



July 6, 2022

To: 2022 Wildfire Mitigation Plans docket (#2022-WMPs)

**Subject: Draft 2022 Change Order Guidelines and Public Notice of the Public Adoption Meeting**

Dear Wildfire Mitigation Plan Stakeholders,

Enclosed are Draft 2022 Change Order Guidelines pertaining to 2022 Wildfire Mitigation Plans.

On July 6, 2022, the Draft 2022 Change Order Guidelines is hereby published for public review and comment. Comments must be submitted no later than July 26, 2022, at 5 p.m. Pacific Time. Reply must be submitted no later than August 5, 2022, 5 p.m. Pacific Time.<sup>1</sup>

Comments must be submitted to Energy Safety’s e-filing system in the 2022 Wildfire Mitigation Plans docket (#2022-WMPs).<sup>2</sup> Comments should be titled “<Commenter Name> Comments on Draft 2022 Change Order Guidelines” (e.g., “Cal Advocates Comments on Draft 2022 Change Order Guidelines”).

If you wish to receive notifications of the comments on these Guidelines and other WMP-related documents, you may subscribe to the 2022 Wildfire Mitigation Plans service list here: <https://energysafety.ca.gov/events-and-meetings/how-to-participate-in-public-events/>.

These Guidelines will be considered for adoption at a public adoption meeting on **August 15, 2022, from 2-3 p.m. Pacific Time**. Public comment on these Guidelines will also be accepted verbally during that meeting. The adoption meeting can be attended in person or remotely. Information about how to participate is below.

- In-person at the California Natural Resources Agency building located at 715 P Street, Sacramento, California 95814. This meeting will be held in the first-floor auditorium.

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<sup>1</sup> Dates falling on a Saturday, Sunday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

<sup>2</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed May 19, 2022)

- Remotely, using the Zoom webinar: <https://us06web.zoom.us/j/83612313333>
- By telephone, by dialing:
  - USA +1 216-706-7075 U.S. Toll
  - USA +1 866-390-1828 U.S. Toll-Free
  - Conference code: 787909

When attending remotely using Zoom, presentations will appear on the video screen of the device you are using to access the meeting (e.g., desktop or laptop computer, mobile telephone, or tablet) and audio will be audible via the device. If you are calling by telephone but not using Zoom, you will only be able to hear the audio. Please be aware that the meeting may be recorded. If you have concerns that you may be unable to use Zoom, use [this link](#) to verify your compatibility with Zoom.<sup>3</sup>

Any documents and presentations for this meeting will be available at [Energy Safety E-Filing](#), Docket Name [2022-WMPs](#). This public meeting announcement and instructions on how to join the meeting will also be posted on [Energy Safety's Upcoming Meetings web page](#).

Those requiring further information regarding this public meeting may contact Energy Safety by email ([safetypolicy@EnergySafety.ca.gov](mailto:safetypolicy@EnergySafety.ca.gov)) or by mail (Office of Energy Infrastructure Safety, 715 P Street, 20<sup>th</sup> Floor, Sacramento, CA 95814). This public meeting announcement is also available in electronic format on Energy Safety's website at: <https://energysafety.ca.gov/events-and-meetings/>.

Pursuant to the Americans with Disabilities Act, individuals who, because of a disability, need special assistance to attend or participate in an Energy Safety public meeting may request assistance by emailing [safetypolicy@EnergySafety.ca.gov](mailto:safetypolicy@EnergySafety.ca.gov). Requests should be made one week in advance whenever possible. For more information about the accessibility features of Zoom visit <https://explore.zoom.us/en/accessibility/>.

Sincerely,



Melissa Semcer  
Deputy Director | Electrical Infrastructure Directorate  
Office of Energy Infrastructure Safety

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<sup>3</sup> Zoom compatibility test link: <https://zoom.us/test>



**OFFICE OF ENERGY INFRASTRUCTURE SAFETY'S  
DRAFT 2022 CHANGE ORDER  
GUIDELINES FOR ELECTRICAL  
CORPORATIONS**

July 2022

## TABLE OF CONTENTS

Executive Summary .....	i
1. The Purpose of a Change Order.....	1
2. Criteria for a Change Order Request .....	1
3. Submission of Change Order Requests & Stakeholder Comments .....	2
3.1 Requirements for Change Order Requests.....	3
3.2 Stakeholder Comments .....	3
4. Change Order Evaluation.....	4

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# Executive Summary

The following guidelines outline the process for an electrical corporation to request Energy Safety's approval of significant changes related to their 2022 Wildfire Mitigation Plan Update mitigation initiatives.

Electrical corporations are required to request approval of changes to their mitigation initiatives if the changes substantially alter the course of their mitigation plan or potentially reduce asset or community protections from wildfire or Public Safety Power Shutoff (PSPS) risk. Specific criteria for change order requests are described in Section 2.

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# 1. The Purpose of a Change Order

After approval of an electrical corporation's Wildfire Mitigation Plan (WMP), the electrical corporation may seek to change approved mitigations as it gains experience and measures its mitigation measure outcomes. To make this type of alteration to its WMP based on an updated understanding of risk, an electrical corporation must submit a change order request.

Energy Safety evaluates change order requests to ensure that electrical corporations continue to follow a risk-based approach to mitigation of wildfire and PSPS risk. Energy Safety will issue a decision on each change order request as set forth in Section 4.

# 2. Criteria for a Change Order Request

An electrical corporation must request approval from Energy Safety prior to making any significant change to a mitigation initiative described in its 2022 Update. To be considered "significant" the change must meet the criteria set out in A, B, and C below.

## A. Type of Initiative

The proposed change is to a mitigation initiative in one or more of the following categories:

- Risk assessment and mapping
- Vegetation management and inspections
- Grid design and system hardening
- Grid operations
- Asset management and inspections
- PSPS

## B. Change in Planned Resource Allocation

The change results in the following:

- An increase, decrease, and/or reallocation of more than \$10 million that also results in a greater than 10% change in planned expenditures.

## C. Change in Risk

The change results in any of the following:

- An increase or decrease of more than 25% of an initiative's risk reduction value based on an updated understanding of risk

- The change represents a significant shift in either the strategic direction or purpose of an initiative (e.g., introducing a novel risk model that significantly alters the risk profile of the electrical corporation's circuits)

If an electrical corporation is unsure whether a proposed change meets these criteria, the corporation is encouraged to submit an advance inquiry to Energy Safety on the matter via email at [safetypolicy@energysafety.ca.gov](mailto:safetypolicy@energysafety.ca.gov).

Electrical corporations should not request approval for a change in approach or targets because full implementation may not be feasible. Similarly, electrical corporations should not request modification of an approach or target because the electrical corporation expects to exceed its targets. Energy Safety will evaluate an electrical corporation's failure to meet a target from the approved WMP (or alternatively, exceeding a target) as part of Energy Safety's compliance program. Electrical corporations should include details in relation to progress against targets in their Quarterly Initiative Updates (QIU).<sup>1</sup>

### 3. Submission of Change Order Requests & Stakeholder Comments

Electrical corporations should endeavor to submit change order requests as soon as practicable after the electrical corporation determines a change is warranted. Electrical corporations must submit change order requests related to their 2022 Updates no later than 5:00 p.m. on November 1, 2022.

Change order requests must be submitted to Energy Safety's e-filing system in the 2022 Wildfire Mitigation Plans docket (#2022-WMPs).<sup>2</sup> Electrical corporations must concurrently send all change order requests to the Department of Forestry and Fire Protection at [CALFIREUtilityFireMitigationUnit@fire.ca.gov](mailto:CALFIREUtilityFireMitigationUnit@fire.ca.gov). Change order requests should be titled "<name of electrical corporation\_the number of the change order request\_the date the change order request is submitted> ", for example, PGE\_change order request01\_06302022.

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<sup>1</sup> See [here](#) for the Electrical corporations' QIUs, which are filed according to the year.

<sup>2</sup> Submit change order requests to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).

## 3.1 Requirements for Change Order Requests

Requests for changes that meet the criteria described in Section 2 must include the following:

- A. A brief description of the proposed change including:
  1. The title of the initiative for which the proposed change request is being submitted
  2. The page number(s) in the 2022 Update where that initiative is described
  3. Whether the proposed change is a change to an approach, a target, or both
- B. The planned expenditure for that initiative according to the 2022 Update including:
  1. The percent of planned expenditure already spent
  2. The planned expenditure for the remainder of the current WMP cycle (prior to the 2023 WMP)
  3. If the expenditure amount is being redeployed, the amount being redeployed
    - i. From what budget
    - ii. To what budget
- C. The type of change proposed; changes may include: increase in scale, decrease in scale, change in prioritization, change in timing, or change in the nature of the work.
- D. Description of the expected outcome from the change within the current WMP cycle, including any reduction to:
  1. Wildfire risk (including ignition and consequence risk)
  2. PSPS risk

## 3.2 Stakeholder Comments

Stakeholders may comment on change order requests within 15 days of the date the electrical corporation submits a change order request to Energy Safety's 2022-WMPs docket.<sup>3,4</sup>

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<sup>3</sup> Dates falling on a Saturday, Sunday or holiday as defined in Government Code Section 6700 have been adjusted to the next business day in accordance with Government Code Section 6707.

<sup>4</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022).



Stakeholder comments must also be submitted to Energy Safety’s 2022-WMPs docket.<sup>5</sup> Stakeholder comments should be titled “<Commenter Name> Comments on < file name of the change order request>”.

## 4. Change Order Evaluation

Energy Safety will evaluate change order requests and approve or deny the request based on the criteria in Table 1, below. Electrical Corporations are encouraged to contact Energy Safety as set forth in Section 3 to receive technical assistance regarding change order requests.

*Table 1*

Decision	Rationale	Impact
<b>Approved</b>	Proposed change responds to updated understanding of risk and is likely to reduce wildfire or PSPS risk.	Electrical corporation must reflect change in all subsequent reports or WMP submissions to Energy Safety.
<b>Rejected</b>	Proposed change is not likely to reduce wildfire or PSPS risk over existing approved initiative.  OR  Proposed change does not respond to updated risk assessment and/or only responds to under- or overperformance for reasons unrelated to the risk assessment.	Targets/approach remain the same as proposed in approved WMP.

Electrical corporations must not include updated targets or approaches in any filing to Energy Safety, including Quarterly Data Reports, until the change is approved. Upon approval, the electrical corporation may amend any previous filings via submission of an amended filing to the relevant service list.

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<sup>5</sup> Submit comments to the 2022-WMPs docket via the Energy Safety e-filing system here: <https://efiling.energysafety.ca.gov/EFiling/DocketInformation.aspx?docketnumber=2022-WMPs> (accessed June 21, 2022)

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