 2022 to clarify WMP guidelines and metrics, as needed.

[10] Any stakeholder may submit reply comments.

[11] Draft action statement must be issued for ~~SCE~~the SMJUs/ITOs by ~~May 20, 2022 and for SDG&E by June 3~~August 5, 2022, unless Energy Safety issues a written determination indicating that the three-month deadline cannot be met, pursuant to Public Utilities Code § 8386.3(a).

~~[12] If any deadline falls on a weekend or holiday, the deadline must be moved to the following business day.~~

~~Friday, May 6, 2022~~	~~**WMP Update** (including 2022 **Q1 Quarterly Reports**) due for the SMJUs/ITOs[13]~~
~~Friday, May 13, 2022~~	~~**WMP workshop** for SMJUs and ITOs~~
~~Thursday, June 2, 2022~~	~~Public comments (on **WMP and workshop**) due for SMJUs and ITOs WMPs~~
~~Thursday, June 9, 2022~~	~~Reply comments (on **WMP and workshop**) due for SMJUs and ITOs WMPs[14]~~
~~Friday, August 5, 2022~~	~~Energy Safety publishes the draft action statement for SMJUs and ITOs[15]~~
~~Monday, August 25, 2022~~	~~Public comments on SMJU and ITO **draft action statements** due~~

Quarterly Data Report Submissions

Quarterly Data Reports (QDR) enable Energy Safety to monitor utility data at an enhanced frequency and shifts much of data evaluation from WMP review to the off-season months. Furthermore, insights generated from the Quarterly Data Reports may reduce analysis time during annual WMP review, leading to a faster review process.

The data required in each Quarterly Data Report are a combination of spatial and non-spatial data:

- Spatial data plans to follow the schema of Energy Safety's GIS Data Reporting Standard version 2.1.
- Non-spatial plans to follow the schema of Attachment 3: 2022 Performance Metrics Data Templates

The schedule for delivering the Quarterly Data Reports will follow the schedule outlined in ~~Table 5.~~Table 3. Each Quarterly Data Report will align with the calendar quarters:

- Q1: January 1 – March 31
- Q2: April 1 – June 30
- Q3: July 1 – September 30
- Q4: October 1 – December 31

The reports are due 30 days following the close of the quarter. See Table 5 below.

~~[13] Energy Safety plans to hold working calls with the utilities in December 2021 and January 2022 to clarify WMP guidelines and metrics, as needed.~~

~~[14] Any stakeholder may submit reply comments.~~

~~[15] Draft action statement must be issued for the SMJUs/ITOs by August 5, 2022, unless Energy Safety issues a written determination indicating that the three-month deadline cannot be met, pursuant to Public Utilities Code § 8386.3(a).~~

Table ~~5~~3 – 2022 Quarterly Report Schedule

Date[16]	Action
Tuesday, February 1, 2022	**2021 Q4 QDR** due (Q1: Jan 1 – Mar 31)
Tuesday, February 15, 2022	Public comments due for **2021 Q4 QDRs**
Tuesday, February 22, 2022	Reply comments due for **2021 Q4 QDR**
Monday, May 2, 2022	**2022 Q1 QDR** due (Q1: Jan 1 – Mar 31)
Monday, May 16, 2022	Public comments due for **2022 Q1 QDR**
Monday, May 23, 2022	Reply comments due for **2022 Q1 QDR**
Monday, August 1, 2022	**2022 Q2 QDR** due (Q2: Apr 1 – June 30)
Monday, August 15, 2022	Public comments due for **2022 Q2 QDR**
Monday, August 22, 2022	Reply comments due for **2022 Q2 QDR**
Thursday, December 1, 2022	**2022 Q3 QDR** due for utilities (Q3: Jul 1 – Sept 30)
Thursday, December 15, 2022	Public comments due for **2022 Q3 QDR**
Thursday, December 22, 2022	Reply comments due for **2022 Q3 QDR**

Naming Convention

Electronic file names for the WMPs and associated document/data submissions must follow the standardized electronic naming convention illustrated in Table 6 below. The electronic file name(s) must include, in order, the naming convention identified in each column (without quotation marks), with an underscore between the character string of each column. See examples below.

Table 6: Electronic File Naming Convention with Examples

[16] If any deadline falls on a weekend or holiday, the deadline must be moved to the following business day.

Date Submitted (Year-Month-Day)	Utility Abbreviated Name	Document Year	Document Type	Revision Number
"2022-02-05"	• "PGE" (Pacific Gas & Electric Company) • "SDGE" (San Diego Gas & Electric) • "SCE" (Southern California Edison) • "BVES" (Bear Valley Electrical Services) • "LU" (Liberty Utility) • "PC" (PacifiCorp) • "HWT" (Horizon West) • "TBC" (Trans Bay Cable)	"2022"	• "WMP" (Wildfire Mitigation Plan) • "WMP-Update" (Wildfire Mitigation Plan Update) • "Survey" (Maturity Model Survey) • "Metrics" (Performance Metrics Data) • "RNR" (Revision Notice Response) • "DSSR" (Data Schema Status Report) • "COR" (Change Order Report) • "PR" (Progress Report) • "QDR" (Quarterly Data Report) • "QIU" (Quarter Initiative Update)	• R0 (First Version) • R1 (Revision 1) • R2 (Revision 2)

Examples:

- **First Version of a WMP Submission:** "2022-02-05_PGE_2022_WMP-Update_R0", which refers to the PG&E 2022 WMP Update submitted on Feb 05, 2022, first version
- **Updated submission in response to Energy Safety Revision Notices:** "2022-06-05_HW_22_RNR_R1", which refers to the Horizon West Revision Notice Response submitted on June 5, 2022, revision 1
- **Maturity Model submission:** "2022-04-05_TBC_2022_Survey_R0", which refers to the Trans Bay Cable 2022 Maturity Model Survey submitted on April 5, 2022, first version
- **Quarter 2 Report data submission:** "2022-05-05_LU_2022_Q2-data_R0", which refers to the Liberty Utility 2022 Quarter 2 Report data submitted on May 5, 2022, first version

Service and Publication of WMPs

The electrical corporations must submit their 2022 WMP Updates to the 2022 Wildfire Mitigation Plan Updates docket (#2022-WMPs)[17] according to the schedule in the previous section. The electrical corporations must concurrently serve the 2022 WMP Updates on the Department of Forestry and Fire Protection at CALFIREUtilityFireMitigationUnit@fire.ca.gov. Energy Safety will publish all WMPs on its website as required by Pub. Util. Code § 8386(d).

Public and Stakeholder Comments on WMPs

Any person or entity may submit opening and reply comments on a 2022 WMP Update in accordance with the schedules above. Electrical corporations' reply comments must address which recommendations from public comments, if any, the electrical corporations agree to incorporate into their 2022 WMP Updates and which recommendations, if any, the electrical corporations agree to incorporate or work towards in future plan years. Comments and reply comments must be submitted to the 2022-WMPs docket.[18] Persons who are not already subscribed to Energy Safety's service lists and wish to receive service of the WMPs and comments on the WMPs may enroll by visiting https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/.

Presentation of Energy Safety's Decision for Commission Ratification

Energy Safety will submit final 2022 WMP Update Action Statements for each electrical corporation to the California Public Utilities Commission for ratification pursuant to Public Utilities Code § 8386.3(a).

Discovery and Document Maintenance

The following process[19] must be observed regarding discovery and staff data requests:

1. Each electrical corporation must post its 2022 WMP Update and all documents referenced in its 2022 WMP Updates on a WMP-specific website in an easy-to-follow format. This will be in addition to the posting of WMPs on the Energy Safety's website.

2. Each electrical corporation must post a WMP Discovery Log according to the guidance set forth in the WMP Discovery Log section below. Each electrical corporation must

[17] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs
[18] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs
[19] This process has been adapted from Resolution WSD-001 and from a letter sent to electrical corporations on January 21, 2021 titled "Wildfire Safety Division Guidance on Resolution WSD-001 and Data Request Best Practices".

update its WMP Discovery Log and post all discovery and responses issued to date by Thursday at 5 pm Pacific time. The website or portion of webpage pertaining to discovery requests must be titled "2022 Wildfire Mitigation Plan Discovery/Data Requests."

3. Data requests from Energy Safety staff to the electrical corporations may come from safetypolicy@energysafety.ca.gov or from individual staff e-mail addresses. All responses to Energy Safety data requests must be submitted to the 2022 WMP Data Requests docket (#2022-WMP-DRs).[20] Electrical corporations must also submit responses to safetypolicy@energysafety.ca.gov.

4. Each electrical corporation must send to safetypolicy@energysafety.ca.gov the name of its single point of contact for all data requests and response matters for Energy Safety staff use no later than the date of submission of its 2022 WMP Update.

    a. Electrical corporations must respond to all data and discovery requests within 3 business days of the request, unless a longer response period is mutually agreed upon by the entity making the data request and the electrical corporation. Absent an agreement between the requestor and the electrical corporation, exceptions to the 3-business day requirement will require a letter to safetypolicy@energysafety.ca.gov and a strong showing of the specific reason for the delay.

    b. The 3-business-day response requirement is only in effect during the WMP review period. The WMP review period begins on date of submission of an electrical corporation's WMP and runs throughout the entire WMP evaluation period until issuance of a final Action Statement.

    c. WMP-related data requests occurring outside of the WMP review period shall be subject to a 10-business day response period, unless a longer response period is mutually agreed upon by the entity making the data request and the electrical corporation. Absent an agreement between the requestor and the electrical corporation, exceptions to the 10-business day requirement will require a letter to safetypolicy@energysafety.ca.gov and a strong showing of the specific reason for the delay.

5. Stakeholders conducting discovery must first analyze the significant data that will be submitted with 2022 WMP Updates. Entities submitting data requests should avoid submissions where such information is contained in the electrical corporations' WMP filings.

[20] https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMP-DRs

WMP Data Request Best Practices

Energy Safety provides the following additional guidance[21] on data request best practices:

1. Stakeholders and electrical corporations must endeavor to resolve all data request confidentiality disputes amongst themselves. Discovery disputes that cannot be resolved shall be remedied according to the confidentiality provisions in General Order 96-B or subsequent processes adopted by Energy Safety.

2. Stakeholders submitting data requests must consider the volume and nature of the data being requested when negotiating response deadlines outside of those set forth above.

3. Stakeholders must endeavor to avoid extensive and comprehensive data requests in the 6 weeks before the electrical corporation must submit its 2022 WMP Update if the data could reasonably be requested outside of that timeframe. In addition, Energy Safety reiterates bullet #5 in **Discovery and Document Maintenance** (above), which states that "parties conducting discovery must first analyze the significant data that will be submitted" with the 2022 WMP Updates.

WMP Discovery Log

The electrical corporations are required to maintain an online discovery/data request log in an easy-to-follow format on the website described in **Discovery and Document Maintenance**. The discovery log must be in the form of a searchable, online table identifying the discovery, questions, and responses for each request received related to the 2022 WMP Update and links to relevant documents. The log must indicate 1) the attachment number of any additional attachments related to the questions, 2) the relevant sections of the 2022 WMP Update, and 3) a thematic category and subcategory of the discovery/data request. Table 7 (below) is provided as an exemplar discovery/data request log.

[21] This guidance has been adapted from a letter sent to electrical corporations on January 21, 2021 titled "Wildfire Safety Division Guidance on Resolution WSD-001 and Data Request Best Practices".

Table 7: Exemplar Discovery Log

Count	Party Name	DR Set #	Data Request	Question No.	Question ID	Question Text	Requestor	Date Rec'd	Final Due Date	Date Sent	Number of Atchs	NDA required	WMP Section	Category	Subcategory
1	Energy Safety	2021-01	ES-2021-01	1	ES-2021-01.1										
2	Energy Safety	2021-01	ES-2021-01	2	ES-2021-01.2										
3	Energy Safety	2021-01	ES-2021-01	3	ES-2021-01.3										

DATA DRIVEN
FORWARD-THINKING
INNOVATIVE
SAFETY FOCUSED

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