

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 21, 2021

SUBJECT: Final Independent Evaluator Scope of Work for the Review of Compliance with 2020 WMP

Pursuant to the Wildfire Safety Division's (WSD's) Final Guidance on Engagement of Independent Evaluators, dated April 6, 2021 (Guidance Document), the WSD has reviewed and considered the scope of work proposals received for the 2020 WMP Independent Evaluator (IE) review. In addition to this final scope, the WSD notes that pursuant to PUC Section 8386.3(c)(2)(B)(i), "The engaged independent evaluator shall consult with, and operate under the direction of, the Wildfire Safety Division of the commission."

Consistent with Resolution WSD-012 and the April 6th Guidance Document, the scope of the IE review is to verify that the electrical corporation has complied with its 2020 WMP, validate and describe the electrical corporation's quality assurance (QA)/quality control (QC) programs in place for Wildfire Mitigation Plan (WMP) compliance, and determination of whether the electrical corporation failed to fund any activities in its WMP. The final scope does not explicitly include verifying compliance with other CPUC General Orders (e.g., GO 95) or other CPUC regulations or decisions. However, if the IE, during the course of their work, identifies any GO 95 non-compliance, then the IE shall document and report such issues in the IE Final Annual Report on Compliance. If the IE identifies any issues that pose an imminent safety threat (e.g., broken crossarm, broken anchor guy, etc.), then the IE shall immediately notify the electrical corporation of such conditions. The IE shall have access to all documents, tools, and systems necessary to complete its review.

Finally, as discussed in the April 6th Guidance Document, given the condensed timing of this inaugural IE compliance review process, finalization of this Final IE Scope of Work was expedited and will be applicable for engagement of IEs in 2021 only. The WSD looks forward to further collaborating on refinement of the IE process moving forward.

1. Compliance Standard to be Applied:

Pursuant to P.U. Code Section 8386.3(c)(2)(B)(i), the IE is "to review and assess the electrical corporation's compliance with its plan." The IE shall verify that the electrical corporation has complied with the goals set forth for each of the initiatives and/or activities contained in its approved WMP or as modified pursuant to the electrical

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021
Page 2

corporation's submittals through the Change Order process.¹ To effectively execute this scope, at a minimum, the IE shall utilize the approved WMP, remedial compliance plan (RCP), quarterly reports (QRs), change orders, quarterly initiative updates (QIUs), and quarterly advice letters (QALs). In addition, the IE shall determine whether the electrical corporation "failed to fund any activities included in its plan."² Finally, in accordance with the April 6th Guidance Document, the IE shall validate and describe the electrical corporation's QA/QC programs in place for WMP compliance.

2. WMP Activities To Be Reviewed:

The IE shall review and verify compliance for all WMP activities that have specific quantifiable or qualitative performance goals/targets set forth in the IOU's 2020 WMP. If the IE is not able to review all the electrical corporation's WMP activities, then the IE shall consult with WSD on which activities to prioritize. It is imperative that the IE avoid any conflicts of interest. Accordingly, the IE shall abide by all conflict of interest parameters as laid out in Request for Qualification (RFQ) number 20NC0427 and shall have an ongoing obligation to inform the WSD of any new or changing circumstances that may raise conflict of interest questions or concerns.

3. Approaches to Verifying Compliance:

a. Large Volume Quantifiable Goal/Target - Field Verifiable:

Examples:

- **SCE:** SH-1 Covered Conductor, SH-3 Fire Resistant Poles, SH-4 Fuses, VM-3 Expanded Clearances Legacy Facilities, SA-1 Weather Stations, SH-10 Remediate Tree Attachments
 - **PG&E:** : 5.3.3.17.4 - C.6 Non-Exempt Surge Arrester Replacement Program, 5.3.5.15 - E.1 - EVM line miles, 5.3.3.7 - C.12 - Expulsion Fuse Replacement (non-exempt equipment), 5.3.3.8-1 - C.2 - Distribution Sectionalizing (automated devices), 5.3.2.1.3 - B.10 - Weather Stations, 5.3.3.17.2-1 - C.10 System Hardening (line miles), 5.3.2.1.4 - B.9 - HD Cameras Deployment, 5.3.3.18.1-1 - C.7 - System Protection deploy DCD (reclosers)
 - **SDG&E:** 5.3.3.7 – Expulsion Fuse Replacement, 5.3.3.10 – Hotline Clamps, 5.3.3.3 – Bare Conductor Hardening, 5.3.5.9 – Enhanced Vegetation Management, 5.3.5.20 – Pole Brushing
- Utilities shall provide a complete list of all large volume (i.e., greater than or equal to 100 units) 2020 WMP initiatives with quantifiable goals/targets that are field verifiable and were conducted in 2020 (e.g., list of all structures where covered conductor was installed, list of all weather stations installed, etc.).

¹ In WSD's Wildfire Mitigation Plan Compliance Process, dated November 2020 and approved in Resolution WSD-012, WSD states that one of their objectives is "assessing electrical corporations' implementation of initiatives identified in their approved WMPs." The footnote goes on to state: "An initiative is a commitment pertaining to a wildfire risk mitigation activity in an electrical corporation's WMP used to measure performance and compliance." See page 3.

² P.U.C. §8386.3(c)(2)(B)(i).

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021
Page 3

- The complete list shall include the quantitative goal/target for each initiative and be attached to the executed scope of work between the utility and IE.
- The IE shall request additional documentation, as needed, to support execution of its field verification.
- The IE shall select a sample to field verify.
 - The WSD shall have final approval over the sample chosen.
- IE shall conduct field verification to confirm installation, work quality, and adherence to applicable utility protocols and standards for such work.
- Based upon field verification of sample, the IE shall extrapolate results to determine if the utility has met the performance goal specified in its WMP.
- The IE's findings and assessment of utility compliance with these activities shall be included in the Final IE Annual Report on Compliance.

b. Large Volume Quantifiable Goal/Target – Not Field Verifiable:

Examples:

- **SCE:** IN-1 Ground Inspections, IN-6 Aerial Inspections, SH-12.1 Distribution Remediation, SH-12.2 Transmission Remediation, VM-1 Hazard Tree Inspections, VM-2 Pole Brush Clearing, VM-5 QC Inspections, IN-3 Infrared Inspection Distribution
- **PG&E:** 5.3.3.8-2 - C.4 -Transmission Line Evaluation for PSPS Scoping, 5.3.4.2-1 - D.3 - Transmission HFTD Inspections (structures), 5.3.4.15 - D.4 - Substation HFTD Inspections (substations), 5.3.4.1 - D.2 - Distribution HFTD Inspections (poles)
- **SDG&E:** 5.3.3.11.1 – Resiliency Grant Programs, 5.3.4.1 – 5-Year Detailed Inspections, 5.3.4.9.2 – Drone Assessments of Distribution Infrastructure, 5.3.5.2 – Tree Trimming

- Utilities shall provide a complete list of all large volume (i.e., greater than or equal to 100 units) 2020 WMP activities with quantifiable goals/targets that are not field verifiable and were conducted in 2020 related to the specific goal (e.g., list of all field inspections conducted, list of all Hazard Tree inspections performed, etc.).
 - The complete list shall include the quantitative goal/target for each activity and be attached to the executed scope of work between the utility and IE.
- The IE shall select a sample to seek additional documentation to verify that the activity was completed and executed in accordance with all applicable work procedures and protocols (e.g., inspection reports, work orders, contractor invoices, etc.).
 - The WSD shall have final approval over the sample chosen.
- The IE shall review additional documentation provided and conduct subject matter expert (SME) interviews, as needed, to verify performance of activities and adherence to applicable procedures and protocols.

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021
Page 4

- Based on sample validation results, the IE shall extrapolate results to determine if the utility has met the performance goal specified in its WMP.
- The IE's findings and assessment of utility compliance with these activities shall be included in the Final IE Annual Report on Compliance.

c. Small (less than 100 items) Volume Quantifiable Goal/Target:

Examples:

- **SCE:** SH-5 RAR/RCS Installation, PSPS-2 Community Resource Centers, OP-3 UAS Operators, DEP-12 Community Meetings, OP-2 Hire additional staff, SA-3 Install HPCC,
- **PG&E:** 5.3.2.2.8 - Distribution Arcing Fault Signature Library, 5.3.3.8-6 - I.6 - Microgrids for PSPS Mitigation (operationalized units), 5.3.2.2.7 - Line Sensor Devices, 5.3.3.17.2-2 - C.11 Butte County Rebuild (UG de-energized miles), 5.3.3.8-3 - C.1 - SCADA Transmission Switching (switches)
- **SDG&E:** 5.3.2.1 – Advanced Weather Station Integration, 5.3.3.1 – SCADA Capacitors, 5.3.3.8.1 – PSPS Sectionalizing Enhancements, 5.3.3.8.2 – Microgrids, 5.3.3.18.1 – Distribution Communications Reliability Improvements

- Utilities shall provide a complete list of all small volume (i.e., less than 100 units) 2020 WMP activities with quantifiable goals/targets that were conducted in 2020 related to the specific goal (e.g., list of all community meetings conducted, list of additional staff hired, etc.).
 - The complete list shall include the quantitative goal/target for each activity and be attached to the executed scope of work between the utility and IE.
- The IE shall request additional documentation (e.g., community meeting notices, contracts for Community Resource Centers, invoices for HPCC) needed to verify that the activity was completed/performed and executed in accordance with all applicable work procedures and protocols.
- The IE shall request SME interviews, as needed, to verify completion/performance of activities and adherence to applicable procedures and protocols.
- The IE shall perform data/documentation review and conduct SME interviews, as needed, to verify completion of activity.
- Based on review, the IE shall determine if the utility has met the performance goal specified in its WMP.
- The IE's findings and assessment of utility compliance with these activities shall be included in the Final IE Annual Report on Compliance.

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021

Page 5

d. Qualitative Goal/Target:

Examples:

- **SCE:** PPS-1 De-Energization Notifications, PPS-2 Customer Resiliency Equipment Incentive Program, RA-1 Implement WRRM module, OP-1 Review Annual System Operating Bulletin 322, SA-4 Implement FireCast and FireSim, AT-3 Alternative Technology Evaluations, AT-1 Meter Alarming Downed Energized Conductor, Dep-2 Hold Internal Training De-energization protocols
- **PG&E:** 5.3.2.4 - Forecast of a fire risk index, fire potential index, or similar, 5.3.2.6 - Weather forecasting and estimating impacts on electric lines and equipment, 5.3.2.7 - Wildfire Safety Operations Center (WSOC), 5.3.3.8-4 - C.9 - System Hardening Criteria Refinement (Dist.), 5.3.3.11 - Mitigation of impact on customers and other residents affected during PPS event, 5.3.3.17.5 - Transmission Line System Hardening Overview and Strategy, 5.3.3.18.1-2 - Increased Protection Sensitivity, 5.3.6.4 - F.2 - Protocols for PPS Re-Energization, 5.3.10.4 - Forest service and fuel reduction cooperation and joint roadmap
- **SDG&E:** 5.3.1.1 – WRRM-Ops, 5.3.2.4.1 – Fire Science and Climate Adaptation Department, 5.3.6.6.1 – Aviation Firefighting Program, 5.3.8.1 – Asset Management, 5.3.8.4.1 – Wildfire Mitigation Personnel, 5.3.9.4.7 – Emergency Management Operations

- Utilities shall provide a complete list of all 2020 WMP activities with no quantifiable goals/targets that were conducted in 2020.
 - The complete list shall include the qualitative goal/target for each activity and be attached to the executed scope of work between the utility and IE.
- The IE shall request documentation needed to verify the activity was completed as stated in the WMP.
- The IE shall request SME interviews, as needed, to verify completion of activity.
- The IE shall perform document review and conduct SME interviews, as needed, to verify that the performance goal was met.
- The IE’s findings and assessment of utility compliance with these activities shall be included in the Final IE Annual Report on Compliance.

4. Approach to Verifying Funding of Each Activity:

- The IE shall use all available financial audit reports and memorandum accounts, including but not limited to Wildfire Mitigation Plan Memorandum Account (WMPMA), Fire Risk Mitigation Memorandum Account (FRMMA), Fire Hazard Prevention Memorandum Account (FHPMA), and Catastrophic Event Memorandum Account (CEMA), the 2020 WMP, associated quarterly reports, the 2021 WMP Update, and other publicly available information to determine the electrical corporation’s financial projections for each of its WMP activities.
- The IE shall request documentation and conduct SME interviews, as needed, to supplement publicly available information and determine financial projections for WMP activities.

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021

Page 6

- For all 2020 WMP activities where the utility actually spent less than 100 percent of its forecasted spend, as determined above, the IE shall document each instance.
- For all instances in which 100 percent of forecasted spend was not spent, the IE shall also request and document the utility's explanation for the underfunding.
- All instances of 2020 WMP activity underfunding and utility's explanations for such shall be included in the Final IE Annual Report on Compliance.

5. Approach to Validating QA/QC Programs for WMP Compliance:

- Utilities shall provide a complete listing and description of their existing QA/QC programs in place to ensure compliance with WMPs.
 - This list shall be attached to the executed scope of work between the utility and IE.
- The IE shall request any additional documentation needed to validate the utility's QA/QC programs.
- The IE shall request SME interviews, as needed, to validate the QA/QC programs.
- The IE shall review all available documentation and/or interviews to validate utility QA/QC programs.
- For all in-scope WMP activities, the IE shall include a validation and detailed description of utility QA/QC programs for WMP compliance in the Final IE Annual Report on Compliance.

6. Data Requests and Interview Requests:

All data and interview requests shall be submitted in writing to the point of contact for each IOU. The utility and IE shall clearly identify, by name, title, email, and phone number, their preferred points of contact. All data request responses shall be provided to the IE's point of contact in writing and in a searchable format (e.g., Excel) or other formats as agreed upon by the IE and the IOU.

The standard turnaround time for data requests shall be three (3) business days, but the IE and IOU shall work cooperatively to provide data in a shorter time where achievable. The IOU shall extend best efforts to meet the three (3) business day goal, realizing some requests will not be completed within this timeframe. All instances of requests being responded to after three (3) business days shall be documented by the IE and included in the Final IE Annual Report on Compliance.

All communications containing exchanges of information and/or documents material to the IE's evaluation of WMP compliance between the IE and the electrical corporation shall include a copy to a designated WSD representative and the following inbox:

WSDCompliance@cpuc.ca.gov.

SUBJECT: Independent Evaluator Scope of Work for the Review of Compliance with 2020 Wildfire Mitigation Plans

April 21, 2021
Page 7

Appropriate confidentiality protocols shall be maintained between the IE and utility, when relevant, consistent with California law and the CPUC's longstanding confidentiality rules.

7. Schedule:

Date	Activity
April XX, 2021	IE to commence review
April XX – June 30, 2021	IE to provide WSD weekly updates on progress
June 11, 2021	Draft report submitted to WSD for review
June XX, 2021	WSD to provide IE comments on draft report
June 30, 2021	Final IE Annual Report on Compliance to be published by WSD and served on parties

For questions regarding the information provided herein, please contact Koko Tomassian, Program Manager of the Wildfire Safety Division, at Koko.Tomassian@cpuc.ca.gov, with a copy to WSDCompliance@cpuc.ca.gov.

Sincerely,



Koko Tomassian, P.E., Program Manager
Compliance Branch, Wildfire Safety Division
California Public Utilities Commission